



WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) COMBINED STATE PLAN

for the period of
July 1, 2020 through June 30, 2024

As Approved by Pennsylvania Workforce Development Board February 5, 2020
(Perkins Plan Approved March 18, 2020 by the State Board of Career and
Technical Education)

Tom Wolf
Governor



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF THE GOVERNOR

March 30, 2020

The Honorable Eugene Scalia
Secretary
United States Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Dear Secretary Acosta:

I am pleased to approve and submit the Commonwealth of Pennsylvania's Workforce Innovation and Opportunity Act (WIOA) Combined State Plan, setting forth my vision and goals to build the strongest workforce in the nation.

Pennsylvania's strategic approach to workforce development is built on a foundation of alignment and collaboration across commonwealth agencies and workforce development partners. Our Combined State Plan emphasizes the importance of advancing proven workforce development strategies, including developing career pathways, supporting sector strategies, better serving Pennsylvanians with barriers to employment, and reaching specific state goals around credential attainment and expanding pre-apprenticeship and Registered Apprenticeship.

In addition to the requirements of WIOA, Pennsylvania is committed to promoting data-driven and evidence-based policy, enhanced performance management, and innovation across all workforce development initiatives. It's imperative that Pennsylvania students and workers develop the skills necessary for high-growth, high-demand careers that pay a family-sustaining wage and contribute to Pennsylvania's economic growth. Pennsylvania's Combined State Plan is designed to meet this challenge.

Pennsylvania's Combined State Plan includes the six required core programs – Title I Adult, Dislocated Worker and Youth; Title II Adult Education and Family Literacy; Title III Wagner-Peyser Act; and Title IV Vocational Rehabilitation – as well as the following partner programs:

- Career and technical education programs authorized under the Strengthening Career and Technical Education for the 21st Century Act (Perkins V)
- Temporary Assistance for Needy Families
- Trade Adjustment Assistance for Workers
- Jobs for Veterans State Grants
- Senior Community Service Employment
- Community Services Block Grant
- Reentry Employment Opportunities

I look forward to working with the United States Department of Labor and all partner federal agencies in implementing Pennsylvania's WIOA Combined State Plan.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Tom Wolf".

TOM WOLF
Governor

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Section I – WIOA STATE PLAN TYPE and EXECUTIVE SUMMARY

WIOA State Plan Type:

Pennsylvania has chosen to submit a Combined State Plan including the following required and optional elements:

Required:

- Title I: Adult
- Title I: Dislocated Worker
- Title I: Youth
- Title III: Wagner-Peyser Act
- Title II: Adult Education and Family Literacy Act
- Title IV: Vocational Rehabilitation Programs

Optional:

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

Section II – STRATEGIC ELEMENTS

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

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

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

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

The Commonwealth of Pennsylvania's economic future depends on a strong, skilled workforce able to compete in today's global economy. To remain economically competitive, Pennsylvania must inform its workforce development policies, strategies, and goals using current labor market information and an understanding of the future workforce needs of workers and employers.

The commonwealth has a diversified economy with numerous competitive industry clusters and strives to develop a skilled workforce that aligns worker career goals to employer needs, and serves those with barriers to employment. The commonwealth's capacity to provide an educated workforce is evidenced by approximately 375 postsecondary educational institutions which collectively enrolled more than 740,000 students in 2017-18. Pennsylvania is an ideal location for families and businesses given its mix of urban, suburban, and rural areas, its proximity to nearly one-half of the nation's population, and strong job markets. While these characteristics of the commonwealth's labor market contribute to its economic strength, they also create an opportunity to develop an increasingly skilled workforce to meet the demands of employers, the career goals of workers, and the needs of our evolving economy.

The availability and analysis of labor market information and trends are essential to the creation of effective workforce and economic development strategies and policies. By utilizing information about the population, labor force, industry mix and employment outlook, the state can enhance its existing sector strategies and ensure they align with the current and expected labor market demands. This approach will support the Governor's goal of building the strongest workforce in the nation.

(i) Existing Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which there is existing demand.

To remain economically competitive, Pennsylvania must identify and meet the diverse workforce needs of existing industries and occupations. Understanding the differences in the commonwealth’s urban (like Philadelphia and Pittsburgh), suburban (like South Central, Lehigh Valley, and Erie), and rural (like Northern PA and the Appalachian region) labor markets is also critical in developing workforce and economic strategies.

From December 2017 to December 2018, Pennsylvania’s seasonally adjusted non-farm jobs increased by 57,500 (1.0 percent). During the same timeframe, U.S. nonfarm jobs increased 2.68 million jobs (1.8 percent) to 150.3 million. The chart below shows that Pennsylvania is currently in a job expansion period, following the job recovery period which began in early 2010. The job recovery and expansion in the state, as well as the nation, has occurred primarily in private sector jobs. Government jobs decreased marginally in Pennsylvania but grew slightly in the nation. Over the past five years, government jobs in Pennsylvania have decreased, while nationally they have increased by a much smaller percentage than private sector jobs.

	PA Jobs in Dec. 2018	PA Volume Change in Jobs from Dec. 2017	PA Volume Change in Jobs from Dec. 2013	PA Percent Change in Jobs from Dec. 2013	U.S. Percent Change in Jobs from Dec. 2013
Total Nonfarm Jobs	6,030,700	57,500	282,900	4.9%	9.4%
Total Private Jobs	5,329,300	58,100	297,800	5.9%	10.6%
Government	701,400	-600	-14,900	-2.1%	3.0%

Sources: Pennsylvania and U.S. Current Employment Statistics, Seasonally Adjusted

In December 2018, seasonally adjusted goods-producing jobs in the commonwealth were up 12,200 from December 2017. All three of the goods-producing super-sectors grew over the last year with the biggest percentage increase in Mining & Logging (5.0 percent), followed by Construction (2.2 percent), and Manufacturing (0.9 percent). Over the last 10 years, goods-producing jobs in Pennsylvania fell by 3.2 percent despite increasing by 4.7 percent over the last five years. Mining & Logging, the smallest of the three goods producing super-sectors, had the largest percentage gain in jobs over the last 10 years (27.9 percent) despite suffering an 18.8 percent decrease in jobs over the last five years. Manufacturing, the super-sector with the most goods-producing jobs, decreased by 8.5 percent over the last 10 years, while modestly increasing by 0.7 percent over the most recent five-year period.

Despite goods-producing job gains (in percentage terms) exceeding those from service-providing industries over the last year, the longer trend is that Pennsylvania’s economy continues to shift from goods-producing to service-providing. Service-providing jobs in December 2018 were up 45,300 from one year prior, but grew by 6.6 percent over the last 10 years. Over the last year, Pennsylvania’s best performing service-providing super-sectors (measured by percent increase) were Real Estate & Rental and Leasing (4.4 percent), Transportation, Warehousing, & Utilities (3.9 percent) and Health Care & Social Assistance (3.0 percent). Over the last decade, jobs in Transportation, Warehousing, & Utilities grew by 24.4 percent and those in Health Care & Social Assistance grew by 19.1 percent.

Many of the occupations employed in the commonwealth’s dominant industries are also found on Pennsylvania’s In-Demand Occupation List (PA IDOL), which highlights occupations with the most significant workforce needs. The PA IDOL includes more than 250 occupations of today, tomorrow, and the future that are currently in greatest demand by businesses. However, not all occupations with a lot of demand are attractive targets for workforce development. Some high demand occupations experience high turnover, as opposed to growth in new openings, so it’s possible these occupations would benefit from strategies to reduce turnover rather than train more workers to fill the available openings.

(ii) Emerging Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which demand is emerging.

Looking forward, Pennsylvania’s demographics and technological advancements will be key factors in the evolution of the commonwealth’s economy. Employment activity in all sectors stress the dynamics of an aging population’s need for more health care, transition of baby-boomers from worker to retiree, constant technological changes, and continued transformation of the state’s economy from that of a goods-producer to a service-provider. The “silver tsunami” is very real in Pennsylvania as more than one-quarter of its current workforce is aged 55-plus. Certain industry sectors, as highlighted in the following table, employ an even larger concentration of older workers and will face additional difficulty finding enough replacements to fill employment demands.

Sectors with the Highest Volume of Older Workers	Sectors with the Lowest Volume of Older Workers
Utilities (32.6%)	Finance & Insurance (25.4%)
Manufacturing (30.4%)	Retail Trade (24.8%)
Wholesale Trade (30.4%)	Construction (24.1%)
Real Estate & Rental & Leasing (30.4%)	Professional, Scientific & Technical Services (24.1%)
Transportation & Warehousing (29.9%)	Information (23.6%)
Public Administration (29.4%)	Arts, Entertainment & Recreation (23.4%)
Educational Services (28.5%)	Admin. & Waste Management & Remediation Svcs (22.7%)
Agriculture, Forestry, Fishing & Hunting (28.3%)	Mining, Quarrying, & Oil & Gas Extraction (20.3%)
Other Services (27.8%)	Accommodation & Food Services (13.9%)
Management of Companies & Enterprises (26.5%)	
Health Care & Social Assistance (25.7%)	

Sources: Local Employment Dynamics (LED) Partnership, 2018Q4

From 2016-2026, Pennsylvania’s total employment is expected to increase by 342,000 (5.5 %) to a level in excess of 6.5 million. The projected growth rate is down slightly from the previous set of projections (5.7%) and less than the current U.S. rate (7.4%). Growth will be greatest in the Construction, Education & Health Services, and Professional & Business Services sectors. With an increase of almost 147,000, Education & Health Services is projected to add the most employment through 2026. Employment levels in Professional & Business Services is expected to increase by just over 73,500. It is also important to look at growth rates in addition to volume growth. Construction will continue to experience very robust growth rates in the state (12.6 percent) and is already starting to reach some pre-recession numbers with most sectors projected to return to pre-recession employment by 2026. This growth can be seen across all three segments of construction: heavy & civil engineering (15.3 percent),

construction of buildings (14.3 percent), and specialty trade (11.4 percent). Conversely, driven largely by the contraction of publishing and telecommunications, Information is expected to decrease employment by more than 5,600 (-6.7 percent). Both Manufacturing and Government sectors are also projected to see an employment decrease for 2016-2026. Manufacturing is projected to decline more than the past round of projections but significantly less than the U.S. (-6.0 percent). Largest declines are in apparel manufacturing; and printing & related support activities. Government continues to show a slight decline in this round of projections but much less than previous (-0.7 percent versus -3.5 percent). Slower employment declines are projected for Federal postal workers. Local government is also showing projected gains for 2026. State government employment continues to remain steady.

Modest economic growth coupled with an aging workforce will create opportunities for job seekers in all major occupational groups. Eight of the 12 occupational groups are projected to have growth rates above the statewide overall growth rate of 5.5 percent. Healthcare Practitioners, Technicians & Support Workers will increase employment the fastest at a rate of 13.3 percent (just over 79,000 workers). The Computer, Engineering & Science group will add less employment, about 29,000, but at the second-fastest rate (9.2 percent). Only two occupational groups – Office & Administration and Production – are projected to experience a measurable employment decline through 2026 with total employment losses of 18,220 (-1.9 percent) and 7,540 (-1.9 percent) respectively.

Employment growth, however, is only one component in determining the annual need, or demand, for workers in any occupation. Each year, Pennsylvania is expected to have a need for almost 727,000 workers across all occupational groups. Only 5.0 percent of all annual demand is due to growth. About nine out of every 10 openings exist to replace workers who leave the occupation and/or retire. Some groups with low growth rates (Sales & Related) have high levels of demand. These occupations tend to require less education or specific skills sets, and workers don't stay long in these positions. It is important to note that the overall demand for workers in occupational groups with slower-than-average growth or even decline, such as Office & Administrative Support (104,974) and Production (43,679), greatly outpace the overall need for workers in other groups with strong growth, such as Computer, Engineering & Science (26,095) or Construction & Extraction (29,018).

To fully understand Pennsylvania's emerging workforce needs, it is important to consider the information from all angles. Occupations with the largest employment growth by volume are often traditional occupations with a large employment base and a consistent need for workers, while occupations with the fastest employment growth rates are often emerging. From another angle, occupations with the largest annual demand are primarily entry-level jobs that have a sizable need to replace workers regularly but often do not pay family-sustaining wages.

Employment Growth by Volume	Employment Growth by Percent	Largest Annual Demand
Combined Food Prep/Serving Workers	Statisticians	Combined Food Prep/ Serving Workers
Registered Nurses	Physician Assistants	Cashiers
Personal Care Aides	Nurse Practitioners	Retail Salespersons
Laborers & Material Movers	Home Health Aides	Laborers & Material Movers
Home Health Aides	Software Developers, Applications	Waiters & Waitresses
Nursing Assistants	Information Security Analysts	Office Clerks, General
Waiters & Waitresses	Physical Therapist Aides	Personal Care Aides
Heavy & Tractor-Trailer Truck Drivers	Physical Therapist Assistants	Customer Service Representatives

Janitors & Cleaners	Operations Research Analysts	Janitors & Cleaners
Software Developers, Applications	Respiratory Therapists	Stock Clerks & Order Fillers

Source: Center for Workforce Information & Analysis, Long-Term Employment Projections (2016-26)

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

For more than a decade, Pennsylvania has been a leader in sector-driven workforce initiatives. This approach, featuring the identification of industry clusters and the establishment of employer/worker consortiums, has enabled workforce development policies to be data-driven and employer-focused, while also meeting the career goals of workers. Industry credentials, postsecondary education, and college degrees will become more important throughout the next decade, as will a shift to life-long learning along a career pathway. Educational requirements of occupations will shift away from short-term and moderate-term on-the-job training lasting no more than one year towards long-term training and some amount of formal education. Pennsylvania has set a goal of 60 percent of Pennsylvanians holding a college or industry-recognized credential by 2025, and given the commonwealth has approximately 375 postsecondary educational institutions, Pennsylvania is well positioned to effectively meet this goal and the needs of the future workforce. This sector-strategies approach also supports systems change at the state and local levels by aligning and coordinating workforce development, education, and economic development in a collaborative way to serve workers and employers.

When analyzing employment needs in the commonwealth, industry clusters can take on strategic importance because activities that benefit one group member will generally have positive effects on other members of the cluster. An industry cluster consists of a group of industries that are closely linked by common product markets, labor pools, similar technologies, supplier chains, and/or other economic ties. They are used to:

- Create a consistent definition that allows for workforce comparison across regions;
- Identify major employers for building Industry Partnerships;
- Provide a basis for occupational and skills analysis of shared workforce needs; and/or
- Direct resource allocation for jobs in demand that will offer career pathways leading to family-sustaining wages.

Currently, Pennsylvania concentrates workforce strategies around 12 industry clusters. These clusters account for nearly 83 percent of all employment in the commonwealth. Along with employment trends and average wages, the strength of a cluster is often evaluated using a location quotient (LQ) which compares a cluster's share of local employment with its share of national employment. A LQ greater than one implies a competitive advantage in an area. While the table looks at statewide LQs, many industries are highly regionalized and are even more competitive than the statewide LQ suggests. Regional and local plans will pick up on this fact as partners develop local and regional priorities.

Cluster (or sub-cluster) Name	Employment (2018)	National LQ (2018)	Wages (2018)
Advanced Manufacturing (AM)	437,654	1.00	\$59,696
AM - Chemicals, Rubber & Plastics (AM - CRP)	79,288	1.20	\$59,766
AM - Electronics (AM - E)	63,810	0.78	\$67,817

AM - Metals (AM - M)	132,461	1.44	\$64,450
AM - Vehicles & Vehicle Equipment (AM - VVE)	162,095	0.83	\$52,579
Agriculture & Food Productions (AFP)	179,083	0.84	\$46,911
Bio-Medical (BM)	82,779	1.22	\$111,562
Building & Construction (BC)	368,522	0.92	\$59,820
Business Services (BSV)	732,994	0.99	\$87,462
BSV - Media, Advertising & Marketing (BSV - MAM)	129,389	0.93	\$88,378
BSV - Operational Services (BSV - OPER)	227,637	0.95	\$53,217
BSV - Professional & Consulting Services (BSV - P&C)	375,968	1.03	\$107,881
Education (ED)	560,960	1.01	\$52,508
Energy (ENGY)	139,836	1.16	\$83,648
Health Care (HC)	1,078,570	1.23	\$54,904
Hospitality, Leisure & Entertainment (HLE)	620,559	0.86	\$21,523
Logistics & Transportation (LT)	255,644	1.15	\$51,417
Real Estate, Finance & Insurance (REFI)	302,665	0.94	\$88,467
Wood, Wood Products & Publishing (WWP)	101,143	1.23	\$53,526

Source: Center for Workforce Information & Analysis, Quarterly Census of Employment and Wages (2018 Annual Average)

Industry clusters have also served as the basis for the creation of Industry Partnerships (IPs) – employer/worker consortiums that bring together companies with similar products, markets, and human resource, and workforce development needs. The intent of IPs, through prudent investments, is for Pennsylvania to address the workforce and economic needs of employers, thereby helping these industries grow while creating career opportunities for its workforce and increasing productivity.

Pennsylvania was among the first states to extend training and career-building efforts beyond individual companies to networks of companies in specific industries. IPs foster industry collaboration on incumbent worker training, school-to-career and other workforce pipeline initiatives, career pathways, recruitment and retention, and other human resource challenges. These types of collaboration can help strengthen skill alignment, increase entry-level employment opportunities, enhance recruitment and retention of talent, and lead to the creation of more high-paying jobs. In recent years, Pennsylvania has expanded its Industry Partnership work through the Next Generation Industry Partnership (Next Gen IP) model.

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

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

It has been nearly 10 years since the end of the last recession (June 2009), as determined by the National Bureau of Economic Research (NBER). Since 2010, when Pennsylvania’s average unemployment rate peaked at 8.5 percent, the average unemployment rate has been trending down except for 2016 when it ticked up by one-tenth of one percent. The 2018 average rate of 4.3 percent was slightly above half of the peak rate of 2010 and was down six-tenths of one percent from the 2017 rate. This is further evidence that the economy and labor market continued to experience positive trends.

In addition to the improvement in the unemployment rate, Pennsylvania’s labor market has displayed other positive indicators. The state’s average employment level rose to a new record high of 6,148,600 in 2018, an increase of 38,100 from the previous record high in 2017. The average unemployment count was down 38,300 from the previous year, falling to 275,800. This was the lowest unemployment level since 2000. Effective workforce and economic development strategies are needed to ensure continued progress and the attainment of sustainable employment for the state’s unemployed.

The following table provides a summary of Pennsylvania’s labor force for 2018 including data for persons with disabilities, veterans, older workers (those 55-plus), persons of color, and persons of Hispanic ethnicity. For comparison, similar data is provided for the U.S. The chart demonstrates that Pennsylvania has employment disparities for certain target populations, including individuals with disabilities, people of color, and people of Hispanic ethnicity.

	Total	Persons with Disabilities	Veterans	Older Workers	Persons of Color	Persons of Hispanic Ethnicity
PA Labor Force (LF)*	6,424.4	329.9	355.6	1,644.4	1,134.8	404.1
PA Employed*	6,148.6	300.3	337.4	1,588.2	1,067.6	378.5
PA Unemployed*	275.8	29.6	18.2	56.3	67.1	25.6
PA Unemployment Rate	4.3%	9.0%	5.1%	3.4%	5.9%	6.3%
PA LF Participation Rate	62.6%	22.7%	45.2%	39.8%	63.2%	62.6%
US Labor Force (LF)*	162,075.0	6,266.0	9,453.0	37,386.0	36,260.0	28,336.0
US Employed*	155,761.0	5,767.0	9,127.0	36,270.0	34,300.0	27,012.0
US Unemployed*	6,314.0	499.0	326.0	1,116.0	1,960.0	1,323.0
US Unemployment Rate	3.9%	8.0%	3.5%	3.0%	5.4%	4.7%
US LF Participation Rate	62.9%	20.8%	49.2%	40.0%	63.0%	66.3%

* Reported in thousands

Source: Local Area Unemployment Statistics (LAUS); Current Population Survey (CPS)

Among the unemployed, the hardest to serve are the long-term unemployed (those unemployed 27 weeks or more). The number of the long-term unemployed in Pennsylvania (64,500 in 2018) continued declining both over the past year (down 10,200 or 13.7 percent) and the past five years (down 129,600 or 66.8 percent) at a faster rate than its volume of unemployed fell. In 2018, the share of those unemployed long term dropped to 23.4 percent of the total unemployed population, a decline of 16.6 percentage points from 2013. By comparison, the U.S. long-term unemployment level decreased 68.7 percent over the past five years to 1,350,000 and constituted 21.4 percent of the nation’s unemployed.

Another indicator of an economy’s strength is the employment to population ratio (a measurement of the number of individuals working divided by the total population), which is affected by demographic and secular trends as well as the economic environment. In 2018, Pennsylvania’s average employment/population ratio, as shown in the table below, was 59.9 percent as compared to 58.6 percent five years earlier. Overall, the nation experienced a slightly bigger increase in this ratio over this period, rising from 58.6 percent in 2013 to 60.4 percent in 2018. In Pennsylvania, the ratio was constant for White non-Hispanics over that period, while increasing for all the other race/ethnic cohorts. The largest percentage point gain was by other non-Hispanic females. Among educational categories the ratio increased for those with lower educational attainment and decreased for those

with at least some college. The ratio for females with at least a bachelor’s degree increased and were the lone exception to that trend.

	Total (2013)	Males (2013)	Females (2013)	Total (2018)	Males (2018)	Females (2018)
Overall	58.6%	63.9%	52.9%	59.2%	63.7%	55.0%
White non-Hispanic	60.0%	65.6%	54.8%	60.0%	65.7%	54.7%
Black non-Hispanic	52.3%	50.9%	53.4%	57.5%	59.8%	55.6%
Other non-Hispanic	52.8%	63.6%	43.9%	64.1%	67.3%	61.3%
Hispanic	53.9%	61.8%	46.4%	58.7%	66.9%	51.1%
Less than a HS diploma	30.0%	36.2%	23.9%	36.3%	41.7%	31.2%
HS graduate, no college	53.8%	60.7%	47.1%	54.5%	62.8%	46.1%
Some college or Associate degree	64.6%	68.2%	61.4%	62.0%	66.7%	58.0%
Bachelor's degree and higher	74.0%	78.9%	69.7%	73.8%	77.0%	70.8%

Source: Current Population Survey

(ii) Labor Market Trends. Provide an analysis of key labor market trends, including across existing industries and occupations.

According to IHS Global Insight’s Population Projections, Pennsylvania’s population is projected to grow by only 1.1 percent over the next 10 years. In comparison, the nation’s population growth is projected to be 6.9 percent over the same period. While the state’s overall population growth will be relatively low in the years to come, the change in age distribution will be more dramatic. Pennsylvania’s population is growing older. The number of Pennsylvanians age 65 and over exceeded 2.3 million in 2018. The state’s percentage of those aged 65 and over (18.5 percent) is the sixth highest in the nation. This is largely a by-product of the aging of the population born during the Baby Boom period after World War II.

While the overall population will increase modestly, the labor force will shrink barring a substantial immigration of workers. Inevitably, baby boomers will leave the workforce in large numbers taking with them key skills and knowledge that have supported industry growth and prosperity. Unfortunately, based on Pennsylvania’s demographics, far fewer youth are available to enter the labor market to replace those who will be leaving. While technology and global competition will help alleviate some of the need for workers, there will still be a shortage of workers, which will force greater efficiencies and competition for key skills.

With an inevitable shortage of workers expected, Pennsylvania’s workforce strategies also must focus on the skills and abilities of individuals with barriers to employment, including individuals with disabilities, veterans, individuals transitioning into the community from the criminal justice system, Temporary Assistance for Needy Families (TANF) recipients, and those who do not speak English well or at all, among other populations, to meet present workforce needs and future demand. In 2018, there were about 1.5 million working age individuals with disabilities living in Pennsylvania. They accounted for 14.4 percent of the state’s working age population compared to 11.7 percent nationally. Pennsylvania’s veterans numbered almost 800,000 in 2018 or 7.8 percent of the working age population. On average, almost 34,000 adult TANF recipients were served each month in 2018. Lastly, in 2017, there were almost 210,000 individuals who did not speak English well or at all. Additional efforts will be made to support ex-offenders looking to re-enter the workforce, at-risk youth, and older workers who wish to remain employed. According to Current Population Survey (CPS) figures from 2018, 35.7 percent of Pennsylvanians ages 65

to 69 are currently in the workforce (employed or looking for work). In addition, studies have shown that current and future retirees have remained in or plan to stay in the workforce in some capacity.

(iii) Education and Skill Levels of the Workforce. Provide an analysis of the educational and skill levels of the workforce.

Education must play a vital role in preparing the workforce for the future demands of the commonwealth's economy. According to the American Community Survey, during the 2013-2017 period, Pennsylvania ranked 43rd among states in the share of adults (age 25 and up) with more than a high school diploma. Currently, 54.3 percent of such Pennsylvanians have participated in some level of postsecondary education. Another 35.5 percent are high school graduates with no postsecondary experience and 10.2 percent have less than a high school diploma. Strategies focused on these individuals are paramount to meeting the future demands of employers and achieving Pennsylvania's goal of 60 percent of Pennsylvanians holding a college or industry-recognized credential by 2025.

Most employment in the state is found in occupations that fall into the on-the-job training category (3.4 million) but that category will have the slowest growth rate (3.8 percent). Conversely, occupations requiring an advanced degree have the highest growth rate through 2026 (11.0 percent) but only employ about 373,000. This growth is primarily driven by an increasing need for Physician Assistants, Physical Therapists, Nurse Practitioners, and Statisticians.

The shift from on-the-job training to some postsecondary education or an Associate degree is strongly connected with growth in Healthcare, Information Technology, and Construction jobs such as Plumbers, Pipefitters & Steamfitters; Carpenters; Physical & Occupational Therapy Assistants; Medical Assistants; Respiratory Therapists; Computer User Support Specialists; and Web Developers.

The most significant change from the previous set of projections occurred in the long-term training group, with a current growth rate of 5.7 percent. This decrease is driven primarily by the reclassification of Maintenance & Repair Workers to moderate-term on-the-job training (7.1 percent growth).

(iv) Skill Gaps. Describe apparent 'skill gaps'.

An equally important phase of Pennsylvania's workforce strategy is the identification of occupations that are critical to the success of local economies and the existence of a process that enables Pennsylvanians to acquire the necessary skills for those careers. The High Priority Occupation (HPO) process identifies those occupations that are in demand by local employers, pay a family-sustaining wage, and have higher skill requirements. Entry-level jobs that serve as an "on-ramp" to high-quality occupations may be considered as HPOs if the career pathway to existing HPOs is clearly documented. This innovative approach combines labor market data with regional stakeholder input allowing for a more complete picture of the actual workforce needs across the commonwealth. HPOs guide the allocation of training dollars for WIOA programs.

Pennsylvania's HPO process and Next Generation Industry Partnership (Next Gen IP) efforts also have served as a method of evaluating occupational workforce needs. The HPO process requires Local Workforce Development Areas (LWDA) to conduct an analysis of in-demand skills and alignment with in-demand occupations. Employer input received through regional stakeholders provides real-world verification of any misalignment or gaps as, well as insight into potential skills mismatches. Some

employers continue to struggle to fill critical workforce positions due to wages, benefits, geography, and other factors, while some individuals remain unemployed for extended periods of time or have difficulty finding employment. Many of the skills today's workers need are expected to be obtained through advanced education and training, resulting in relevant credentials that are valued by employers. However, feedback from many employers suggests that candidates lack basic employability skills necessary to gain and/or maintain employment, which the commonwealth is working on through Career Ready PA and the Future Ready PA Index, along with integrating employability skills into workforce development strategies.

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

(A) The State's Workforce Development Activities. Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop delivery system partners.

The Pennsylvania WIOA Combined State Plan includes the six Core WIOA programs and the following optional programs: Career and Technical Education Programs Authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins); the Temporary Assistance for Needy Families (TANF) Program; the Trade Adjustment Assistance (TAA) Program; programs under the Jobs for Veterans State Grant (JVSG); the Senior Community Service Employment Program (SCSEP); the Community Services Block Grant (CSBG); and the Reintegration of Ex-Offenders (REO) Program. Collectively, the thirteen programs included in the Combined State Plan work to serve target populations, including individuals with barriers to employment and incumbent workers, in finding and maintaining employment, while concurrently meeting the talent needs of employers, as follows:

WIOA Title I Adult: This program serves participants age 18 or older in need of employment or career advancement, with priority of service given to participants who are recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Veterans and covered veteran spouses who are eligible for the WIOA Title I Adult program receive veterans' priority of service. Individuals assessed as ready for work are provided career services to assist them in finding existing employment opportunities. Individuals not ready for employment or looking for employment in a new field receive training to prepare them with the skills necessary to meet the needs of employers.

WIOA Title I Dislocated Worker: This program assists workers before or after a layoff to help facilitate rapid reemployment. Dislocated workers with requisite skills may be directly referred to employers with hiring needs. Other dislocated workers may require training and other services to meet the skill requirements of employers.

WIOA Title I Youth: This program serves eligible youth and young adults through high-quality case management support toward educational attainment, including career guidance and exploration, summer and/or year-round work experience opportunities, and skills training along a career pathway for in-demand industries and occupations.

WIOA Title II Adult Basic Education: This program assists adults who need to improve their basic skills to access and succeed in career pathways. Local programs provide academic instruction at educational levels from beginning literacy through high adult secondary, including English language acquisition for English language learners when needed. Instruction and workforce preparation activities support college and career readiness. Other services support persistence and successful transition to employment or postsecondary opportunities by connecting students to social services organizations, partner programs, and entities in the workforce development system. Integrated education and training activities, which are aligned with local workforce needs and developed in consultation with Local Workforce Development Boards, employers, and training providers, prepare students for realistic, existing employment opportunities in their communities.

WIOA Title III Wagner-Peyser: This program serves all jobseekers and employers – the universal customers – through both PA CareerLink® offices and PA CareerLink® Online with the twin goals of assisting individuals with placement in employment and assisting employers with workforce recruitment. Services range from job search and career counseling for jobseekers to customized labor market information and job fairs for employers.

WIOA Title IV Vocational Rehabilitation: This program helps persons with disabilities prepare for, obtain, and/or maintain employment. Its single-point-of-contact model helps any employer hire and on-board talented individuals with disabilities by connecting the employer with one staff member who coordinates all program support.

Perkins: This program funds career and technical education programs at the secondary and postsecondary levels. Perkins programs work with businesses to identify relevant technical standards, including national industry standards and credentialing opportunities, to ensure that program completers have the technical skills employers need.

Temporary Assistance for Needy Families (TANF) Employment and Training: This program supports TANF recipients through a range of activities based on individual needs as they pursue employment plans leading to long-term stability. The type and duration of the activity depends on the customer's work experience, education/training, and/or employment barrier(s). All activities aim to increase the skills and employability of TANF recipients. The commonwealth requires each adult, minor head of household, or minor child ages 16 or 17 who is not in school to engage in work or an approved employment and training activity.

Trade Adjustment Assistance (TAA): This program provides eligible workers with services and training to assist them in returning to the workforce following a layoff impacted by global trade. The services and training ensure that TAA recipients have the skills needed to find reemployment within the industry from which they were separated or to enter a new industry where employment opportunities exist.

Jobs for Veterans State Grants (JVSG): This program funds Disabled Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representative (LVER) staff in PA CareerLink® offices. DVOPs work with veterans with significant barriers to employment, and LVERs work with employers to showcase qualified veterans for job openings.

Senior Community Service Employment Program (SCSEP): This program promotes part-time employment opportunities in community service activities for unemployed low-income persons who are

age 55 or older and who have poor employment prospects. SCSEP utilizes Labor Market Information (LMI) to identify occupations most likely to hire older workers and prepares participants for those jobs. Some SCSEP grantees already work with PA CareerLink® Business Service Teams (BSTs) to develop employment opportunities for older workers. Employers recognize the benefit of hiring older workers, who are generally viewed as reliable, loyal, and ethical with well-established critical thinking, leadership, teamwork, and communication skills.

Community Service Block Grant (CSBG): This program funds programs that provide opportunities for participants to attain basic employability skills, occupation-specific skills, and work experience necessary to meet employer talent needs.

Reentry Employment Opportunities (REO): This program supports increased collaboration and alignment of reentry planning and service activities among system partners to improve the justice-involved individual's ability to attain and retain a job along a career pathway that pays family-sustaining wages. Efforts described in the Combined State Plan will allow for greater coordination of services and activities provided by REO grantees with the workforce development system. Activities seek to not only get the justice-involved individual employed, but to provide the necessary supports to allow employment retention, thus reducing turnover and costs for employers providing job opportunities to justice-involved individuals.

The commonwealth coordinates and integrates service delivery among Core and other partner programs in several ways. One integration method is partnerships within the PA CareerLink® network. The PA CareerLink® sites are designated as comprehensive American Job Centers where, at a minimum, the services associated with all WIOA-mandated Core Programs are provided. In addition, many partner program recipients may be able to receive services required under Pennsylvania's Perkins or TANF programs, to name two partner programs, through the PA CareerLink®. Integration of PA CareerLink® service delivery is critical for effective, efficient, and comprehensive services to customers. To that end, all partners have itemized the types and availability of services to be provided, and how the program will work in partnership, in a Memorandum of Understanding (MOU) with the PA CareerLink® offices.

To ensure greater coordination across partner programs, the PA Department of Labor & Industry is developing a policy document for the local MOU. The guidance will underscore the responsibilities of the required partners in the one-stop service delivery system, including their involvement in the MOU process and the contributions necessary to appropriately fund the local system.

Agency staff representing PA CareerLink® partners are collaborating on ways to better inform their local workforce system stakeholders of the significant value that results from a strong partnership. Local boards engaged and representatives from local libraries and local community and economic development agencies engaged in surveys to determine collaboration in their local areas. State staff are using those surveys to pilot networking sessions in those areas where it appears there was little or no engagement at the local level. The commonwealth will continue to work with all of the required partners in a similar fashion.

Within PA CareerLink®, program staff are aligned functionally, rather than by program, as appropriate for staffing capacity and customer volume. Aligned functions may include initial customer intake and assessment; career and training services for workers; and workforce services for businesses. This functional alignment offers direct access to a broader range of services that may be adapted and leveraged

to address a customer's unique needs. Individuals seeking assistance, either workers or businesses, may access services in person at the PA CareerLink® or virtually through the PA CareerLink® online system. Staff are available to provide direct assistance to customers in both group and individual settings, and self-service resources are available in a Career Resource Room or Area.

Career pathways are another method that the commonwealth uses to coordinate service delivery. Local Workforce Development Boards lead career pathway development, in partnership with employers, workforce partnerships, secondary and post-secondary education providers, Titles I, II, and IV providers, and other programs, such as TANF. This model connects workers with a career path that will lead to a family-sustaining wage, in an in-demand career, while comprehensively addressing barriers to employment and offering individuals multiple entry and exit points to progress in their careers. This approach supports both workers and employers, through collaboration across Core and partner programs, and external partners.

Because the workforce development system must be responsive to the needs of employers, Next Generation IPs are also a method of identifying and responding to employer needs. They address common workforce challenges and other, shared competitiveness needs of an industry. Relatedly, Pennsylvania emphasizes establishing new and expanding existing Registered Apprenticeship programs and pre-apprenticeship standards as part of relevant career pathway models.

PA CareerLink® staff serving on a Business Service Team (BST) work with area employers to identify their talent needs and refer qualified candidates to fill those positions. This includes referring candidates for on-the-job or customized training when the referred individual is not immediately ready to take on the position's full duties. BSTs also have access to labor market information (LMI) that can help employers set wages and benefits that will attract high-quality candidates. BSTs communicate and collaborate with local organizations, state and federal agencies, and other entities with economic and workforce development interests to ensure coordination of services. This also includes coordination and connection with school districts, career and technical centers, and post-secondary providers who can serve as a source of talent for employers.

(B) The Strengths and Weaknesses of Workforce Development Activities. Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

The commonwealth strives to consistently provide excellent service to its workforce development customers in all 23 Local Workforce Development Areas across the state, led by 22 Local Workforce Development Boards. Consistency in service delivery also supports alignment of services across programs and across the commonwealth. Memoranda of Understanding (MOUs) among Core and partner programs help ensure defined roles, accountability, responsibility, and opportunities for collaboration and partnership. Further, the commonwealth supports staff training and development, as a well-trained staff increases program knowledge and understanding and promotes better service delivery. Identified areas of strength include:

- Strong relationships among agency executive leadership prioritizing collaboration on numerous workforce development initiatives and grant applications, and frequent sharing of information and best practices.
- Diverse secondary and postsecondary education and training opportunities in the state.
- A decade of experience working with sector strategies through programs like the Industry Partnership program and Next Generation Industry Partnerships, which has supported

thousands of employers and trained over 100,000 employees since its inception and has been modeled by other states.

- A history of successfully applying for and implementing competitive federal grants.
- Ample Labor Market Information (LMI) through the Center for Workforce Information and Analysis (CWIA) and other sources to inform decisions and strategies.

Identified areas for improvement include:

- Increasing the share of working-age adults who have postsecondary education or industry-recognized credentials.
- More effectively and comprehensively assisting customers with addressing their barriers to employment.
- Strengthening cross-training for front-line staff engaging with customers, including workers and businesses, across all workforce development programs and initiatives.
- Increasing the accessibility, quantity, and quality of online, self-service PA CareerLink® options, along with direct customer access to live-person assistance via phone; Internet coaches and access points in recognition of an increasingly tech-savvy society; and limited funding which makes it difficult to maintain the existing physical one-stop presence.
- Refining the Commonwealth Workforce Development System (CWDS), the system of record used by the commonwealth to collect participant data and report performance outcomes, to allow for more effective case management and information sharing for job seekers, employers, agency, and partner staff, including integrating CWDS with the case management systems of other partner programs or bringing partner programs into CWDS.
- Integration and alignment of educational services, especially Adult Basic Education and TANF services, within the workforce development system, including through co-enrollment of participants in Titles I, II, and TANF. Development and utilization of contextualized literacy programs are crucial to helping TANF/SNAP Able Bodied Adults without Dependents (ABAWD) clients and will be a component of alignment of educational services.
- Integration and alignment of workforce programs designed to serve specific populations and administered by other state agencies (e.g., programs for TANF and SNAP recipients operated by the Department of Human Services) with workforce programs administered by the Department of Labor and Industry.
- Making Labor Market Information (LMI) accessible and user-friendly for all customers of the workforce development system to inform their decision making, including workers, businesses, students, parents, educators, economic development professionals, and other stakeholders.
- Connecting early childhood education, education, higher education and workforce development data into a Statewide Longitudinal Data System (SLDS), to monitor education and workforce outcomes from early learning to career, and use this information to support continuous improvement of education and workforce initiatives.

The state will make significant investments in technology to improve service delivery and allow for collection and sharing of information necessary to support WIOA implementation. The commonwealth is currently conducting multiple focus groups to drive technology investment decisions.

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

The Core programs – Adult, Dislocated Worker, Youth, Adult Basic Education, Wagner-Peyser, and Vocational Rehabilitation – work collaboratively and in partnership to effectively serve workforce development customers across the commonwealth. The Center for Workforce Information and Analysis (CWIA) and other sources gather, analyze, and provide labor market information (LMI) to inform workforce development strategies. While each program has clearly defined activities, as defined by law, the commonwealth leverages services and resources to best serve customers and meet its workforce development goals.

The commonwealth's alignment of Core programs will include establishing effective career pathways that combine guidance, education, training, and support services that prepare individuals for careers. The pathway system will include coaches who help guide individuals to appropriate programs and services given their needs and career goals. The commonwealth will promote co-enrollment to align complementary services to comprehensively serve customers and will encourage shared roles for guidance and support services within each career pathway program to prevent duplication of services.

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

(1) Vision. Describe the State's strategic vision for its workforce development system.

In Governor Wolf's first term, the administration focused on creating Jobs That Pay, Schools That Teach, and Government That Works. These goals continue to be a priority in this second term, along with developing career pathways, supporting sector strategies, better serving Pennsylvanians with barriers to employment, addressing employment disparities, and reaching specific workforce development goals around credential attainment and expanding pre-apprenticeship and Registered Apprenticeship. In addition to the requirements of WIOA, Pennsylvania is committed to a workforce system built on the foundation of increased alignment and collaboration, innovative strategies, and enhanced accountability.

Pennsylvania is focused on providing the highest level of service to all workforce development customers, including workers, businesses, students, parents, educators, economic development professionals, and other stakeholders, through collaborative efforts of all state and local partners. The commonwealth remains committed to increasing access to all customers, with increased attention to meeting customers where they are at. Barrier remediation and supportive services are of particular importance for Pennsylvania's workforce development system, as comprehensively addressing the challenges many of our customers face will allow them to not only get a job, but also help them develop the skills and credentials necessary to embark on career pathways leading to self-supporting and family-sustaining careers.

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

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment and other populations.

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

Pennsylvania has prioritized five broad goals for the workforce development system:

1. **Career Pathways and Apprenticeship:** Develop a comprehensive career pathways system in PA and expand career pathways as the primary model for skill, credential, degree attainment, with an emphasis on assisting individuals to address barriers to employment, earn a family-sustaining wage, and advance their career.
2. **Sector Strategies and Employer Engagement:** Engage employers and industry clusters through innovative strategies to improve the connection and responsiveness of workforce programs and services to labor market demand, including recruiting, training, and retaining talent.
3. **Youth:** Increase opportunities for all youth to experience work-based learning through summer employment, pre-apprenticeship, Registered Apprenticeship, internships, job shadowing, mentoring, and other experiences in the workplace, including developing employability skills.
4. **Continuous Improvement of the Workforce Development System:** Identify and enact system changes and improvements that enhance the collaboration and partnership between agencies and partners in the workforce development system.
5. **Strengthening the One-Stop Delivery System:** Implement improvements to one-stop service delivery to better serve all customers, including job seekers and employers.

The overriding theme throughout these five goals is the coordination across all systems and partners, both within state government agencies, and throughout the state and local systems devoted to developing Pennsylvania's workforce and economy. Prioritizing and achieving these goals will allow Pennsylvania's workforce development system to serve workers and businesses in the most effective ways possible.

Goal 1: Career Pathways and Apprenticeship

It is of the utmost importance to serve individuals in a manner that meets those individuals where they are at, in order to help them develop the knowledge, skills, and abilities to meet the needs of an ever-evolving economy. This means working to address any and all barriers to employment that individuals face and offering them multiple entry and exit points to progress in their careers. Apprenticeship is a key career pathway strategy, as it allows individuals to learn on-the-job while also earning a paycheck. The value of the apprenticeship model has led Governor Wolf to prioritize doubling the number of apprentices in the Commonwealth to 30,000 by 2025.

- 1.1 **The commonwealth will increase the creation of registered pre-apprenticeship and apprenticeship programs, particularly in non-traditional occupations, as part of its career pathway system building efforts.**

The Departments of Labor & Industry and Community & Economic Development will work collaboratively to assist employers in developing new registered apprenticeship and pre-apprenticeship programs. The commonwealth will measure progress by tracking the number of new registered apprenticeship and pre-apprenticeship programs created, and the increase in the types of occupations where registered apprenticeships and pre-apprenticeships are available to job seekers.

- 1.2 The commonwealth will increase recruitment efforts of registered pre-apprenticeship and apprenticeship programs to increase the number of individuals from non-traditional populations, such as women, minorities, re-entrants, and persons with disabilities, into these programs, while also ensuring opportunities are available to both youth and adults.**

The Departments of Labor & Industry and Community & Economic Development will work collaboratively to make registered apprenticeship and pre-apprenticeship opportunities available to these populations and recruit non-traditional and under-represented populations into these opportunities. The commonwealth will measure progress by tracking the increase in the percentage of non-traditional and under-represented populations participating in these programs, across existing registered apprenticeship and pre-apprenticeship programs, and the programs that are being newly developed.

- 1.3 The commonwealth will promote Pre-Employment Transition Services (PETS) for all transition-age youth with disabilities.**

The Office of Vocational Rehabilitation, within the Department of Labor & Industry, in partnership with the Departments of Human Services, and Education will collaborate to encourage transition-age youth to take advantage of opportunities available to them. The commonwealth will measure progress by tracking the number of individuals receiving PETS services and the number of these individuals that are provided career awareness education, specifically The Career Index Plus (TCI+) Plus and labor market information (LMI).

- 1.4 The commonwealth will increase public awareness of the career pathways model and program design, in an effort to build a career pathways system.**

All partner agencies and programs will prioritize educating customers about career pathways in Pennsylvania and creating opportunities to develop new, and expand existing, career pathways programs. The commonwealth will measure progress by tracking the educational programming available to customers, including workshops, LMI training, and through the utilization of online resources, and tracking the work of Local Workforce Development Boards in developing career pathways programs.

- 1.5 Increase exposure to career awareness and exploration activities for K-12 and postsecondary students, as well as adult learners, as a strategy related, but not limited to, dropout prevention, increased knowledge of career opportunities, and exposure to business and industry in students' communities.**

The Departments of Labor & Industry, Human Services, and Education will focus on increasing career awareness and exposure activities. The commonwealth will measure progress by tracking the number of these events, and the number of individuals that participate in them.

- 1.6 The Pennsylvania Workforce Development Board will continue to maintain a standing Career Pathways and Apprenticeship Committee, charged with developing policy recommendations related to interagency collaboration and coordination around career pathways and apprenticeship programs and priorities, and implementing the career pathways and apprenticeship related goals set forth in the WIOA Combined State Plan. The committee will update the full board on goal progress and execution.**

The Career Pathways and Apprenticeship Committee will meet regularly and update the Pennsylvania Workforce Development Board at its quarterly meetings.

Goal 2: Sector Strategies and Employer Engagement

Pennsylvania recognizes that it is imperative to work with the business community to ensure training programs and resources are aligned with the workforce development and human capital needs of businesses. By strategically engaging with businesses, the commonwealth will be best positioned to make sure employers have the opportunity to work collaboratively with training providers and educational institutions as they develop curriculum and help to prioritize the types of training and education needed by employers in an environment where resources are limited. Pennsylvania's Next Generation Industry Partnership (Next Gen IP) program supports this work by convening employers within the same industry cluster to collectively address issues facing those companies and enhance their economic competitiveness.

- 2.1 The commonwealth will promote Next Gen Industry Partnerships funded through Industry Partnership grants, with a focus on business-identified priorities.**

The Pennsylvania Workforce Development Board, in coordination with the Department of Community and Economic Development, will administer the grant program for Pennsylvania's Industry Partnership program. The commonwealth will measure the impact of this program in several ways. For workers trained through Next Gen Industry Partnership funds, Pennsylvania will track increases in wages, credentials, and retention. For businesses participating in these partnerships, Pennsylvania will track the number of jobs created and retained, and their economic impact. The commonwealth will also track career awareness activities, in terms of both the number of events and the number of individuals participating, and partnerships will be measured

in terms of their ability to braid and leverage resources, the number of employers participating, and the number of events these partnerships engage in.

2.2 The commonwealth will increase coordination between business engagement staff at each agency through the Engage! Program to more effectively provide businesses with both workforce and economic development services.

The Departments of Labor & Industry and Community & Economic Development will utilize the Engage! Program to better coordinate when working with the employer community to more efficiently communicate with businesses and to minimize employer fatigue. The commonwealth will measure this goal by the number of companies in the Engage! Program and the number of Departments utilizing the program.

2.3 The commonwealth will expand access to online education and training programs that result in a credential or certification of value.

All partner agencies and programs will make this a priority. The commonwealth will measure progress in meeting this goal by the number of individuals served in online training, including those that receive a credential or certificate, and by tracking the performance outcomes of those served online.

2.4 The commonwealth will encourage employers, including those that receive state funds from economic development and other programs, to utilize the public workforce system. The commonwealth will increase employer awareness and use of the one-stop system to recruit and retain talent, to diversify their workforce by hiring Pennsylvanians with barriers to employment, and provide information of other benefits of using the one-stop system.

The Departments of Labor & Industry, Education, Human Services, and Community & Economic Development will coordinate efforts on this goal. The commonwealth will measure progress in meeting this goal by tracking the increase in the number of companies registered with PA CareerLink®.

2.5 The commonwealth will increase engagement with the business community on issues related to Employment First, accessibility standards, disability talent recruitment, Americans with Disabilities Act Accessibility Guidelines compliance, disability etiquette, and the benefits of hiring individuals with disabilities.

The Office of Vocational Rehabilitation, within the Department of Labor & Industry, in partnership with the Department of Community and Economic Development, will lead efforts on engaging the business community on this priority. The commonwealth will measure progress in meeting this goal by tracking the number of Americans with Disabilities Act Accessibility Guidelines (ADAAG)

consultations, no-cost reviews of employer's workplace and public area accessibility, number of employer requests for OVR talent, and the number of disability etiquette trainings.

2.6 The commonwealth will increase collaboration and coordination between the OVR and local workforce development systems when using on-the-job training models.

The Office of Vocational Rehabilitation, within the Department of Labor & Industry, will lead this effort. The commonwealth will measure progress in meeting this goal by tracking the number of OVR customers enrolled in on-the-job training.

2.7 The commonwealth will increase inter-agency career readiness engagement activities and partnerships for students and educators by engaging with business and industry.

The Departments of Labor & Industry and Education will work collaboratively to address this priority. The commonwealth will measure progress in meeting this goal by tracking the number of these activities.

2.8 The commonwealth, led by the Pennsylvania Workforce Development Board, will continue to maintain a standing Sector Strategies and Employer Engagement Committee, charged with developing policy recommendations related to interagency collaboration and coordination around sector strategy and employer engagement programs, and priorities and implementing the sector strategy and employer engagement goals set forth in the WIOA Combined State Plan. The committee will update the full board on goal progress and execution.

The Sector Strategies and Employer Engagement Committee will meet regularly and update the Pennsylvania Workforce Development Board at its quarterly meetings.

Goal 3: Youth

Pennsylvania recognizes the priority that WIOA places on serving Youth and commits to prioritizing services to these individuals, who comprise our future workforce. Engaging young people early in their lifelong career journey creates a unique opportunity to help them find a successful career pathway and engage them around life-long learning. For youth with barriers to employment, early identification of their strengths and challenges can allow for better identification of supports that means smaller investment of time and resources than if supports were no identified until later in life.

3.1 The commonwealth will identify and promote evidence-based models and effective practices for engaging opportunity youth.

The Pennsylvania Workforce Development Board and all partner agencies will coordinate efforts on this priority. The commonwealth will measure progress toward meeting this goal by establishing a definition of evidence-based, data-driven models, tracking the number of

opportunity youth served, as well as performance outcomes for those receiving services and program evaluation. This data will be used to inform the continuous improvement of future programming.

- 3.2 The commonwealth will increase co-enrollment of opportunity youth in WIOA Core and partner programs, when relevant, to ensure that appropriate funds are leveraged to provide necessary services to these individuals. The commonwealth will also encourage the use of Individual Training Accounts when serving opportunity youth.**

All partner agencies will work together to ensure that opportunity youth have access to strategic co-enrollment when it helps support their overall career goals. The commonwealth will measure the increase in the number of opportunity youth successfully enrolled for multiple services across programs including, but not limited to, ABE, TANF, and OVR, and the number of ITAs these individuals are provided with.

- 3.3 The commonwealth will increase opportunities for youth in registered pre-apprenticeship and apprenticeship programs and establish new partnerships with secondary and postsecondary institutions to achieve this goal.**

The Departments of Labor & Industry and Education will coordinate on this priority. The commonwealth will measure the increase in the number of youth entering registered apprenticeship and pre-apprenticeship programs, the performance outcomes for those individuals, and the number of new registered programs created at secondary and post-secondary schools.

- 3.4 The commonwealth, via PennSERVE, will promote and encourage service opportunities with AmeriCorps and require all WIOA regional and local plans to include AmeriCorps, when available, as a referral option for young people, particularly opportunity youth.**

The Department of Labor & Industry, in partnership with PennSERVE, will focus on this goal. The commonwealth will track the increase in the number of youth, and specifically opportunity youth, enrolled in AmeriCorps State programs. Pennsylvania will also require the inclusion of AmeriCorps programs in WIOA regional and local plans, where AmeriCorps programs are available.

- 3.5 The Commonwealth will promote and encourage opportunities in YouthBuild and Job Corps programs and require that these priorities be included within all WIOA regional and local plans, when available.**

The Department of Labor & Industry will prioritize opportunities for these programs and measure the number of youth, and specifically opportunity youth, enrolled in these programs. Pennsylvania will require these programs to be part of WIOA regional and local plans.

- 3.6 The commonwealth will support youth with disabilities in the attainment of competitive, integrated employment by increasing paid work experience opportunities and other career exposure experiences, such as job shadowing, mentoring, and employer mock interviews, in addition to supported employment services.**

The Office of Vocational Rehabilitation, within the Department of Labor & Industry, will collaborate with Local Education Agencies to achieve this goal. The commonwealth will track the number of youth with disabilities placed in work-based learning experiences and the number of youth with disabilities served who obtain competitive, integrated employment.

- 3.7 The commonwealth will promote early career exposure and exploration, as well as the development of employability skills through work-based learning opportunities, particularly through summer employment and STEM career pathways, for in-school youth, as a means of increasing student engagement and drop-out prevention, by engaging businesses.**

The Departments of Labor & Industry, Education, and Human Services will coordinate efforts on this goal. The commonwealth will track career readiness and work-based learning opportunities through the Future Ready PA Index.

- 3.8 The commonwealth will promote awareness of the 14 required WIOA youth program elements including financial literacy education, adult mentoring, leadership development opportunities, entrepreneurial skills training, etc.**

The Departments of Labor & Industry and Human Services will coordinate on this goal. The commonwealth will measure the increase in the number of services rendered related to the 14 youth program elements.

- 3.9 The Pennsylvania Workforce Development Board will continue to maintain a standing Youth Committee, charged with developing policy recommendations related to interagency collaboration and coordination around youth programs and priorities and implementing the youth-related goals set forth in the WIOA combined state plan. The committee will update the full board on goal progress and execution.**

The Youth Committee will meet regularly and update the Pennsylvania Workforce Development Board at its quarterly meetings.

Goal 4: Continuous Improvement of the Workforce Development System

Pennsylvania recognizes that the workforce development system requires constant evaluation in order to learn and adapt to an ever-changing labor market and economy. By focusing on continuous improvement, the commonwealth recognizes that there are always opportunities for improvement. Better

communication and coordination related to the sharing of data, policy development, and overall system operations will help to eliminate silos within the system, duplication of efforts, and increase efficiency.

4.1 Share data across partner programs to assist in the ability to coordinate services to participants and to track participant outcomes, to maximize the positive impact of limited financial resources, including expanding the commonwealth’s Statewide Longitudinal Data System.

All partner agencies and programs will track where data sharing can be increased, including connecting early childhood education, education, higher education and workforce development data into a Statewide Longitudinal Data System (SLDS), to monitor education and workforce outcomes from early learning to career, and use this information to support continuous improvement of education and workforce initiatives. The accomplishments realized through more effective data sharing and creating a culture of information empowerment will be tracked and highlighted.

4.2 The commonwealth will prioritize issuing joint guidance when two or more agencies have policies that impact the function of multiple agencies, or collaborate on implementing an initiative.

All partner agencies will prioritize issuing joint-guidance whenever a policy impacts two or more programs. The commonwealth will track the increase in the issuance of joint guidance and will engage stakeholders on the effectiveness of joint-guidance and greater collaboration between agencies.

4.3 Ensure program planning and policy development are demand- and data-driven, built on sound socio-economic and labor market information, recognize trends related to programmatic data and outcomes, and prioritize evidence-based models. The commonwealth will also use program evaluation as a tool to evaluate the effectiveness of workforce development programs, initiatives, and strategies.

The commonwealth will establish a definition of evidence-based, data driven models and effective practices, track the percentage of policies developed through evidence-based models, with the goal of ensuring all policy is data-driven.

4.4 The commonwealth will streamline the occupational licensing process by removing barriers preventing qualified individuals from receiving occupational licensure.

The Department of State will lead the effort on this goal. The commonwealth will track occupations where the licensing process has been made more efficient through the removal of barriers, as well as process improvements related to reciprocity for veterans and spouses and licensing improvements for additional targeted populations.

- 4.5 The commonwealth will develop a dashboard to track all key performance indicators related to the workforce development system and implementation of the Combined State Plan, including developing state-driven metrics and elevating promising practices across the system.**

The Pennsylvania Workforce Development Board will coordinate tracking all key performance indicators related to the workforce development system across agencies and develop and maintain the dashboard. The dashboard will be updated on a timely basis, as new data becomes available, and available online in an accessible, user-friendly format.

- 4.6 The Commonwealth will encourage employers and educational institutions to accept work-based learning experiences as provisional credits and certifications, including military experience and training.**

The Departments of Labor & Industry, Education, Military & Veterans Affairs, and State will coordinate on these efforts. The commonwealth will track the number of employers and educational institutions utilizing this model.

- 4.7 The Pennsylvania Workforce Development Board will continue to maintain a standing Continuous Improvement Committee, charged with developing policy recommendations related to interagency collaboration and coordination around continuous improvement programs and priorities and implementing the continuous improvement related goals set forth in the WIOA Combined State Plan. The committee will update the full board on goal progress and execution.**

The Continuous Improvement Committee will meet regularly and update the Pennsylvania Workforce Development Board at its quarterly meetings.

- 4.8 The Pennsylvania Workforce Development Board will continue convening the Interagency Workgroup beyond the submission of the WIOA Combined State Plan to ensure the continuous improvement of Pennsylvania's workforce system, and maintain collaboration between agencies and programs.**

The Interagency Workgroup will meet on a regular basis to help ensure ongoing collaboration related to the implementation of the Combined State Plan and improvements to the workforce development system. Updates from these meetings will be provided to the Pennsylvania Workforce Development Board as appropriate.

Goal 5. Strengthening the One-Stop Service Delivery System

The One-Stop system, known in Pennsylvania as PA CareerLink®, is the primary touch point for the vast majority of customers, including job seekers, individuals looking to advance in their careers, and

employers. Increasing the coordination among system partners, identifying efficiencies, eliminating duplication, and improving customer service are all essential functions of improving service delivery.

5.1 The commonwealth will prioritize increasing online resources, utilizing shared space models, and enhance coordination across programs and services.

All partner agencies will strive to highlight any efficiencies that are identified within the PA CareerLink® system. The commonwealth will measure cost savings and additional financial resources that result from these efficiencies.

5.2 The commonwealth will expand customer access and services across the One-Stop system to engage new customers and increase the number of individuals being served by the workforce system through better partner relationships including, but not limited to, local libraries and community-based resources and programs.

The Department of Labor & Industry will work with all partner agencies and programs to document system improvements including, but not limited to, increased hours when services are available and additional locations where services are available. The additional number of individuals being served will also be tracked.

5.3 The commonwealth will increase training to all front-line staff on all available program offerings to allow for informed internal and external referrals to additional services and facilitate serving the holistic needs of the customer.

The Department of Labor & Industry will work with all partner agencies and programs to track the number of training hours staff receive and the increase in the number and types of trainings available. Staff will also be surveyed to measure increases in job related knowledge and identify where additional training opportunities would be valuable. A workgroup with members from the PA CareerLink® partner programs is developing a series of asynchronous online training modules to support this work.

5.4 The commonwealth will promote innovative strategies for serving customers with barriers, including better customer engagement and support, as well as a focus on increasing awareness of community partners and available resources.

All partner agencies and programs will coordinate to track increases in the number of referrals made, including populations that are being referred and where they are being referred to. The commonwealth will also track the number of individuals with barriers, including those with multiple barriers, and the percentage of services that are provided to individuals with barriers.

- 5.5 Business Service Teams will focus on collaborative efforts across programs to increase engagement with employers in a more coordinated way, especially as it relates to barrier remediation and worker recruitment.**

The Department of Labor & Industry will coordinate these activities, in partnership with the Department of Community and Economic Development. The commonwealth will track the number of business services events and measure the increase in the employer penetration rate and the number of repeat business customers.

- 5.6 The commonwealth will prioritize high-level customer service in facilitating more personal and customer-focused, customer-centered referrals and program design.**

This will be a priority for all partner agencies and programs. The commonwealth will measure the increase in the percentage of referrals that result in a successful connection and track all process improvements.

- 5.7 The commonwealth will increase the number of individuals co-enrolled in all WIOA Core programs, when relevant, and other partner programs to allow increased access to additional programmatic and supportive services.**

This will be a priority for all partner agencies and programs. The commonwealth will measure the increase in the percentage of customers that are co-enrolled and the employment outcomes of co-enrolled individuals.

- 5.8 The commonwealth will continue to increase the capacity of the Commonwealth Workforce Development System, the workforce development system of record, to include additional partners, programs, and resources, and to increase system communications, referral capabilities, and improve customer usability.**

The Department of Labor & Industry will lead efforts on this priority. The commonwealth will track and document all system improvements.

- 5.9 The Pennsylvania Workforce Development Board will establish and maintain a standing One-Stop Service Delivery System Committee, charged with developing policy recommendations related to interagency collaboration and coordination around the one-stop system and implementing the one-stop system related goals set forth in the WIOA combined state plan. The committee will update the full board on goal progress and execution.**

The One-Stop Service Delivery Committee will meet regularly and update the Pennsylvania Workforce Development Board at its quarterly meetings.

(3) Performance Goals. Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

Title I - Adult

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	73.0%	73.0%	73.0%	75.0%
Employment (Fourth Quarter after Exit)	70.0%	70.0%	70.0%	71.0%
Median Earnings (Second Quarter after Exit)	\$5,300	\$5,800	\$5,300	\$5,800
Credential Attainment Rate	55.0%	56.0%	55.0%	58.0%
Measurable Skill Gains	38.0%	38.0%	38.0%	38.0%

Title I – Dislocated Worker

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	75.0%	75.0%	75.0%	78.0%
Employment (Fourth Quarter after Exit)	76.0%	76.0%	76.0%	78.0%
Median Earnings (Second Quarter after Exit)	\$7,300	\$7,800	\$7,300	\$8,000
Credential Attainment Rate	57.0%	58.0%	57.0%	59.0%
Measurable Skill Gains	30.0%	32.0%	30.0%	33.0%

Title I - Youth

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	65.0%	66.0%	65.0%	66.0%
Employment (Fourth Quarter after Exit)	58.0%	58.0%	58.0%	60.0%
Median Earnings (Second Quarter after Exit)	\$2,750	\$2,750	\$2,750	\$2,750
Credential Attainment Rate	72.0%	72.0%	72.0%	72.0%
Measurable Skill Gains	57.0%	57.0%	57.0%	57.0%

Title II – Adult Education and Family Literacy Act Program

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	50.0%		50.0%	
Employment (Fourth Quarter after Exit)	50.0%		50.0%	
Median Earnings (Second Quarter after Exit)	\$4,775		\$4,775	
Credential Attainment Rate	39.0%		39.0%	
Measurable Skill Gains	48.0%		48.0%	

Wagner-Peyser Act Employment Services Program

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	62.0%	64.0%	62.0%	65.0%
Employment (Fourth Quarter after Exit)	62.0%	64.0%	62.0%	66.0%
Median Earnings (Second Quarter after Exit)	\$5,000	\$5,400	\$5,000	\$5,500
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Vocational Rehabilitation Program

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	15.0%		18.0%	

All WIOA Core Programs

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level

Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable
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Additional Indicators of Performance

1.
2.
3.
4.
5.
6.

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

All applicable content related to this prompt is outlined in the answer to (2) above. Tracking and assessment of these goals will be accomplished in through multiple mechanisms: The Pennsylvania Workforce Development Board will convene monthly meetings of an interagency workgroup, comprised of all core and partner programs, to discuss implementation initiatives and strategies, current progress on goals, and to identify opportunities for increased collaboration across programs.

Additionally, Pennsylvania intends to track and report the progress on each WIOA Combined State Plan Goal on a periodic basis, to ensure all partners and stakeholders in Pennsylvania’s workforce development system possess the most current information on where implementation stands, in order to make adjustments to strategy.

Through this, Pennsylvania intends to continuously evaluate goals to determine where adjustments need to be made to strategies and measurement.

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

(1) Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B),

(D). “Career pathway” is defined at WIOA section 3(7) and includes registered apprenticeship. “In-demand industry sector or occupation” is defined at WIOA section 3(23).

Pennsylvania has a strong infrastructure in place to address both sector strategies and career pathways.

Pennsylvania has long been a national leader in pursuing sector strategies to support the workforce development system. Beginning in 2005, and enacted into law in 2011, Pennsylvania’s Industry Partnership Program focuses on convening businesses operating in the same industry cluster, on a regional basis, in order to facilitate the identification of shared challenges and opportunities faced across the industry sector. Pennsylvania has since embraced the Next Gen Industry Partnership model to expand on this foundation. Pennsylvania provides financial support to the partnerships, in the form of a competitive grants, to help enable these partnerships to collectively address their identified challenges and leverage opportunities. Businesses participating in these partnerships have used these resources for many things, including, but not limited to, training workers in high-priority occupations from several companies on a cohort basis, addressing economic development priorities, developing curriculum for training providers and educational institutions, and promoting career opportunities and their regions generally.

The priority Pennsylvania places on career pathways is most clearly articulated in the PA Workforce Development Board maintaining a standing committee focused on Career Pathways and Apprenticeship. The state goals of this committee include increasing diversity in registered apprenticeship and pre-apprenticeships, increasing the types of occupations where apprenticeships are available beyond those traditionally available in the building trades, and increasing career awareness activities for all Pennsylvanians.

The Commonwealth is keenly focused on providing supportive services as a means of barrier remediation to assist workforce development system customers as they move along their career pathways. Many of Pennsylvania’s goals in this WIOA combined state plan speak directly to the need to meet customers where they are, in order to assist those individuals in their pursuit of satisfying employment in jobs that provide self-sufficient and family sustaining wages.

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

Pennsylvania has committed to five standing committees of the PA Workforce Development Board aligned to each of the five broad goals identified in this plan. These committees include: (1) Career Pathways & Apprenticeship, (2) Sector Strategies & Employer Engagement, (3) Youth, (4) Continuous Improvement, and (5) One-Stop Service Delivery. Each of these committees is focused on increasing alignment among

the core and partner programs to achieve a fully integrated One-Stop system that delivers unparalleled customer service to all workers and businesses in Pennsylvania.

Pennsylvania also routinely convenes interagency meetings to ensure all partner agencies and programs are coordinating their efforts and identifying any duplicative efforts, so as to make the system as efficient as possible. The interagency convening provides a forum to share best practices and was instrumental in developing the goals set forth in this plan.

Pennsylvania utilizes both the State Workforce Board's committees and the interagency group as tools to address the identified weaknesses in section II(a)(2), including:

- Governor Wolf has a goal of increasing the share of working-age adults who have a postsecondary education or industry-recognized credential to 60 percent by 2025. Through increased investment in registered apprenticeship programs, STEM education, and other related strategies, Pennsylvania is well positioned to achieve this goal.
- The Pennsylvania Workforce Development Board's Career Pathways and Apprenticeship Committee is currently researching successful career pathway work across the commonwealth and will use this research to inform additional career pathway system development in the form of increased state guidance and by providing state resources for additional system building.
- The One-Stop Service Delivery committee of the State Workforce Development Board is focused on addressing the level of customer service and customer options within the PA CareerLink® system.
- Improvements to the system of record, the Commonwealth Workforce Development System (CWDS), are an ongoing priority. Of particular focus is increasing the ability of partners to be able to make referrals to each other through the system, and for partners to collaboratively serve customers.
- The integration and alignment of Adult Basic Education services through co-enrollment and contextualized learning is prioritized to comprehensively serve customers in a more efficient manner.
- Pennsylvania is developing strategies to serve priority populations in a coordinated manner, by developing policies and programs collaboratively across agencies.

Section III – OPERATIONAL PLANNING ELEMENTS

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

State Strategy Implementation. The Unified or Combined State Plan must include—

(1) State Board Functions. Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision-making processes to ensure such functions are carried out).

The Pennsylvania Workforce Development Board (Board) is the Governor’s business-led, industry-driven policy advisor on building a strong workforce consistent with the Commonwealth’s education and economic development goals. The Board’s mission is to ensure Pennsylvania’s workforce development system, across programs and agencies, helps jobseekers advance their careers and economic standing, and helps employers connect with skilled workers. The Board is responsible for recommending policies and strategies to support the continuous improvement of the workforce development system, including system collaboration, innovation, alignment, effectiveness, and accountability.

The PA WDB is governed by bylaws. Members serve three-year, staggered terms. Standing and ad hoc committees are formed as necessary. The bylaws require members to accept the following duties and responsibilities:

1. Support the development and implementation of Pennsylvania’s WIOA Combined State Plan and the Commonwealth’s workforce development goals and initiatives.
2. Be generally familiar with Pennsylvania workforce programs, and the laws and policies that govern them.
3. Provide strategic guidance on the Board’s goals and initiatives.
4. Connect with workforce development stakeholders, including elected officials; business leaders; labor leaders; workforce, education, and economic development leaders; and philanthropic partners to encourage their involvement in the Commonwealth’s workforce development initiatives and emphasize the importance of strategic investments in workforce development.
5. Connect with the leaders of new business enterprises in Pennsylvania to help them understand and become familiar with Pennsylvania’s workforce and educational systems.
6. Actively participate on at least one Board standing or ad hoc committee.

7. Attend at least three Quarterly Meetings every year.
8. Complete all required state Ethics and Financial Disclosure forms annually.
9. Advise the Board of any potential conflicts of interest, request guidance from the Board if a potential conflict of interest is identified, and recuse themselves or abstain from official Board deliberations and votes in a decision-making capacity if a conflict of interest is confirmed.

The board must have a quorum at the Quarterly meetings to act on any formal motions offered in person. If a Board member is unable to attend a Quarterly Meeting but wishes to participate in a vote taken at that meeting, the member may vote on formal motions in one of two ways:

1. By alternative designee: A member may vote through an alternative designee in attendance.
2. By proxy: A member may vote by submitting a proxy ballot prior to the Quarterly Meeting, designating another member in attendance to exercise their voting authority

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

(A) Core Program Activities to Implement the State's Strategy. Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

The core programs – Adult, Dislocated Worker, Youth, Adult Basic Education, Wagner-Peyser, and Vocational Rehabilitation – work in concert to effectively serve jobseekers and employers across the commonwealth. CWIA and other sources gather, analyze, and provide labor market information (LMI) to inform workforce development strategies. While each program has clearly defined activities, as defined by law, the commonwealth leverages services and resources to achieve outcomes.

The commonwealth's alignment of core programs will include establishing effective career pathways that combine guidance, education, training, and support services that prepare individuals for careers. The pathway system will include coaches who help guide individuals to appropriate programs and services given their needs and career goals. The commonwealth will promote co-enrollment to align services and will encourage shared roles for guidance and support services within each career pathway program to prevent duplication of services among the core programs.

PA CareerLink® offices designated as comprehensive are the physical locations where, at a minimum, the services associated with all WIOA-mandated partners' core programs are provided or available. In addition, many partner program recipients may be able to receive services required under Pennsylvania's Perkins plan or TANF program, to name two partner programs, through the PA CareerLink® offices. Integration of PA CareerLink® service delivery is critical for effective and efficient service to customers. To

that end, all partners have itemized the types and availability of services to be provided in a Memorandum of Understanding with the PA CareerLink®.

Within PA CareerLink® offices, program staff are aligned functionally, rather than by program, as appropriate for staffing capacity and customer volume. Aligned functions may include: initial customer intake and assessment; provision of career and training services; and the provision of services to businesses to include Next Generation Sector Partnerships. Functional alignment offers direct access to a broader range of services that may be adapted and leveraged to address a customer's unique needs. Individuals seeking assistance may access services in person at PA CareerLink® offices or virtually through PA CareerLink® Online. Staff are available to provide direct assistance to customers in both group and individual settings, and self-service resources are available in a Career Resource Room or Area.

Below is a summary of the activities, and alignment strategies, funded by each of the core programs.

WIOA Adult

The Adult program is one of three Title I core programs authorized under WIOA to assist participants, aged 18 or older, to attain employment. Veterans and spouses of veterans who meet WIOA Adult eligibility criteria, recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient receive priority of service.

WIOA Dislocated Worker

The Dislocated Worker program assists workers, before or after a job layoff, in identifying basic skills training, on-the-job or customized training programs, and apprenticeship opportunities to facilitate rapid reemployment. Dislocated workers may be triaged at the point of entry to identify potential program eligibility. This process allows for the development of a streamlined service strategy that maximizes the funding of all entities in carrying out reemployment activities.

WIOA Youth

The Youth program serves eligible youth and young adults with support toward educational attainment, including: career guidance and exploration; work experience opportunities such as internships and pre-apprenticeships; skills training along a career pathway for in-demand occupations and industries; and supportive services. The goal for participants is either advancement into post-secondary education or attainment of employment with a self- or family-sustaining wage. Program services are prioritized for out-of-school youth (OSY) or youth with significant barriers to success, such as disability, pregnant or parenting youth, or those subject to the juvenile/adult justice system.

Wagner-Peyser

The Wagner-Peyser Act funds services to all jobseekers and employers – the universal customer – through both PA CareerLink® offices and PA CareerLink® Online. Jobseeker services include: job search and job placement assistance; career counseling; provision of relevant labor market information; needs and interest assessments; proficiency testing; workshops on employment and reemployment topics; and help with the development of an individual employment plan. Wagner-Peyser also provides funds for employer, or business, services including: assistance with developing and uploading job postings to PA CareerLink® Online; referring qualified jobseekers to job openings; providing customized labor market information; and organizing job fairs and specialized recruitments.

Adult Basic Education

Adult Basic Education (ABE) funds provide academic instruction at educational levels from beginning literacy through high adult secondary, including English language acquisition for English language learners when needed. Instruction and workforce preparation activities support college and career readiness. Other services support persistence and successful transition to employment or postsecondary opportunities by connecting students to social services organizations, partner programs, and entities in the workforce development system. Local programs are encouraged to co-enroll out-of-school youth by providing basic skills instruction. Integrated education and training activities, which are aligned with local workforce needs and developed in consultation with Local Workforce Development Boards, employers, and training providers, prepare students for realistic, existing employment opportunities in their communities.

Vocational Rehabilitation

Vocational rehabilitation funds, through the Office of Vocational Rehabilitation (OVR), provide individualized services to persons with disabilities to assist them for preparing for, obtaining, or maintaining employment – both directly and through a network of approved vendors. OVR counselors continue to meet with businesses and with individuals with disabilities in PA CareerLink® offices to provide services and outreach; they collaborate with partners in the workforce development and education systems to develop strategies for streamlining and enhancing services and service delivery.

(B) Alignment with Activities Outside the Plan. Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The Pennsylvania workforce development system extends far beyond the core programs to include programs administered by numerous state agencies and quasi-governmental entities. Core and partner programs will collaborate to ensure that resources are leveraged and services are not duplicated.

An interagency work group has been established and meets on a regular basis to consider ideas, discuss agency initiatives and goals, how partner agencies can help in achieving them, and share best practices. The interagency work group is a group comprised of executive and program level staff from the Departments of Aging, Education, Human Services, Labor & Industry, Agriculture, Community and Economic Development, Military and Veterans Affairs, State, and Corrections, as well as the Governor's Office. The work group is coordinated by the Pennsylvania Workforce Development Board. The Secretaries of Labor & Industry, Aging, Agriculture, Corrections, Community & Economic Development, Education, and Human Services serve on the Workforce Development Board. Other agency secretaries are invited to participate in Board meetings when populations they serve are expected to be discussed.

Additionally, the Workforce Development Board will create a committee dedicated to One-Stop Service delivery to promote greater connections between all agencies and partners providing services to Pennsylvania citizens. The committee will also focus on ensuring the implementation of the One-Stop related goals outlined in the Strategic Elements section of this Plan.

There are numerous examples of specific collaborations among partner programs beyond the high level strategic and planning efforts taking place through the interagency work group and State WDB including:

- OVR works extensively with education partners including Local Education Agencies (LEAs) to coordinate the provision of pre-employment and other transition services for students with disabilities.
- The Secretaries of PDE, DHS and L&I, along with other commonwealth agencies and executive office officials, created a written plan that implements Employment First as the policy of all commonwealth executive branch agencies; aligns funding, policy, and practice toward an emphasis on competitive, integrated employment; prioritizes competitive, integrated employment as the first consideration and preferred outcome of all publicly-funded services for all Pennsylvanians with a disability; and creates the conditions that lead to a material increase in the number of Pennsylvanians with a disability who are employed in a competitive, integrated job.
- WIOA Youth service providers coordinate with LEAs, adult education agencies, county human service offices, county assistance office income maintenance caseworkers, Keystone Education Yields Success (KEYS) student coordinators, EARN contractors, juvenile justice and local law enforcement agencies, local housing authorities, OVR, economic development entities, and other community and faith-based organizations to ensure youth participants have access to all the services they need to be successful in training activities and employment.
- The braiding of WIOA Title I-B funded programs with other youth-directed state and local entities allows comprehensive services to be offered to all eligible low-income populations under WIOA. Available TANF funding will continue to support WIOA year-round services and summer employment activities.
- Applicants for Title II funds are required to describe how they will align services with WIOA Local Plans and how they will coordinate with other available education, training, and social services in the community.
- Perkins postsecondary providers assist job seekers in identifying their interests and abilities and aligning these skills needs to training and financial resources to assist with training. Training is linked to the state's HPO list and is designed to lead to credential attainment. Both credential attainment and HPO alignment assist job seekers in securing employment with family-sustaining wages.
- The commonwealth co-enrolls all trade-impacted workers in the WIOA Dislocated Worker program to ensure that all individuals receive the full range of assistance available to Dislocated Workers.
- The Community Education Councils (CECs) network, as designated by PDE, will align training development efforts with the overarching strategies of the commonwealth to increase the education and training delivery to residents of rural communities.

- The PA DOC is working closely with L&I, PDE, DHS, DCED, and other partners to align its Career Pathways in Reentry Initiative with on-going efforts in the workforce and education systems.
- The DOC is partnering with LWDBs and PA CareerLink® service providers to build staff capacity in reentry employment and offender workforce development services.
- The DOC will continue the working relationship and partnership with WDB, L&I, and PA CareerLink. PA CareerLink staff come into the SCIs to provide information on the services available at least quarterly. In addition, DOC works with PDE and DCED to assist with the Career Pathways framework sustainability. OVR has been involved in some of the SCI Reentry Job Fairs providing information to inmates close to release.
- The Bureau of Corrections Education, within DOC, coordinates with PDE staff for a variety of reasons. Most importantly, PDE approves the Commonwealth Secondary School Diploma program. This program was developed to allow a student to utilize high school credits earned while on the streets in conjunction with credits earned while they are incarcerated in order to earn a PDE recognized high school credential. One of the required credits for this diploma is the successful completion of the Pathway to Success course. This provides the career readiness preparation needed by DOC students. PDE staff provide training to our staff at various conferences throughout the year. This includes the PDE Special Education Conference, CEA Education conference, and various specialized trainings provided by PATTAN.
- PDE will partner with DOC to improve coordination of resources and systems at the state level, including providing professional development for Bureau of Correction Education (BCE) staff on key issues such as career pathways, rigorous academic standards, and the development of college- and career-ready skills. PDE's Bureau of Career & Technical Education (BCTE) offers regional meetings with secondary schools to discuss best and promising practices related to workforce readiness and will extend these opportunities to DOC BCE staff and others who are committed to improving educational and employment outcomes for students in the criminal justice system. In addition, PDE will work to connect DOC with institutions of higher education and other partners who can provide opportunities for offenders to enhance skills and earn postsecondary credentials.
- The Area Agencies on Aging (AAAs) and seven national Senior Community Service Employment Program (SCSEP) sponsors refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in PA CareerLink® Online. PA CareerLink® staff reciprocate by referring SCSEP-eligible individuals to the AAAs and SCSEP partners as appropriate. In some cases, SCSEP staff are co-located at PA CareerLink® centers on a full- or part-time basis. SCSEP is the largest federal workforce development program targeted to serve older workers.
- SCSEP sponsors seek to co-enroll participants in WIOA and OVR programs, as appropriate, to efficiently leverage available federal and state workforce development funds.
- When appropriate, SCSEP sponsors pursue the placement of SCSEP participants to serve as greeters, resource room aides, job developers, custodians, clerical aides, and customer service representatives in PA CareerLink® centers.

- The PA Centers for Independent Living (CILs) play an important role in helping individuals with disabilities achieve or maintain independence through supportive services and programs, including four core services: information and referral, peer support, advocacy, and independent living skills. WIOA provides new opportunities for PA CareerLink® to partner with CILs leading to improved employment outcomes for job seekers with disabilities. The comprehensive services provided by CILs to advocate for and support the independence of individuals with disabilities is a perfect match with the focus of the public workforce system. CILs, OVR, and PA CareerLink® centers are natural partners committed to improving the employment and economic advancement of all job seekers, including in-school and out-of-school youth, and adults with disabilities through collaboration.
- The PA Link to Aging and Disability Resources (PA Link) is a resource for elderly Pennsylvanians and adults with disabilities. The PA Link, through its collaborative network of partners including state and local public and private agencies improves access to information and provides referrals to long term living supports and services. Examples of services accessible through the PA Link network include assisted living and nursing home services, vocational rehabilitation services, and transportation services.
- OVR collaborated with Penn State’s AgrAbility Program and the U.S. Department of Agriculture in developing the Farming and Agriculture Rehabilitation Management (F.A.R.M.) policy to address the rehabilitation needs of farmers and ranchers with disabilities. VR Counselors, with technical assistance and guidance from Pennsylvania’s AgrAbility Program, assess the rehabilitation needs of farmers and ranchers with disabilities in order to provide the specialized rehabilitative and assistive technologies they may need to maintain their employment.
- The PA Department of Agriculture works with the Department of Education (PDE) in administering agriculture education programs (a part of career and technology education) as well as the accompanying FFA programs and 4-H (in cooperation with Penn State University). The Department of Agriculture plans an evaluation of the agriculture education system in the commonwealth in conjunction with PDE and the Pennsylvania Association of Agriculture Educators in 2016.

(C) Coordination, Alignment and Provision of Services to Individuals. Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas The activities described shall conform to the statutory requirements of each program.

The commonwealth strives to provide consistently excellent service to workforce development customers across the state through technical assistance on standards, roles and responsibilities, and training for staff. Reviewing orientation programs, flow processes, and forms ensures consistency statewide and supports service alignment across programs. Trained and informed staff are critical to providing comprehensive,

high-quality service. Labor & Industry's Bureau of Workforce Partnership & Operations offers a curriculum of courses open to all PA CareerLink®, Local Workforce Development Board, and partner staff and contributes to conferences, symposia, and workshops. These enhance staff's knowledge, skills, and professional development and promote collaborative and consistent service delivery. A work group comprised of staff from a multitude of partner agencies is developing additional online resources for cross training local, regional, and state staff on the services of the workforce development system partners. This training is intended to ensure that all staff can make informed internal and external referrals that meet the needs of one-stop system clients, especially those with barriers to employment.

The commonwealth recognizes the need for supportive services to customers, particularly those with barriers to employment, to achieve successful outcomes. While many services may be provided by the core programs, Local Workforce Development Boards are encouraged to obtain other services through partner programs and community- and faith-based organizations, based on local needs. Examples of coordination of supportive services include:

- Referrals to and/or assistance with transportation, housing, child care, and dependent care are available through PA CareerLink® offices and can often be leveraged with TANF and SNAP employment and training programs.
- Using a case management approach, Adult Basic Education programs connect students with other services: social services to address barriers to participation in Adult Basic Education programming as well as services to support students' transition to employment and/or post-secondary education and training.
- Perkins post-secondary programs are part of career pathways aligned to High Priority Occupations and credentials; they are included on Pennsylvania's eligible training program list.
- OVR partners with local providers to increase resources for extended services for individuals with the most significant disabilities in Supported Employment.
- OVR also collaborates with PA CareerLink® offices to better assist veterans who have disabilities in obtaining assistive technology to remove barriers in locating and maintaining employment. OVR staff stay current with assistive technology and training programs so they can provide equipment and training to customers who are veterans with disabilities.

(D) Coordination, Alignment and Provision of Services to Employers. Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

The commonwealth is committed to providing high-quality service to employers and works to ensure their active participation in the implementation of workforce development strategies throughout the state.

At the local level, PA CareerLink® staff serving on a Business Service Team (BST) work with area employers to identify their talent needs and refer qualified candidates to fill those positions. This includes referring

candidates for on-the-job or customized training when the referred individual is not immediately ready to take on the position's full duties. BSTs also have access to labor market information (LMI) that can help employers set wages and benefits that will attract high-quality candidates. BSTs communicate and collaborate with local organizations, state and federal agencies, and other entities with economic and workforce development interests to ensure coordination of services. This also includes coordination and connection with school districts, career and technical centers, adult basic education programs, and post-secondary providers who can serve as a source of talent for employers.

Employers also have access to PA CareerLink® Online for posting and tracking job openings; reviewing position candidates; and using other online resources to address their workforce issues and plans.

The commonwealth welcomes the addition of an employer satisfaction measure to the federal common measures. Measuring employer engagement and satisfaction provides LWDBs with actionable intelligence to identify best practices and weaknesses in serving employers allowing constant system improvement.

The commonwealth's additional efforts to ensure comprehensive, high-quality service to employers include:

- The Office of Vocational Rehabilitation single-point-of-contact model helps employers hire and on-board talented individuals with disabilities. It connects an employer with one staff member responsible for coordinating all program support, including pre-screened talent recruitment and onboarding to ensure new-hire success.
- The commonwealth-funded Industry Partnership (IP) program has been successful at enlisting businesses participating in the same general economic sector to collaborate and cooperate. In 2017, the commonwealth is providing seed funding for Next Generation Sector Partnerships, with the goal of building capacity statewide.
- The Pennsylvania Department of Aging has partnered with the Pennsylvania Homecare Association to improve the skills of current and future workers and consequently improve the home care provided to older individuals. This has been accomplished through the creation of 55 online Direct Care Worker training courses and through a grant to Westmoreland County Community College to train older individuals to become direct care workers.
- The Pennsylvania Department of Education's secondary and postsecondary career and technical education (CTE) programs will collaborate and partner with employers who will assist in: informing and developing career pathways for targeted HPOs; developing work-based learning opportunities for CTE students and career exploration activities for middle school students; developing pathways to high value industry certificates and credentials; developing a system of micro-credentials; and improving STEM focused career exploration.
- The PA Department of Agriculture is working with local industry partnerships to identify industry needs and develop relevant training programs to include seeking to establish apprenticeship programs for positions such as Agriculture Equipment Service Technicians and in other occupations, particularly in the dairy industry and organic farming.
- The Work Opportunity Tax Credit program (WOTC) provides tax credits to employers for wages

paid to individuals from targeted population groups. The program conducts outreach through PA CareerLink® and Local Workforce Development Board offices as well as a website.

- The Strategic Early Warning Network (SEWN), a program managed by the Steel Valley Authority, offers layoff aversion services to manufacturing companies, upon request, at no cost. Core services include financial restructuring, operational restructuring and cost management, ownership transition, high performance workplace strategies and new market opportunities.
- Pennsylvania's Small Business Procurement Initiative designates a portion of state government contracts for companies with 100 or fewer employees that do not exceed established revenue ceilings. Allowing these small businesses to compete for contracts will, in turn, provide opportunities for them to add to their labor force.
- PA CareerLink® offices help employers, looking to fulfill USDOL Foreign Labor Certification requirements, recruit U.S. workers and determine whether qualified job applicants are available to fill their job postings.
- Adult Basic Education programs provide contextualized basic skills instruction and workforce preparation activities to support incumbent worker training.
- Career and technical education programs provide soft skills instruction, workforce preparation and technical skills instruction to support new worker and incumbent worker needs.
- The public library system can provide programs and tools, particularly for small business owners and entrepreneurs.

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

The commonwealth's workforce development strategy is integrally tied to education, starting with the secondary school system, to include career and technical schools, and continuing through postsecondary education to include community colleges, and public and private colleges and universities. All core programs have a history of engaging with the education system, in particular the career and technical schools and community colleges and will continue to develop those relationships. The core programs will work with the education system to support and develop career pathways identified by employers and the workforce system.

One key area of collaboration and cooperation is the transition from the workforce development program to postsecondary education. Title II case managers, OVR Counselors, Keystone Education Yields Success (KEYS) student coordinators, and WIOA and Wagner-Peyser employment specialists have established relationships with educational staff to support the successful transition of their customers to postsecondary programs. A collaboration between the Pennsylvania Department of Education and providers of CTE Programs of Study works to align industry credentials to high priority occupations (HPOs).

A priority of the governor and of commonwealth agencies, as outlined in Governor Wolf's PAsmart Grants Framework: Principles and Funding Priorities, which was approved by the Pennsylvania Workforce Development Board in 2018, is "equity, diversity, and inclusion." Commonwealth workforce development efforts therefore seek to increase access to postsecondary and career and technical education specifically for historically under-represented and under-served students.

In serving individuals with disabilities, the Office of Vocational Rehabilitation (OVR) will continue to work collaboratively with local community colleges, career and technical schools and other Perkins recipients to explore the development of training programs that are implemented with universal design to train individuals with disabilities for competitive, integrated employment in jobs that meet local labor market demand. OVR will also work to develop and implement interagency agreements with community colleges and career and technical schools to fill unmet needs within the local workforce delivery system.

In serving veterans, the Pennsylvania Department of Military and Veterans Affairs - Office for Veterans Affairs (DMVA-OVA) will continue to work closely with the Pennsylvania Department of Education and student veteran organizations at colleges, universities, trade schools, and other institutions of higher learning to create "veteran friendly" learning environments. DMVA will support partners in education with focused outreach and coordination with community partners while supporting veterans and their family members to take full advantage of educational benefits that they have earned. DMVA will leverage these education and training platforms to focus on job skills that meet the needs of employers within the regions. DMVA will coordinate with partners to link employers to these educational institutions and programs to ensure that we graduate skilled applicants who have the greatest potential to move successfully into employment.

The commonwealth strives to connect youth and adults seeking postsecondary education with available financial aid to include Pell and Pennsylvania Higher Education Assistance Agency (PHEAA) grant programs. The commonwealth also encourages those students without a high school diploma or recognized equivalent deemed eligible under ability-to-benefit for financial assistance to enroll in eligible career pathway programs. Contextualized high school equivalency test preparation programming will also be used as a mechanism for encouraging students without a high school diploma or recognized equivalent to enroll in eligible career pathway programs.

Postsecondary career and technical education is a critical partner in providing occupational training for adults and a proven skills-building strategy. Postsecondary career and technical education programs collaborate with Adult Basic Education programs to develop service delivery models that support adults with basic skills deficiencies to successfully take advantage of these training opportunities.

It is the state's vision that all Pennsylvanians exiting basic education services, both through the traditional K-12 system and through Adult Basic Education, will be prepared to participate successfully in postsecondary level instruction without remediation. To support this vision, Title II Adult Basic Education

providers are implementing the College and Career Readiness Standards for Adult Education. At the local level, many adult education providers developed relationships with postsecondary education providers. Students who do not earn a high enough score on placement tests at the postsecondary institution are referred to a local Adult Basic Education program for remedial work. After the student has demonstrated sufficient academic progress at the local adult education program, as determined by an approved standardized test, the student is referred back to the postsecondary institution. The commonwealth will build on best practices developed through these relationships. For example, in the most successful partnerships, both the adult education program and the postsecondary institution have points of contact for referrals. Also, the adult education and postsecondary programs have worked together to identify key content areas for the adult education program to cover to support successful transition to the postsecondary program.

(F) Partner Engagement with Other Education and Training Providers. Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

The commonwealth issued Workforce System Policy No. 04-2015 detailing initial implementation of eligible training provider provisions of WIOA. The policy outlines the requirements for becoming and remaining an eligible training provider in accordance with federal law and regulations. Guidelines may be revised later to ensure that eligible training providers and programs are aligned with career pathways once they are established.

New providers and programs seeking initial eligibility must, in general: have been in operation at least 12 months; provide program information; assure compliance with nondiscrimination, equal opportunity, and ADA; demonstrate effectiveness; and agree to collect and provide performance data. In order to maintain eligibility a provider or program must meet the minimum established performance criteria. Full details regarding initial and continued eligibility requirements can be found in the policy.

(G) Leveraging Resources to Increase Educational Access. Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

Over the past four years, commonwealth agencies have engaged thousands of stakeholders across the commonwealth and worked with cross-sector partners from pre-K to postsecondary education, workforce development, and human services to improve career readiness for all students. There are now established structures that can continue to leverage the expertise and resources at the local, state, and federal levels for Pennsylvania's workforce development.

In 2017, Governor Wolf convened the Middle Class Task Force, comprised of leaders in education, workforce, and economic development systems. The outcomes of the Task Force's report led directly to the development of the PAsmart initiative, which has invested \$70 million in its first two years in education and training needed for careers in high-growth industries. PAsmart supports the creation of regional workforce development and education partnerships such as STEM Ecosystems, the training of educators

in computer science skills so that students are prepared for a high-tech digital economy, the expansion of Registered Apprenticeships, and next-generation industry partnerships. The governor's office also launched the PAsmart website to serve as a resource for commonwealth residents to identify the tools and resources they need to make education and career decisions.

The Task Force findings, and the governor's commitment to the vision of "jobs that pay" and "government that works," also led the governor to establish the Keystone Economic Development and Workforce Command Center. The Keystone Command Center is a group of state agency representatives from education, labor, industry, human services, and others, as well as representatives of labor and business. This cross-sector body elevates and seeks to align all workforce development efforts—whether the actions take place under the purview of education, labor and industry, economic development, or private industry partners—with the urgency that workforce issues demand in the current economic climate. The collaborative nature of the body facilitates the identification and elimination of barriers that confront residents of the state seeking to advance in their careers, as well as the barriers that face businesses and education and training institutions seeking to develop the workforce.

The Commonwealth provides training funds to qualified employers for new and existing employees through the Workforce and Economic Development Network of Pennsylvania (WEDnetPA). This program is a unique, collaborative partnership consisting of community colleges, State-owned universities, and other educational institutions working together to be responsive to the needs of Pennsylvania's business community. Funding through WEDnetPA can be used for a wide range of incumbent worker training that can be categorized as either essential skills training or advanced technology training.

Collaboration between the PA Departments of Labor and Industry (L&I) and Education has leveraged state workforce development policies and federal programs in order to initiate and grow self-sustaining local initiatives. L&I has partnered with Pennsylvania community colleges to apply for federal grants to increase access to post-secondary education for non-traditional, harder to serve individuals. Each of the community colleges is a Perkins postsecondary recipient and each is expected to leverage investments to enhance access to career pathways. Additionally, in 2019, the PA Department of Education and L&I each contributed federal funding to a state initiative called Teacher in the Workplace that drives greater work-based learning and career-ready skills development in schools (including Career and Technical Centers), while fostering self-sustaining local and regional partnerships between educational institutions and businesses.

In addition to statewide efforts, Community Education Councils (CEC) provide a more targeted regional approach to workforce development where there are fewer postsecondary resources. CECs have historically leveraged other state and local funding to implement sector-based training provided through a variety of educational institutions in rural communities where campus locations are non-existent. CECs serve as an intermediary and broker of training programs based on identified need and demand.

The commonwealth will continue to work closely with postsecondary education partners, including all Perkins postsecondary recipients, to leverage federal, state, and local resources, including financial aid programs and veterans' benefits, to enhance access to educational opportunities. These efforts are essential in order to meet Governor Wolf's goal for postsecondary credential attainment, and to work toward the broader strategic vision of "jobs that pay, schools that teach, government that works."

(H) Improving Access to Postsecondary Credentials. Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry recognized certificates, licenses or certifications, and that are portable and stackable.

As discussed in the Strategic section of this plan, the commonwealth has embraced state-local collaboration, cross-sector partnerships, and a focus on barrier remediation to achieve its vision of career pathways to self-supporting, family-sustaining careers. Pennsylvania recognizes the importance of postsecondary credentials as part of such pathways. In 2015, Governor Wolf established the goal that 60% of Pennsylvania residents have some form of postsecondary education by 2025, in order to meet industry demand for skilled workers. In 2016, Pennsylvania's State Board of Education Council on Higher Education passed a Motion to Support this postsecondary attainment goal. To meet this goal, Pennsylvania has aimed to produce nearly 820,000 additional postsecondary credentials between 2017 and 2025.

Pennsylvania employs many strategies to help more residents earn recognized postsecondary credentials, including the following:

- **Fostering early awareness of postsecondary opportunities:** K-12 schools in Pennsylvania integrate the Academic Standards for Career Education and Work (CEW standards) into curriculum, addressing career awareness and preparation, career acquisition, career retention and advancement, and entrepreneurship. Pennsylvania is the only state to include a true K-12 Career Readiness Indicator as part of its federal accountability system under the Every Student Succeeds Act. The Career Standards Benchmark identifies career readiness activities aligned with the CEW standards in all public K-12 schools. This emphasis on career readiness expands younger students' understanding of the career opportunities, and the relevant postsecondary education and training, available to them.
- **Improving access to advanced coursework for all students:** PDE will work to expand the number of students enrolled in at least one advanced rigor course – including Advanced Placement (AP), International Baccalaureate, and dual enrollment courses – each year, and to identify opportunities to improve equitable access to such coursework. Governor Wolf established a goal to increase the number of AP tests given in high schools by 46 percent by 2020.
- **Leveraging networks and resources to guide postsecondary pathways:** Under Pennsylvania's ESSA Consolidated State Plan, local education agencies may use Title IV, Part A, and other federal funds, such as Title I, Part A and Title II, Part A, to support college and career exploration and advising, including hiring school counselors and other support staff to help all students, and especially underrepresented students, have the information and tools they need to gain

awareness of college and career pathways and make informed decisions regarding their postsecondary future. Recognizing the critical role school counselors have on student success, PDE has also partnered with the Pennsylvania Higher Education Assistance Agency, public and private postsecondary institutions, and the Pennsylvania School Counselors Association over the past 18 months to identify opportunities for K-12 school counselors to explore data and connect with resources on postsecondary access and success.

- **Improving awareness of college resources through regional partnerships:** The Pennsylvania Higher Education Assistance Agency (PHEAA) has fourteen Higher Education Access Partners strategically located throughout the commonwealth to provide postsecondary services to students, families, educators, schools, community partners and the public. Services include free financial aid presentations and completion sessions, programs to assist students with planning and preparing for postsecondary education, and professional training for school counselors and advisors. The Pennsylvania College Advising Corps also places recent college graduates as full-time advisors in underserved, rural high school schools across Pennsylvania to increase matriculation rates of their students.
- **Building seamless secondary-postsecondary transitions:** In accordance with the federal Strengthening Career and Technical Education for the 21st Century Act of 2018 (“Perkins V”), Pennsylvania requires postsecondary institutions receiving Perkins funding, including the 14 community colleges, to articulate with secondary schools that offer PDE-approved Career and Technical Education (CTE) Programs of Study. The Students Occupationally and Academically Ready (SOAR) Program allows qualified students enrolled in an approved career and technical Program of Study to receive college credit toward a diploma, certificate or degree in a similar program at a postsecondary institution. The SOAR program serves as a seamless pathway from secondary to postsecondary education and ensures students transition from level to another without delays or duplication of learning. Colleges use an electronic transfer and articulation system provided by the state to indicate the number of credits awarded to each program of study. Students can earn between two and twenty-two college credits for their secondary technical coursework, before high school graduation.
- **Career and technical education as a path to industry-recognized credentials:** All PDE-approved career and technical education (CTE) programs lead to industry recognized credentials. Schools use the PDE [Industry-Recognized Certifications for Career and Technical Education Programs Guide](#) to identify industry-recognized credentials aligned to CTE programs in Pennsylvania’s career clusters.
- **College-level remediation for CTE students:** To ensure career and technical education students are prepared for the rigors of postsecondary education, Pennsylvania College of Technology collaborates with Lycoming Career and Technology Center and East Lycoming School District to assess students’ math skills and provide college-level remediation before the students graduate high school.
- **Recognizing prior learning:** Four of Pennsylvania’s community colleges use a website and e-portfolio platform called College Credit FastTrack to translate prior educational, workforce, and life experiences into college credit and to establish common standards for prior learning assessment within the community college sector. The website guides students through

developing and submitting a portfolio that highlights their prior learning experiences, including transfer credit, military service, workforce training, and badges. A community college faculty member then reviews the portfolio and determines how many credits are awarded. Led by Montgomery County Community College, College Credit FastTrack was made possible by a \$2.5 million Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant from the U.S. Department of Labor.

- **Aligning credentials to career pathways for high priority occupations:** The commonwealth is working to identify and align credentials to career pathways for high priority occupations (HPOs). The commonwealth is also exploring the use of micro-credentials, particularly for individuals with barriers to employment, to allow for the attainment of skills in shorter segments and the receipt of an industry-recognized credential to demonstrate skill competency to potential employers. In addition, students enrolled in PA Department of Education (PDE)-approved career and technical education (CTE) programs can earn digital badges upon achieving a minimum score on the technical assessment, which serve as an indicator of their skills, performance, and achievement.
- **Prioritizing HPOs:** The PA-TIP program, administered by the Pennsylvania Higher Education Assistance Agency (PHEAA), provides need-based awards to students enrolling in certificate programs less than two years in length for high priority occupations (HPOs) in several industry sectors.
- **Facilitating postsecondary credit transfer:** The Pennsylvania School Code was amended shortly before the adoption of this plan, requiring all public institutions of higher education and all public-school districts to provide the Pennsylvania Department of Education with copies of each of the institutions' articulation agreements for inclusion in an electronic database that is web-accessible. The amendment also requires the posting of all agreements that award credit for an industry-recognized credential. The purpose of posting these agreements on the web-accessible electronic database is to increase transparency to students and allow them the ability to better plan their educational career. This will improve student's movement among and between institutions and allow them to graduate more quickly by removing the need to re-take courses.
- **Leveraging state investments in workforce readiness:** The PAsmart initiative promotes the expansion of Registered Apprenticeships and invests in postsecondary education and training in computer science and STEM fields. The Next Generation Sector Partnership program, also supported at the local level through state grants, encourages trainings that result in a postsecondary credential by requiring all proposals to identify credentials/certifications to be obtained and by making credentials a required outcome measure.

In addition to the strategies above, the commonwealth has developed specific initiatives focused on key populations and occupations to improve access to postsecondary credentials. These initiatives stem from the strategic vision to build career pathways to self-supporting, family-sustaining careers through barrier remediation.

- **Supporting student-parents:** The Parent Pathways Model, led by the Pennsylvania Department of Human Services and the Pennsylvania Department of Education, is a multigenerational, whole-family approach to provide wraparound support to low-income, single parents pursuing college or other postsecondary training options. The Governor's FY 19-20 budget made \$2.5 million

available in the initiative's inaugural year to establish community-specific comprehensive models to support access to, and success in, postsecondary education and training for single parents.

- **Creating pathways for aspiring teachers:** Aspire to Educate is a program being piloted in 2019 that will help Pennsylvania attract, recruit, train, and retain a more diverse generation of teachers and school leaders. The pilot partnership among the Pennsylvania Department of Education, the School District of Philadelphia, and several postsecondary institutions in the Philadelphia area establishes three age-based program tiers to engage and support students and adults of color who are interested in becoming a teacher as they progress through secondary and postsecondary education.
- **Making postsecondary education affordable for foster children:** The *Fostering Independence through Education Act* of 2019 guarantees a free postsecondary education to youth and young adults who have been in the foster system at age 16 or beyond, regardless of adoption or "aging out." Effective as of fall 2020, eligible students will receive a waiver for the cost of tuition at any institution of higher education in Pennsylvania, minus any monies provided through federal or state grants.
- **Focusing on residents who have some credits and no degree:** Pennsylvania has become one of six states to join the National Governors Association's Educate for Opportunity project to connect postsecondary education and work. Both the National Governor Association and the Education Commission of the States are working with Strada Education Network on this initiative. Pennsylvania's project focuses on learning more about the population of residents who have attained some postsecondary credits but no postsecondary credential, in order to understand what they need to advance in their careers and to help reconnect them with postsecondary education and obtain a credential where necessary.
- **Supporting TANF and SNAP recipients:** The Keystone Education Yields Success (KEYS) program, funded by the PA Department of Human Services (DHS), provides support and guidance to TANF and SNAP recipients attending Pennsylvania's 14 community colleges. A KEYS student facilitator assists eligible students with identifying career goals, scheduling courses, applying for financial aid, transportation, and child care needs.
- **Supporting rural students:** The Community Education Councils across the commonwealth extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential-bearing training opportunities.
- **Supporting students with disabilities:** The Office of Vocational Rehabilitation (OVR) will continue to analyze labor market demand and model service delivery systems to identify opportunities for industry-recognized certificates that lead to increased and improved employment outcomes for individuals with disabilities.

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

The Department of Community and Economic Development (DCED) is the Commonwealth of Pennsylvania's lead economic development agency. DCED encourages the shared prosperity of all

Pennsylvanians by supporting good stewardship and sustainable development initiatives across the state. Driven by the needs of Pennsylvania's citizens, the agency acts as an advisor and advocate to provide strategic technical assistance, training, and financial resources to help communities and industries flourish. DCED also partners with sister agencies to work together to better integrate community, workforce development and economic development efforts to maximize impact.

DCED continues to promote coordination and collaboration among regional public partners through the Partnerships for Regional Economic Performance (PREP), a network of business assistance partners designed to encourage regional coordination in community and economic development efforts. PREP partners are organized in ten regions across the state, offering one-on-one counseling, specialized workshops, online training, and financial incentives to new business ventures and existing companies looking to expand and grow. The commonwealth continues to use these PREP regions as the WIOA planning regions under WIOA. This has more closely aligned the coordination between economic and workforce development at the regional level.

In 2018, DCED created the Engage! program. Engage! is a statewide, industry-driven initiative featuring a team of experienced professionals in each of the PREP regions who proactively listen to businesses across the state to identify their opportunities and challenges and offer targeted technical assistance and solutions. While a majority of the Engage! coordinators are economic development agencies, the South-Central PA Workforce Investment Board (SCPa Works) is the coordinator for that region. Having SCPa Works as the Engage! coordinator has brought together the economic development and workforce in this region to provide better service to companies and to meet their workforce needs.

PREP partners continue to use Executive Pulse, a cloud-based customer relation management (CRM) software platform, to help manage and coordinate partner outreach with employers. The workforce development system uses a different CRM platform called the Commonwealth Workforce Development System (CWDS). For the first time, users of both these systems, Executive Pulse and CWDS, can now see company notes either group has created for better information sharing and coordination of meeting the needs of businesses. Those using both systems include the Business Services Teams, Office of Vocational Rehabilitation and economic development organizations.

In addition to driving state economic development strategies, DCED is committed to workforce development efforts. Several program guidelines at DCED (PREP, Engage!, WEDnet and Training-to-Career) encourage the partnership of economic development partners with local workforce development boards as a part of workforce development efforts to ensure the needs of a region are being met and to eliminate duplication of efforts.

The department changed the name of the Business Financing deputate to Business Financing and Workforce Development. The Office of Workforce Development Initiatives within this deputate aims to improve the quality and skills of the commonwealth's workforce, helps businesses meet their workforce needs, and provides opportunities for businesses and workers to connect. The office works closely with other sister agencies in promoting internal workforce initiatives as well as collaborating with other agencies to learn about their workforce initiatives to promote them to businesses. The office has a full-time staff member dedicated to workforce development, along with administering workforce grant programs. DCED's to workforce development related grant programs include: Pre-Apprentice and Apprenticeship, Manufacturing PA Training-to-Career, and the Workforce and Economic Development Network (WEDnet).

- **Manufacturing PA Training-to-Career Program (Training-to-Career):** This program is designed to help companies identify and train a skilled workforce while creating a workplace culture that allows the workforce to advance and the company to grow and compete in a competitive, global economy as a complement to existing programs. The projects in this program are short-term work-readiness training programs designed to give those with barriers to employment, the skills necessary to gain entry level employment in the manufacturing industry. The training developers work collaboratively with local manufacturers to identify and teach missing essential skills for entry level applicants for existing or near future open positions. The program also engages youth or those with barriers in awareness to building activities of career opportunities in manufacturing, and or advance capacity for local or regional manufacturers.
- **Pre-Apprentice and Apprenticeship (Apprenticeship):** The Apprenticeship program is a statewide program which offers assistance to registered apprenticeship programs. The program's goal is to increase apprenticeship availability to Pennsylvania employers to assist them with their talent recruitment and development. The grant funds through this program helps to cover the costs of the classroom training (real-time instruction) portion of an apprenticeship as well as books, supplies and small tools that stay with the apprentice throughout their training.
- **Workforce and Economic Development Network of Pennsylvania (WEDnet PA):** WEDnet has been in operation for 20 years and continues to provide qualified companies with funding for essential skills and technical skills training. During the 2018-19 fiscal year, the WEDnet program invested \$7,896,801 in training, assisted 745 companies and trained 30,460 employees.

At a state level, there are several collaborative efforts happening between workforce development and economic development. The Secretary of DCED continues to serve as a member of the PA Workforce Development Board (WDB), ensuring that workforce development strategies align with economic development efforts. DCED served as the lead agency in the development of WIOA Broad Goal 2: Sector Strategies and Employer Engagement (for the 2020 State Plan) and has several staff members, including the DCED Deputy Secretary-Business Financing, as members of the interagency workgroup and the State Board's Sector Strategies and Employer Engagement Committee.

The Pennsylvania Department of Labor and Industry (L&I) with the support from DCED, transitioned from traditional industry partnerships to Next Generation Sector Partnerships. Next Gen partnerships are industry-led, community-supported partnerships that strengthen regional economies and connect people to jobs. To date, over 20 Next Gen partnerships have launched across the commonwealth. Some industries these partnerships represent are Manufacturing; Healthcare; Business Services; and Building and Construction. These partnerships are working on issues such as developing the future pipeline of employees, business to business connections, awareness of opportunities in these industries as well as promoting the region to attract people to come and stay.

Through Executive Order: 2019-02, the Governor created the Keystone Economic Development and Workforce Command Center (Command Center). The Center will address Pennsylvania's workforce challenges by convening a public-private partnership to target public programs and resources to address Pennsylvania's workforce shortage and talent needs, recommend action to reduce or eliminate impediments to employment, and better align Commonwealth resources and private sector needs to position Pennsylvania as the keystone for a skilled workforce and competitive business climate. DCED,

L&I, the Department of State, the AFL-CIO, PA State Chamber and the Team Pennsylvania Foundation are the six co-chairs of the Command Center, along with many other agencies participating as well.

DCED participates in a monthly cross-agency collaboration for workforce development meeting hosted by the Department of Human Services (DHS). At these meetings, agencies discuss how their programming can be more inclusive of the barrier populations served by DHS.

Another workforce collaboration effort between DCED, L&I, the Department of Education and DHS is a proactive approach to developing and growing business/employer relationships; leveraging Pennsylvania agency and department flexibility, expertise, and knowledge to partner with businesses; and ultimately meet industry need no matter where they are in the business cycle.

With so many programs and employer services at the state level, the opportunity to create deeper, long-term relationships with businesses/employers is needed so these opportunities can be realized. Given that more and more agencies at the state level and public partners at the local level are engaging with businesses, BizWorks is a way to keep businesses engaged and informed without overwhelming them.

Having a repository of employer service programs at the commonwealth that address business needs and concerns is at the heart of this initiative. In the spirit of increasing efficiency, eliminating duplications, leveraging resources and encouraging interagency collaboration, agencies have collaborated to create this much-needed resource guide.

The last four years have seen a tremendous growth in collaboration at the state level and the local level when it comes to aligning workforce development and economic development efforts. Through continued interagency workgroups, Pennsylvania positions itself to meet the workforce needs through a variety of resources and efforts.

State Operating Systems and Policies. The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section II Strategic Elements. This includes—

(1) The State operating systems that will support the implementation of the State’s strategies. This must include a description of—

(A) State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case management systems, job banks, etc.).

Pennsylvania has strong operating systems and policies in place to support implementation of the Governor’s Strategic Vision.

Commonwealth Workforce Development System (CWDS) is the Commonwealth’s system of record. All core partners use CWDS to capture, track and monitor WIOA activities. Additionally, Eligible Training Providers use CWDS to post programs and program information as well as to upload performance

information. Individual customers engage CWDS to apply to and save jobs to their personal dashboards and schedule workshops and other activities. Employers use CWDS to post job orders, search for talent and report new hires.

CWDS has been modified to capture WIOA activities in alignment with PIRL reporting.

Recent enhancements to CWDS include and interface with Pennsylvania Department of Economic Development's (PADCED) CRM, ExecutivePulse. This interface allows workforce business service teams (BSTs) to view PADCED's employer information and case notes. Access to this information has led to more collaborative employer engagement and has reduced duplicative services that lead to employer fatigue.

Each partner-user must sign a user agreement and abide by the Commonwealth's security policies.

PA CareerLink® is the public facing facet of CWDS, which has numerous additional features for job seekers to include skills assessments, career exploration tools and videos, Labor Market Information (LMI), interview training, and listings of eligible training providers. Similarly, it provides additional tools and resources for employers.

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

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

The Commonwealth Workforce Development System (CWDS) serves as the primary database and system-of-record for tracking and recording services, activities, and outcomes for workforce development programs funded under Titles I, III, and IV. Activities are recorded by funding stream to identify outcomes for each investment. CWDS allows dual- and multi-program enrollment; customers provide intake information once. The Center for Workforce Information & Analysis uses the data collected through CWDS to generate federal and state performance reports. Although CWDS is the case management system for Labor & Industry workforce development programs, such as TAA and RESEA, the commonwealth uses other case management systems for different agencies' education and workforce development programs.

The PA Department of Education Division of Adult Education (DAE) uses the e-Data v2 web-based system to collect Title II program data for federal and state reporting purposes. e-Data v2 is a real-time data system with a web-based design that allows users and DAE staff access to individual programs' adult education and family literacy data. DAE staff and local program staff also use a corresponding Access template to further analyze program data to improve and expand services to participants. For example, reports in the template identify students who have demonstrated measurable skill gain and may be ready for referral to the local PA CareerLink® site for employment or training. This Access template can be expanded to include additional reports that support implementation of the State's strategies to establish career pathways, increase opportunities for out of school youth and adults with basic skills deficiencies, and engage employers.

Federal Perkins recipients submit data into the Pennsylvania Information Management System (PIMS). Data is collected at the recipient, program, and student level for each of the mandated performance

measures. Data reports are provided on an aggregate level. The entities can pull student level reports. PDE works with CWIA on an annual basis to align Perkins Programs of Study to occupations defined as in demand. The resulting product is a CIP/SOC crosswalk. Federal Perkins recipients also utilize the data produced by CWIA to connect with regional and local employers. Perkins recipients are required to work with the LWDBs to interpret the data and to apply the data to educational program needs of the region. The LWDB also provides assistance to the Perkins recipients in identifying employers they can partner with.

The TANF system of record is the Department of Human Services-Customer Information System (CIS). CIS sends referral information to DHS business partners who then utilize CWDS to enroll DHS recipients in contracted Employment and Training programs. The DHS services and related information entered in CWDS are transferred back to CIS via a nightly batch process. Participants may be dual enrolled in a DHS and an L&I program. Duplication of services is avoided due to the integration of the PA CareerLink® centers and DHS EARN centers and by using specific service codes to identify WIOA funded services.

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

PA CareerLink® customers are universally offered Wagner-Peyser, or labor exchange, services. Coenrollment in Wagner-Peyser (WIOA Title III) and WIOA Title I programs occur regularly and are encouraged; Title I eligibility is assessed and determined at the local level. The Common Measure Program Activity Log in CWDS tracks periods of participation by program for all USDOL-funded workforce development programs. Activities of all programs are tracked in this centralized location, allowing for the creation of reporting and program participation cycles. Participants who are co-enrolled exit for measurement after 90 days have passed since the provision of services from any program in which they were participating.

Relevant state guidance and policies include, but are not limited to:

- Measurable Skill Gains and Youth Placement in Education or Employment data entry guides;
- WIOA Data Element and Acceptable Eligibility Verification guide;
- Guidance for WIOA Title I-B Programs, which aids staff in determining program eligibility and appropriately entering services into CWDS;
- PA CareerLink® System Procedure Manual, which discusses CWDS system use policies, how to enter customer information (both job seeker and employer), how to post jobs, labor exchange services, and other pertinent information;
- Eligible Training Provider Policy, which addresses initial and continued eligibility requirements for the statewide Eligible Training Provider List;
- e-Data v2 Instruction Manual and Glossary, which provides technical guidance for using the eData v2 system; and
- PDE's PIMS Secondary and Postsecondary Instruction Manual, which outlines each data element and reporting requirements.

Pennsylvania's workforce system partners (departments of Aging, Human Services, Education, Corrections, the Office of Vocational Rehabilitation and others) work in concert to execute a multi-agency review process for local and regional workforce system plans. Partners closely coordinate the review of content, contact with local workforce development boards, operational implementation, technical

assistance and compliance requirements tied to local and regional plans.

Continuing this partnership, and new for PY20-24, the state is working to create and deploy multi-agency workforce system policies (e.g. One-Stop Operator and Memorandum of Understanding) that bring partners together to ensure alignment, eliminate overlap and focus efforts on targeted, efficient and effective service provision.

Finally, state agencies are collaborating to create a networking space in those local workforce development areas where partner surveys reveal the need for strengthening relationships, as well as need for understanding what each partner's contributions to the local workforce service delivery system.

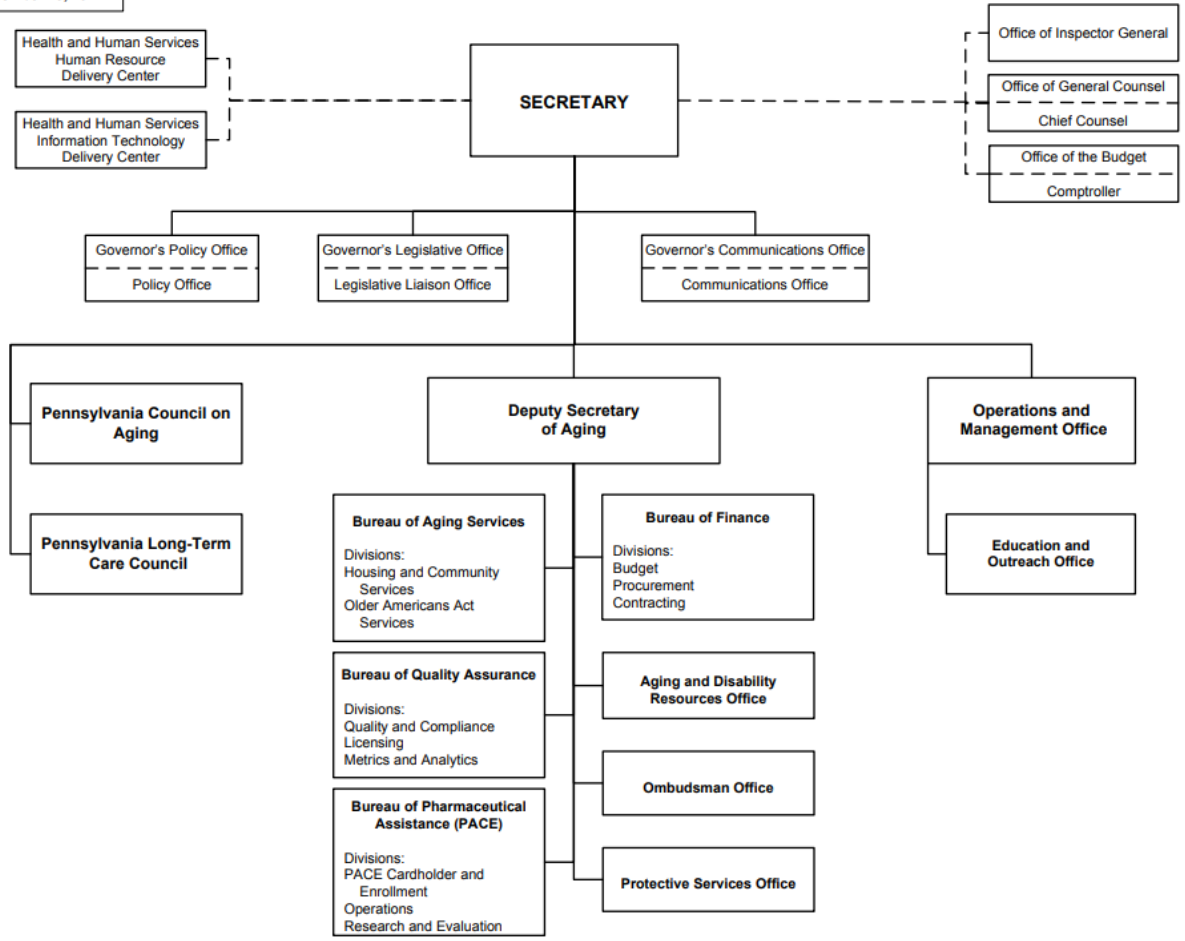
(3) State Program and State Board Overview.

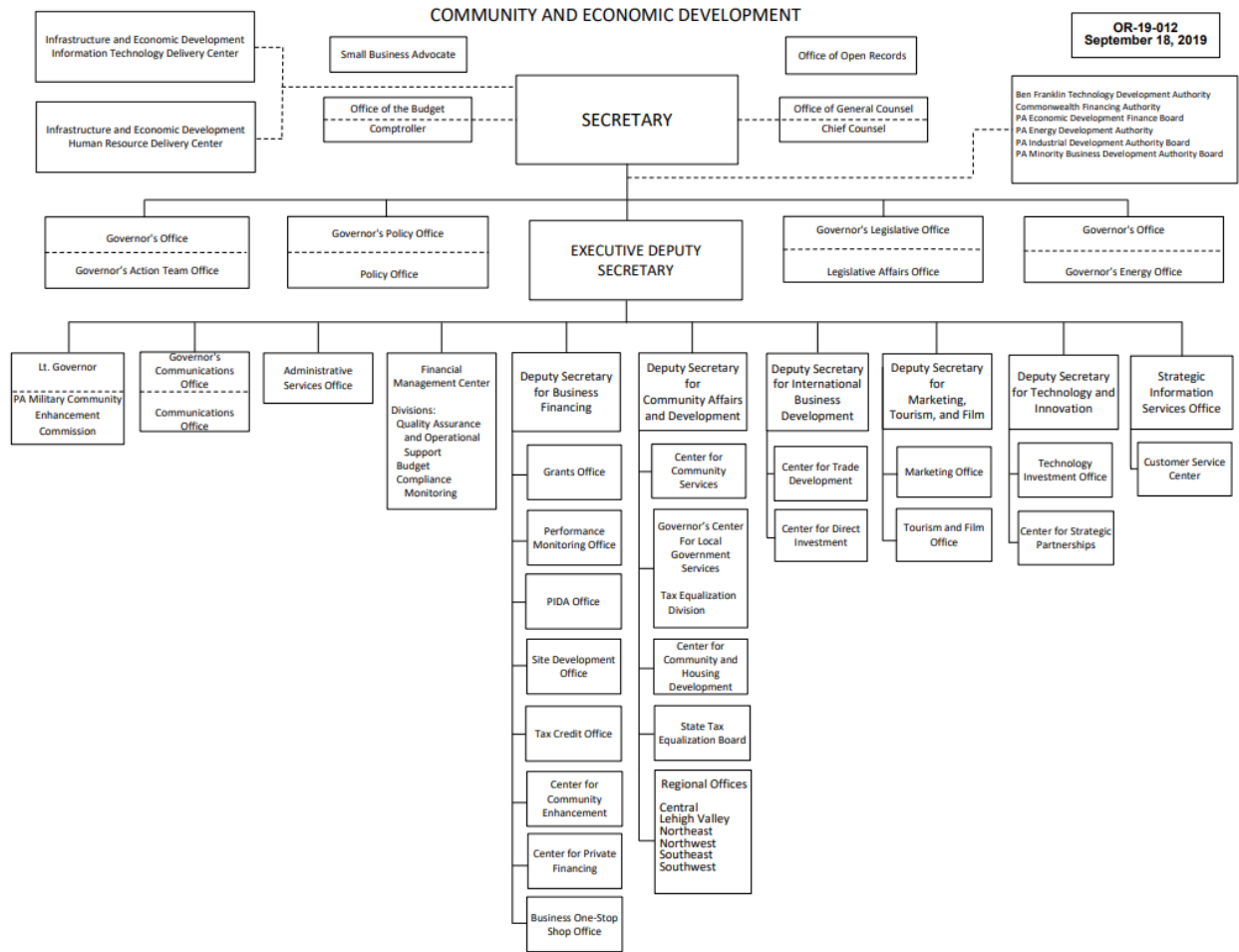
(A) State Agency Organization. Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

The operation of the workforce development system is a shared responsibility among the commonwealth, LWDBs, state and local elected officials, the core WIOA partner programs, other partner programs and PA CareerLink® operators. Five of the six core programs are administered by the PA Department of Labor & Industry (L&I) with the PA Department of Education (PDE) administering Adult Basic Education. Additional partner programs are housed within L&I, PDE, and the Departments of Aging, Corrections, Community & Economic Development, and Human Services. Organizational charts for each of these agencies are provided below.

OR-17-008
December 19, 2017

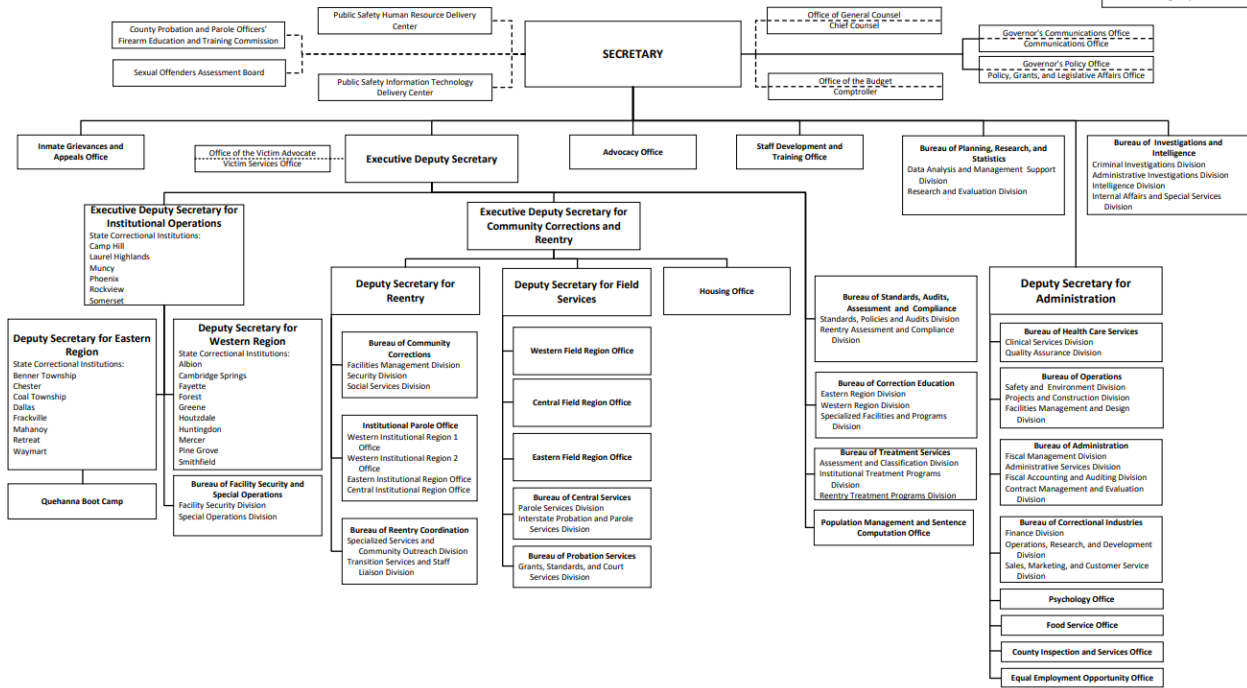
DEPARTMENT OF AGING





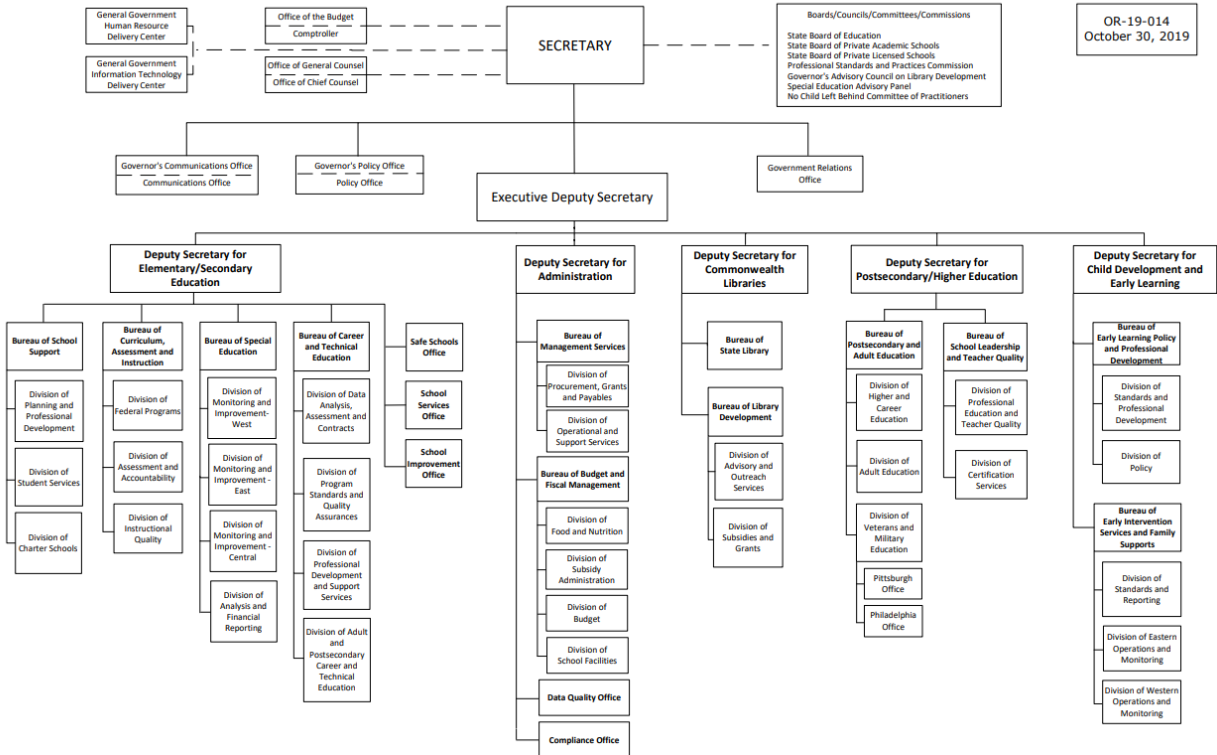
PENNSYLVANIA DEPARTMENT OF CORRECTIONS

OR-19-001
February 5, 2019



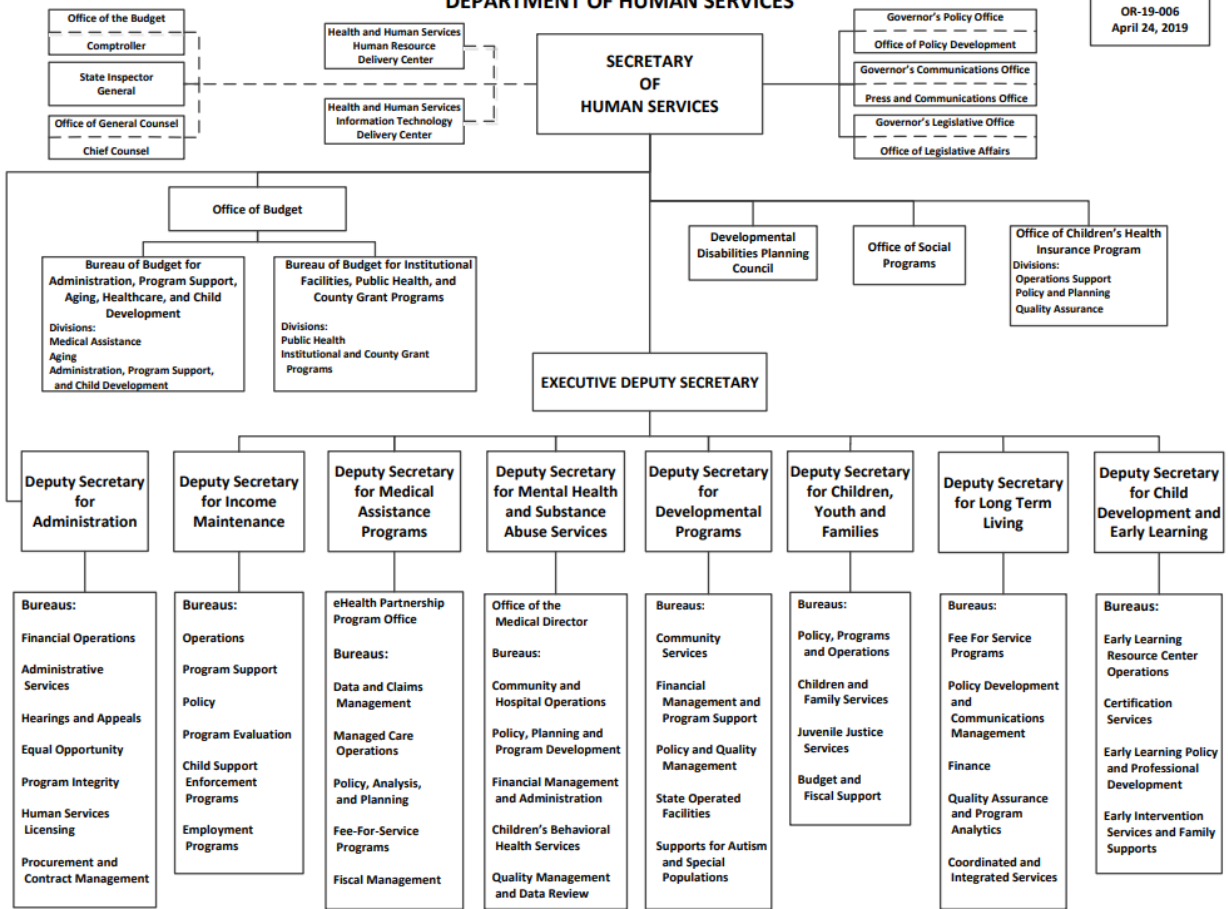
DEPARTMENT OF EDUCATION

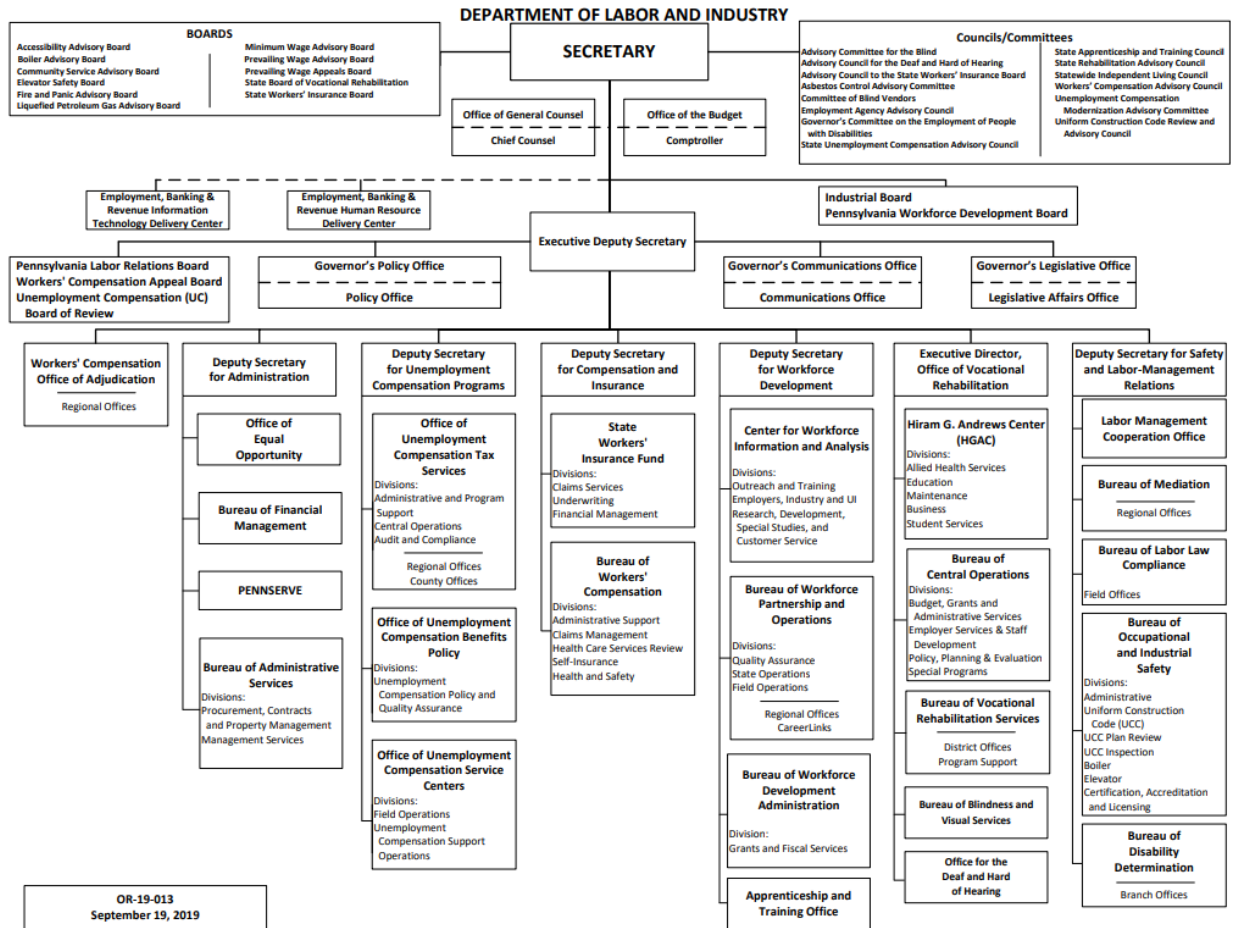
OR-19-014
October 30, 2019



DEPARTMENT OF HUMAN SERVICES

OR-19-006
April 24, 2019





(B) State Board. Provide a description of the State Board, including Content is provided in the following sections.

(i) Membership Roster. Provide a membership roster for the State Board, including members' organizational affiliations.

Pennsylvania Workforce Development Board Members

Name	Title	Organization	Membership Category
Jeff Brown, Chair	President and CEO	Brown's Super Stores	Business
Tom Wolf	Governor	Commonwealth of Pennsylvania	Governor
Idayat Adewunmi	President	Timi Pharmaceuticals	Business
Joseph J. Alex	President	Alex Color Company	Business
Denise Andahazy	VP and Chief HR Officer	CSS Industries	Business
Shannon Austin	Executive Director	Office of Vocational Rehabilitation	Lead State Official
Camera Bartolotta	Senator	Pennsylvania Senate	General Assembly
Tim Bean	CFO	Control Chief Corporation	Business
Georgia Berner	President and CEO	Berner International	Business
Julene Campion	VP HR Talent Management	Geisinger Health System	Business
Morgan Cephas	Representative	PA House of Representatives	General Assembly

Dennis Davin	Secretary	PA Department of Community & Economic	State Agency Official
Wendie DiMatteo-Holsinger	CEO	ASK Foods Inc.	Business
Patrick Eiding	President	AFL-CIO Philadelphia Council	Labor/CBO/Youth/Ed
Diane Ellis-Marseglia	Commissioner	Bucks County	Chief Local Elected Official
Chekemma Fulmore-Townsend	President and CEO	Philadelphia Youth Network, Inc.	Labor/CBO/Youth/Ed
Brian Funkhouser	President and CEO	Buchart Horn Inc./BASCO Associates	Business
Nick Gilson	Founder and CEO	Gilson Brands	Business
Christopher Hackett	President and CEO	i2M	Business
James Harper, Jr.	Business Manager	Laborers Local 413	Labor/CBO/Youth/Ed
Brad Hollabaugh	Secretary	Hollabaugh Bros., Inc.	Business
Sarah Hollister	Vice President-Youth Development and Gateway Programs	Formerly with JEVS Human Services	Labor/CBO/Youth/Ed
Timothy James	Tech Lead/Manager	Google	Business
Peter Klein	Director	Steamfitters Local 420	Labor/CBO/Youth/Ed
Marguerite Kline	HR Manager	Berks Heim Nursing & Rehabilitation	Business
Carrie Lenze	Global Continuous Improvement Director	Morgan Advanced Materials	Business
Ryan Mackenzie	Representative	PA House of Representatives	General Assembly
Bob McAuliffe	Director	United Steel Workers District 10	Labor/CBO/Youth/Ed
Teresa Miller	Secretary	PA Department of Human Services	State Agency Official
Henry Nicholas	President	AFSCME Hospital and Health Care Employees	Labor/CBO/Youth/Ed
Jerry Oleksiak	Secretary	PA Department of Labor & Industry	Lead State Official
Jodi Pace	HR Business Partner	AFP Advanced Food Products LLC	Business
Michael Pipe	Commissioner	Centre County	Chief Local Elected Official
Russell Redding	Secretary	PA Department of Agriculture	State Agency Official
Gregg Riefenstahl	Talent Acquisitions Manager	Penske	Business
Pedro Rivera	Secretary	PA Department of Education	Lead State Official
JoAnne Ryan	President and CEO	Alpha Sintered Metals	Business
Robert Scaer	Chairman and CEO	Gannett Fleming	Business
Frank Sirianni	President	PA State Building Trades Council	Labor/CBO/Youth/Ed
Meg Snead	Secretary of Policy and Planning	Office of Governor Tom Wolf	State Agency Official
John "Ski" Sygielski	President	Harrisburg Area Community College	Labor/CBO/Youth/Ed
Robert Torres	Secretary	PA Department of Aging	State Agency Official
Jessica Trybus	Founder and Chief Games	Simcoach Games	Business
Dionne Wallace-Oakley	SVP-Human Resources	Erie Insurance	Business
Yvette Watts	CEO	Watts Facility Solutions	Business
John Wetzel	Secretary	PA Department of Corrections	State Agency Official
Lindsey Williams	Senator	PA Senate	General Assembly
Matt Yarnell	President	SEIU Healthcare PA	Labor/CBO/Youth/Ed

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

Members are given a thorough orientation of their roles and responsibilities, including Governor’s Wolf’s Strategic Vision for the workforce development system in the commonwealth. The Board meets quarterly to conduct business, including the deliberation and approval of recommendations developed by the Board’s committees. As of the enacting of this plan the Board will have five standing committees focusing on the Governor’s goals, including (1) Career Pathways and Apprenticeship, (2) Industry Partnerships and Employer Engagement, (3) Youth, (4) Continuous Improvement, and (5) One-Stop Operation. Additionally, the Board has two ad-hoc committees; Healthcare and Reentry.

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

(A) Assessment of Core Programs. Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

The commonwealth will at a minimum produce the six common performance measures described in Section 116(b) on a quarterly basis for each of the core programs under Titles I, III, and IV. Outcomes will be compared to negotiated levels of performance for each measure. Participant-specific reports that provide the pool of people included in the six common performance measure(s) for Titles I, III, and IV will be compiled in conjunction with these quarterly reports and distributed to LWDBs in support of program management and analysis. Assessment of effectiveness measures are also being developed to allow the state and LWDBs to make better informed decisions about programming and the use of funds. The commonwealth will be developing additional performance measures to the degree they provide meaningful and actionable information and data can feasibly be collected. The PA Workforce Development Board has established a standing committee to review recommendations for Performance and Accountability standards and measures.

The commonwealth will negotiate performance levels for core programs under Title I with LWDBs and local programs based on the state negotiated levels. PA Department of Education (PDE) will establish agency performance outcome measures and targets for local programs. The agency performance measures will encompass those outcomes on which adult education and literacy activities have the greatest and most direct impact: educational functioning level gain, attainment of a high school equivalency credential, and transition to postsecondary education or training. In addition, the division will establish targets for employment in the second quarter after exit and median earnings in the second quarter after exit. In addition, Title II programs will be required to report on the number of outcomes per enrolled student. All core programs will be monitored on a regular basis to ensure progress toward meeting or exceeding state and local WIOA negotiated performance levels.

To better ensure local and regional workforce development areas are aligned with the WIOA combined state plan, Pennsylvania has offset the local and regional planning cycle by one-year. For example, local and regional areas are at the time of this document's submission – using the WIOA Combined State Plan to make informed decisions about their PY 20221-2024 plans and subsequent modification. Doing so ensures local and regional alignment with statewide strategy, and the local and regional contextualization of performance standards.

(B) Assessment of One-Stop Partner Programs. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

The PA CareerLink® operator plays an instrumental role in assessing all one-stop partner programs. Beyond traditional program-specific performance metrics, the operator will consider how well all the one-stop partner programs coordinate and integrate service delivery, promote the seamless transition of customers from one partner to another, and demonstrate the capacity to meet the needs of customers accessing the PA CareerLink® system. Program-specific performance is addressed in the response to the effectiveness of programs in the preceding two-year period question that follows.

(C) Previous Assessment Results. Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

The commonwealth has produced the six common performance measures described in Section 116(b) on a quarterly basis for each of the core programs under Title I, III, and IV. Staff in these programs have compared the outcomes to the negotiated performance levels for each of the measures and adjusted as necessary to develop a solid baseline for each of the measure. Quarterly reports were also distributed to LWDBs in support of program management and analysis. Solid collaboration between the state and the LWDBs revealed both opportunities to improve service delivery, while at the same time, ensuring a primary focus of serving those customers with the greatest barriers to employment. A solid system of sharing promising practices among the local delivery system is also evolving.

PA CareerLink® operators continually evaluate how well the partners coordinated and integrated service delivery, promote the seamless transition of customers from one partner to another, and demonstrate the capacity to meet the needs of customers. These operators assess the programs within their purview and are continually looking for opportunities to improve their local service delivery systems for maximum customer satisfaction.

PDE Division of Adult Education established agency performance outcome measures and targets for local Title II programs, which are designed to support Pennsylvania's attainment of its negotiated performance levels. The agency performance measures encompass those outcomes on which adult education and literacy activities have the greatest and most direct impact: educational functioning level gain, attainment of a high school equivalency credential, and transition to postsecondary education or training. In addition, the division established targets for employment in the second quarter after exit and median earnings in the second quarter after exit. Final agency performance outcomes are posted on the division's website. Over the course of the preceding two-year period, employment outcomes improved for participants in adult basic education programs. At the same time, their measurable skill gains as defined by WIOA stagnated. The lack of improvement in measurable skills gains is tied, in part, to participants exiting Title II programming before they can be assessed for educational gains using standardized assessment approved for reporting purposes. To increase intensity of instruction and accelerate learning gains, the Division of Adult Education established a formal distance learning policy

beginning in PY 2018-19 and funded a Distance Education Technical Assistance (DETA) Project to support Title II programs in implementing blended models of instruction. The Division and DETA Project staff review resources for approval on an ongoing basis, and the distance learning policy was expanded during PY 2019-20 to add additional distance learning models.

The Division of Adult Education conducted ongoing informal and formal monitoring, assessment, and evaluation of local programs through desk monitoring. Regional advisors kept track of agency progress toward the agency performance outcome measures and other key markers of performance, such as contracted enrollment, appropriate assessment, employment outcomes and student persistence, using a range of tools. When data showed areas for concern, advisors contacted the local program administrators to discuss the concerns and provide guidance and technical assistance. After the end of the program year, advisors contacted each agency individually to discuss its performance, focusing on areas in which the program has shown progress and areas in which it must improve.

(D) Evaluation. Describe how the State will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

Pennsylvania is developing a five-year evaluation plan to look at the overall workforce service delivery system through a system of periodic assessments aimed at both the overall statewide system and the local service delivery system. Appraisals of the local system are already underway through a contract with *Jobs for the Future* looking at various aspects of a local workforce delivery area. When this first review is complete, it will serve as a replicable process for future reviews of the other workforce development areas in PA.

Additionally, the commonwealth is assessing specific areas within the one-stop system. For example, Pennsylvania's Office of Vocational Rehabilitation, or OVR, will conduct accessibility reviews of all of Pennsylvania's one-stop centers. After the review of each site, OVR will provide a report outlining non-legal best practices on compliance requirements of the American with Disabilities Act Accessibility Guidelines (ADAAG) standards, and a set of recommendations and resources to address any accessibility requirements.

(5) Distribution of Funds for Core Programs. Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

*(A) For Title I programs, provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—
(i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),*

Allocation of WIOA Adult and Youth Funds to Local Areas:

The three-part formula for allocating WIOA Adult and Youth funds to Local Areas is as follows:

Step 1

The process begins by determining the average number of individuals in the civilian labor force and unemployed for the most recent twelve-month reference period of July 1st through June 30th, by Local Area.

Once these numbers are calculated, the areas of substantial unemployment (ASU) are identified. By definition, an ASU is a contiguous area with a population of at least 10,000 individuals and an unemployment rate of at least 6.5 percent.

For Local Areas that have unemployment of 6.5 percent or greater, the civilian labor force and unemployment data is inserted directly into the allocation formula. For Local Areas that have unemployment less than 6.5 percent, an ASU search is performed. For reference, the ASU search process, as described below, is completed through a joint working venture between L&I's Center for Workforce Information and Analysis (CWIA) and the Bureau of Workforce Development Administration (BWDA).

An ASU search is a procedure developed by the federal Bureau of Labor Statistics to identify ASUs. County-level unemployment data, along with either Census tract or municipal level unemployment data from the most recent Census, is used to determine the current unemployment rates for cities, townships, or Census tracts. Through this procedure, which can utilize a subtraction or addition method, cities, townships, or Census tracts that border each other are joined together until the definition of an ASU is achieved. A Local Area can have more than one ASU within their geographic border, if the building method is used.

Once the ASU(s) is designated, the civilian labor force and unemployed totals for each Local Area's ASU are then inserted into the computer-based allocation formula.

Step 2

The first third of funds is allocated on the basis of the number of unemployed in ASUs compared to the statewide total of such individuals (as determined in Step 1). The percentage share of funds is determined by dividing the number of unemployed in each Local Area with unemployment of 6.5 percent or greater, by the statewide total of unemployed in areas with unemployment of 6.5 percent or greater. The resulting percentage is then multiplied by one-third of the State's local area portion of the allocation.

Step 3

The next third of funds is allocated on the basis of the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in each Local Area compared to the total number of such individuals in the State. As required by WIOA the "higher of" either the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the Local Area; or the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in the Local Area is calculated.

The excess number of unemployed over 4.5 percent of the civilian labor force is then totaled for the State. This statewide total is then divided into the number of excess unemployed in each Local Area to determine each Local Area's percentage share of funds. This percentage is then multiplied by one-third of the State's local area portion of the allocation.

Step 4

The final third of funds is allocated based on the number of economically disadvantaged individuals in each Local Area compared to the statewide total of such individuals. The number of economically disadvantaged individuals is derived from the most recent federal Census. Economically disadvantaged youth (age 16-21) and economically disadvantaged adults (age 22-72) are used for each respective funding stream.

Using federal Census data, the percentage share is determined by dividing the number of economically disadvantaged for each Local Area by the statewide economically disadvantaged total. The resulting percentage for each Local Area is then multiplied by the final one-third of funds. The amount of funds for each third of the formula is then totaled for each Local Area.

Step 5

Note that prior to the minimum allocation percentage, commonly known as "hold-harmless" provision, being applied, the total amount determined in the prior steps would be each Local Area's allocation. Briefly, the hold-harmless provision ensures that a Local Area will not be allocated funds that are less than 90 percent of their average allocation percentage for the prior two years. Utilization of this authority, combined with WIOA's requirement that a hold-harmless percentage be applied, means that Local Area's allocations will continue to include the critical hold-harmless provision. The utilization of the hold-harmless provision will stabilize Local Area funding and minimize service disruptions.

The next step is then to apply the hold-harmless provision to the allocations. This is done by first combining each Local Area's allocation, excluding transfers, restorations, or unexpended funds, for the previous two years. The Local Area's two-year combined allocation is then divided by the statewide two-year combined allocation to determine the relative share percentage of funds that each Local Area received for the two reference years.

Ninety percent of the relative share percentage is then calculated to establish the minimum percentage share that each Local Area must receive in the formula allocation process.

Step 6

Using the base allocations determined in steps 2, 3 and 4, each Local Area's percentage share of funds is calculated by dividing each Local Area's allocation amount by the statewide total.

Step 7

This step calculates the minimum dollar amount of funds each Local Area is to receive based on the hold-harmless provision. This is determined by multiplying the 90 percent relative share percentage determined in Step 5, by the State's local area portion of the allocation. The resulting figure establishes the minimum amount of funds that each Local Area will receive under the formula allocation process.

Step 8

Local Areas with a relative share percentage that is less than the 90 percent minimum hold-harmless percentage are identified by comparing the percentage share determined in Step 6, to the 90 percent minimum hold-harmless percentage determined in Step 5.

The funds needed to bring the Local Areas with percentages below the mandated minimum into compliance comes from the Local Areas who have a percentage share of funds which is above the mandated minimum percentage. Funds are subtracted, on a prorated basis, from the Local Areas that exceed the minimum percentage to bring the other Local Areas that are below the minimum percentage into compliance with the hold-harmless provision.

The Local Area allocations and relative share percentages are then recalculated to determine whether each Local Area received the 90 percent minimum allocation percentage.

This step is repeated as many times as is necessary to comply with the minimum allocation percentage provision within 2 decimal points. Compliance with this provision completes the formula allocation process.

Additionally, Temporary Assistance for Needy Families (TANF) Youth Development Funding (YDF) is allocated to LWDAs by the PA Department of Labor & Industry (L&I). L&I currently utilizes TANF caseload numbers (broken down by county), provided each year by the PA Department of Human Services (DHS), to determine the percentage of TANF YDF that will be distributed to each local area.

(iii) Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

The following factors will be utilized when allocating Dislocated Worker funds to Local Areas:

FACTOR	DATA SOURCE	PERCENTAGE WEIGHT
Insured Unemployed	Continued Unemployment Compensation Claims	10%
Unemployment Concentrations	Number of Unemployed Over 4.5%	20%
Plant Closing and Mass Layoff	# of Workers affected by WARN notices (CWDS).	15%
Declining Industries	Employment in Industries Projected to Lose 10% of Employment Between 2012-2022	10%
Farmer-Rancher Economic Hardship	Employment Levels in the Agriculture Industry based upon American Community Survey (US Census Bureau)	5%

Long-Term Unemployment	Number of Claimants Exhausting Unemployment Compensation Benefits	17%
Dislocated Worker [State added factor]	Estimated Number of Dislocated Workers	23%

The data used to calculate the Dislocated Worker Local Area allocations is provided by the L&I's Center for Workforce Information and Analysis (CWIA).

County-level data for the most recent 12-month program year is entered into the computerized formula. In order to provide a balanced distribution of funds, one-half of the funds are allocated on a relative share percentage basis and one-half on a proportional basis. Specifically, the insured unemployment, unemployment concentrations, and plant closings and mass lay-off factors are calculated on a relative share percentage basis. For example, the number of insured unemployed for the Local Area is divided by the statewide number of insured unemployed to determine the relative share percentage for that factor. Conversely, the declining industries, farmer rancher, long-term unemployment, and Dislocated Worker factors are calculated on a proportional percentage basis of each Local Area's civilian labor force. For example, the number of Dislocated Workers for the Local Area is divided by the civilian labor force for that Local Area to determine the percentage of Dislocated Workers in proportion to that area's civilian labor force.

Using the Local Area data, the computerized formula calculates the Local Area's relative or proportional percentage share for each factor. For the relative factors, the percentage share for each Local Area is first multiplied by the percentage weight assigned to each factor and then by the local area portion of the state's Dislocated Worker allocation figure to determine the dollar amount for each relative factor. For the proportional factors, the percentage share for each Local Area is totaled. The resulting percentage is then divided into each Local Area's proportional percentage share and then multiplied by the percentage weight assigned to each factor and then the statewide allocation to determine the Local Area dollar amount for each factor. The Local Area's allocation amount for each factor is then added together to determine the Local Area's total Dislocated Worker allocation.

Note that prior to the minimum allocation percentage, commonly known as "hold-harmless" provision, being applied, the total amount determined in the prior steps would be each Local Area's allocation.

The hold-harmless provision ensures that a Local Area will not be allocated funds that are less than 90 percent of their average allocation percentage for the prior two years. Utilization of this authority, combined with WIOA's requirement that a hold-harmless percentage be applied, means that Local Area's allocations will continue to include the critical hold-harmless provision. The utilization of the hold-harmless provision will stabilize Local Area funding and minimize service disruptions.

The next step is then to apply the hold-harmless provision to the allocations. This is done by first combining each Local Area's allocation, excluding transfers, restorations, or unexpended funds, for the previous two years. The Local Area's two-year combined allocation is then divided by the statewide two-

year combined allocation to determine the relative share percentage of funds that each Local Area received for the two reference years.

Ninety percent of the relative share percentage is then calculated to establish the minimum percentage share that each Local Area must receive in the formula allocation process.

Using the base allocations, each Local Area's percentage share of funds is calculated by dividing each Local Area's allocation amount by the statewide total. This step calculates the minimum dollar amount of funds each Local Area is to receive based on the hold-harmless provision. This is determined by multiplying the 90 percent relative share percentage by the State's local area portion of the allocation. The resulting figure establishes the minimum amount of funds that each Local Area will receive under the formula allocation process. Local Areas with a relative share percentage that is less than the 90 percent minimum hold-harmless percentage are identified by comparing the percentage share to the 90 percent minimum hold-harmless percentage previously determined. The funds needed to bring the Local Areas with percentages below the mandated minimum into compliance comes from the Local Areas who have a percentage share of funds which is above the mandated minimum percentage. Funds are subtracted, on a prorated basis, from the Local Areas that exceed the minimum percentage to bring the other Local Areas that are below the minimum percentage into compliance with the hold-harmless provision. The Local Area allocations and relative share percentages are then recalculated to determine whether each Local Area received the 90 percent minimum allocation percentage. This process is repeated as many times as is necessary to comply with the minimum allocation percentage provision within 2 decimal points. Compliance with this provision completes the formula allocation process.

(B) For Title II:

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

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

Section 231 Adult Basic Education Direct Service grants that were awarded through PDE's first competition under WIOA are in effect through June 30, 2022. The PDE Division of Adult Education will conduct a full and open competition for the next multi-year grant cycle for Title II Section 231 funds in early 2022 for grants to be awarded July 1, 2022. State adult education direct service funds will be competed through the same process.

For the competition, PDE will use a needs-based funding formula to allocate funds to the local workforce development areas. The formula includes six data sets weighted equally: 1) the number of individuals age 18 and over who are not enrolled in school and who do not have a high school diploma; 2) the number of individuals age 16 and over who are in the labor force and are unemployed; 3) the number of individuals age 18 and over with less than a ninth grade education; 4) the number of people below poverty level; 5) the number of OJT openings per year; and 6) the land area in square miles of the local workforce areas. In local areas comprised of multiple counties, PDE will further break out funding by county to ensure services are available throughout the area.

Section 243 Integrated English Literacy and Civics Education (IELCE) grants are competed separately. Section 243 IELCE grants that were awarded through PDE's first competition under WIOA end June 30, 2020. PDE Division of Adult Education will hold a full and open competition in early 2020 for the next IELCE grant cycle, which will be July 1, 2020 to June 30, 2023. Funds will not be allocated to specific areas. Rather, applicants will need to provide evidence of the need and support for the proposed IELCE program. As with the section 231 grants, grants funds will be awarded through annual funding notifications contingent on the availability of federal funds. Each year's grant amount and conditions will be based on the following criteria: contract compliance, including success in meeting contracted enrollment and providing the contracted services; evidence of sufficient progress in meeting the state-imposed targets for the agency performance outcome measures; evidence of continuous program improvement; compliance with fiscal and programmatic policies and guidelines; and the amount of the federal award.

As part of the grant application process, all applicants will be required to submit evidence of demonstrated effectiveness in order for the application to be reviewed and considered for funding. To demonstrate effectiveness, applicants that have been funded under Title II AEFLA, as amended by WIOA, and/or state matching funds through PDE Division of Adult Education in the three program years immediately preceding the competition will be required to provide performance data under WIOA section 116 from those years. Applicants who were not previously funded by the Division of Adult Education under Title II AEFLA, as amended by WIOA will be required to provide performance data that show their past effectiveness in serving basic skills deficient eligible individuals, including evidence of success in achieving outcomes in comparable measures. For both groups, these measures include effectiveness in helping students develop their academic skills in reading, writing, mathematics, and English language acquisition, achieve high school equivalency, and transition into employment and/or postsecondary education/training. The content of the section 231 and 243 grant applications will address the seven requirements and thirteen considerations identified in the Act. Eligible providers will be required to demonstrate clear alignment of proposed activities and services to the strategies and goals of the local workforce development plans for the areas to be served.

Through a standardized process developed by PDE Division of Adult Education, local workforce development boards will review applications for alignment with the local plan. Eligible providers will submit their applications to PDE Division of Adult Education through the eGrants system. Once the review of applicant eligibility is completed, the division will distribute the eligible applications to the appropriate local workforce boards for review. The division will establish a timeline for the review process and provide a review/scoring rubric to all local boards, which will include a section in which local boards can provide recommendations to improve alignment of proposed Title II services with the local plans. PDE will take the recommendations and results of the review into consideration when making decisions regarding grant awards and conditions.

PDE has policies, procedures, and guidelines in place to ensure that all eligible providers have direct and equal access to apply and compete for funds. The notice of availability of funds is first published through the Pennsylvania Bulletin, the commonwealth's official gazette for information and rulemaking. Once the notice is published, all grant information is posted to the PDE website, which is accessible to the public. Policies established by PDE's Communications Office ensure the accessibility of all grant-related documents that are posted to the website. PDE will conduct the grant competition through its eGrants system. Through this system all eligible providers have access to the same grant application for each project being competed.

In accordance with PDE grant guidelines, grant applications will be evaluated by teams of at least three individuals. Team members will include staff from the Division of Adult Education, other PDE staff, other qualified commonwealth staff, and, as needed, peer reviewers, subject matter experts, and/or consultants. Division staff will create a scoring rubric for each grant type, which will address all items in the grant application. Review team members will be trained prior to beginning evaluation and scoring of applications. Once the applications have been reviewed and scored, they will be ranked from highest to lowest scoring. PDE will award grants to the highest scoring applicant in each of the local workforce development areas and will continue to award funds until the amount allocated to the area under the needs-based formula is reached or until all applications for service in the local area with a sufficient score have been funded. PDE Division of Adult Education will consider the results of the local board reviews with recommendations during the awarding process.

(C) Vocational Rehabilitation Program: In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

PA Department of Labor & Industry Office of Vocational Rehabilitation (OVR) is a combined agency and consists of the Bureau of Vocational Rehabilitation Services (BVRS) and Bureau of Blindness and Visual Services (BBVS). Funds are distributed based on historical spending patterns of specific regions covered by offices. OVR also maintains a reserve fund in case offices experience an increase in demand for services and funds are redistributed as necessary so that no one single office ever runs out of funds if other offices have remaining funds.

(6) Program Data

(A) Data Alignment and Integration. Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

(i) Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.

The Commonwealth has executed an historic multi-agency data sharing agreement that allows flexibility in the exchange of data necessary for, among other uses, federal reporting, performance metrics tracking and enhanced service to shared customers.

The Pennsylvania Departments of Labor and Industry and Community and Economic Development have created an interface between their systems to allow the sharing of business services data. Business service representatives from each agency have access to their counterpart's business engagement history and case notes to reduce employer/business fatigue, eliminate duplication of efforts, and work collaboratively when possible to better serve our business customer.

The Commonwealth is currently researching feasibility and will design and implement technology that allows automated (Robotic Processing Automation (RPA)) communication between agency systems. This technology will allow citizens to access information and have frequently asked questions answered from multiple agencies in a single session and will allow agencies to glean and disseminate information essential to providing comprehensive services to our shared customers. Initially, this technology will bridge workforce and unemployment compensation and will eventually connect other agencies in order to better serve individuals.

(ii) Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.

Last year, the Commonwealth conducted various surveys, interviews and evaluations designed to elicit information to inform process improvement efforts. One such evaluation around human-centered design painted our customers' experience as splintered, siloed, confusing and in some instances, disconnected. Since then, the Commonwealth has prioritized using technology to streamline intake and service delivery. The Commonwealth will create a digital common intake "form" that will be used among core and non-core partners. The Commonwealth is exploring other uses of technology to eliminate the need for customers to re-enter or repeat personal information that is essential to determine program eligibility across multiple partners and agencies.

The Pennsylvania Departments of Human Services and Labor and Industry are working together to modify our system of record, Commonwealth Workforce Development System (CWDS) to allow a single view of our shared customer. The Office of Vocational Rehabilitation is participating in this project to understand how they might also share information, within the constraints of federal regulations, that will assist their customers in receiving the most comprehensive services.

The Commonwealth is committed to using technology to create an easily-accessible, streamlined workforce delivery system.

(iii) Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals.

The Pennsylvania Workforce Development board is focused on developing policy recommendations to assist the governor in aligning technology and data systems across one-stop partner programs. Over the past year, the Continuous Improvement Committee of the WDB has been developing a dashboard displaying all relevant data on Pennsylvania's Industry Partnerships. Industry Partnerships are one of the primary mechanisms for Sector Strategies in the Commonwealth. Additionally, the committee developed a recommendation that was approved by the WDB related to data transparency.

Over the coming year, the WDB is researching best practices to develop recommendations related to credentialing guidance, barrier identification, career pathways system development, reentry services, and services to opportunity youth. The WDB will continue to explore all workforce development operations system wide to identify where improvements can be made and inefficiencies can be eliminated.

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

The Commonwealth Workforce Development System (CWDS) serves as the primary database and system-of-record for tracking and recording services, activities, and outcomes for workforce development programs funded under Titles I, III, and IV, in accordance with WIOA section 116. In addition, the CWDS is designed to integrate the recording of services for Titles I and III to ensure the tracking and reporting of common program participation cycles. Title II uses the e-Data v2 web-based system to collect program data for federal and state reporting purposes.

Staff from the Center for Workforce Information & Analysis are responsible for coordinating production of the reports for Titles I and III, while staff from the Office of Vocational Rehabilitation ensure the production of reports for Title IV. This work is accomplished by establishing detailed mapping of how system data aligns with the PIRL and RSA-911 data element definitions. Staff from the Office of Information Technology utilize this mapping to create the Participant Individual Record Layout (PIRL) and the RSA-911. Wage and employment outcomes are added from a data match the unemployment compensation wage records. Currently, over 90 percent of all PIRL and RSA-911 elements are being reported.

All of the data elements required for reporting under Section 116 for Title II are collected through PDE's eData system. Local adult education programs must use the division-created intake form to collect student data to ensure all data elements are collected completely and accurately. In addition, local programs report on expenditures for career services, training services, and contributions to one-stop infrastructure costs in annual final expenditure reports. Division of Adult Education staff work with a contractor to analyze the data and produce the required aggregate statistical reports following the guidance in the NRS Technical Assistance (TA) Guide. PDE does data matching with L&I for employment outcomes and co-enrollment numbers. Under its contracts with the National Student Clearinghouse and DiplomaSender, PDE is able to conduct data matching to identify participants who have enrolled in postsecondary education or training and those who have earned a Commonwealth Secondary School Diploma, Pennsylvania's high school equivalency credential. In addition to the statistical reports, PDE,

Division of Adult Education submits an annual narrative report as required by USDOE, Office of Career, Technical, and Adult Education. All required reports have been submitted on time and have been approved with little or no correction necessary.

Annually, PDE, Division of Adult Education establishes agency performance outcome measures and targets for local programs, which are designed to support Pennsylvania's attainment of its negotiated performance levels. The agency performance measures encompass those outcomes on which adult education and literacy activities have the greatest and most direct impact: educational functioning level gain, attainment of a high school equivalency credential, and transition to postsecondary education or training. In addition, the division establish targets for employment in the second quarter after exit and median earnings in the second quarter after exit. Final agency performance outcomes are posted on the division's website.

(B) Assessment of Participants' Post-Program Success. Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The commonwealth currently has a data system, PADataShare, which incorporates all PA Department of Labor & Industry (L&I) workforce program data, Unemployment Compensation (UC) wage record data, and TANF and SNAP participant data from the PA Department of Human Services. The proposed plan is to incorporate Adult and Basic Literacy Education and Office of Vocational Rehabilitation data as well. In addition, the PA Department of Education (PDE) is working to integrate its current pre-k through grade 12 statewide longitudinal student level data into PADataShare and develop more robust postsecondary data. This will enable the production of performance metrics via one data platform with reporting and analysis capabilities.

PADataShare has the potential to longitudinally track workforce development system participants as they enter and complete postsecondary education, but the system currently lacks postsecondary education data at an individual level. Discussions have been ongoing to try to bring postsecondary education data into the system while protecting the confidentiality of personally identifiable information. In the interim, programs will continue to track postsecondary program enrollment and completion through manual processes.

(C) Use of Unemployment Insurance (UI) Wage Record Data. Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

Pennsylvania will continue to use Unemployment Insurance (UI) Wage Record Data for performance accountability and evaluations under WIOA. Pennsylvania will match WIOA participants covered under the common measures to UI wage record data in accordance with the timeframes and participant cohorts

outlined in the common measures guidelines. In addition, UI wage records are routinely used for general labor market analysis and labor market information that informs policy in the commonwealth. UI wage record data are also utilized to conduct studies on postsecondary education graduates as well as other populations upon request. Past studies include outcomes related to specific training programs within the WIOA system, and future studies will include an analysis of UI exhaustees. Pennsylvania will continue to use UI Wage record data in accordance with all applicable Federal and State laws.

(D) Privacy Safeguards. Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

CWDS is a role-based system with specific permissions granted depending on an individual's role; confidential information is protected within the system. Access to CWDS by commonwealth employees and staff of partner organizations requires the completion of a *CWDS User Agreement and Access* form. The agreement outlines the policy for the disclosure of confidential data and information maintained in CWDS. The form authorizes staff access to the integrated database system and its information, which is processed, stored in, maintained on, and transmitted through CWDS for the commonwealth.

(7) Priority of Service for Veterans. Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

Veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under a qualified job training program. Priority of Service establishes that veterans and eligible spouses are entitled to precedence over non-covered persons for services. A veteran or an eligible spouse either receives access to a service earlier in time than a non-covered person or, if the resource is limited, the veteran or eligible spouse receives access to the service instead of or before the non-covered person. The term "veteran" means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable. Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of "active service" does not include full-time duty performed strictly for training purposes."

"Eligible spouse" as defined at section 2(a) of the JVA (38 U.S.C. 4215[a]) means the spouse of any of the following:

- a. Any veteran who died of a service-connected disability;
- b. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:

- i. Missing in action;
 - ii. Captured in line of duty by a hostile force; or
 - iii. Forcibly detained or interned in line of duty by a foreign government or power;
- c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- d. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

The application of priority of service varies by program depending on the eligibility requirements of the program. Qualified job training programs include universal access programs and programs that require prospective participants to meet specified eligibility criteria. To qualify for eligibility-based programs, veterans must meet the criteria for that program before their veteran's Priority of Service can be applied.

When a customer appears for PA CareerLink® services, the receptionist determines if the customer is a veteran and eligible for priority of service. If the customer self-discloses veteran status, the veteran is assessed for eligibility to receive specialized Jobs for Veterans State Grant (JVSG) funded staff services. This assessment allows the veteran customer to disclose whether he/she possesses significant barriers to employment, including lacking a high school diploma, transitional service member, or otherwise qualifies to receive intensive case management services from a Disabled Veterans Outreach Program (DVOP) Specialist, if present.

Upon determining that a veteran qualifies for intensive case management services from a DVOP Specialist based upon self-disclosed veteran status and the completed intake assessment, a referral to the DVOP Specialist can then be made, if available. If the DVOP Specialist cannot see the veteran immediately, the receptionist gives the veteran the choice of making an appointment with the DVOP Specialist or exercising priority of service.

If the veteran exercises the latter (i.e., will go to the front of the line for assistance and case management services). If a PA CareerLink® office does not have a DVOP Specialist, then priority of service automatically occurs and the veteran will see the next available PA CareerLink® staff member.

Upon meeting the veteran for the first time, the DVOP Specialist or PA CareerLink® staff member will ensure that the veteran's CWDS record contains the appropriate veteran service code and that the veteran is otherwise eligible for DVOP Specialist services. Thereafter, the DVOP Specialist will provide the necessary intensive case management services to assist with removing those barriers that inhibit full employment.

Priority of service also comes into play with respect to eligible veterans who seek to enter workforce programs such as On-the-Job Training or Occupational Skills training via an Individual Training Account. In these instances, the veteran receives the next available training slot. Additionally, qualified veterans receive priority of service for open job postings and job development opportunities with hiring employers. When employers conduct candidate searches, PA CareerLink® Online places a United States flag adjacent to a veteran's name.

(8) Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities. Describe how the one-stop delivery system (including one-stop center operators and the onestop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

The commonwealth's Draft Non-Discrimination Plan, or NDP, provides written assurance that the state complies with all non-discrimination and equal opportunity requirements provided for in federal and state law and regulations. The NDP describes the actions and policies the state takes to ensure compliance. L&I's Office of Equal Opportunity, or OEO, is responsible for implementing and monitoring compliance with non-discrimination and equal opportunity provisions of WIOA, the Americans with Disabilities Act, or ADA, and other relevant laws and regulations.

The commonwealth's [Workforce Delivery System PA CareerLink® Certification and Continuous Improvement Policy, WSP 121-05](#) outlines criteria for certification and re-certification of its PA CareerLink® offices including physical and programmatic accessibility. Additionally, L&I's Office of Vocational Rehabilitation, or OVR, assists OEO with the evaluation of each PA CareerLink® site annually to ensure compliance with ADA standards and 29 CFR 38.51. OVR offers OEO the expertise of Business Service staff to evaluate the physical accessibility and information technology accessibility of these sites to ensure Pennsylvanians with a disability can fully avail themselves of PA CareerLink® services.

PA CareerLink® centers will be physically and programmatically accessible to all customers, including individuals with disabilities. The commonwealth mandates that all PA CareerLink® service locations provide reasonable accommodations, reasonable modifications, architectural accessibility, programmatic accessibility, and website accessibility for individuals with disabilities. Each office is equipped with assistive technologies and accessibility features; staff members are trained on the maintenance and operation of available assistive technology devices.

PA CareerLink® centers use principles of universal design and human-centered design, such as flexibility in space usage; the use of pictorial, written, verbal, and tactile modes to present information for customers with disabilities or limited English proficiency; providing clear lines of sight to information for seated or standing users; providing necessary accommodations and providing adequate space for the use of assistive devices or personal assistants.

To support service to individuals with limited English proficiency, PA CareerLink® Online can be used in English or Spanish and uses translation services to allow the site to be viewed in multiple languages. Based on local need, PA CareerLink® offices may employ bilingual staff to assist customers.

PA CareerLink® Online offers a variety of resources and information on services available to individuals with disabilities including: information on training opportunities and links to online training; technology guides for using screen enlargement software, screen reading software, Windows Accessibility features and the Text Telephone or Teletypewriter for the Deaf; information on the ADA and accessibility; alternate format handbooks; links to service providers and resources to assist persons with disabilities in removing barriers to employment; and links to information for employers interested in hiring a person with a disability including tax benefits, the ADA and accommodations.

Program partner staff and other individuals assigned to PA CareerLink® service locations receive training on disability awareness, sensitivity and etiquette, outreach for employers and guidance concerning Social Security and related topics. To further promote programmatic accessibility, OVR developed a comprehensive disability awareness and etiquette training that is delivered across the commonwealth to interested PA CareerLink® partners and businesses. OVR has also made available to all commonwealth employees an “Introduction to OVR” training to inform staff about the services OVR can offer to individuals with disabilities.

The PA Department of Education’s Division of Adult Education requires all WIOA Title II programs to be ADA compliant and mandates that programs have reasonable materials available for students to use to accommodate learning differences. The Division of Adult Education supports various professional development activities on providing services to address learning differences.

(9) Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners. Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

The One-Stop Delivery System in Pennsylvania (PA CareerLink®) provides an array of employment and educational services to customers. To ensure that English Language Learners (ELLs) have access to services, all PA CareerLink® offices are equipped with Language Line capabilities as a “baseline” to ensure that communication between program experts and customers can occur seamlessly. Language line services provides interpreters to the customer/staff members (either by phone or in person) that allows access to services for ELLs. There is also a partnership with Unemployment Insurance partners to have interpreters in offices where there is a high concentration of ELLs that can facilitate dialogue between the customer and the call centers.

For individualized services, the PA CareerLink® has bilingual case managers in offices with a high concentration of Spanish-speaking customers (case managers use language line for other languages during case management). This allows for the intake process and eligibility of programs under WIOA to be explained clearly to customers who need reemployment services. Further, the Commonwealth Workforce Development System (CWDS) is also available in Spanish to facilitate the information available for training

programs, job orders, job fairs, and workshops. Hence, ELL customers have access to reemployment services online and physical access points. The Operator also works with the PA CareerLink® Administrator and partner leadership to review on a yearly basis local policy on cultural diversity and accessibility of services for all barrier populations.

Section IV – COORDINATION WITH COMBINED STATE PLAN PROGRAMS

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

Representatives from each of the core programs assisted in writing the Combined State Plan.

The PA WDB held five listening sessions across the Commonwealth on the development of the WIOA Combined State Plan to gather input from stakeholders across the system. Additionally, each of the board's four standing committees (Youth, Career Pathways & Apprenticeship, Employer Engagement and Sector Strategies, and Continuous Improvement) has focused on goal development related to the Plan.

Pennsylvania has also been convening an interagency workgroup, on a monthly basis, composed of all Commonwealth agencies with workforce development-related initiatives. This includes all core partners in the Pennsylvania Departments of Labor & Industry and Education, which administer Titles I, II, III, and IV. Additional partners participated across the Pennsylvania Departments of Aging, Agriculture, Corrections, Community & Economic Development, Human Services, State, Military & Veteran's Affairs, and Conservation & Natural Resources. The WDB facilitated this process, in coordination with the Governor's Office. The Pennsylvania Department of Health will join the workgroup moving forward.

All state partners, including the full WDB, had the opportunity to review and comment on the draft Plan prior to it being posted for public comment, to ensure the Plan serves the needs of the populations served by each program area and aligns with the state's workforce development initiatives.

Section V – COMMON ASSURANCES (for all core programs)

The Unified or Combined State Plan must include assurances that:

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;

- [PA Management Directive 205.9 Code of Conduct Statement of Financial Interest Filing](#)
- [PA Management Directive 205.10 Ethics Act Financial Disclosures](#)
- [Bylaws of the Pennsylvania Workforce Development Board](#)
- [Local Governance Policy 02-2015](#)

2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;

- [Pennsylvania Sunshine Act](#)
- [PA Management Directive 250.1, Advertisement of Public Meetings](#)
- [PA Management Directive 205.36, Right to Know Law](#)
- [PA Management Directive 205.26 The Americans with Disabilities Act of 1990, Title II, Subtitle A, Nondiscrimination in State and Local Government Services](#)
- [Local Governance Policy 02-2015](#)

3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;

Assurance(s) or Attachment(s): Yes

4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public;

Assurance(s) or Attachment(s): Yes

4. (b) *The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;*

Assurance(s) or Attachment(s): Yes

5. *The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;*

Financial Management Policy

6. *The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);*

Financial Management Policy

7. *The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;*

- [PA Management Directive 205.26 The Americans with Disabilities Act of 1990, Title II, Subtitle A, Nondiscrimination in State and Local Government Services](#)
- [PA Management Directive 215.12 Provisions Concerning the Americans with Disabilities Act](#)
- [PA Management Directive 410.10 Amended - Guidelines for Investigating and Resolving Internal Discrimination Complaints](#)
- [PA Management Directive 410.11 - Commonwealth's Equal Employment, Outreach, and Employment Counseling Program](#)
- [IT Accessibility Statement](#)

8. *The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;*

Financial Management Policy

9. *The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;*

Financial Management Policy

10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);

Local Workforce Delivery System - PA CareerLink® Certification and Continuous Improvement

11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and

Each PA CareerLink® site possesses a local customer flow policy that identifies those veterans who may be referred to the DVOP Specialist. PA CareerLink® staff members and partners who provide services to PA CareerLink® customers only refer veterans with significant barriers to employment, veterans age 18 to 24, and transitioning service members in need of intensive services to DVOP Specialists. Veterans' Program Letter Nos. 03-14, 04-14, 08-14.

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

Workforce System Policy 05-2015, Priority of Service

Section VI – PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

General Requirements

(1) Regions and Local Workforce Development Areas

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

Local Workforce Development Areas

LWDA Number	LWDA Name	Counties
SW005	Allegheny County*	Allegheny
SE015	Berks County	Berks
SE020	Bucks County	Bucks
CE175	Central	Centre, Clinton, Columbia, Lycoming, Mifflin, Montour, Northumberland, Snyder and Union
SE030	Chester	Chester
SE035	Delaware	Delaware
NE055	Lackawanna	Lackawanna
SE060	Lancaster	Lancaster
LV070	Lehigh Valley	Lehigh and Northampton
NE075	Luzerne-Schuylkill Counties	Luzerne and Schuylkill
SE080	Montgomery	Montgomery
NC125	North Central	Cameron, Clearfield, Elk, Jefferson, McKean and Potter
NT130	Northern Tier	Bradford, Susquehanna, Sullivan, Tioga and Wyoming
NW170	Northwest	Clarion, Crawford, Erie, Forest, Venango and Warren
SE090	Philadelphia	Philadelphia
NE135	Pocono Counties	Carbon, Monroe, Pike and Wayne
SC180	South Central	Adams, Cumberland, Dauphin, Franklin, Juniata, Lebanon, Perry and York
SA100	Southern Alleghenies	Bedford, Blair, Cambria, Fulton, Huntingdon and Somerset
SW165	Southwest Corner	Beaver, Greene and Washington

SW095	City of Pittsburgh*	City of Pittsburgh (within Allegheny County)
SW110	Tri County	Armstrong, Butler and Indiana
NW145	West Central	Lawrence and Mercer
SW045	Westmoreland-Fayette	Fayette and Westmoreland

* Three Rivers Workforce Development Board oversees the Allegheny County and City of Pittsburgh workforce development areas.

Designated Planning Regions

Designated Number	Region Name	Local Workforce Development Area Members
1	Central	Central
2	Lehigh Valley	Lehigh Valley
3	North Central	North Central
4	Northeast	Lackawanna County, Luzerne-Schuylkill Counties and Pocono Counties
5	Northern Tier	Northern Tier
6	Northwest	Northwest and West Central
7	South Central	Lancaster County and South Central
8	Southeast	Berks County, Bucks County, Delaware County, Montgomery County and Philadelphia County
9	Southern Alleghenies	Southern Alleghenies
10	Southwest	Allegheny County, City of Pittsburgh, Southwest Corner, Tri County and Westmoreland-Fayette

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

Pennsylvania issued a revised Workforce System Guidance 02-2014 on June 30, 2015, providing initial designation to Pennsylvania’s 23 local workforce investment areas that existed under WIA. The guidance requires Chief Elected Official(s), in collaboration with local workforce development boards and other workforce system stakeholders, to evaluate their Local Areas on a series of factors to include:

- Natural labor market areas;
- Regional economic development areas;
- Existence of education and training providers, such as institutions of higher education and career and technical education schools;
- Service delivery and resources available toward the provision of services;
- Benefits of multiple resources within areas that are based on labor markets and natural travel patterns of local residents;
- Capacity and access to public/private transportation resources;

- Education leaders, business leaders, government officials, stakeholder buy-in;
- Availability of Federal and non-federal resources necessary to effectively administer workforce investment activities and other provisions of the WIOA to include resources beyond the 10 percent allowed for administrative expenditures allotted to Local Areas;
- Strategies to provide enhanced quality services to employers and individuals; and
- Local capacity to manage funds, provide oversight of programs, and provide for the proper stewardship of public funds.

The Chief Elected Official(s) and local workforce development board chairs were required to submit a formal letter to the Department by March 1, 2016 describing the evaluation process and addressing each of the factors above. The review was intended to serve as the basis for a local workforce development area either seeking continued designation in its current form or seeking designation as part of a newly proposed workforce development area. A newly proposed workforce development area had to include more than one unit of local government. A request for new area designation had to address the factors listed above and the impact on the workforce development area from which it was withdrawing (if applicable). The request was required to be signed by all Chief Elected Official(s) within the new local workforce development area. Final approval of newly requested workforce development areas rests with the governor. The governor reserves the right to make additional changes regarding local area designation.

The local area is determined to have performed successfully if it has met or exceeded locally negotiated levels of performance and has not failed any individual measure for the last two consecutive program years before the enactment of WIOA for initial designation and in the first two years of enactment for subsequent designation. The terms “met or exceeded” and “failed” are defined as consistent with how those terms were defined at the time the performance levels were negotiated.

The local area is determined to have sustained fiscal integrity if, within the last two (2) consecutive years preceding the determination of fiscal integrity, a formal determination has not been made that either the grant recipient or administrative entity of the local area inappropriately expended funds due to willful disregard of the requirements of the provisions involved, gross negligence, or failure to comply with accepted standards of administration.

The commonwealth is drafting a local area designation appeals process that will be published in policy on the Pennsylvania Department of Labor & Industry website. This policy will be written, reviewed, published for public comment with any necessary revisions completed before the close of business Dec. 4, 2020.

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

Pennsylvania’s [Workforce System Guidance \(WSG\) No. 02-2014](#) Process and Timeline for Designation of Pennsylvania’s Local Workforce Development Area – Initial Implementation of the Workforce Innovation and Opportunity Act of 2014 provides technical assistance to chief elected officials and other local workforce system stakeholders in the transition from local workforce investment areas under the Workforce Investment Act of 1998 to local workforce development areas in compliance with Workforce Innovation and Opportunity Act of 2014 requirements. During the transition, all areas and board

structures were retained, and the commonwealth found no administrative need to create an appeals process, as none were either anticipated or materialized.

The commonwealth is drafting a local area designation appeals process that will be published in policy on the Pennsylvania Department of Labor & Industry website. This policy will be written, reviewed, published for public comment with any necessary revisions completed before the close of business Dec. 4, 2020.

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

The commonwealth's policy regarding the local Memorandum of Understanding, or MOU, is currently under revision in preparation for the renewal of most of Pennsylvania's LWDB MOUs for Program Year 2020.

The commonwealth is drafting an infrastructure funding agreement appeals process that will be published in policy on the Pennsylvania Department of Labor & Industry website. This policy will be written, reviewed, published for public comment with any necessary revisions completed before the close of business Dec. 4, 2020. The commonwealth understands the importance of this policy and will prioritize its completion with the goal of completing prior to December.

(2) Statewide Activities

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

Pennsylvania issued Workforce Investment Information Notices (WIINs) and workforce policies that provided guidance for the workforce system from the time the Workforce Investment Act of 1998 (WIA) was enacted up until the time it was replaced by WIOA. Such notices and policies administered direction to the commonwealth's 23 Local Boards as well as other statewide and local workforce system stakeholders.

Upon the enactment of WIOA, the commonwealth established seven workgroups composed of various stakeholders throughout the commonwealth to provide recommendations to the PA Department of Labor & Industry (L&I) and inform key elements of the State Plan, as well as future policies and guidance. Pending fully complete federal guidance, the commonwealth has had an obligation to issue interim guidance to maintain federal compliance, which may change due to additional guidance from the federal government.

That guidance included, but was not limited to [the policy and guidance published on the department's website](#). Pennsylvania intends to update this policy by December 4, 2020.

Finally, the department did not develop a policy regarding the 2015 version of the Trade Act but does follow [U.S. DOL Training Employment Guidance Letter \(TEGL\) No. 5-15](#), dated September 4, 2015.

(B) Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.

Governor's set-aside funds will generally be used to promote Governor Wolf's vision of Jobs that Pay, Schools that Teach, and Government that Works with more specific emphasis on the five goals for the workforce development system articulated in the Strategic Vision portion of the State Plan.

The commonwealth uses a portion of Governor's set-aside funds to support the Apprenticeship and Training Office (ATO) with the goal of promoting and growing registered apprenticeship and pre-apprenticeship programs across the state. The ATO is described in greater detail in the response to how the state will incorporate registered apprenticeships into its strategies and services.

The commonwealth intends to use set-aside funds to provide discretionary grants to LWDBs to support programs and activities that better serve targeted groups of individuals within the workforce development system. The funds are also used to provide expanded services for employers.

Lastly, a portion of set aside funds will be used to accomplish the objectives laid out in sections 682.200 and 682.210 of the WIOA final rule including but not limited to carrying out monitoring and oversight activities, conducting evaluations, providing technical assistance to state entities and agencies, providing staff training for local areas, operating a fiscal and management accountability information system, providing incentive grants to local areas for performance, implementing innovative programs and strategies designed to meet the needs of all employers, implementing programs to increase the number of individuals training for non-traditional employment, and disseminating labor market information.

Leveraging the State's allocation formula for distribution of funds to core programs, WIOA Title I formula funds provide the foundation for serving dislocated worker populations. Local boards may also seek Rapid Response additional assistance funds to serve targeted populations, general dislocated worker populations, Trade/WIOA co-enrollment and layoff aversion strategies to include Incumbent worker strategies. Statewide and/or regional initiatives are also acceptable uses of rapid response funds and must reflect a multi-LWDB initiative.

Rapid Response coordinates layoff aversion and outplacement services for employers and workers affected by layoffs, plant closures, or natural disasters. It is not always event-driven; it is a pro-active approach to planning for and managing economic transitions. At its best, Rapid Response assist employers with their layoffs by coordinating outplacement services prior to layoff, while supporting the business by working with other state and local stakeholders who can then assist in job expansion. Rapid Response is an introduction to the workforce and economic development systems and helps workers and employers

navigate the Commonwealth's system of user-friendly resources and information to help transition workers into reemployment and assist businesses.

The primary objective of Rapid Response is to provide workers with the resources and services necessary to allow them to find new jobs or get the training and education needed for new careers so they can return to work quickly.

Rapid Response Services (RRS) also helps communities develop proactive and coordinated strategies to access Pennsylvania's economic development systems that help businesses at risk of closing to keep their doors open.

The PA Department of Labor & Industry (L&I) Deputy Secretary for Workforce Development is responsible for executive oversight of Pennsylvania's RRS activity under WIOA. The Rapid Response/Trade Coordination Services Unit within the Bureau of Workforce Partnership & Operations is responsible for the policy development and implementation of the state's Rapid Response program.

The commonwealth uses a regional approach to deliver rapid response assistance. There are L&I Rapid Response Coordinators assigned to geographic areas covering one or more LWDA's. Rapid Response Coordinators work closely with PA CareerLink® staff as well as the local board or Chief Elected Official(s), and local and state economic development agencies, as appropriate. They meet with the LWDB staff periodically to share information and to discuss major dislocation events. RRS provides information and access to a comprehensive menu of available services and resources to avert or reduce the effect of plant closings and mass layoffs to businesses, communities and individuals.

Early intervention services provided through RRS offer workers affected by downsizing the best chance to reenter the workforce as quickly as possible. Since inception, RRS has become nationally recognized, often cited by the U.S. Department of Labor as a model for service delivery.

RRS, in concert with partners operating as a single business services team (BST) provides strategic planning that helps area employers become more globally competitive and connect with area economic development and educational institutions to meet their workforce needs. RRS is the state's lead unit delivering a business-focused approach, working with employers to coordinate layoff aversion activities in coordination with the Strategic Early Warning Network (SEWN) and other economic development stakeholders working with the affected employer and supply chain companies, as applicable.

L&I, through a competitive process, contracted with the Steel Valley Authority to design and manage SEWN, which provides layoff aversion services to help businesses, particularly in the manufacturing sector, remain competitive and keep workers employed. SEWN and RRS obtain referrals to struggling companies through a variety of sources, including workforce development professionals, LWDBs, financial institutions, company customers, suppliers or vendors, industrial resources centers, local and state economic development agencies, unions, or affected workers themselves. Within 48 hours of receiving a referral, SEWN staff and/or RRS will contact the company and attempt to establish a meeting and plant tour. SEWN staff has expertise in several areas of business turnaround and layoff aversion, including: financial restructuring; buyouts; succession planning and ownership transition; labor-management relations; high-performance workplace strategies; operations; and cost management.

Rapid response activities are triggered when L&I learns of a planned closure or layoff, either by receiving a notice as required under the Worker Adjustment and Retraining Notification (WARN) Act, through the media, or by information provided by community and business leaders. Services may also be offered when Pennsylvania experiences mass job dislocation as the result of a natural disaster. There is no charge to the employer or employee for these services, and they are provided regardless of the reason for the layoff or closing; however, employer participation is vital to the services success

RRS initiates a fact-finding meeting to plan for coordination of services within 48 hours of receipt of notice. Contact is made with the employer and any union to develop a preliminary service strategy. Rapid Response information meetings are held either at the workplace or at a convenient site to provide workers with a wide range of information about benefits and services that are critical for a successful transition to new employment or training for a high-priority occupation. When possible, information meetings are held prior to the layoff date and on company time. Information is typically provided on the following topics:

- Unemployment insurance;
- Transition teams;
- Outplacement services;
- Health and pension benefits;
- Job-search activities;
- Education services;
- Training programs;
- Trade Adjustment Assistance;
- Social services programs;
- Community and economic development activities;
- Emergency assistance; and
- Crisis counseling

Working in close partnership with CWIA, along with PA CareerLink® and LWDBs, RRS developed an outplacement curriculum delivered to affected workers that uses comprehensive, customizable workshops and a proven “Surviving a Layoff” publication. The customized workshops include information about the realities of job loss, job-search strategies, local Labor Market Information (LMI), using social media as a job-search and networking tool, resume development, job-search resources, household budgeting, and job-interviewing tips.

Crucial to the program’s success is the ability of RRS to gather and synthesize real-time LMI and conduct needs-profiling of Dislocated Workers accomplished through surveys distributed, completed, and collected at RRS informational meetings with affected employees. By understanding the local, regional, and in some cases statewide cause and effect related to a dislocation event, along with the way these circumstances directly affect individual workers, RRS has become an essential component in the commonwealth’s layoff-aversion and reemployment network. The sharing of this information between the workforce development and economic development agencies will enhance the state’s ability to be proactive with services and provide earlier intervention with our employers.

RRS realizes its full potential for employers when it is managed as a business service during the entire business lifecycle. The commonwealth will continue to invest rapid response dollars to fund a layoff-aversion system targeting small- and medium-sized manufacturing firms. RRS staff sit on local PA

CareerLink® and regional economic development BSTs to help employers with turnaround and to market Dislocated Workers to employers, enhancing the value of business services provided by the workforce and economic development systems. RRS staff, as well as the regional SEWN representatives, will also receive technical training to effectively market the Shared-Work Program operated by the Office of Unemployment Compensation Benefits & Services as a component of layoff-aversion strategy.

RRS staff will maintain a comprehensive set of partnerships to provide customers the services, resources, and benefits they are eligible for and need. To complement the current network of partnerships, RRS staff will continue outreach efforts to other entities such as local chapters of the Society for Human Resource Management, manufacturing associations, state and local economic development entities, chambers of commerce, Next Generation Sector Partnerships and sector-based associations and business groups. Central labor councils and area labor federations increasing awareness of Rapid Response Services as a business-cycle service linking workforce and economic development.

Rapid Response Additional Assistance (RRAA) funding will be directed to serve LWDA's when local funding balances are insufficient to ensure a continuum of services for Dislocated Workers. Funds may be provided to LWDA's that experience increased numbers of unemployed individual's due to natural disasters, plant closings, mass layoffs, or other events for provision of direct services to participants.

Through the fact-finding process, RRS staff gather information from the employer related to the layoff/closure. At times, the information shared by the employer reveals that the loss of business is due to foreign trade impacts. When such information is shared, the RRS staff informs the employer, employees, and union (if applicable) to apply for Trade Act benefits. RRS works with any entity (employer, union, workers) willing to file a Trade petition with the U.S. DOL. RRS provides the technical assistance to complete the Trade petition application and file it with the U.S. DOL accordingly.

The fact-finding information gathered is shared with all partners in the LWDA to ensure that planning for such dislocation occurs in a timely manner. It also provides the opportunity for RRS staff to recommend that LWDA's request additional RR funds to ensure that services can be provided for the Dislocated Workers (DW). When a company has applied for Trade benefits, the additional RR funds can be used to provide "on-site" DW services prior to the company closure. RR and LWDA staff develop a comprehensive plan with the company and union, if applicable, to provide workers with services such as PA CareerLink® registration and access to various workshops related to topics such as healthcare, retirement, training opportunities in the workforce area, and soft skills to re-enter the workforce.

Funds can also be provided to develop customized pre-employment/training services. Local partnerships with community colleges and organizations will help with development and planning of basic computer skills training and pre-GED/basic skills workshops. Planning these services in advance enables the DW to obtain or refresh skills that are needed for the current job market. It may also serve as a platform for more in depth training.

The additional funds will also be used to re-enforce the partnerships established with local employers in the respective workforce area. The RRS staff, with the collaboration of LWDA partners, can opt to arrange various job-fairs for the Trade affected Dislocated Workers. Companies in the workforce area may benefit in filling current open positions and/or take the opportunity to engage in on-the-job-training for workers with transferable skills.

Ultimately, RRS have substantial benefits for the impacted employees, employers and community at large. RRS helps Dislocated Workers turn the challenge of a layoff into an opportunity by providing information about, and access to, the following services:

- Unemployment compensation;
- Career counseling, resume preparation and job-search assistance;
- Education and training opportunities, including Trade Adjustment Assistance;
- Locally available supportive services;
- Referrals and information about English as a second language or Limited English Proficiency classes;
- Referrals and information about Adult Basic Education and high school equivalency preparation classes;
- Referrals and information about services available through the Office of Vocational Rehabilitation;
- Dislocated Worker transition teams;
- Surviving a layoff, resume preparation, and interviewing skills workshops;
- Information about the local labor market;
- Information about retirement-plan benefits, Social Security and health-insurance options; and
- Services exclusively for veterans and adults with disabilities.

When employers contact RRS, they can expect:

- A quick response to transition planning needs;
- Confidentiality concerning business decisions;
- Help throughout their entire business cycle;
- Help understanding government regulations;
- Information about alternatives that may reduce or avoid layoffs;
- For small- to medium-sized businesses, referral to agencies that can help in re-structuring to avoid layoffs or closing the business; and
- Higher productivity and worker morale and lower absenteeism during the layoff event due to reduced stress.

Lastly, community involvement forms the basis for some of the most dynamic and effective transition services available. The benefits of RRS to the community include:

- Working with elected officials at the state and local levels;
- Helping to save the local tax base by keeping workers employed;
- Lessening adverse economic effects on other businesses within the community;
- Responding to job and business loss when a natural disaster occurs;
- Coordinating available resources by tapping into the community's service providers;
- Reducing emotional and financial stress on the community by offering workshops for unemployed workers, and local affected supply-chain or vendor companies; and
- Coordinating support groups and transition teams for unemployed workers.

Pennsylvania intends to update the policy governing these activities by December 4, 2020.

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

The PA Department of Labor and Industry (L&I) Rapid Response Unit works as the initial point of contact for businesses, emergency management teams to assist the businesses, and Dislocated Workers that are

affected by a natural disaster. The Rapid Response Services Unit works in conjunction with Federal, State, and Local Emergency Coordinators to respond to affected businesses. Rapid Response Coordinators work with their regional and local emergency teams to develop contingency plans. Rapid Response works with the business through the business downturn cycle regardless if the disaster is PEMA or FEMA designated. If the disaster has an immediate impact on local business operations, Rapid Response coordinates the efforts with their local teams including Unemployment Compensation, local workforce development and economic development entities, and other stakeholders to tailor the response to the specific needs of the affected business and Dislocated Workers.

Rapid Response Coordinators work with LWDBs, fiscal agents, and operators to assure delivery of services and assist in the application for additional workforce funds when necessary. WIOA permits states to provide Rapid Response Additional Assistance funds to Local Areas with an increased number of unemployed individuals, due to natural disasters, plant closings, mass layoffs, or other events, if there are not adequate local funds to assist the Dislocated Workers.

Pennsylvania intends to update the policy governing these activities by December 4, 2020.

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

The PA Department of Labor & Industry (L&I) placed Trade Act Services, which administers the Trade Adjustment Assistance (TAA) program and RRS within the Bureau of Workforce Partnership and Operations to align early intervention with TAA program administration. RRS markets TAA to companies, workers, and unions (if applicable) through the rapid response process. Within 48 hours of receiving a WARN notice (or any other form of Public Notice) from a company that is either closing or laying-off, a RR Coordinator contacts the employer and initiates a fact-finding meeting. Information is gathered on the following items:

- Reason for closure/layoff
- Size of the workforce
- Demographics of the workforce
- Supply chain
- Timeframe in which closure/layoff will take place.

Following this information gathering, the RR Coordinator provides a summary of workforce services that will benefit the affected workers such as on-site workshops covering resume writing, job search skills, interviewing techniques, managing a household budget, and Unemployment Compensation. These pre-layoff workshops serve as a precursor for the workers in preparing for the upcoming layoff. Further, the RR Coordinator explains the benefits of having the company apply for Trade Act benefits on behalf of their workforce. The RR Coordinator reviews the benefits that the Trade Act offers to workers, emphasizing the training opportunities available for a higher skilled workforce in the respective area. The RR Coordinator

assists the employer with completing a Trade Act petition application on site and encourages sending the completed application via the US DOL website (<https://doleta.gov/tradeact/>). Finally, the employer is left with an informational folder providing a summary of what has been reviewed during the fact-finding meeting and schedules a follow-up meeting for next steps.

With the information gathered during the fact-finding meeting, the RR Coordinator assembles a Rapid Response Team that can meet the needs of the workers in a dislocation. The demographic information gathered during fact-finding allows for Rapid Response Services to focus in on the needs of the workers. This includes, but is not limited to:

- Limited English Proficiency (LEP);
- Workers near Retirement Age;
- Workers lacking a High School Diploma;
- Workers with limited or no post-secondary education; and
- Transportation barriers.

The RR Coordinator encourages the LWDB to request additional Rapid Response funds to ensure that enough funds for supportive services are available to serve the workers in question, specifically in areas that are identified as barriers to employment. A Rapid Response Team will include specialists that will cover:

- Unemployment Insurance;
- Health and Pension Benefits;
- Job Search Activities;
- Education Services;
- Trade Adjustment Assistance;
- Social Service Programs;
- Community and Economic Development; and
- Other members deemed necessary to serve a specific dislocation.

The Rapid Response Coordinator follows up with the employer to schedule pre-layoff workshops as well as a Rapid Response Information Meeting (RRIM) with the affected workers. Various dates can be scheduled to accommodate large dislocations. The Rapid Response Coordinator makes it a priority to involve the employer and union (if applicable) in planning the RRIM to cover subjects including, but not limited to, location of the event, number of invitees, and information that will be presented. The RRIM is usually scheduled four to six weeks prior to layoff/closure date. The RR Coordinator will also follow up with the employer to check the status of the Trade petition application. If the employer has not moved ahead with the application, the RR Coordinator will encourage the union (if applicable) and/or workers to submit a Trade petition application. In situations where three workers are unable to come together to complete a Trade petition application, the Labor and Industry will submit it on the workers' behalf.

The Rapid Response Coordinator meets with the assembled RR Team to provide an overview of how the event will unfold to include order of presenters and general flow of the event. A strong emphasis is given to providing the participant with up to date information on UC, health benefits, and workforce services. Workers are given an overview of what their local PA CareerLink® offers, include training, one-on-one job search assistance, career assessment, and case management services built on an Individual Employment Plan tailored to the worker needs. PA CareerLink® staff is present at the RRIM to schedule one-on-one appointments with workers who want to access workforce benefits. Each worker present at the RRIM completes a survey that gathers critical information for ongoing follow-up services (contact information,

education background, work history, skills, interest in training/job search, etc.) These surveys are reviewed by Rapid Response Services staff and shared with local PA CareerLink® case managers who will provide follow-up services to these workers. The surveys provide a solid foundation for the case managers to build a plan with the worker that leads to employment/training opportunities. Additionally, the surveys also provide good indicators on what employment barriers exist (limited education, job skills, LEP, etc.) and allow for appropriate referrals to PA CareerLink® partners that can assist workers overcome such barriers. RR Coordinators maintain contact with the employer during the layoff/closure period to ensure that all workers receive the information presented at the RRIM. The RR Coordinator also encourages the formation of a Dislocated Worker Transition Team. These teams are mostly made up of workers, & managers within the company that can serve as ombudsmen representing the voice of the workforce, to coordinate outreach and service delivery. Emerging issues can be addressed, including further information on specific topics, development of newsletters, and arrangement of smaller worker groups that address specific topics of interest.

Upon receiving notification from US DOL that a TAA petition has been approved/certified, the RR Coordinator contacts the employer and union (if applicable). The Federal Programs unit in the UC Office of Benefits Policy obtains a worker-list from the employer and sends out notification to all workers of the potential eligibility for Trade Act benefits. Next, the RR Coordinator collaborates with local PA CareerLink® Trade, Title I and Unemployment Compensation service staff to set up a Trade Benefits Rights Interview (BRI) meeting date convenient for the employer and workers. The RR Coordinator recommends BRI meetings to be held at the actual company site to maximize participation. Workers receive a personal invitation to the BRI meeting and obtain a copy of the information that will be reviewed during the meeting.

Rapid Response Services staff highlight the benefits that the Trade Act offers to assist in returning to the workforce by providing a detailed timeline for workers to follow. It emphasizes the services provided at the PA CareerLink® as a staging point to access Trade benefits in a timely manner. A strong emphasis is given to TAA training, High Priority Occupations, and important deadlines that have an impact on time sensitive benefits. Case managers are present to schedule one-on-one appointments with TAA eligible workers who have an immediate interest in Trade benefits.

Rapid Response Services staff will also recommend holding an Enrollment Assessment (EA) session to take place one to two weeks after the BRI is held, specifically for larger dislocations. EA sessions are a collaborative effort among PA CareerLink® partners present at the different stations. These stations serve the purpose of:

- Explaining Trade Act benefits on an individual basis;
- Full-enrollment on the PA CareerLink® system;
- Completion of dual-enrollment;
- Initial skills assessment;
- WIOA supportive services;
- Initiating the IEP;
- Overview of the Reemployment Trade Adjustment Allowance (RTAA) for workers 50 years of age or older;
- Scheduling comprehensive assessment for participants interested in training
- Reviewing the training programs and providers in the Local Area; and
- next steps/follow-up appointments.

The EA sessions allow for a TAA eligible worker to go through a smooth process where there is a clear understanding of expectations and results. Furthermore, having the dual-enrollment completed at an early stage of case management allows for the TAA eligible worker to take full advantage of all workforce services offered under the PA CareerLink® umbrella. Once the EA session is completed, a case manager is identified, who assists in making sure the worker accesses the TAA benefit(s) prior to the deadline. The EA session allows for the Local Area to pull additional resources by having staff from other parts of the commonwealth assist with the logistics of such an event. It also allows for the case managers to identify TAA workers with a strong interest in using Trade Act benefits to secure suitable employment. The RR Coordinator encourages the involvement of the DWTT to encourage workers to use Trade benefits and engage with the PA CareerLink® staff.

The commonwealth implemented an online application for TAA training, job-search, and relocation allowances, and Reemployment Trade Adjustment Assistance (RTAA) programs. This online application is accessed by Dislocated Workers, PA CareerLink® Merit staff and training providers, to add information, in real time. PA CareerLink® merit staff helps trade-affected workers complete their applications and assess workers' skills and experiences.

Pennsylvania's service delivery system provides greater choice and focuses resources where Dislocated Workers most need them. Pennsylvania co-enrolls all TAA-eligible workers in the WIOA program to ensure that all Trade participants receive the full range of assistance available to Dislocated Workers.

Adult and Dislocated Worker Program Requirements

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

The state continues to use Work-Based training models as part of its strategy to meet the demands of employers looking for skilled workers and job seekers looking for a career. The local workforce development areas will continue to use the established Industry Partnerships as a mode to identify what are the pressing training needs for employers. The methods of training will be tailored to the employer needs but may include one or a combination of Incumbent Worker Training (IWT), On-the-Job Training (OJT), classroom training, customized training, and Apprenticeships. Through the IPs, employers will continue to have direct communication with training providers that can tailor/create a curriculum to address a skills-gap need. Where possible, the workforce partners will consider leveraging program funds to maximize the customer training experience. Trainings will be posted on the ETPL available through CWDS that will showcase more than 2000 different types of trainings available to job seekers.

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

Since Pennsylvania's 2016 formation of the Apprenticeship and Training Office, or ATO, active apprentices in the state increased 21%. ATO expanded its partnering with other Workforce partners resulting in engagement of rapid response and Trade Act staff to include apprenticeship program opportunities in their participant delivery models. Pennsylvania has continued its use of the statewide Eligible Training Provider List, or ETPL, ensuring registered apprenticeship programs are listed and employers, sponsors and providers are knowledgeable of WIOA funding resources exclusive to their inclusion on the ETPL. Under the State Apprenticeship Expansion, or SAE, grants, Pennsylvania has focused on development of pipelines into apprenticeship. The current focus has been on pre-apprenticeships and career and technical center, or CTC, relationships. The cumulative benefit of this pipeline has been the registration of 24 pre-apprenticeship programs and an expanded communications network between CTCs and local employers. Pennsylvania will not be using Apprenticeship State Expansion Grant, or ASE, funds to support pre-apprenticeship activities as participants would not count toward performance; however, Pennsylvania will leverage state funding resources to ensure the continued success of this vital pipeline and provide employers with a pool of potential apprentices that ultimately support Governor Wolf's goal of doubling Pennsylvania registered apprentices by 2025.

As reflected in Pennsylvania's ASE project narrative, the state remains focused on several key goals: increase statewide capacity for apprenticeship, enhance apprenticeship collaboration and integration into the twenty-two (22) local workforce development boards, or LWDBs, and integrate data collection, tracking and reporting into the Commonwealth Workforce Development System, or CWDS. Pennsylvania's Apprenticeship and Training Office has relied on the Registered Apprenticeship Partners Information Data System, or RAPIDS, to track apprentices and programs and report on grant related activities. The ATO has long recognized the importance of building apprenticeship program functionality into CWDS – a major program undertaking in terms of staff commitment and funding. ATO leadership commenced partnering with performance staff and workforce partners to integrate ASE required performance tracking and reporting (participant eligibility determination, participant data collection and tracking and updating participant data) into CWDS. Current efforts have focused on securing an MOU with the U.S. Department of Labor to integrate RAPIDS data into CWDS, Pennsylvania's system of record for all WIOA programs. Additional conversation has delved into current participant data collection, tracking and PIRL reporting and whether these processes can be leveraged to integrate ASE required data collection and reporting. These upgrades will take time (nine months to a year, conservatively estimated) and ASE grant funds will be leveraged to facilitate the required CWDS system development and corresponding service design and delivery.

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

The Workforce Innovation and Opportunity Act (WIOA) provides an opportunity for registered apprenticeship programs to be active partners in the public workforce system. Under WIOA Title I-B, registered apprenticeship programs are not subject to the same application procedures and information

requirements as other training providers considering the detailed application and vetting procedures that apprenticeship programs already undergo to become registered.

In Pennsylvania, an SAA state, this means that apprenticeship programs registered with the Pennsylvania Department of Labor & Industry Apprenticeship and Training Office can be integrated onto the commonwealth's statewide Eligible Training Provider List, or ETPL. Registered apprenticeship program sponsors that request to be eligible training providers are automatically eligible to be included on the list. New registered apprenticeship programs attest to their automatic inclusion on the ETPL when executing their Standards of Apprenticeship for presentation to the Pennsylvania Apprenticeship and Training Council, or PATC. Once the PATC approves the program, the program is automatically added to the statewide ETPL where it remains as long as the program remains in an active registered status or until the program sponsor submits notification that it no longer wishes to be on the list.

While automatically eligible, not all registered apprenticeship sponsors may desire to be included on the statewide ETPL. However, inclusion allows eligible participants and employers to use available WIOA Title I-B funds for training in registered apprenticeship programs, in accordance with the Act; and more directly connects apprenticeship programs to job seekers through the commonwealth's PA CareerLink® locations. Registered apprenticeship program sponsors that were registered prior to the current standards attestation process, may request, at any time, to be added to the statewide ETPL. Additionally, apprenticeship program sponsors may request, at any time, to be removed from the statewide ETPL. Any such requests must be communicated to L&I through the following resource account: apprenticeship@pa.gov.

The statewide ETPL, which can be electronically accessed at www.pacareerlink.pa.gov, will be modified no less than every six months by L&I.

The following outlines the process for Registered Apprenticeship program sponsors seeking inclusion on (opt in) or exclusion from (opt out) the statewide ETPL. For new Registered Apprenticeship Programs, the sponsor's Standards of Registered Apprenticeship includes an attestation whereby the Sponsor acknowledges their inclusion on the statewide ETPL.

1. *Step One Established Programs wishing to be included on the Statewide ETPL requires the Program sponsor to notify L&I and submit the following information to L&I, in addition to providing a copy of the apprenticeship program's Pennsylvania Certificate of Registration:*

- *Occupations included within the registered apprenticeship program;*
- *The name and address of the registered apprenticeship program sponsor;*
- *The name and address of the related technical instruction provider, and the location of instruction if different from the program sponsor's address;*
- *The method and length of instruction; and*
- *The number of active apprentices.*

All notifications must be submitted to the following resource account: apprenticeship@pa.gov

1. *Step Two. Once the registration status has been verified, L&I will add the registered apprenticeship to the statewide ETPL and notify the Commonwealth's local workforce development areas. Once a registered apprenticeship is included on the statewide ETPL, L&I will verify the registration status annually.*

Such apprenticeships will remain on the list as long as the entity's registration status remains valid or until a program sponsor requests to have a program removed.

Training providers interested in having courses/programs included on Pennsylvania's Eligible Training Provider List (ETPL) may apply electronically through the Commonwealth Workforce Development System (CWDS) to one (1) of twenty-three (23) local workforce development area (LWDA) offices located throughout Pennsylvania. Available WIOA Title I funds and restriction of such courses/programs are impacted by the policies and guidance issued from the Pennsylvania's Department of Labor & Industry (L&I) as well as Pennsylvania's local workforce development boards' respective policies and guidance.

Each program must be listed individually and only approved once through the application process that starts locally. Local workforce development board approval is the first step of a two-step process for inclusion on the statewide ETPL. State approval by the Department, is the second and final step for having a course/program become eligible and included on the statewide ETPL. Each step of approval should take no longer than thirty (30) calendar days. If a training service application is rejected in an area due to local policies, a training provider may apply to another local area to have the training included on the statewide ETPL.

The statewide ETPL is an annual list. Training providers must reapply for continued eligibility to have available courses/programs remain on the statewide list for the following year. Applications are accepted on an ongoing basis.

Trade Adjustment Assistance Program

Training providers’ courses/programs listed on the statewide ETPL that have a fully executed Trade Master Agreement (TMA) with the Department may be considered by dislocated workers funded by the Trade Adjustment Assistance (TAA) Program. TAA training is not subject to WIOA performance measures. Interested training providers may submit course/program service applications through CWDS for the TAA-Eligible only Training Programs/Provider Statewide List. Training providers must have a TMA with the Department before a training program can be considered by a participant eligible for trade benefits.

Registered Apprenticeship Programs

Interested registered apprenticeship programs registered with the U.S. Department of Labor, Office of Apprenticeship, or Pennsylvania’s State Apprenticeship Council are automatically eligible for inclusion if the program remains registered. Such programs are not required to apply. Information on the Registered Apprenticeship program can be found at <http://www.dol.gov/apprenticeship>.

Submitting Data for Performance Measures

Institutions of higher education are required to provide program performance data for courses/programs to be considered for approval and inclusion on the statewide ETPL. The Department offers two (2) different ways of submitting data for performance measures. Training providers may enter students’ Social Security numbers (SSNs) in CWDS for comparison of employment and wage data for aggregate training and performance data, or training providers may enter their own aggregate data which would not require students’ SSNs. Aggregate data are needed for each performance question on the course/program application. Aggregate data will only be accepted from training providers if:

- the data are independently validated by a third party, such as a public accounting firm; or
- the necessary data can be verified against a copy of the provider’s accrediting agency’s annual report for the course/program’s performance.

If aggregate data are submitted, a hard copy of the report must be sent to the local ETPL point of contact within thirty (30) calendar days from the date the course/program is submitted in CWDS. Training course/program applications cannot be approved at the local level until after the local point of contact has reviewed and approved all required documentation.

Data are collected on the scheduled completion/exit dates of training providers’ students during a one-year reporting period. Due to the reporting timeline for wage record information, CWDS will advance the reporting period one (1) quarter at the end of each quarter. Please be prepared to enter student course/program completion data based on the following reporting periods.

ETPL Applications Submitted	Reporting Period for Scheduled Exit Dates of Students
04/01/2019 - 06/30/2019	10/01/2016 - 09/30/2017
07/01/2019 - 09/30/2019	01/01/2017 - 12/31/2017
10/01/2019 - 12/31/2019	04/01/2017 - 03/31/2018
01/01/2020 - 03/31/2020	07/01/2017 - 06/30/2018
04/01/2020 - 06/30/2020	10/01/2017 - 09/30/2018

Criteria

Courses/programs must meet the following criteria for inclusion on the statewide ETPL:

Facility must meet one (1) of fourteen (14) certification categories;
Facility must comply with the Americans With Disabilities Act of 1990;
Facility must abide by WIOA nondiscrimination and equal opportunity provisions;
Courses/programs must be available to the general public;
Courses/programs must meet established performance measures; and
Courses/programs must train for a high priority occupation(s).

Training providers must meet all applicable state and federal requirements for operating certain schools. It is the responsibility of the individual training provider to contact the appropriate state agency to be properly licensed or approved. Depending on what type of school is being operated, a training provider may have to register, be licensed, or receive a permit or approval from one or more various state/federal agencies.

Training providers submitting training course/program applications must meet one (1) of the following categories:

Apprenticeships. Apprenticeship programs registered with the U.S. Department of Labor's Bureau of Apprenticeship and Training (BAT), and/or programs approved by the Pennsylvania State Bureau of Apprenticeship and Training;

Auctioneers. State Board of Auctioneer Examiners, 63 P.S. §734. 1 et seq and 49 PA Code §1.11;

Aviation. Schools that provide training or instruction in flying and are regulated by the Federal Aviation Administration. However, as an example, if the school chooses to offer non-flying training in the field of Aircraft Mechanics, then the program must be licensed by the Pennsylvania Department of Education (PDE);

Barber schools. State Board of Barber Examiners, 63 P.S. §562;

Cosmetology Schools. State Board of Cosmetology, 63 P.S. §512. However, as an example, if the school chooses to offer Massage Therapy, then the program must be licensed by PDE;

Community-Based Organizations. Groups of individuals organized by and for a particular community of people based on shared interests and/or attributes providing occupational skills training;

Out-of-State Schools. Schools providing educational instruction at institutions within the confines of their state that do not have a physical presence within Pennsylvania;

Private Tutorial Schools. PDE licensed schools providing individual instruction by a private tutor;

Real Estate. Schools providing training in the field of real estate - State Real Estate Commission, 63 P.S. §455.402 and/or schools providing training for real estate appraisal - State Real Estate Commission, 63 P.S. §§ 457.5(2). Training providers will be required to supply their license number;

Hospital Schools. Operated by a hospital licensed under the Health Care Facilities Act, 35 P.S. §§448.101 – 448.904 and accredited by a regional or national accreditation agency; educational programs for LPNs, RNs and CRNPs are approved by the State Board of Nursing, 49 PA Code §§21.31-21.33 and 49 PA Code §21.161;

Colleges and Universities. Schools authorized to award degrees under 24 PA C.S. §6505 (relating to power to confer degrees) other than those schools approved to award specialized associate degrees under §§42.11-42.14 (relating to specialized associate degree programs approval procedure), this includes four-year colleges;

Pennsylvania Schools. Schools operated by the Commonwealth of Pennsylvania or a political subdivision thereof, such as the PDE's Stevens College of Technology, community colleges or vocational technical schools;

Service Occupations. Schools/classes providing training in public service or other service occupations. Persons engaged in public service occupations are limited to ambulance personnel, emergency medical technicians, firefighters, police, school bus drivers, and school crossing guards. Persons engaged in other service occupations are limited to maids, butlers, and chauffeurs; and

Private Licensed Schools. Act 174 of 1986, the Private Licensed Schools Act (PLSA), requires postsecondary institutions that offer career training in Pennsylvania be licensed by the State Board of Private Licensed Schools. Schools which meet all five (5) of the following requirements **must be licensed before operating**: (1) offers classes or maintains a school, (2) charges tuition or makes a profit from its fees, (3) contracts with members of the public directly rather than through a third party, (4) prepares those members of the public to pursue employment as defined in the Dictionary of Occupational Titles as supplemented or amended, and (5) is not specifically exempt under the statute. For further information, training providers should contact PDE's Division of Private Licensed Schools, at 717-783-8228 or visit PDE's website at <http://www.education.pa.gov>.

If a training institution does not fall into one of the fourteen (14) certification categories listed above, it may be considered for inclusion on the statewide ETPL on a case-by-case basis. Local workforce development boards and the Pennsylvania Department of Education (PDE) provide recommendations for provider approval or rejection. Final approval for inclusion on the ETPL is determined by the Department.

High Priority Occupations

Pennsylvania's public workforce development system targets education and training funds to high priority occupations (HPOs). HPOs are a direct result of Pennsylvania's industry-driven approach to workforce development. These occupations are in demand by employers, have higher skill needs and are most likely to provide family sustaining wages.

Regional HPO lists guide public workforce investments and are evaluated on an annual basis to ensure investments keep pace with rapidly changing technology and labor market demands. Local areas are responsible for ensuring that the training courses/programs of study accurately correspond to the occupation(s) selected. Educational institutions and local areas can submit documentation to have an occupation added to their regional HPO list.

In order to address deficiencies in Pennsylvania's Eligible Training Provider policy as identified by the US Department of Labor, the current policy will be amended and updated. The completed policy will be prepared and in place by Dec. 4, 2020.

The following required conditions will be added to the initial eligibility criteria: a description of each program of training services to be offered and information concerning whether a provider is in partnership with a business.

The following required conditions will be added to the continuing eligibility criteria of the policy:

- a description of access to training services throughout the commonwealth (including rural areas and through technology use); information reported to state agencies on federal and state training programs other than WIOA Title I-B programs
- the training provider's ability to offer industry-recognized certificates and credentials
- the training provider's ability to offer programs that lead to a recognized post-secondary credentials
- the quality of the program of training services including programs that lead to a recognized postsecondary credential
- the training provider's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities and a description of the timeliness and accuracy of the training provider's performance reports.

The updated ETP policy will include a description of the process for removing a training provider and the appeals process for a removed provider. The policy will also contain a definition of what the commonwealth considers to be a "substantial violation of the requirement to timely and accurately submit all required information."

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

Priority of service requirements will no longer be triggered by limited funds, but instead, precedence will be provided based on an established grading of priority. The commonwealth, LWDBs, and PA CareerLink® offices shall provide priority for Title I Adult services. Additionally, the commonwealth shall allow for a local discretionary priority of service to be applied to individuals with barriers of employment for the provision of individualized career services and training services funded through the Adult program. Lastly, the commonwealth has established measures to monitor the implementation and assess the effectiveness of priority of service for this program.

“Priority of service” is the right to take precedence over non-covered persons in obtaining services.

“Taking precedence” means:

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

“Covered persons” (as it applies to the Adult program priority of service) are veterans and eligible spouses; and individuals who are included in the WIOA priority groups, who are given priority over other individuals for receipt of individualized career services and training services funded by WIOA title I Adult Program.

“WIOA priority groups” (in relation to the Adult program priority of service) are the categories of individuals who are eligible to receive priority of service (i.e., recipients of public assistance; other low-income individuals; individuals who are basic skills deficient; and individuals who are both underemployed and low-income), and may include other categories of individuals with barriers to employment as established through a LWDB’s local discretionary priority.

“Recipients of public assistance” includes individuals who receive, or in the past six months have received, or are a member of a family that is receiving or in the past six months has received, assistance through one or more of the following:

- Supplemental Nutrition Assistance Program (SNAP);
- Temporary Assistance for Needy Families (TANF) program;
- Supplemental Security Income (SSI) program; or
- State or local income-based public assistance

“Low-income individual” means an individual who:

- Receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the SNAP, TANF, SSI, or State or local income-based public assistance;
- Is in a family with total annual family income that does not exceed the higher of: (I) the poverty line, or (II) 70 percent of the lower living standard income level;
- Is a homeless individual (as defined in the Violence Against Women Act) or a homeless child or youth (as defined under the McKinney-Vento Homeless Assistance Act);
- Youth or the parent of a youth who receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act;
- Is a foster child on behalf of whom State or local government payments are made; or
- Is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

“Individual who is basic skills deficient” means an individual who is:

- A youth who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- A youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

Basic skills may be assessed using instruments that are considered valid and appropriate and/or via case manager observation and documented case notes. Standardized assessments will be administered following published guidelines, and locators/appraisals will be used to determine the appropriate level of use of such assessments. This assessment method must include reading, writing, or computing skills. Soft skills deficiency or occupation skills deficiency shall not be used to determine otherwise proficient individuals as basic skills deficient. Case notes and other documents must provide an auditable trail back to the source of the verified information. This assessment method includes assessment questions, test results, school records, and/or referrals. Reasonable accommodation must be provided during the assessment process, if necessary, for individuals with disabilities.

“Individual who is both underemployed and low-income” is both:

- “Underemployed” is an individual who is:
 - employed less than full-time and is seeking full-time employment;
 - employed in a position that is inadequate with respect to his/her skills and training;
 - employed but whose current job earnings are not sufficient compared to his/her previous job’s earnings from their previous employment, per state and/or local policy; and
- A “low-income individual” as defined in WIOA Section 3(36).

“Local discretionary priority” is a priority group established in addition to WIOA priority groups provided above; such priority may be used by LWDBs to meet the needs and vision of their respective local area.

The commonwealth allows LWDBs to identify and apply one local discretionary priority of service group to the established priority hierarchy. If a LWDB elects to develop a local discretionary priority, this priority group must include individuals with barriers to employment as defined in WIOA Section 3(24), may be created by adding a local requirement to one of the four required WIOA priority groups, and must last no less than one program year.

The following examples illustrate how priority of service will work:

- Three individuals apply for training services. One is receiving public assistance, one is low-income, and the other does not fall into a priority category. There are two training slots available. In this scenario, the first two individuals take precedence over the third, meaning that the public assistance recipient and low-income person will receive training services and the non-covered person will not.
- The local board purchases ten slots for a short-term training program. Fifteen persons apply, seven of whom are eligible for priority of service, eight of whom are not. All seven of those entitled to priority of service will receive training slots; only three of the non-covered persons will receive training slots.
- Under the above example, with ten short-term training slots available, if only three of the fifteen people who apply are eligible for priority of service, those three will receive training slots. In addition, the local board or PA CareerLink® office will make affirmative efforts to conduct effective outreach to other individuals eligible for priority of service to ensure that at least 70 percent of slots are provided to those with priority of service.

The commonwealth will monitor data reported by LWDBs and PA CareerLink® offices to determine the percentage of those individuals in the four WIOA priority groups who are being served through the Adult program in comparison to all other individuals (i.e., individuals who are not receiving required WIOA

priority) who are being served through the Adult program. For this assessment, only individuals included in the four WIOA priority groups described above receiving value-added services through the Adult program funds will be counted as “individuals who are receiving priority.” Individuals made eligible for priority of service through local discretionary priority of service will be counted as “individuals who are not receiving any priority of service.” Should the percentage of “individuals who are receiving priority” be less than 51 percent, the commonwealth shall provide the LWDB or PA CareerLink® office with technical assistance to ensure that effective affirmative outreach efforts to individuals with priority of service are made. The 51 percent requirement applies to all individuals who receive Adult services. Note that 51 percent does not equate with satisfaction of priority of service requirements but is simply an indicator of whether affirmative outreach efforts are needed to ensure that those with priority of service are served.

Reflective of federal guidance in [Training and Employment Guidance Letter 10-09](#), veterans and eligible spouses who are also recipients of public assistance, low income, basic skills deficient, or both underemployed and low income will receive first priority. Non-veterans who are recipients of public assistance, low-income, basic skills deficient, or both underemployed and low income will receive second priority. Veterans and eligible spouses not included in priority groups will receive third priority. Non-veterans participating in the Adult program who are not included in any priority group but who meet a local discretionary priority will receive fourth priority. All other individuals will receive last priority.

In their Local Plans, LWDBs, and PA CareerLink® offices will continue to be required to state the additional methods by which they will apply the WIOA priority of service requirements and the commonwealth’s policy regarding priority of service and identify the local area’s discretionary priority and any additional requirements, if a local discretionary priority group exists. LWDBs must communicate in their plans the methods to be used to apply priority of service requirements and any local discretionary priority, to include a description of the following:

- How they will obtain data reflecting each of the four groups of persons entitled to priority of service in their service area and the approximate numbers in each category.
- The outreach they will do to inform the public of Pennsylvania’s priority of service policy and how they will target this outreach to best reach those potentially eligible for priority of service and any agencies that serve them.
- How they will inform individuals seeking to access WIOA services of their priority of service, such as through posters and prominent placement of other information.
- When otherwise deemed eligible for program participation, how they will affirmatively identify persons entitled to priority of service and inform those individuals of the full array of services available.
- The assessments they will use to identify barriers to employment among those entitled to priority of service and the services needed to address them.
- The process by which they will develop Individual Employment Plans for persons entitled to priority of service that will address, in addition to career service and training needs, any barriers to employment they may have.
- How they will ensure that they are serving the spectrum of persons entitled to priority of service, including those, such as English language learners, who may require more resources to serve.
- How they will address the special needs of individuals with barriers to employment in the delivery of services, such as by assuring that appropriate career planning services are provided. This should include a detailed description of how appropriate career planning services will be

provided, or arranged for, through collaboration with other agencies if the LWDB or PA CareerLink® office lacks the required expertise.

- How they will ensure access to services, i.e., interpreters and translated documents, for English language learners, as well as for persons who are deaf or hard of hearing.
- How they will train staff to ensure that staff members understand who is entitled to priority of service and that the office is responsive to the needs of these groups.
- What, if any, local discretionary priority of service has been established for a specific program year and what data will be used to support the need or benefit for the discretionary priority.

LWDBs and PA CareerLink® offices will be required to collect data for each of the three categories of persons with priority of service that show the number of persons who were served, and the levels of performance achieved.

More information regarding WIOA Title I Adult program priority of service is provided in the commonwealth's priority of service policy, Workforce System Policy (WSP) 05-2015. The commonwealth's priority of service policy will be revised to align with the State Plan and federal regulations.

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

WIOA provides flexibility to local WDBs to provide services in the areas of greatest need by allowing fund transfers of up to 100 percent of a program year allocation between the local adult and the local Dislocated Worker allocations. In accordance with WIOA's regulations that require the governor to establish factors for approving such transfers, the commonwealth provides the following criteria for local WDBs to request transfers between these funding streams:

- Local Boards must seek approval for transferring funds between the adult and Dislocated Worker funding allocations by submitting a transfer request to the Department of Labor & Industry's (L&I) Bureau of Workforce Development Administration (BWDA). For a transfer request to be approved and fully executed prior to June 30, all transfer requests must be received no later than April 15. Written requests must be submitted to L&I on a Funds Request Form as directed in the Workforce System Policy WSP 03-2015, Financial Management Guide, page 5-8 through 5-9 and Appendix A.
- A local area must consider how it will meet adjusted levels of performance for the primary indicators before requesting such transfer since the negotiated levels of performance for the primary indicators remain in effect.
- Local Boards must attest to the following when submitting a transfer request:
 - Employment and training activities of the program that funds are being transferred from or the program that funds are being transferred will not be adversely impacted.
 - Any transfer of funds from the Dislocated Worker program to the adult program to be adult program funds fall under the priority requirements of the adult program. Likewise, any transfer of funds from the adult program to the Dislocated Worker program will fall under the requirements of the Dislocated Worker program;
 - A local area is still responsible for meeting the adjusted levels of performance for any participants that it is required to serve; and
 - When funds are transferred from one program to another, the transferred funds adopt the identity of the new fund source and are bound by all requirements of that source.

As indicated in the commonwealth's workforce system policy (WSP) on financial management, the maximum dollar amount that a local area can transfer is calculated against the total base annual allocation (excluding any transfers or other adjustments to the allocation amount) for the funding stream that the funds are being transferred from. It should also be noted that administrative funds must be included with the transferred program funds based upon a 90/10 percent program to administrative split. Therefore, Local Areas must have adequate administrative funds available before BWDA will approve a transfer request.

For reference, transferred funds retain their federal year-of-appropriation identity and must be accounted for and reported accordingly. For example, PY 2016 WIOA Adult funds can only be transferred to the PY 2016 WIOA Dislocated Worker program. All transfers assume the identity and applicable requirements of the funding stream receiving the transfer. Expenditures associated with the transferred funds are tracked or accounted for separately. Transferred funds are accounted for, and reported, as part of the total available funds in the originally allocated program.

Transfer requests approved will result in a separate Notice of Obligation (NOO) and contract number being issued for the transferred amount, while the program in which the amount is being transferred from will be revised to reflect the reduced allocation. The issuance of said NOOs will serve as a local area's official notification that the transfer is approved. Conversely, Local Areas will receive notification of any transfer request that is not approved.

Youth Program Requirements. With respect to youth workforce investment activities authorized in section 129 of WIOA–

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

Every local workforce development board will be required to have a youth standing committee, whose activities may include but are not limited to the following:

- Providing information and assisting with planning, operational oversight, and other issues relating to the provision of services to youth;
- Recommending policy direction to the local board for the design, development, and implementation of programs that benefit all youth;
- Recommending the design of a comprehensive community workforce development system;
- Recommending ways to leverage resources and coordinate services among schools, public programs, and community-based organizations serving youth;
- Recommending ways to coordinate youth services and recommend eligible youth service providers;
- Providing on-going leadership and support for continuous quality improvement for local youth programs; and
- Overseeing eligible youth providers and other aspects of youth programs.

The commonwealth will strongly encourage local workforce development boards and their standing youth committees to think comprehensively and systematically about youth programs and services described in WIOA Section 129, and to establish youth priorities in the WIOA Local Plans that allow for the provision of services to as many eligible youth as possible, especially OSY, older youth, and those young people who are most at risk of not acquiring the necessary skills and abilities to attain meaningful employment.

The success of a solid youth program that fulfills the intent of WIOA largely depends on the full and openly competitive procurement of qualified providers of the youth workforce investment activities outlined in WIOA Section 129, and active oversight of their performance in accordance with WIOA Section 116.

This begins with the incorporation of WIOA's youth program requirements into future Requests for Proposals (RFPs) and subsequent contracts, as well as existing youth provider contracts.

Such requirements include:

- The expenditure of a minimum of 75 percent of funding on services to out-of-school youth;
- The expenditure of 20 percent of funding on the provision of work experiences for youth, including those with significant barriers to employment;
- The development of strong career pathways for youth;
- The co-enrollment of eligible youth into appropriate partner programs and activities, including TANF;
- The provision of the 14-required youth program design elements;
- The provider's past record of success with the retention of youth participants in education, training activities, or unsubsidized employment during the second and fourth quarters after program exit; and
- A detailed description of the local board's negotiated performance goals with the commonwealth for which the provider has a role in meeting and/or exceeding.

Additionally, Local Areas are strongly encouraged to employ single-year provider contracts with the inclusion of a renewal option for additional years, rather than multi-year contracts. Local Boards will establish criteria to ensure that newer provider entities with less professional experience in the provision of youth services are afforded the opportunity to compete with more established providers for a contract. Criteria will also be established and included in contracts that outline the right of the local board to terminate a provider's contract for cause, such as fraud or failure to meet established performance standards.

The commonwealth will also work with LWDBs to explore the use of pay-for-performance approaches, as appropriate, when they appear to have the potential to produce positive returns on investment and result in better services for the target population.

The commonwealth will encourage LWDBs to assist with Next Generation Sector Partnerships and other multi-employer workforce partnerships, where relevant, on industry-specific career awareness, school-to-work, and other pipeline activities for youth.

Finally, to ease burdens on both applicants and providers that serve out-of-school youth who are most in need, the commonwealth will allow self-attestation for out-of-school youth under WIOA eligibility determination, consistent with federal rulemaking. The commonwealth will require LWDBs and youth service providers to accept such self-attestation. An applicant will become eligible for youth services by

providing a statement that addresses the required element that may make the applicant eligible to receive services as an out-of-school youth, signing and dating a form acknowledging this status, followed by verification conducted by workforce staff that such information meets WIOA eligibility criteria for out-of-school youth. The key elements for self-attestation are: the participant identifying his or her status for permitted elements and signing and dating a form attesting to this self-identification. The commonwealth will work with LWDBs to develop additional self-attestation policies and procedures that are consistent with the commonwealth's self-attestation policy.

(2) Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

Through WIOA the out-of-school youth, or OSY, expenditure rate increased from 30% to 75%. This allowed a greater focus to be placed on serving our OSY population who faced the greatest challenges in attaining meaning career pathways and employment, both in dollars and resources. To help assist in this paradigm shift, the commonwealth developed several WIOA workgroups comprised of stakeholders from various levels of Pennsylvania's workforce system.

An overall goal of the WIOA Youth Service Workgroup, led by Pennsylvania Department of Human Services TANF Youth Development Program supervisory staff, was to provide recommendations that would help build a workforce system to meet the demands of today's customers and employers, as well as future demands. As workgroup members, representatives from Pennsylvania's youth-serving organizations examined multiple strategies focused around intensive outreach and the engagement of disconnected youth and young adults, which resulted in recommendations around co-enrollment, partnerships, career pathways/sector strategies, retention, and performance measures.

L&I has used many of the recommendations identified in these workgroups to develop overall youth strategies. One such strategy has led to the issuance of a guidance document that provided new definitions for youth to enable a larger number of OSY to be more efficiently served, a policy embraced by each of Pennsylvania's core partners.

Moreover, Pennsylvania has established a strong partnership between L&I and DHS by leveraging resources and improving outcomes for out-of-school youth through the TANF Youth Development Program, or YDP. This partnership encourages the network of state and local youth services providers and workforce development providers along with public housing agencies to develop workforce programs for needy and at-risk youth that provide employment, educational experiences, and essential skills such as financial literacy and time management. The agencies strongly encourage programs to co-enroll youth in TANF YDP and applicable workforce programs, such as WIOA, so participants in TANF-funded subsidized employment opportunities can benefit from additional services, such as occupational skills training, and other relevant services. As TANF enrolled youth, the out-of-school youth have the full complement of WIOA services available to them. Correspondingly, out-of-school youth who are found

not to be WIOA eligible are referred to the TANF YDP. All TANF YDP participants have access to a full complement of programs and services which include the 14 program elements such as, Career Exposure, Services Learning, Work Experience, Paid Internship Opportunities, Financial Literacy Education, and many more innovation programs.

In addition to the work being done at the state level, Local Boards are to prioritize the adoption of the following strategies to effectively serve their youth population:

- Recruitment and Outreach: Conduct activities, including outreach to local government facilities, non-profit, and faith-based organizations that provide support services to disconnected youth and young adults, including the use of word-of-mouth referrals and social media platforms. Other suggested activities for youth services provider staff include:
 - Visiting local parks, tattoo parlors, smoke shops, homeless shelters, and other places that disconnected young people visit, connecting with them one-on-one in that environment, and in terms that make them the most comfortable.
 - Going into low-income communities and neighborhoods, knocking on doors, and speaking to friends, families, and young adults about available services and opportunities.

Creating a program application process that is easy to complete by removing as many of the administrative hurdles as possible, such as the inclusion of self-attestation, when needed.

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

Pennsylvania will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented in all of the state's PA CareerLink® One-Stop In-school-Youth (ISY) and Out-of-school Youth (OSY) programs. These programs provide services to youth both within the PA CareerLink® offices, as well as through staff stationed throughout Pennsylvania's K-12 school districts. Services include GED prep and alternative secondary school services, skills training for in-demand occupations through Individual Training Accounts (ITAs), LMI-based guidance on local career pathways, tours of local businesses, financial literacy and entrepreneurial skills training, and other leadership development opportunities. Eligible youth in need are also offered comprehensive case management, including counseling, mentoring, supportive services, and follow-up support.

Youth are also provided with paid and unpaid work experiences that have both academic and occupational components, including through summer employment opportunities, internships and job shadowing, and On-the-Job (OJT) training opportunities. Pennsylvania also has a growing focus on registered pre-apprenticeship and apprenticeship programs that combine classroom training and work experience. The Pennsylvania Apprenticeship and Training Office (ATO) continues to work closely with

WDBs to integrate a focus on apprenticeship programs within the State's One-Stop system, including developing a system-wide expertise on apprenticeship through PA CareerLink® staff participation in PA L&I's Registered Apprenticeship Navigator program.

The ATO also partners with WDBs and local PA CareerLinks® to enroll and support youth in pre-apprenticeship and apprenticeship programs. Each Pennsylvania region already has a network of established programs engaging youth and young adults that will be leveraged and built on to provide these services. For example, the Southeast PA (SEPA) Workforce Development Planning Region (Berks, Bucks, Chester, Delaware, Montgomery and Philadelphia counties) strategically focuses on engaging employers into youth career pathway programs such as pre-apprenticeship and registered apprenticeship, CTE programs in secondary schools, and ISY/OSY programs. Through industry collaboratives such as the Manufacturing Alliances, the region brings employer perspectives and feedback into youth CTE, training and work-readiness.

In support of developing pre-apprenticeship and apprenticeship programs, the SEPA region also formed ApprenticeshipPHL, a collaborative, that consists of workforce organizations, educational and training partners, employers, and economic development agencies. Philadelphia Works, the Philadelphia workforce development board, currently implements a program on behalf of ApprenticeshipPHL focused on Opportunity Youth entering registered apprenticeships in healthcare, Pharmacy, and IT occupations. Philadelphia PAYA, a project of ApprenticeshipPHL, develops stronger youth apprenticeships both through advising secondary schools and alternative opportunity youth schools such as Youth Build and Job Corps. Other local youth networks include The Philadelphia Youth Network, which supplies transitional support to youth in Philadelphia progressing through pre-apprenticeships, work-based learning and into Registered Apprenticeships; and the Lenfest Foundation, which is supporting a collaborative of nonprofits to educate parents and younger students in the Philadelphia School District about apprenticeships and other earn & learn models.

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

Due to the uniqueness of Pennsylvania's 23 Local Areas and the varying levels of resources available, LWDBs are each required to establish a definition, along with reasonable, quantifiable, and evidence-based eligibility documentation requirements for the “requires additional assistance to complete an education program or to secure and hold employment” criterion (if this “additional assistance” barrier category is to be utilized locally). To assist the Local Boards with policy development, the PA Department

of Labor & Industry (L&I) facilitated discussions during the Spring of 2017, that included state representatives from WIOA program partner agencies, to help assist local board representatives to develop recommendations on definitions and with interpretations of the term “requires additional assistance to complete an education program or to secure and hold employment.” This policy was developed by each applicable Local Board and is articulated in each respective local board’s WIOA Local Plan.

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

The commonwealth’s Workforce System Guidance No. 03-2015, [Youth Eligibility Definitions-Initial Implementation of the Workforce Innovation and Opportunity Act](#), December 23, 2015, provides definitions to ensure compliance with law and other federal guidance, expand the flexibility of Local Areas to expend funds appropriately, and eliminate barriers to the provision of services to individuals most in need.

Under WIOA, a key element of youth eligibility determination is whether the applicant is attending school or not attending school, as defined by State law. An in-school youth (ISY) must be attending school, while an out-of-school youth (OSY) must not be attending school. Unfortunately, Pennsylvania law does not define these terms, but the policy is guided by how the PA Department of Education defines schools. In Pennsylvania, providers of youth services must establish whether a youth is an ISY or OSY by utilizing the criteria outlined below:

- **Attending Any School:** Youth receiving services from any one of the ‘public’ or ‘non-public’ institutions to include: school districts; charter schools; cyber charter schools; area vocational technical schools; sectarian schools; and private schools, as well as those being home-schooled or privately tutored, would be considered “attending school” for the purpose of WIOA Title I-B youth eligibility determination. A youth enrolled at a post-secondary institution is considered “attending school,” unless the youth is enrolled at the post-secondary institution as part of an integrated education and training program.
- **Not Attending Any School:** Youth not receiving services from any one of the ‘public’ or ‘nonpublic’ institutions listed above would be considered “not attending school” for the purpose of WIOA Title I-B youth eligibility determination.

For purposes of WIOA eligibility, L&I does not consider providers of adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, or dropout reengagement programs to be schools. Therefore, in all cases except the one provided below, WIOA Youth programs may consider a youth to be an OSY for purposes of WIOA youth program eligibility if he or she attends adult education provided under title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding source of those programs. Youth attending high school equivalency programs funded by the public K-12 school system

who are classified by the school system as still enrolled in school are an exception; they are considered ISY. Youth must be categorized as OSY or ISY at the time of registration in the Commonwealth Workforce Development System (CWDS).

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

Pennsylvania further defines basic skills deficient as a youth or adult who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society by using instruments that are considered valid and appropriate for the targeted population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. When using Standardized assessments, the administration will follow published guidelines, and locators/appraisals will be used to determine the appropriate level of use of such assessments. This assessment method must include reading, writing, or computing skills. Soft skills deficiency or occupation skills deficiency shall not be used to determine otherwise proficient individuals as basic skills deficient. Local programs may use previous basic skills assessment results if such previous assessment have been conducted within the past six months. Individuals with disabilities will be provided with reasonable accommodations in the assessment process. Individual's with Limited English Proficiently will be offered assessments designed to accommodate such persons.

Alternative assessment methods include employer statement, school records, lacks a high school diploma or high school equivalency and is not enrolled in post-secondary education, referrals or records from a Title II Adult Basic Education program, determined to be Limited English Skills proficient through staff-documented observations, and/or referrals or records from an English Language Learner program.

Detailed case notes and other documents will provide an auditable trail back to the source of the verified information and how basic skills determination was made. Youth 18 or older determined basic skills deficient for the WIOA Youth Program, may be co-enrolled in the Adult Program without an eligibility redetermination, and may be counted as an individual who meets Adult priority of service, if the original determination was made no more than 6 months prior to the date of co-enrollment.

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

Not applicable

Waiver Requests (optional). States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

Pennsylvania does not intend to submit any waivers with its WIOA Combined State Plan Submission

Title I-B Assurances

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;

[Workforce System Policy 05-2015, Priority of Service](#)

2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;

[Workforce System Policy 05-2015, Priority of Service](#)

3. The State has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;

[Local Governance Policy 02-2015](#)

4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);

[Local Governance Policy 02-2015](#)

5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;

This assurance is not applicable to Pennsylvania.

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults 21 with chief elected officials in local areas throughout the State in determining the distributions;

This policy is still under development and will be brought before the State Board in 2020.

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);

In accordance with WIOA Section 181(b)(7), the Commonwealth of Pennsylvania will not use funds received under WIOA Title I to assist, promote or deter union organizing.

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;

Financial Management Policy

9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;

VR programs are administered by the Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry. Wagner-Peyser, Adult, Dislocated Worker and Youth programs under Title I are also administered by the Department of Labor & Industry allowing for cooperation across the programs.

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

Per Training and Guidance Letter (TEGL) 38-14, the commonwealth has no current waivers. When a barrier is identified that precludes or limits the effectiveness of efforts to serve businesses or citizens, the commonwealth may pursue a waiver of the provision. Pennsylvania agrees to report on the impact and outcomes of any approved waivers in the WIOA Annual Report.

11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);

- [Oversight and Monitoring \(Change 1\)](#)
- [Financial Management Policy](#)

WAGNER-PEYSER ACT PROGRAM (Employment Services)

Employment Service Professional Staff Development.

(1) Describe how the state will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through state employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.

Pennsylvania will continue to use state merit staff to provide labor exchange services under the Wagner-Peyser Act. Merit staff are co-located at all comprehensive American Job Centers (PA CareerLink®) and will to continue to work with workforce partners to ensure a seamless delivery of reemployment services to customers.

(2) Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both job seekers and employers.

Within Labor & Industry's Bureau of Workforce Partnership & Operations (BWPO), Staff Development Services continues to develop, facilitate, and provide a training curriculum that strengthens the professional skills of staff in PA CareerLink® and Local Workforce Development Board offices; Staff Development Services also provides the curriculum to agency staff in headquarters and regional locations who provide workforce development program expertise, guidance, and support to the PA CareerLink® offices and local Areas. The curriculum is designed, delivered, and evaluated to ensure staff from all partnering organizations acquire consistent information and practical skills to effectively provide integrated programs and services to jobseeker and business customers. In addition, Staff Development Services continues to assist the bureau's programmatic managers and staff in creating procedural and informational materials that promote accurate and consistent service delivery among PA CareerLink® offices.

(3) Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication.

Management staff from Labor & Industry's Office of Unemployment Compensation Benefits Policy meet with BWPO management staff on a regular basis to collaboratively identify and address Unemployment Insurance (UI) eligibility and other issues. The Re-Employment Services & Eligibility Assessment (RESEA) program introduces UI claimants to the workforce development services available to them through PA CareerLink® offices while simultaneously keeping Unemployment Compensation Service Centers informed of any potential issues with claimant UI eligibility. Labor & Industry monitors the number of cases being referred to UC Service Centers to ensure that PA CareerLink® staff are fulfilling this requirement.

Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through one-stop centers, as required by WIOA as a career service.

Pennsylvania equips PA CareerLink® with staff and technology to assist customers with filing a UC claim. All sites have designated computers that allow for customers to file a new claim online, there are printers and email access for customers to exchange and provide information to the UC service centers. Additionally, there are trained staff that provide one-on-one assistance to customers who may need help with the online claim platform. An interactive desk guide is used by staff at all PA CareerLink® sites to ensure consistency across the state with the information provided; the desk guide uses Google translator as an added feature for customers with limited English Proficiency. Interpreter services are also available for customers that need additional assistance. Existing UC customers can file their biweekly claims at PA CareerLink® if they lack the technology or broadband capabilities from home.

All PA CareerLink® sites have at least 1 designated phone that connects directly with the UC Service Centers. Pennsylvania uses a sophisticated automated call distribution system (ACD) to receive calls from UI customers. The ACD system allows Labor & Industry to prioritize calls, and it is designed to give calls from courtesy phones located within PA CareerLink® offices the highest priority. When calling from a courtesy phone in a PA CareerLink® office, the customer hears the greeting; makes a service selection; is placed at the top of the queue; and is routed to the next available customer service agent in the UC Service Center.

Finally, every PA CareerLink® site has at least one Wagner-Peyser staff that has access to the UC mainframe database. These staff members have been trained to answer initial claims inquiries, check the status of a claim, and provide updates on benefit information.

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

Reemployment services are available to all UI claimants and other unemployed individuals through PA CareerLink® offices and PA CareerLink® Online. Information about reemployment services and instructions for enrollment are printed on the UI claim confirmation letter and in the Pennsylvania Unemployment Compensation Handbook that is sent to every UI claimant. Additionally, this information is available online at the commonwealth's UC and Workforce Development websites. Pennsylvania UC law requires claimants to register for employment search services with PA CareerLink® Online within 30 days of filing for benefits. Beginning with the third week of the benefit year for which a compensation claim is filed and each week thereafter, claimants must apply for two positions; participate in one work search activity each week; and maintain records of their work search efforts.

Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:

(1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

As explained above, Pennsylvania UC law requires claimants to register for employment search services. When claimants apply for UC benefits they are immediately directed to PA CareerLink® Online to register for employment search services where occupational skills information is collected. The PA CareerLink®

Online portal matches claimant skills with those required for jobs posted in CWDS to help satisfy job-search requirements. The system can also suggest training and education programs that may assist the individual to increase reemployment prospects. Claimant participation in reemployment services is tracked until exhaustion of UC benefits or termination of reemployment services.

In addition to PA CareerLink® services available to all unemployed jobseekers, Pennsylvania provides the federal Re-Employment Services and Eligibility Assessment program (RESEA), a worker profiling/reemployment collaborative program to expedite reemployment services for UI claimants while eliminating duplicative services. UC's database ranks claimants according to those most likely to exhaust UI benefits before returning to work. The ranking algorithm, based on common characteristics found in similar unemployed workers (e.g., employment history, educational levels), excludes claimants with a recall-to-work date, union affiliation, those involved in a work stoppage, and claimants who are working part-time. Collaboration among PA CareerLink® partners makes RESEA an effective means for UI claimants to obtain reemployment and training services across all service levels, including: orientations; job search planning, assistance, and workshops; labor market information; résumé preparation; program assessment; vocational and career guidance; testing; remedial or prerequisite training (e.g., Adult Basic Education, high school equivalency preparation, or ESL); and skills training. All RESEA customers receive an employment needs assessment and an Individual Employment Plan. Participation in RESEA is tracked through CWDS until exhaustion of UI benefits or termination of reemployment services.

L&I will verify the registration status of apprenticeship programs. Once the registration status has been confirmed, the entity will be added to the ETPL and the L&I will notify the appropriate LWDB(s). Programs will remain on the list so long as the entity's registration status remains valid or until a program sponsor requests the program be removed.

Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include—

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

The Agricultural Outreach Plan discusses Pennsylvania efforts related to serving Migrant and Seasonal Farmworkers (MSFW), temporary foreign labor obtained through the H-2A program and in serving agricultural employers through the PA CareerLink® system. The Department of Agriculture, Department of Labor & Industry, and other relevant state agencies as necessary, will work together to ensure that the needs of agricultural workers and employers are met. As part of that collaboration, the two departments will encourage agricultural employers to create multi-employer workforce partnerships and apply for funding through the Next Generation Sector Partnership program

(A) An assessment of the agricultural activity in the State means: 1) identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are

they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.

Agriculture is one of Pennsylvania's leading industries, with diverse animal and crop production throughout the commonwealth. Pennsylvania ranks first in the nation in mushroom production, second in Christmas tree farms, fourth in apple production and fifth in terms of the number of dairy cows. Lancaster County is the top agricultural county in the state.

In Pennsylvania, the agriculture footprint is unique to certain geographical areas. The southeast part of the state produces 62 percent of the nation's mushrooms. The eastern part of the state has considerable blueberry and cherry production. Bucks, Montgomery, and Lancaster Counties are hubs for wholesale nursery production. Lancaster County leads the commonwealth in animal agriculture including dairy, poultry, and swine. The southcentral part of the state is considered the fruit belt with Adams and Franklin Counties leading in the production of apples, peaches, cherries, and pears. Bedford and Blair Counties also have numerous apple growers. Central Pennsylvania is the heart of the Christmas tree industry while northwestern Pennsylvania leads a burgeoning wine industry that also has pockets throughout the commonwealth. Grapes, cherries, vegetables, and nursery production fills out production categories in the western part of the state.

According to the 2017 Census of Agriculture, the five leading labor-intensive crops (where the most hired farm labor is employed) are Greenhouse, Nursery, and Floriculture Production (NAICS code 1114) (16,628 employed); Dairy Cattle and Milk Production (NAICS code 11212) (4,045); Other Crop Farming (NAICS code 1119) (6,818); Fruit and Tree Nut Farming (NAICS code 1113) (6,434); and Oilseed and Grain Farming (NAICS code 1111) (5,683). The commonwealth 61,071 workers in total employed as hired farm labor.

Counties that led in the employment of hired farm labor include Lancaster (8,402); Chester (6,740); Adams (3,369); Franklin (2,741); Berks (3,375); York (2,146); Erie (1,730); Cumberland (1,348).

Further, using the Census, Chester (1,071); Adams (1,192); Franklin (453); Cumberland (207) York (234); Berks (158); Lancaster (161); are the top counties where the migrant workforce has been deployed.

The five leading crops where the migrant workforce is employed include Fruit and Tree Nut Farming (NAICS code 1113) (119); Dairy Cattle and Milk Production (NAICS code 11212) (90); Greenhouse, Nursery, and Floriculture Production (NAICS code 1114) (71); Vegetable and Melon Farming (NAICS code 1112) (43); and Oilseed and Grain Farming (NAICS code 1111) (29).

The agriculture community uses migrant farmworkers to supplement its local workforce. There is greater percentage of the workforce in some counties such as Adams and Franklin than there is in the larger agriculture counties such as Lancaster and Chester. There is also a higher percentage of workers in crops that are more seasonal, presumably helping with planting and harvest at key times.

Records related to the H-2A program confirm that assumption in that the busiest times for applications are from December to January with consistent activity continuing through June and July.

In general, employers in the agriculture and food industry express the need for more workers, particularly in the seasonal parts of the business. There is intense competition for low-skill, low-wage workers between the agriculture, retail, hospitality, health care, and other industries.

Temporary help services and farm labor contractors compete for the migrant workforce in the agriculture, construction and landscaping industries. This competition is reflected in the low unemployment rate in many of the counties that use hired farm labor.

This overall scarcity of workers will be the factor which most dramatically affects the agriculture and food industry in the future. Housing and transportation as well as training for agriculture tasks as the work gets more sophisticated will be additional challenges. The industry itself is experimenting with technology that may allow machines to replace some of the manual labor that is currently required.

(B) An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration.

The PA Department of Labor & Industry, working with the PA Department of Agriculture, the National Agriculture Statistical Service of the US Department of Agriculture, PathStone (the WIOA Section 167 National Farmworker Jobs Program grantee for the commonwealth), Penn Ag Industries, and other agriculture employer organizations and agriculture employers themselves, has assembled this profile of the MSFW's in Pennsylvania.

Just fewer than 4,300 farmworkers are employed annually with the peak months for employment in southcentral Pennsylvania from May through November and in southeastern Pennsylvania from September through April. These differences can be attributed to the differing needs of the mushroom and fruit industries. Of all farmworkers, 24 percent are seasonal, and 76 percent are migrants.

BWPO recognizes that some farm workers possess specific needs and face certain barriers that result from cultural, educational, linguistic, scheduling, logistic and other dynamics. The Administration will continue to seek stakeholder and customer input and will engage Migrant Seasonal Farm Worker (MSFW) service providers to identify and address needs, explore solutions and collaborate to ensure quality living and working conditions.

Farm worker needs include, but are not limited to, the following:

- Timely Labor Market Information (LMI) to facilitate planning for continuous employment
- Occupational guidance and training to maintain a job or transition into a different occupation or industry
- Transportation to seek employment or supportive services

- Affordable and adequate housing
- Information from various jurisdictions on labor laws and worker rights, protections, and responsibilities
- Supportive services to enable MSFWs to obtain and maintain employment
- Fair and equitable conditions and supervision from trained and committed field foremen, supervisors, and farm labor contractors
- Fair and equitable pay that includes health benefits. This is a necessity for the laborers, as well as for the safety of our nation's food supply, and for reducing health and public assistance cost
- Pesticide and heat stress prevention training
- Barriers that at times confront farm workers include, but are not limited to, the following:
 - Lack of timely, reliable data, and information pertinent to intrastate and interstate job openings and supportive services
 - Provider service delivery hours of operation that conflict with MSFWs work schedules
 - Lack of transportation, limiting access to jobs and supportive services
 - Underemployment or unemployment due to limited literacy education, and lack of non-agricultural job experience
 - Limited participation in support programs due to lack of understanding of eligibility and other factors, such as impact on immigration status for having utilized certain services;
 - Lack of full-time, year-round work, combined with low wages, that relegates MSFWs to living below the poverty line
 - Competition from undocumented workers who work for less pay and substandard living and working conditions
 - Competition from intrastate and interstate farm labor contractors who follow migrant streams accompanied by their own farm worker crews
 - Limited educational opportunities, including a lack of short-term, skilled-based training offered bilingually, for MSFWs; and
 - Limited knowledge of job search techniques for finding employment outside of agriculture.

Outreach Activities *The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:*

The commonwealth projects 30,000 MSFWs for the coming year as estimated by WIA 167 National Farmworker Jobs Program (NFJP) grantees. This number remains static because similar crop activities are anticipated.

In PY 2020, PA CareerLink® centers estimate they will receive approximately 1,212 agricultural job openings and will refer applicants to approximately 85 percent of them. The offices estimate they will continue to receive approximately 165 clearance orders for the PY 2020 harvest season from other states and anticipate these to be primarily requests for H-2A workers.

(A) Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

Currently, every PA CareerLink® center in Pennsylvania has an employee, who may have other duties, designated as the “Agricultural Specialist.” That employee serves as a liaison to agriculture employers and the placement needs of MSFW. Agricultural Specialists will utilize, when feasible, the Agriculture Recruitment System to recruit and refer qualified MSFW to job openings. The commonwealth is considering reducing the number of staff designated as Agriculture Specialists and concentrating staff efforts to the areas with a high concentration of agriculture employment while ensuring all areas can be covered when needed. PA is currently in the process of revamping its MSFW outreach program. The State Monitor Advocate performs a portion of the MSFW outreach, H-2A field checks and field visits as required in 20 CFR regulations, while a regional person performs those services when agricultural activity is greatest in the state or as needed.

The SMA maintains open communication with various agencies, including various legal services and charitable organizations that all perform their own outreach to both MSFWs and H-2A workers, and refers farm workers to these agencies and organizations for services. The SMA also receives referrals from these agencies when farm workers are in need of CareerLink services. When needed, farm workers are directly contacted either by the SMA or by a local office or outreach worker.

(B) Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e., availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System (“Complaint System” described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

The PA Department of Labor & Industry (L&I) outreach workers will be aware of training, development as well as technical assistance resources available to them. The Foreign Labor Certification (FLC) program is overseen by the L&I Bureau of Workforce Partnership & Operations (BWPO) with a dedicated staff to implement FLC requirements. BWPO will ensure outreach workers clearly understand the technical assistance resources available to them. Specific WIOA services available to MSFW and employers may vary locally, and therefore are catalogued and shared at a local level with area outreach workers.

Outreach workers will receive training and on-going technical assistance from the State Monitor Advocate. This includes directly taking any new outreach workers to the field to first observe outreach, and then, once proficiency and confidence is reached, to be observed performing outreach. Once an outreach worker displays competency in performing outreach, that individual will perform outreach alone, and report findings back to the SMA. When changes in outreach practices occur, the SMA will share that information. Generally, on an annual basis the SMA will accompany outreach workers to monitor and to assure that uniform outreach practices are observed.

Outreach workers will be trained by the SMA to take complaints from farm workers and to refer those complaints to the SMA for resolution. Outreach workers will be trained on wage complaints, workers’ rights, apparent violations, other supportive service organizations, job search and referrals.

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

The PA Department of Labor & Industry (L&I) will incorporate a training plan into the outreach worker activities, to include training requirements such as PA CareerLink® 101, a two-day in-person classroom training that reviews the foundations of workforce development, including the WIOA core programs and other commonwealth initiatives, or similar workforce foundation training activities that meet the needs of the worker, such as webinars and staff symposiums. Unemployment activities are also under the purview of the L&I, Wagner-Peyser staff assigned as Agriculture Specialists in the PA CareerLink® are also trained to directly engage UI claimants in the one-stop with re-employment services and can provide assistance to individuals seeking to file and/or appeal UI claims. Agricultural Specialists are trained to understand and offer employment services, therefore domestic and MSFW jobseekers and workers are afforded universal access to employment services.

(D) Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

State merit staff outreach workers will be trained by the State Monitor Advocate on an annual or on an “as needed” basis.

Trainings will cover the reasoning behind these requirements to instill a comprehensive understand of the purpose of outreach based on 20 CFR regulations. Training will instruct workers step-by-step into outreach techniques: introduction, presentation, labor camp inspection—including bulletin board requirements, workers’ rights, CareerLink contact referrals, services provided, job search and referrals, complaint and wage complaint overview, apprenticeship, and a listing of available partner agencies including PA Migrant Health, PathStone Corp., PA Migrant Education, charitable organization and legal service options.

Outreach workers will be trained to be able to serve agricultural employers by sharing a wealth of information with regard to keeping the employer in compliance with regard to regulations, how to access our website and place job orders into the system, and how to place ARS and H-2A orders into the system and the availability of our apprenticeship program.

(E) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups. If an NFJP grantee is the State Workforce Agency’s (SWA) subrecipient conducting outreach, provide:

- i. A description of that relationship;*
- ii. A description of any other MSFW service providers the NFJP is coordinating with; and*
- iii. The NFJP grantee’s outreach plan to be included in the State Plan.*

The NFJP grantee in Pennsylvania is PathStone Corp. Each PathStone office serves as the focal point for outreach and recruitment to remote and less accessible areas of the state. In addition, PathStone Corp. is a Title I provider and/or PA CareerLink® partner in select locations across the commonwealth. The PA Department of Labor & Industry has established a budding working relationship with PathStone. Meetings and discussions have led to BWPO outreach staff and support to begin attending Pathstone community outreach efforts. In addition, The PA Department of Labor & Industry, in partnership with the PA Department of Agriculture, will also work with Pathstone to identify areas for improvement, opportunities

for collaboration. As a result, an outreach plan will be developed that addresses the needs of the MSFW population and agriculture employers.

It is currently unknown whether PathStone is acting as an unaffiliated service provider to any other MSFW service providers in Pennsylvania. To date our relationship with them has been on a fact-finding basis with the possibility of using their services to enhance our own statewide MSFW outreach coverage. More details will be looked into as we proceed, and we expect to have more information in the near future.

Specific details of PathStone's inhouse agency outreach plan for MSFWs has not been shared with us at this early time, but we are aware that there are locations where they perform outreach on a regular basis and other locations where outreach is performed in an "as needed" basis. If we do contract with them we will look into these details more specifically to be able to work out an agreement that is pragmatic and mutually beneficial for all parties concerned.

Services provided to farmworkers and agricultural employers through the one-stop delivery system. *Describe the State agency's proposed strategies for:*

(A) Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;

Services are to be equal under terms and conditions qualitatively equivalent and quantitatively proportionate to those provided to non-MSFWs.

ii. How the State serves agricultural employers and how it intends to improve such services.

As proposed, outreach to MSFW workers will be coordinated and implemented by the PA Department of Labor & Industry. Its grantee and the PA CareerLink® staff. All findings, complaints, and apparent violations will be immediately reported to the State Monitor Advocate.

In the PA CareerLink® offices, according to conditions in 20 CFR 651.10, designated staff provide MSFWs with in-depth services including:

- Referrals to agricultural and non-agricultural jobs
- Information on training and supportive services
- Testing, counseling, and job development services
- An explanation of basic farm worker rights and the complaint system.

These services are provided regardless of a MSFW's ability to communicate in English (see available LEP services in other areas of this plan).

As proposed, outreach to MSFW workers and agriculture employers will be coordinated and implemented by the PA Department of Labor & Industry, its grantee and CareerLink® staff

MSFWs receive a basic summary of their rights when they receive services in the PA CareerLink® or through outreach. Outreach workers shall explain to MSFWs at their working, living, or gathering areas services available from the PA CareerLink®, including the availability of employment referrals, training, supportive services, testing, counseling, and other job development service; types of specific employment opportunities available in the PA CareerLink®; information on the agriculture complaint system; and information on other organizations serving MSFW, including PathStone. Outreach workers will encourage the MSFW to visit their local PA CareerLink® to access the full range of employment services. In the instance the MSFW cannot or will not visit the local PA CareerLink®, the worker can assist the MSFW in the preparation of applications, assistance in obtaining referral to employment opportunities currently available, as well as information regarding the type of employment opportunities which will become available; assistance in the preparation, receipt and referral of complaints; referral to supportive services; and transportation assistance to appointments at local PA CareerLink® offices or appropriate partners. Outreach tools include printed material, flyers, cellular phone, business cards, and posters. Printed materials range from business cards, listings of services, provider agencies, worker rights, and topical information on everything from pesticides to heat stress.

Pennsylvania growers are offered the full range of PA CareerLink® services. Through the Agricultural Recruitment System (ARS), the PA CareerLink® centers help employers meet their needs for permanent, temporary, and/or seasonal labor by placing job postings in CWDS and by marketing openings to job seekers.

In addition to Pennsylvania's professional business services offered to all employers as outlined throughout the State Plan, agricultural employers are also offered our services when met in person on MSFW outreach, at agricultural meetings, and other business-related events.

Job posting requirements, as specified under federal regulations at 20 CFR 653, and housing standards, as specified at 20 CFR 654 and 29 CFR 1910.142, are complied with in the PA CareerLink® centers. Additional requirements, as outlined in ETA Manual No. 3398, which pertain to requests from employers for employing temporary alien agriculture workers under the H-2A Program, are also followed.

Along with these requirements, the Central Office staff conducts the Prevailing Wage and Prevailing Practice surveys where there is significant MSFW activity, and where there are requests for seasonal or temporary farm workers under the H-2A Program.

(B) Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.

There are several points in the system where the employment service complaint system is publicized to MSFWs. Every PA CareerLink® prominently displays an ETA-approved employment service complaint system poster in each local office and satellite or district office. The posters are also made available in retail and service establishments frequented by MSFWs in communities that have a high concentration of farm workers. PathStone and Migrant Education, Migrant Health, and other agencies that serve the farm worker community." that are involved in the recruitment process are another outlet for providing

information about the employment service complaint system as mandated by federal regulation at 20 CFR 653.112.

(C) Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

In Pennsylvania the Agricultural Recruitment System is in place to facilitate the hiring of U.S. workers from other states. Our Foreign Labor Certification unit (FLC) will assist employers who may need help in completing the application to place an order into the system. Any agricultural employers who request assistance in finding workers will be made aware of all options which will include the placement of local job orders into our system, the Agricultural Recruitment System, and the H-2A System.

Other Requirements

(A) Collaboration. Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

Pennsylvania has an agreement with PathStone to conduct outreach to workers.

The SWA has hired bi-lingual staff to conduct outreach to worker groups beginning in the upcoming year. BWPO has already had a meeting with the statewide outreach award winner, PathStone, to begin devising a plan for outreach. We will leverage PathStone's experience conducting out types of outreach until our staff feels comfortable enough to conduct our own visits. These efforts are only in the beginning stages, but there is a plan to continue to build on these efforts over the next four years.

Additionally, the SWA collaborates with the PDA on an annual basis to arrange for all H-2A guest worker labor camps to be inspected and to inform them of any apparent violations at either H-2A or MSFW labor camps.

These agreements are scheduled to be completed by the November 2020.

(B) Review and Public Comment. In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been

incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

i. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

Copies of the AOP have always been sent to agencies and legal services in the state for comment. PA Migrant Health, PA Migrant Education, PathStone, Philadelphia Legal Services, and Friends of Farmworkers all receive copies for comment. We have not received comments for the last several AOPs.

(C) Data Assessment. Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

Over the previous four years, all goals have been met.

(D) Assessment of progress. The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

PY 2016 MSFW Activity

During PY 2016, there were an estimated 30,000 migrant workers in the commonwealth, with 101 MSFWs registered for services with PA CareerLink®. Since only a small percentage of MSFWs use the PA CareerLink® computerized system, the 101 registered farm workers represent less than one percent of all MSFWs.

These numbers are not unique to Pennsylvania or to Federal Region II. One of Pennsylvania's neighboring states listed in its AOP zero (0) as the total number of registered farm workers on their system. While MSFW usage of state one-stop services are constantly low through the entire East coast migrant stream, Pennsylvania welcomes and encourages MSFWs to take full advantage of the wide range of services.

The following table shows estimated numbers of MSFWs involved in the harvest of labor intensive agricultural communities for some of the highest volume crops during PY 2017. Estimates have changed only slightly over the last several years.

Estimates of Migrant and Seasonal Farm Workers Crops	MSFW Estimates	Geographic Area
Apple/Peach	3,600 Workers	Southcentral PA
Green Wrap Tomatoes	135 Workers	Northcentral PA
Mushroom Harvest	4,500 Workers	Southeast PA
Vegetable Harvest	3,600 Workers	Southcentral & Western PA

Nursery/Landscape/Trees
Cut-Christmas Trees

145 Workers
230 Workers

Western & Central PA
Central & Eastern PA

The difference between the estimated 30,000 MSFWs in Pennsylvania and the numbers of estimated workers provided in Table 5.1 (13,550) can be attributed to all other crop activities, many of which are too small to have their own category and breakdown. Cherries, strawberries, grapes, raspberries, blueberries, nuts, pears, Asian pears, apricots, pumpkins, sweet corn, potatoes, beets, asparagus, carrots, garlic, and a full range of other crops comprise a large agricultural industry spread out across the state. The 40,000 number of farm workers on the AOP was provided to the commonwealth by the WIOA Section 167 grant recipient, PathStone, which collects data and comes up with the total number of MSFWs on an annual basis.

Between July 1, 2018, and June 30, 2019, CWDS listed 161 temporary H-2A agricultural job postings. (1,898) U.S. workers applied for these jobs in person at PA CareerLink® centers. A considerably larger number of U.S. applicants self-referred for those same jobs, but the exact numbers are not captured. Total numbers are captured by the Chicago National Processing Center.

During this same period, PA CareerLink® offices received 7,457 temporary non-agricultural job openings and 46,898 permanent non-agricultural job openings. PA CareerLink® offices placed 5,987 job applicants against the temporary non-agricultural job postings and 33,547 against the permanent non-agricultural job postings.

The 5148 Labor Exchange Agricultural Reporting System (LEARS) statistical activities require little explanation. Although MSFW numbers are low due to extenuating circumstances, Pennsylvania consistently meets or exceeds U.S. DOL-ETA goals. All five “Equity Indicators,” i.e., referrals to jobs, staff assisted services, supportive services, career guidance, and job development contacts were met. That means that in each of the above categories MSFWs received equal or greater service than the general population. Regarding the seven “minimum service level indicators,” which are job placement, placed at \$0.50 above the minimum wage, placed in long term non-agricultural job, reviews of significant offices, field checks conducted, outreach contacts per staff day worked, and timely process of ES complaints, all service levels consistently met or surpassed U.S. DOL-ETA goals for the year.

Unlike areas of growth industries, agriculture in Pennsylvania remains robust yet static. Therefore, our goals are set accordingly. From year to year there is practically no change in the numbers of growers, labor camps, and ultimately MSFWs. The same holds true for the H-2A guest worker program. The different numbers of H-2A orders from year to year generally vary by single digits. Thus, field checks, field visits, outreach, monitoring, and equity ratio indicators remain constant.

During the 2018 growing/harvest season, L&I received a total of 56 agricultural interstate clearance orders for a total of 829 farm workers.

(E) State Monitor Advocate. The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

Pennsylvania’s State Monitor Advocate assisted in the development of the Agricultural Outreach Plan (AOP) Section of the Pennsylvania Combined State Plan and approved of its contents.

Wagner-Peyser Assurances

The State Plan must include assurances that:

1. The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));

All of Pennsylvania's one-stop centers provide co-location for Wagner-Peyser Employment Service staff. The commonwealth does not have any centers where Wagner-Peyser Employment Service staff are in a stand-alone location.

2. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers;

The commonwealth does not have any one-stop centers that have been designated as MSFW significant.

3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and

The Pennsylvania Department of Labor & Industry has been designated by the Governor as the State Workforce Entity. This entity is responsible for administering both the Office of Vocational Rehabilitation and the bureau that administers Wagner-Peyser activities. In its capacity as the State Workforce Entity, the Department requires cooperation among these partners.

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations

Merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations.

Adult Education and Family Literacy Act Program. The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

Aligning of Content Standards. *Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as*

adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The content standards for adult education are currently in full alignment with state-adopted challenging academic contents standards. The Pennsylvania State Board of Education adopted the Pennsylvania Core Standards in November 2013. The standards went into effect March 1, 2014. PDE, Division of Adult Education began formal statewide implementation of the *College and Career Readiness Standards for Adult Education* (CCRS) during PY 2014-15. Prior to implementation of the CCRS, Division of Adult Education staff completed a crosswalk of the CCRS to the Pennsylvania Core Standards. All items included in the CCRS are also in the Pennsylvania Core Standards; in many cases, the wording of the standards is identical.

PDE, Division of Adult Education implemented the use of CCRS in Title II programs over a three-year period. The CCRS now serves as the foundation for instruction in all Title II programs, including English language acquisition programs. For PY 2020-21 and beyond, adult education programs will continue to align all instruction to the CCRS. The two foci for PY 2020-21 through PY 2023-24 will be peer observation and curriculum alignment. Programs have started to use the peer observation process to help them improve and strengthen individual lessons. New national training in CCRS will focus on curriculum alignment. We expect to pilot this process with a few programs during this time period.

Local Activities. *Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.*

Adult Education and Literacy Activities (Section 203 of WIOA) Adult education; Literacy; Workplace adult education and literacy activities; Family literacy activities; English language acquisition activities; Integrated English literacy and civics education; Workforce preparation activities; or Integrated education and training that— 1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and 2. Is for the purpose of educational and career advancement.

Special Rule. *Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.*

Section 231 Adult Basic Education Direct Service grants that were awarded through PDE's first competition under WIOA are in effect through June 30, 2022. In 2022, PDE Division of Adult Education will conduct a full and open competition for the next multi-year grant cycle for Title II Section 231 funds for grants to be awarded July 1, 2022. State adult education direct service funds will be competed through the same process. The content of the section 231 grant applications will address, at a minimum, the thirteen considerations and seven requirements established in Title II. Eligible providers will be required to demonstrate clear alignment of proposed activities and services to the strategies and goals of the local workforce development plans for the areas to be served. The competition will be conducted through PDE's eGrants system.

The competition will be open to all eligible providers. All applicants will be required to submit evidence of demonstrated effectiveness in order for the application to be reviewed and considered for funding. To demonstrate effectiveness, applicants that have been funded under Title II AEFLA, as amended by WIOA, and/or state matching funds through PDE Division of Adult Education in the three program years immediately preceding the competition will be required to provide performance data under WIOA section 116 from those years. Applicants that were not previously funded by the Division of Adult Education under Title II AEFLA, as amended by WIOA, will be required to provide performance data that show their past effectiveness in serving basic skills deficient eligible individuals, including evidence of success in achieving outcomes in comparable measures. For both groups, these measures include effectiveness in helping students develop their academic skills in reading, writing, mathematics, and English language acquisition, achieve high school equivalency, and transition into employment and/or postsecondary education/training.

As part of the application review process, Local Boards will review applications for alignment with the Local Plan following a standardized process developed by PDE Division of Adult Education. Eligible providers will submit their applications to PDE Division of Adult Education through the eGrants system. Once the review of applicant eligibility is completed, the division will distribute the applications to the appropriate local workforce boards for review. The division will establish a timeline for the review process and provide a review rubric to all Local Boards, which will include a section in which Local Boards can provide recommendations to improve alignment of proposed Title II services with the Local Plans. PDE will take the recommendations and results of the review into consideration when making decisions regarding grant awards and conditions.

PDE anticipates a four- or five-year grant cycle. Grants funds will be allocated through annual funding notifications contingent on the availability of federal and state funds. Each year's grant amounts and conditions will be based on the following criteria: contract compliance, including success in meeting contracted enrollment and providing the contracted services; evidence of sufficient progress in meeting the state-imposed targets for the agency performance outcome measures; evidence of continuous program improvement; compliance with fiscal and programmatic policies and guidelines; and the amount of state and federal awards. All funds will be used in compliance with the supplement not supplant stipulation of the law.

Prior to the competition, PDE will use a needs-based funding formula to distribute funds to the local workforce areas. The formula includes six data sets weighted equally: 1) the number of individuals age 18 and over who are not enrolled in school and who do not have a high school diploma; 2) the number of individuals age 16 and over who are in the labor force and are unemployed; 3) the number of individuals age 18 and over with less than a ninth grade education; 4) the number of people below poverty level; 5)

the number of OJT openings per year; and 6) the land area in square miles of the local workforce areas. In local areas comprised of multiple counties, PDE will further break out funding by county to ensure services are available throughout the area.

All adult education programs funded under Section 231 and state matching funds are required to be full-service adult education programs. They must provide year-round classroom instruction at adult basic education (ABE) educational functioning levels (EFL) 1-6 including high school equivalency test preparation as needed. In counties with sufficient need as determined by the Division of Adult Education, adult education programs must also provide year-round classroom-based English language acquisition (ELA) activities, including instruction that supports English language learners to transition successfully to ABE instruction within the programing funded by the grant and to earn a high school equivalency credential, if needed. Programs serving counties not determined by the division to require ELA activities may provide ELA activities as needed. In addition to ELA activities, programs may offer integrated English literacy and civics education (IELCE) activities where there is a need. Programs must provide supplemental computer-based distance learning opportunities to students participating in face-to-face instruction. Programs must also prepare students for and support them in achieving successful transition to postsecondary education/training or employment. All programs must use a portion of their state funds to support a program to recruit, train, and support volunteer classroom aides. Programs will be allowed to provide workplace literacy activities as appropriate. Family literacy activities will be supported with state funds.

Programs will integrate digital literacy, employability skills and workforce preparation activities into services. Basic skills instruction will incorporate activities that require the use of technology, promote critical thinking, and build self-management skills, such as utilizing resources and information, understanding systems, and working with others. Programs will have an intake and orientation process that helps students and staff determine an individual's readiness for participation in the program. This includes activities to help the individual assess their schedule and potential barriers to successful participation in instruction. It also includes a discussion of the individual's reasons and goals for participation. Programs must have attendance and other policies that are consistently enforced to help students develop the self-management skills to persist in services, with the goal that those skills will transfer to employment and postsecondary education situations. All programs will integrate career awareness and career planning activities into the services provided to students, including using those activities as the context for basic skills instruction. Programs must have at least one case manager who works with students to address barriers to participation and to plan and prepare for transition to postsecondary education and/or training. Case management activities in support of transition will be offered in a variety of ways: integrated into instruction, stand-alone group activities, and one-on-one case management support. The activities will include introducing students to and helping them use the resources available through L&I and the PA CareerLink®; helping students identify employment and career pathways that align with their skills and interests and also lead to jobs that pay; and supporting students through the application process for employment or training. Case managers will help students identify and address potential barriers to successful transition, such as child care, transportation, and funding to pay for training, among others. Case managers will work closely with staff at the local PA CareerLink® site and refer students to PA CareerLink® career services as appropriate. Case managers will also coordinate with TANF, Title I, and Title IV career counselors to support co-enrollment.

When and where appropriate, programs will be encouraged to develop integrated education and training activities that provide adult education and literacy activities, concurrently and contextually with both

workforce preparation activities and workforce training for a specific occupation or occupational cluster, and that is for the purpose of educational and career advancement. Integrated education and training activities will support the needs of the local labor market and will be developed in consultation with local workforce development boards, employers, and training providers. The occupational training provided as part of an integrated education and training activity will be connected to realistic, existing employment opportunities in the local area and provide an “on ramp” to a career pathway for the participants. The commonwealth will develop policy and guidance further clarifying allowable and required activities in an integrated education and training program. In addition, the commonwealth will research funding opportunities to cover the costs of the occupational training whenever possible.

Corrections Education and other Education of Institutionalized Individuals. *Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:*

- *Adult education and literacy activities;*
- *Special education, as determined by the eligible agency;*
- *Secondary school credit;*
- *Integrated education and training;*
- *Career pathways;*
- *Concurrent enrollment;*
- *Peer tutoring; and*
- *Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.*

PDE Division of Adult Education will compete funds for services under Section 225 as part of the overall application for Section 231 funds. Eligible providers submitting applications under Section 231 will have the option to include corrections education under Section 225 as part of the services to be provided. Thus, Section 225 funds will be included in the multi-year grants for Title II direct service funds where there is a local need. All aspects of the grant competition as described in sections III.b.5.B.i and ii and Title II Local Activities of the State Plan apply to Section 225 funds. The competition will be open to all eligible providers. PDE has policies procedures, and guidelines in place to ensure that all eligible providers have direct and equal access to apply and compete for funds. The notice of availability of funds is first published through the Pennsylvania Bulletin, the commonwealth’s official gazette for information and rulemaking. Once the notice is published, all grant information is posted to the PDE website, which is accessible to the public. Policies established by PDE’s Communications Office ensure the accessibility of all grant-related documents that are posted to the website. PDE will conduct the grant competition through its eGrants system. Through this system all eligible providers have access to the same grant application for funds, including Section 225 funds. The applications in which Section 225 funds are included will address the seven requirements and thirteen considerations. All applications will be reviewed by teams of at least three using the same rubric and scoring criteria. The rubric will include special consideration to eligible providers that prioritize corrections education services to individuals who are likely to leave the correctional institution within five years of participation in the program. As appropriate, PDE will include individuals with knowledge of corrections education on application review teams.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Through the competition, PDE will ensure that there is at least one eligible provider offering corrections education services in the state. Entities funded to provide corrections education will provide at least one of the allowable activities listed in section 225 and will be required to ensure that priority of service is given to those individuals who are likely to leave the correctional institution within five years of participation in the program.

Integrated English Literacy and Civics Education Program. *Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities*

Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

PDE holds a separate competition for funds to establish and operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Section 243 IELCE grants that were awarded through PDE's first competition under WIOA end June 30, 2020. PDE Division of Adult Education will hold a full and open competition in early 2020 for the next IELCE grant cycle, which will be July 1, 2020 to June 30, 2023. The content of the grant application will address the seven requirements and thirteen considerations identified in WIOA with an emphasis on those that most directly address the goals of section 243, including the extent to which the proposed activities are responsive to regional needs and align with the strategies and goals identified in the Local Plans. Applicants will be required to provide extensive data to demonstrate the need for and potential for success of the proposed IELCE program and the affiliated integrated education and training (IET) activity in the proposed service area. Such data will include, but not be limited to, immigration trends, demographics of the English language learners in the

area where the program will be provided, and employment and labor market statistics that show sufficient employment opportunities for students who complete the program. Applicants will need to provide evidence that they have developed or will be able to develop, in a timely fashion, partnerships that support the purpose of the program. Such evidence will include documentation of commitment from a training provider for the occupational training component of the IET. Applicants will also need to provide evidence of communication with and input from social service organizations serving the target population, the local workforce board, and local businesses/employers in identifying the need for the IELCE program and related IET. Applicants will provide evidence that the occupational training provided in the IET is in-demand industries, has the potential to lead to economic self-sufficiency, and is part of a career pathway. Applicants will be required to provide assurances that the occupational training included as part of the program will be provided by qualified providers.

PDE will not determine specific grant amounts or allocate funds to specific areas. Applicants will determine the amount to request in order to provide a compliant program that meets the intent of section 243. Funds awarded under section 243 will be used to provide a continuum of IELCE activities, including instruction on the rights and responsibilities of citizenship and civic participation, that assist English language learners to acquire the reading, writing, listening, and speaking skills necessary to transition successfully to the integrated education and training activity and to earn a high school equivalency credential, if needed. Programs must provide services to help students identify education and career goals and develop employability skills and must connect students to other services within the workforce system to meet those goals. All section 243 IELCE grantees must provide an IET as part of the program, and the IELCE activities must align with the content of the IET. Section 243 funds will, at a minimum, be used to provide the adult literacy and education activities and workplace preparation activities of the IET programs. Applicants will be encouraged to identify alternative funding opportunities to cover the costs of the occupational training component of the IET; however, use of Section 243 funds for such training will be allowable. PDE will not mandate a specific model for all programs that receive Section 243 funds to provide IELCE with IET. Applicants will propose a model that ensures provision of all required components in compliance with WIOA regulations. In cases in which the grant recipient does not provide all components itself, it will be responsible for ensuring full integration of all activities.

As part of the grant application process, all applicants will be required to submit evidence of demonstrated effectiveness in order for the application to be reviewed and considered for funding. To demonstrate effectiveness, applicants that have been funded under Title II AEFLA, as amended by WIOA, and/or state matching funds through PDE Division of Adult Education in the program years immediately preceding the competition will be required to provide performance data under WIOA section 116 from those years. Applicants that were not previously funded by the Division of Adult Education under Title II AEFLA, as amended by WIOA will be required to provide performance data that show their past effectiveness in serving basic skills deficient eligible individuals, including evidence of success in achieving outcomes in comparable measures. For both groups, these measures include effectiveness in helping English language learners develop their English language skills, achieve high school equivalency, and transition into employment and postsecondary education/training. While all of these measures will be considered as evidence of demonstrated effectiveness, demonstrated effectiveness in improving English language skills of English language learners will be given the greatest weight.

Through a standardized process developed by PDE Division of Adult Education, local boards will review section 243 IELCE grant applications for alignment with the local plan. Eligible providers will submit their applications to PDE through the eGrants system. Once the review of applicant eligibility is completed, the

division will distribute the eligible applications to the appropriate local workforce boards for review. The division will establish a timeline for the review process and provide a review/scoring rubric to all local boards, which will include a section in which local boards can provide recommendations to improve alignment of proposed IELCE program with the local plans. PDE will take the recommendations and results of the review into consideration when making decisions regarding grant awards and conditions.

Eligible providers that are awarded funds through the competition will be required to submit additional documentation to PDE during the contract approval process to ensure that the activities supported by the grants meet all requirements. Providers will submit a completed *Integrated Education and Training Checklist* before the grant contract will be fully approved. They must submit and have approved an *Integrated Education and Training Proposal* before they will be allowed to conduct the IET. Projects funded with state leadership funds (see the next section) will provide technical assistance to IELCE grantees as they develop their curricula to ensure that IELCE activities align with and prepare students for the IET activity and to ensure full integration of components in both IELCE and IET activities. State leadership projects also support grantees to make connections and integrate with partners in the local workforce development system to carry out the IELCE program activities. Grant amounts and conditions for the second and third years of the grant cycle will be based on the following criteria: contract compliance, including success in meeting contracted enrollment and providing the contracted services; evidence of sufficient progress in helping students improve English language skills and successfully enroll in the associated IET; evidence of continuous program improvement; compliance with fiscal and programmatic policies and guidelines; and the availability of funds determined by the amount of the federal award.

PDE has policies, procedures, and guidelines in place to ensure that all eligible providers have direct and equal access to apply and compete for section 243 funds. The notice of availability of funds is first published through the Pennsylvania Bulletin, the commonwealth's official gazette for information and rulemaking. Once the notice is published, all grant information is posted to the PDE website, which is accessible to the public. Policies established by PDE's Communications Office ensure the accessibility of all grant-related documents that are posted to the website. PDE will conduct the grant competition through its eGrants system. Through this system all eligible providers have access to the same grant application for IELCE funds under section 243.

In accordance with PDE grant guidelines, grant applications will be evaluated by teams of at least three individuals. Team members will include staff from the Division of Adult Education, other PDE staff, other qualified commonwealth staff, and, as needed, peer reviewers, subject matter experts, and/or consultants. Division staff will create a scoring rubric specific to the section 243 IELCE grant application, which will address all items in the grant application. Review team members will be trained prior to beginning evaluation and scoring of applications. Once the applications have been reviewed and scored, they will be ranked from highest to lowest scoring. PDE will award grants to the highest scoring applicant and will continue to award funds until the total amount available for grants has been awarded or until all applications that meet the minimum score have been funded.

State Leadership. *Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.*

The overarching goal of PDE's investment of state leadership funds is to support a system of professional development and technical assistance to ensure a high-quality Adult Basic Education system that aligns with the goals of the state, regional, and local workforce development plans to meet the needs of workers and employers in the commonwealth. The system emphasizes program improvement based on data and high-quality research-based technical assistance and professional development opportunities that promote such program improvement.

PDE intends to fund one or more activities that provide technical assistance and support to Title II programs to be effective partners in the workforce development system. Such work will focus on the required activities: 1) align adult literacy activities with other core programs and with one-stop partners, as appropriate, to implement strategies in the State Plan; 2) participation in the development of career pathways that provide access to employment and training for individuals in adult education programs; 3) understanding and fulfilling Title II's role as a one-stop partner to provide access to employment, education and training services. These activities will also support permissible activities such as developing content and models for integrated education and training and career pathways; and promoting linkages with employers to promote workplace adult education and literacy activities and integration of adult education and literacy activities into occupational training.

PDE intends to fund one or more activities to support the use of technology. PDE will continue to support the use of technology to disseminate information about models and promising practices for instruction, staff development and program improvement; instructional and programmatic practices based on rigorous and scientifically valid research; and other information relevant to high-quality adult education and literacy services. PDE will also fund a project to provide technical assistance to eligible providers on the use of technology to improve system efficiencies and provide staff training, as well as on the integration of technology into instruction to promote learning and digital literacy.

PDE intends to fund several activities that, together, comprise a high-quality professional development system that identifies and provides training in the following: instruction in areas such as reading, writing, speaking, mathematics and English language acquisition; use of data for program monitoring and evaluation for continuous program improvement; training for volunteer instructors; and development of lesson plans, resources and curricula that align with the CCRS.

PDE will ensure that procurement of both required and permissible state leadership activities is in compliance with state procurement policy. PDE anticipates using a combination of contractual tools, including both grants and purchase of services.

The quality of Pennsylvania's state leadership and professional development activities will be assessed using both formal and informal methods of evaluation. These evaluations will be completed by participants in the activities, by the providers of professional development and technical assistance (referred to collectively as the professional development system, PDS), and by PDE staff. The goal of evaluation is to support continuous improvement of these professional development activities and to improve instructional practices.

Local program staff will evaluate and provide feedback through several means. Participants will complete evaluations at the end of every formal professional learning opportunity. The evaluations will follow a standard format that includes questions about participant satisfaction and impact on practice, as well as open-ended questions seeking suggestions for improvement. Local program staff across the state will be

invited to participate in the annual formal needs assessment conducted by the PDS. In addition to these formal methods, local program staff will provide feedback via their interactions with the PDS during the consultant meetings held at individual agencies and in the monthly Agency Professional Development Team Webinars. While the main purpose of these meetings is to support the programs' progress in implementing skills and knowledge from professional development and assist agencies in completing improvement at their programs, the discussions also help the PDS and PDE to determine if the professional development and technical assistance activities are helping to improve the use of new knowledge and skills by instructors and are positively impacting student outcomes.

In addition to input from local program staff, PDE has several tools available to directly evaluate the work of the projects funded to provide professional development and technical assistance activities. All projects will submit quarterly and final reports, which will provide evidence of progress toward and achievement of the goals specified in their grant narratives. Evidence will include both quantitative and qualitative data. Additionally, each project will write a program improvement/professional development plan similar to that required of local programs. In the first grant year, each project will identify professional development activities for project staff that support the goals and objectives of the project. In subsequent grant years, each project will examine its prior year quarterly and final reports and submit an improvement plan that includes areas of focus and a description of the professional development in which project staff will participate to meet their program improvement goals. At the end of each year, the projects will submit to PDE an evaluation with appropriate documentation of whether they met their goals for the year. PDE staff will also use its weekly meetings with the leaders of each funded project to monitor and evaluate work.

During the period of this combined state plan, PDE Division of Adult Education hopes to develop a process to evaluate the impact of state leadership activities provided by the PDS on teacher practice and ultimately student outcomes. The development and implementation of the evaluation will build on the knowledge and skills that division staff develop through participation in the National Reporting System Institute: Evaluation Learning Community in 2019-2020.

Assessing Quality. *Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.*

PDE, Division of Adult Education will establish agency performance outcome measures and targets for monitoring, assessment, and evaluation of local programs. The agency performance measures will encompass those outcomes on which adult education and literacy activities have the greatest and most direct impact: educational functioning level gain, attainment of a high school equivalency credential, and transition to postsecondary education or training. In addition, the division will establish targets for employment in the second quarter after exit and median earnings in the second quarter after exit. Further, the division will apply an additional performance measure: the number of outcomes achieved per student; the outcomes are those addressed in the agency performance measures: educational functioning level gain; employment in the second quarter after exit, attainment of a high school equivalency credential, and transition to postsecondary education or training. The numerator for this performance measure is the unduplicated number of successful outcomes an agency has for all of its enrolled students. The denominator is the unduplicated number of enrolled students in the agency.

The Division of Adult Education will conduct formal ongoing monitoring, assessment, and evaluation of local programs through both desk monitoring and onsite monitoring visits. Regional advisors will keep track of agency progress toward key markers of performance, such as contracted enrollment, appropriate assessment, employment outcomes and student persistence, using a range of tools. When data show areas for concern, advisors will contact the local program administrators to discuss the concerns and provide guidance and technical assistance. After the end of the program year, advisors will contact each agency individually to discuss its performance, focusing on areas in which the program has shown progress and areas in which it must improve.

In addition to this ongoing desk monitoring, division staff will conduct comprehensive, on-site monitoring visits. Every year, the division will use a risk rubric to determine which agencies to monitor. Agencies with the highest scores will be selected for on-site monitoring visits. These visits will be conducted by teams of two, four or six people. Each visit will be guided by a monitoring tool to ensure standardization of the visits. Monitoring visits will include an initial meeting with the administrator of the adult education program; class visits; a student focus group; a staff focus group; a review of data and student records; program compliance review; fiscal review; and a meeting at the end of the visit for the presentation of commendations, findings with required actions, and recommendations.

After the monitoring visit, the division will send a written monitoring report to the agency explaining all of the commendations, findings with required actions, and recommendations. The agency will submit a corrective action plan (CAP), which must address all findings with required actions, at a minimum. Agencies will be strongly encouraged to address recommendations as well. The regional advisors will be available to provide technical assistance during the development of the CAP and during implementation of the approved actions for correction and improvement. In addition, programs will be referred to the services of state leadership-sponsored activities where appropriate. The program will be required to provide updates on progress and documentation/evidence of completed actions. When necessary, the regional advisor will conduct a follow up visit approximately six months after the CAP is submitted.

The state office will also conduct ongoing informal evaluation for the purpose of technical assistance and continuous program improvement. Topics will be determined based on the results of future assessment and evaluation.

Local programs will also be supported by state office staff and state leadership activities to engage in required, ongoing self-monitoring, assessment and evaluation. Each program year, they will be required to develop a program improvement/professional development plan based on data and aligned with state office goals. They will be provided with tools similar to those used by the state office staff to track their own progress toward key markers of performance.

Adult Education and Family Literacy Act Program Certifications and Assurances

States must provide written and signed certifications that:

1. The plan is submitted by the State agency that is eligible to submit the plan;

Assurance(s) or Attachment(s): Yes

2. The State agency has authority under State law to perform the functions of the State under the program;

Assurance(s) or Attachment(s): Yes

3. The State legally may carry out each provision of the plan;

Assurance(s) or Attachment(s): Yes

4. All provisions of the plan are consistent with State law;

Assurance(s) or Attachment(s): Yes

5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;

Assurance(s) or Attachment(s): Yes

6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;

Assurance(s) or Attachment(s): Yes

7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and

Assurance(s) or Attachment(s): Yes

8. The plan is the basis for State operation and administration of the program;

Assurance(s) or Attachment(s): Yes

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);

Assurance(s) or Attachment(s): Yes

2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;

Assurance(s) or Attachment(s): Yes

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;

Assurance(s) or Attachment(s): Yes

4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

Assurance(s) or Attachment(s): Yes

5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).

Assurance(s) or Attachment(s): Yes

Section 427 of the General Education Provisions Act (GEPA)

Instructions: In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

As the eligible agency responsible for administering and supervising policy for activities and services under the Adult Education and Family Literacy Act, Title II of WIOA, PDE takes steps to ensure equitable access to and participation in the Title II adult basic education programs funded with AEFLA funds.

In the application for Title II funds, eligible providers must include a description of the steps they will take to ensure equitable access to and participation in the federally-assisted adult education program. Successful applicants enter into grant contracts with PDE, which include the PDE Master Standard Terms and Conditions. The PDE Master Standard Terms and Conditions include multiple requirements for grantees to adhere to all federal and state regulations related to the funding. They also specifically cite Sections 503 and 504 of the Rehabilitation Act of 1973, as amended, as well as The Americans with Disabilities Act.

PDE Division of Adult Education has a Safety, Security, and Accessibility policy. As part of on-site monitoring visits, division staff check for the accessibility of service sites and for the availability of resources and tools to help program participants address learning differences.

To ensure direct and equitable access to federal funds administered through PDE Division of Adult Education, the division holds a full and open competitive grant application process. The notice of availability of funds is published in the Pennsylvania Bulletin, which is available to the public with no limitations. All documents related to the competition are 508 compliant and are posted to the Division of Adult Education Grant Competitions webpage, which is available to the public. Division staff ensure that all interested applicants have access to the eGrants system and will waive the requirement to submit the application through the eGrants system for applicants that can demonstrate extraordinary circumstances impacting the applicant's ability to access the eGrants system.

Contracts for services provided with administrative funds are procured following Commonwealth of Pennsylvania procurement policies and procedures, which ensure equitable access to bid on opportunities. The commonwealth has a program in place to support access to contracts for small diverse businesses.

Vocational Rehabilitation: The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

Input of State Rehabilitation Council. *All agencies, except for those that are independent consumer controlled commissions, must describe the following:*

(1) Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The Pennsylvania Rehabilitation Council (PaRC) used the following sources to develop its recommendations to the Office of Vocational Rehabilitation (OVR):

1. the PaRC annual report (Federal Fiscal Year (FFY) 2018 - 2019);
2. OVR Customer Satisfaction Surveys;
3. review of items in 2018 State Plan Attachment (description a);
4. comments received at 2018 and 2019 State Plan Public Meetings; various meetings with OVR liaisons to discuss and prepare input into the 2020-2023 plan.
5. participation in the Rehabilitation Services Administration (RSA) Monitoring (2019);
6. Comprehensive Statewide Needs Assessment (CSNA) FFY 2016 - 2018 OVR/Institute on Disabilities at Temple University;

7. local Citizen Advisory Committees (CAC) meetings and/or minutes; and
8. quarterly reports received from OVR at PaRC Council meetings.

(2) The designated State unit's response to the Council's input and recommendations; and

Commendation: The Council supports OVR in their efforts to open the order of selection as soon as possible for the benefit of Pennsylvanians with disabilities seeking employment services through OVR.

1. The Closure of the Order of Selection (OOS) for All Categories

Issue: The closure of the Order of Selection (OOS) for all categories represents a significant challenge to people with disabilities having access to employment services when they are needed. OVR must develop appropriate internal controls and other adjustments in order to re-open the OOS as soon as possible and update the PaRC regarding progress on at least a quarterly basis.

Recommendations/Measurable goals:

- A. OVR provides quarterly reports (at a minimum) to the PaRC on how many people were added to and removed from the waiting list in each category each quarter.

OVR Response: OVR will provide quarterly reports to the PaRC during the quarterly council meetings to address how many people were added to and removed from the OOS waiting list in each category per quarter.

- B. OVR provides quarterly reports (at a minimum) to the PaRC and the State VR Board on new application response times.

OVR Response: OVR numbered memo 17-200.02, *Essential Procedures for the Vocational Rehabilitation Program* establishes the 15-day standard for persons referred to OVR for services to be contacted and the 30-day standard for an intake appointment to be scheduled. OVR is currently not tracking these timeline statistics. OVR appreciates the importance of this recommendation and will explore how tracking of this information can occur within the Commonwealth Workforce Development System (CWDS). In addition, during PaRC quarterly meetings, OVR will report on progress related to this recommendation and share statistical information on the number of individuals who were determined eligible for services and had eligibility completed within 60 days per quarter.

- C. OVR establishes a clear deadline for reopening the OOS with intermediate steps and goals to re-open the OOS on time. OVR provides quarterly reports (at a minimum) to the PaRC on progress and factors affecting progress toward achieving the goal of re-opening the OOS on a permanent basis by the deadline.

OVR Response: The goal of OVR is to open the OOS as soon as possible. RSA has approved OVR to review and evaluate the ability to open the OOS on a quarterly basis. OVR will report to the PaRC quarterly on plans to reopen the OOS and factors affecting progress toward achievement of this goal.

- D. Identify resources and opportunities outside of OVR for organizations to provide employment services to OVR customers on the waitlist.

OVR Response: OVR will seek opportunities to leverage other public and private resources that may provide employment services to OVR customers on the waitlist. During a closed OOS, information and referral services will remain available. Individuals will be given information and referrals to other appropriate Federal and State programs, including programs carried out by other components of the Statewide Workforce Development System, such as the one-stop centers known in the Commonwealth as PA CareerLink®.

2. Hiram G. Andrews Center (HGAC)

Issue: OVR's current fiscal problems require a review of HGAC's return on investment.

Recommendations/Measurable Goals:

A. OVR should conduct a study at a minimum of every 3 years and report on the return on investment (compared to community-based VR services) for students attending HGAC. HGAC's yearly budget averages approximately \$23 million, which includes staff, operations, brick and mortar and other costs. Overall, the cost per customer is reported as significantly higher at HGAC than that of non-HGAC customers. The report must include:

- (1) an analysis on return on investment;
- (2) an impact statement on customer choice;
- (3) a review of the extent to which its programs are provided in an integrated setting;
- (4) an assessment of the availability of HGAC programs in the community; and
- (5) a determination of what other partners like the Pennsylvania Department of Education (PDE) should be paying/contributing.

OVR Response: OVR will conduct a regular review of HGAC and provide data and information that illustrates the viability, value, and uniqueness of HGAC from multiple perspectives (customer satisfaction, Comprehensive Statewide Needs Assessment, Fiscal, programmatic outcomes, diversification initiatives of student populations and revenue streams). This information will be shared with the PaRC during their quarterly meetings.

3. Conduct a review of OVR's statutory and regulatory obligations to obtain public comment and/or consult with stakeholders, providers, VR staff, and individuals with disabilities in the development, implementation and amendment of OVR's policies and procedures.

Issue: Pursuant to 34 CFR 361.20, OVR is required to solicit public participation when it proposes to develop, amend or otherwise modify substantive policies/procedures affecting OVR services.

Recommendations/Measurable goals:

A. OVR should provide quarterly information on the number and names of new/amended policies, such as a college policy or vehicle modification policy, being developed or in consideration for future development/modification, including how they differ from any existing policy and the potential number of customers impacted by the policy.

OVR Response: During each PaRC quarterly meeting, OVR will continue to report on the number and names of new/amended policies being developed or in consideration for future development/modification.

B. Inclusion of the Council in the development/amendment of the policy/procedure, the proposed timeline of implementation, including schedule of public comments and plans to educate stakeholders on the new/amended policy/procedure.

OVR Response: When a substantive policy/procedure change is being considered, OVR will continue to consult with RSA to confirm that a public comment period is necessary. OVR will continue to invite Council members to participate in any planned workgroup. OVR will continue to provide subsequent drafts of new and revised policies to the appropriate PaRC committees and full council. OVR will keep the PaRC informed of any training plan developed to educate stakeholders on policy changes.

4. Strengthen Collaboration and Partnerships with Stakeholders

Issue: OVR has made significant changes to services without including key stakeholders throughout the change development process. OVR needs to make sure that those changes will not unnecessarily reduce the achievement of outcomes in terms of quantity and quality.

Recommendations/Measurable goals:

A. Before OVR makes any substantive changes, the PaRC will be informed of what needs to change and why, and what affected stakeholder representatives are being included in the change development process.

OVR Response: OVR will continue to inform the PaRC before making any substantive changes to policy and identify which stakeholders may be affected by any change.

- B. OVR provides (at a minimum) quarterly reports to the PaRC on all substantive changes either anticipated or currently in development with information on progress, including key stakeholder representative involvement and contributions to the process.

OVR Response: When a substantive policy/procedure change is being considered, OVR will continue to invite Council members and stakeholder representatives to participate in any planned workgroup. Workgroup progress will be provided during quarterly PaRC meetings.

- C. OVR provides annual reports (at a minimum) on feedback survey information from key partners.

OVR Response: Anytime OVR initiates a survey of key partners, the results will be shared during quarterly PaRC meetings.

- D. OVR provides quarterly progress reports with measures of quality and quantity of outcomes for partnerships, programs, and services, including pre-employment transition services, local workforce development boards, supported and customized employment, business services, and PA CareerLinks®.

OVR Response: OVR provides quarterly reports on Act 26, Work Experience for High School Students with Disabilities, which is shared with the PaRC and available publicly on OVR's website. This report includes information related to pre-employment transition services as well as information on supported employment outcomes. OVR developed an Excel document that identifies connections between OVR District Offices with workforce development boards and PA CareerLinks®. This document can be shared with the PaRC on an annual basis. OVR Business Services information is regularly included in the Executive Director quarterly report to the PaRC.

5. Review of OVR Policies and Procedures

Issue: Clarification is required regarding public participation in the adoption or amendment of OVR policy, and OVR's obligation to consult with the PaRC, among others, on matters of general policy arising in the administration of the VR services portion of the State Plan.

Recommendations/Measurable goals:

- A. OVR reports to the PaRC on a quarterly basis substantive policies and procedures under review which are subject to public meetings, non-substantive administrative changes, and policies on matters of general administration of the VR program which require consultation. Additionally, include quarterly reports on workgroups.

OVR Response: Pursuant to 34 CFR 361.20, OVR will report to the PaRC on any substantive changes to policies or procedures governing the provision of vocational rehabilitation services that would require

OVR to conduct public meetings and/or directly impacts services provided to individuals with disabilities. As requested, OVR will also report during quarterly PaRC meetings on any active workgroups.

(3) The designated State unit's explanations for rejecting any of the Council's input or recommendations.

OVR did not reject any of the PaRC's input or recommendations.

Request for Waiver of Statewideness. *When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:*

(1) A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

OVR requests a continuation of its waiver of statewideness for its Intergovernmental Agreement (IGA) with the Berks Career and Technology Center (BCTC) and its IGA with the School District of Lancaster (SDoL). Through each of these programs, transition age students with disabilities are provided with enhanced activities and services that lead to employment or career-related postsecondary education or training.

OVR entered into an IGA with BCTC effective October 1, 2014, to provide school-to-work transition services to OVR eligible students with disabilities who are enrolled in approved training programs at BCTC and attend one of 16 public school districts within Berks County. The most recent IGA with BCTC was approved by the BCTC Board of Directors on December 10, 2018, signed by the school's authorized representative, and then fully executed by the Commonwealth on March 7, 2019. BCTC provides 21.3 % of project funding which serves as the required local/state match. OVR provides the remaining 78.7 % from federal VR funds.

BCTC's program, named "Work Partners Program," provides for joint funding (including salary & benefits) of two positions which did not previously exist at BCTC:

1. School-to-Work Coordinator (Professional); and
2. Job Trainer (Paraprofessional).

Services to be provided through the Work Partners Program include:

1. workplace readiness instruction;
2. work-based learning experiences which include job shadowing, internships, and paid work experiences;
3. job development and placement services including employer contacts, job site analyses, job task analyses, facilitation of job accommodations, coordination of job interviews, and on-the-job supports;
4. career training supports to address employment related concerns on and off the job; and

5. independent living skills related to employment.

Goals and Deliverables of the Work Partners Program

During fiscal years 2018-2023, it is expected that:

1. 60-65 OVR eligible and potentially eligible students with disabilities will participate in the Work Partners program each year;
2. 100% of OVR eligible and potentially eligible students in the program will receive workplace readiness instruction prior to graduation;
3. 100% of OVR eligible and potentially eligible students with disabilities in the program will participate in at least one form of work-based learning experience prior to graduation;
4. 80% of OVR eligible and potentially eligible students with disabilities in the program will receive job development & placement services and career training services prior to graduation; and
5. 60% of OVR eligible and potentially eligible students with disabilities who graduate from the program shall be placed in competitive, community-integrated employment or post-secondary education consistent with their Individualized Educational Plan, related Transition Plan, and their Individualized Plan for Employment (IPE), if available.

BCTC served 68 students to date in FFY 2019: 100% of these students received workplace readiness instruction; 84% of the students participated in at least one form of work-based learning experience prior to graduation; 100% of the students received job development & placement services and career training services prior to graduation; and 89% of the graduates were placed in community-integrated employment or post-secondary education.

A second IGA was developed between SDoL and OVR to provide school-to-work transition services for OVR eligible students with disabilities enrolled in education supports at SDoL.

The IGA provides SDoL with funds to create two programs, named “Employability and Career Readiness” and “College and Career Readiness.” The IGA allows for joint funding (including salary & benefits) of three positions which did not previously exist at SDoL:

1. Program Coordinator (Professional);
2. Vocational Special Education Teacher (Professional); and
3. Job Trainer (Paraprofessional).

The two programs are considered to be two separate paths for transition services. Pathway One is identified as “Employability and Career Readiness” and Pathway Two is identified as “College and Career Readiness.”

Services in the Employability and Career Readiness program include:

1. workplace readiness instruction;

2. work-based learning experiences which include job shadowing, internships, and paid work experiences;
3. job development and placement services including employer contacts, job site analyses, job task analyses, facilitation of job accommodations, coordination of job interviews, and on-the-job supports;
4. career training supports to address employment related concerns on and off the job; and
5. independent living skills related to employment.

The Goals of the Employability and Career Readiness program are:

1. to provide employment skills, career readiness training and transition services to 50 OVR eligible students with disabilities;
2. to provide at least one form of work-based learning experience to 50 OVR eligible students with disabilities during FFY 2019 – 2020; serve 60 OVR eligible students with disabilities during FFY 2020 – 2021;
3. to establish a minimum of 4 student-employee (job positions) with employers that afford small group training opportunities for OVR eligible students with disabilities during FFY 2019-2020 and 5 student-employee (job positions) with employers during FFY 2020-2021;
4. to establish a minimum of 4 student-employee (job positions) with employers that afford on-site employment training opportunities for OVR eligible students with disabilities identified by the school district as having a need for a high level of support during FFY 2019-2020 and 5 student-employee (job positions) with employers during 2020-2021;
5. to have 25 OVR eligible students with disabilities receive job coaching services for FFY 2019-2020 and FFY 2020-2021; and
6. to have 20 OVR eligible students with disabilities shall be placed in competitive, community integrated employment consistent with their Individual Education Plan (IEP). Same goal expectation for FFY 2020-2021.

The College and Career Readiness program incorporates college and career readiness supports on a college campus. This Pathway is designed to assist students with disabilities acquire skills necessary in transitioning from high school to a post-secondary education program. Students enrolled in the College and Career Readiness program have identified employment goals which require post-secondary training to secure employment.

The goals of the College and Career Readiness program include:

1. during fiscal years 2019-2020, and 2020-2021, this project will provide college and career readiness instruction to 12 OVR eligible students with disabilities each year; and
2. as a result of the services provided through this agreement, it is expected a minimum of 5 OVR eligible students with disabilities shall be placed in post-secondary educational programs consistent with their Individualized Education Plan. Goal expectation is increased to 8 OVR eligible students with disabilities for FFY 2020-2021.

The IGA was approved by SDoL and signed by the school's authorized representative. SDoL provides 21.3% of project funding which serves as the required local/state match. OVR provides the remaining 78.7% from federal VR funds.

During the past two school years (2017-18 and 2018-19) of the Employability and Career Readiness Program: 83 OVR eligible students with disabilities received employability skills, career readiness training and transition services; 47 students participated in at least one form of work-based learning experience; 5 student-employee (job positions) with employers that provide small group training were developed and 5 student-employee (job positions) with employers were available for individual high needs students cases; 39 students participated in extended work site training (job coaching); and 15 students were placed in competitive, community integrated employment consistent with their IPE.

The College and Career Readiness Program during the past two school years provided 24 OVR eligible students with college/career readiness training and transition services, and 17 of these students were placed in post-secondary education consistent with their IEP.

Statewide replication of these programs could provide OVR with opportunities to braid funding, address the needs of OVR eligible students with disabilities, and to collaborate with the Departments of Education and Human Services more effectively.

(2) The designated State unit will approve each proposed service before it is put into effect; and

OVR, as the designated State unit, approved each proposed service before it was put into effect as demonstrated by a fully executed inter-governmental agreement (IGA) between the parties and following guidance in the OVR Fiscal Policy. Based upon 34 CFR §361.50 and the OVR Fiscal Policy guidance, the OVR Executive Director or their designee also conducted a rate review of these inter-agency agreements to determine appropriate rates. These agreements are available for review, by year, upon request.

OVR approves each proposed service before it is provided by requiring BCTC and SDoL to submit budgets listing service costs for pre-approval. The IGAs were drafted to state that the parties to the agreements shall provide the services as specified and described in Appendix A of each of the Agreements, consistent with the submitted budgets as described in Appendix B of said Agreements. These terms are continued after the first-year term of the IGA, when the renewal process of the IGA requires the provider to submit statements of work including descriptions of the proposed services, a timeline for the provided services, and expected student outcomes, which OVR then approves or requests revisions on, prior to the execution of the renewal. Further, since the budgets are proposed and approved prior to the provision of the services, any changes to service provision must be requested by the provider and approved by OVR prior to implementation.

(3) Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

All other State Plan requirements of the VR services portion of the State Plan will apply to the services approved under the waiver.

Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System. *Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:*

(1) Federal, State, and local agencies and programs;

Current agreements include the following:

1. The Pennsylvania Department of Health (DOH), Department of Labor & Industry (DLI), PDE, and Department of Human Services (DHS) entered into a Memorandum of Understanding (MOU) in 1999, with a 2006 Addendum, and a Transition MOU addendum in 2010, to devote staff and other agency resources to promote successful post-school outcomes for youth/young adults with disabilities in transition. Per WIOA amendments to the Rehabilitation Act, an updated MOU is being developed between the parties as both OVR and PDE share responsibility to prepare students with disabilities for successful community employment. DHS transfers funds to OVR for programs under this MOU, which enables OVR to draw additional match funds and further our partnerships to our mutual customers.
2. A Data Sharing Agreement between OVR and the Office of Developmental Programs (ODP) has been finalized to exchange information on the services delivered to individuals enrolled in DHS ODP programs who also receive or received services through OVR. OVR and ODP are sharing data between the CWDS and the Home & Community Services Information System.
3. OVR and ODP issued a joint bulletin that dictates when an individual receiving Supported Employment (SE) services can move to ODP-funded extended services and documentation requirements.
4. An MOU was initiated between OVR and the DHS Office of Mental Health and Substance Abuse Services (OMHSAS) in 2017, which ends on June 30, 2022. The MOU allows for a funding transfer from DHS to OVR, which supports opportunities for customers with serious mental illnesses and serious emotional disturbances to participate in the Certified Peer Specialist (CPS) training opportunities to achieve competitive integrated employment.
5. An MOU has been developed between OVR and DHS, Bureau of Juvenile Justice Services (BJJS). The MOU was established in May of 2017 to provide pre-employment transition services to adjudicated students and youth placed in Pennsylvania Academic Career Technical Training (PACTT) affiliate locations. The MOU was amended in July 2019 to also include dependent students and youth. OVR has collaborated with the PACCTT affiliates to provide the 5 required pre-employment transition services to this vulnerable population to expose them to as many employment and post-secondary options as possible. OVR has provided group and individual services to these affiliates through pre-employment transition services provider agreements with the PACTT affiliate, OVR staff, or an outside provider. OVR has also collaborated with local community colleges to provide post-secondary educational opportunities to residential, community-based, and secure facilities throughout the state.

6. OVR has entered into Institute of Higher Education Agreements with the 14 State owned Universities and the 14 Community Colleges referred to as the Pennsylvania State System of Higher Education. The Institute of Higher Education Agreements will remain in effect through January 31, 2020. This will be re-initiated by OVR in 2020.
7. OVR partners with Pennsylvania Centers for Independent Living (CILs) by executing grants and contracts to provide services and outreach projects to individuals with disabilities within community settings.
8. OVR has entered into IGAs with BCTC, the SDoL, ODP, BJJS, and OMHSAS for the provision of VR services and referrals.

(2) State programs carried out under section 4 of the Assistive Technology Act of 1998;

PA-OVR utilizes the following agreements to address the assistive technology needs of customers seeking employment services:

1. Pennsylvania's Initiative on Assistive Technology (PIAT), a program of the Institute on Disabilities at Temple University, is Pennsylvania's statewide program under section 4 of the Assistive Technology Act. Activities that are provided by PIAT are: device demonstrations; device lending; device reuse; public awareness activities; and trainings to raise awareness and knowledge of assistive technology (AT) topics. Any of these activities are available to OVR staff and clients, mostly at no charge.
2. OVR has multiple AT providers on the fee schedule for customer services; some providers have Letters of Understanding (LOUs) or Administrative Memoranda (AM) agreements for the provision of services.
3. OVR establishes an annual contract via an Invitation for Bid with an AT provider for staff services.

(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

Currently, OVR does not have any agreements with the Department of Agriculture. However, in 1997, OVR and the Pennsylvania State University, College of Agricultural Sciences, Penn State Extension approved an LOU for the AgrAbility program. Since that time, the LOU and the associated fees were updated in 2002 and 2014. In 2017, two new fees were added to the LOU. Currently both agencies are developing a new AM. The AgrAbility Project is a statewide project whose staff provides direct services for farmers and farm family members with a disability or long-term health condition who want to remain in production agriculture. This agreement does not guarantee a specific amount of total funds or total number of participants to be funded by OVR. OVR has modeled this agreement and payment structure after existing rates and services where applicable.

(4) Non-educational agencies serving out-of-school youth; and

OVR has numerous Provider Agreements and AMs with a variety of service providers serving all populations, including out-of-school youth:

1. OVR has developed an On-the-Job Training (OJT) initiative specifically targeting youth. This was entitled "Jobs for All" and allowed a Youth in plan status who starts a non-permanent summer job to have their employer reimbursed for their wages. One occupational sector, large scale amusement and theme parks such as Hershey Park in Derry Township Dauphin Co., DelGrosso's

amusement Park and Laguna Splash Water Park in Tyrone, PA., and Dorney Park in Allentown have offered summer youth served by OVR hundreds of hours of work. These initial employment experiences have helped to build soft skills, a work ethic and work record. Other employers have included municipalities, seasonal retailers and food service/fast food employment. This initiative included over 230 employers.

2. OVR continues to develop more programs to partner with community service providers to target transition aged youth. This includes access to summer jobs through shared employer contacts such as Lowe's, Fed Ex., Fenner Drives, Giant Eagle, McDonalds and Walmart.

(5) State use contracting programs.

OVR uses a number of statewide contracts through the Pennsylvania Department of General Services (DGS), the agency responsible for the majority of Commonwealth contracting programs. The Business Enterprise Program (BEP) and DGS created the "Randolph-Sheppard Retail Sales" Invitation to Qualify (ITQ) which is solely revenue based. This ITQ pre-qualifies contractors to provide vending machine and micro-market services for locations not operated by BEP Licensees. When a vending facility is available and there is no BEP licensee to operate the facility, a Request for Quote (RFQ) is developed and sent to the ITQ qualified contractors. An ITQ qualified contractor will be awarded a contract to provide necessary services based on the best value, meaning the best service with an appropriate commission remitted to the BEP. DLI procurement then creates a contract with the awarded contractor. Commissions are sent to the BEP based on the awarded proposal.

OVR and ODP have developed a Training Services ITQ through DGS for Specialized Professional Skills Development Training. This ITQ seeks contractors to administer Supportive Employment Certification Trainings for OVR and/or ODP Community Rehabilitation Provider (CRP) agencies, who support individuals with the most significant disabilities, and who provide supportive employment services. Contractors will provide training for CRP agencies for the following two certifications: The Association of Community Rehabilitation Coordinators (ACRE)'s Certificate Training Program; or the Association of People Supporting Employment First (APSE) Certified Employment Support Professional (CESP) Certification.

DGS developed a statewide Invitation for Bid to establish a contract to provide Sign Language Interpretation and Transliteration Services for all agencies in the Commonwealth requiring the services of an interpreter or translator for business functions. OVR uses this contract to secure interpreter services for daily business proceedings, meetings, workshops, public presentations, and conventions.

DGS developed a statewide Request for Proposal to establish a contract for Information Technology Hardware for Commonwealth executive agencies. OVR uses this contract to purchase computers, monitors and peripherals for staff.

DGS developed a statewide Information Technology (IT) Services ITQ to qualify responsible and responsive contractors to address IT service requirements of the Commonwealth of Pennsylvania's executive agencies. This contract is for fixed price, deliverables-based IT services projects. OVR uses this contract to purchase IT Training-Classroom/Non-Classroom for OVR staff.

Coordination with Education Officials. *Describe:*

(1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

OVR and PA's Bureau of Special Education (BSE) have been working to revise the Memorandum of Understanding (MOU) and we have a tentative agreement where both legal departments agree to the terms. The MOU is in the final stages of approval with the PA Office of General Counsel, and we are hopeful that the MOU will be in place by July 1, 2020. However, due to the COVID-19 pandemic, the MOU may be delayed.

(2) Information on the formal interagency agreement with the State educational agency with respect to:

A. A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

In the draft MOU with Pennsylvania Department of Education, OVR agrees to:

- provide consultation for transition planning for students with disabilities to facilitate the development of their IEPs. OVR can provide information, technical assistance, case consultation and information/referral as needed for eligible or potentially eligible students.
- coordinate with non-educational agencies, such as juvenile justice, treatment facilities or foster care programs, for referrals of out-of-school youth with disabilities. These youths will be encouraged to participate in transition services and programs to improve future employment opportunities.
- inform and collaborate with Local Education Agencies (LEA) on development and implementation of community events, such as job fairs, transition fairs, and career days, to introduce students with disabilities to possible career goals.
- Along with BSE, collaborate on the provision of ongoing joint staff training, such as development and implementation of IEPs, pre-employment transition services, accommodations under Section 504, and limitations on youth entering employment paying subminimum wage.

Additionally, OVR participates in collaborative training each school year with other statewide transition stakeholders for education staff so that the most recent pre-employment transition services information is made available to all LEAs.

Documentation requirements under Section 511 of the Rehabilitation Act for students with disabilities seeking subminimum wage employment: Under Section 511 of Rehabilitation Act, 14(c) businesses referred to as "employers" are prohibited from employing any individual with disabilities who is 24 years of age or younger at subminimum wage, unless the individual has received documentation from OVR upon completion of all the following activities:

1. Pre-employment transition services or transition services under the IDEA; and
2. Apply for VR services and the individual was determined:
 - Ineligible for VR services.

- Eligible for VR services, had an approved IPE, and the individual was unable to achieve an employment outcome in CIE after a reasonable period of time, and his/her case was closed.
- Regardless of the eligibility determination made, the youth with a disability has received career counseling, and information and referral services to federal and state programs to help the individual explore, discover, experience, and attain competitive, integrated employment and the counseling and information was not for employment at subminimum wage.

BSE will direct LEAs to disseminate these requirements to parents, guardians, teachers, and students. OVR will maintain the documentation and provide a copy to the youth within the timelines identified as specified under 34 C.F.R. Part 397. Any of the services identified above that LEAs provide must be documented by the LEA and provided to the student and OVR.

OVR, in consultation with the BSE, will develop a new process or use an existing process to document the completion of the actions described in sections 397.20 and 397.30 by a youth with a disability, as well as a process for the transmittal of that documentation from LEAs to OVR, consistent with the confidentiality requirements of the Family Education Rights and Privacy Act (20 U.S.C. § 1232g(b) and 34 C.F.R. §§ 99.30 and 99.31) and IDEA (20 U.S.C. § 1417(c) and 34 C.F.R. § 300.610), pursuant to section 511(d) of the Rehabilitation Act and 34 C.F.R. § 397.10. This documentation must contain, at a minimum (34 C.F.R. § 397.10(a)(1)):

- youth's name;
- determination made, including a summary of the reason for the determination or a description of the activity or service completed;
- name of the individual making the determination or the provider of the service or activity;
- date determination was made or the required service or activity completed;
- applicable signatures and dates by OVR or education personnel making determination or documenting completion of the required services or activity;
- signature of the OVR personnel transmitting documentation to the youth with a disability; and
- date and method by which the document was transmitted to the youth.

If a youth with a disability or, as applicable, the youth's parent or guardian, refuses, through informed choice, to participate in the activities required by Section 511 or the implementing regulations at 34 C.F.R. Part 397, documentation must, at a minimum:

- contain the information in section 397.10(a)(2); and
- be provided by the OVR to the youth within 10 calendar days of the youth's refusal to participate.

OVR and LEAs will retain copies of the documentation in a manner consistent with the requirements of 2 C.F.R. § 200.333.

BSE will not and will instruct LEAs to not enter an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

B. B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

The draft MOU states that OVR will collaborate with the BSE to provide any or all the five pre-employment transition services required activities or Transition services described in WIOA to students with disabilities 14-21 years of age who are in a secondary, postsecondary, or other recognized educational program. Pre-employment transition services are provided based on individual need once a student request's them or is recommended for one or more pre-employment transition services. Any pre-employment service OVR provides will be to students identified by the school of record or to an individual known as a person with a disability to the OVR staff. Additionally, OVR will work collaboratively with LEAs to provide transition services for students with disabilities to facilitate the development and implementation of IEPs in accordance with section 1414(d) of the IDEA. 20 U.S.C. § 1414(d).

In addition to the MOU and WIOA, The Pennsylvania Work Experience for High School Students with Disabilities Act (Act 2016-26) requires OVR to collaborate with local education and public agencies. Act 2016-26 requires:

- OVR to provide pre-employment transition services;
- OVR to facilitate the process of job and career development between local education agencies and public and private employers focusing on: job skills training; job coaching; competitive integrated work-based learning experiences; and counseling on opportunities for enrollment in post-secondary education programs;
- that students with disabilities have pre-employment transition services included in Individualized Education Plans (IEP) when appropriate; and
- OVR to report on IEP meeting attendance.

C. C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

The draft MOU states that OVR will:

1. Roles and Responsibilities.

- - OVR Responsibilities:
 - Provide students with pre-employment transition services and transition services under Title IV of the Rehabilitation Act of 1973, as amended by WIOA.
 - Conduct outreach for students with disabilities who may benefit from VR services as early as appropriate during the transition planning process. OVR will work to foster the referral of students with disabilities to VR services at least two years prior to exiting high school.
 - Coordinate a referral process for students with disabilities in need of pre-employment transition services, and students or youth with disabilities interested in applying for VR services. A student with a disability is an individual: with a disability in a secondary, postsecondary, or other recognized education program between the ages of 14 and 21; who is eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1411 *et seq.*); or is an individual with a disability, for purposes of section 504.

- Determine eligibility for individual VR services and develop an Individualized Plan for Employment (IPE) in coordination with the student’s or youth’s IEP or 504 plan as early as possible, if a student is interested and applies for VR services prior to graduation.
- Attend IEP meetings in person or by alternative means, such as videoconferences and conference calls, when invited by LEAs.
- Designate staff to be responsible for the oversight of the provision of technical assistance and consultation, and the development of program strategies and procedures applicable for students with disabilities.
- Provide technical assistance to BSE and LEAs through formal and informal training, joint problem-solving, and exchange of information on policies and procedures.
- Identify a single point of contact for each LEA (including charter and cyber charter schools) and other schools (including approved private schools and other specialty schools) who will coordinate transition activities, develop collaborative approaches for student outreach and referral for VR services, facilitate communication with OVR staff, and assist with transition planning that facilitates the completion of a student’s IEP and the student’s transition from school to post-school employment.
- Provide information to BSE on referrals and employment outcomes of students with disabilities by LEA on an annual basis, and additional information as requested and as applicable law allows.
- Share information regarding policies, procedures, guidelines, programs and services to improving the access to, and availability of, pre-employment transition services and transition services.
- Provide brochures and materials about the OVR process and services to LEAs for distribution to the students, parents, legal guardians, teachers and others.
- Promote employer participation in work-based learning experiences, such as worksite tours, employer mock interviews, job shadowing, and paid work experiences for students with disabilities.
- Advise OVR staff to attend IEP meetings when invited and with parental consent to provide employment information, technical assistance, case consultation, and information on VR programs and referrals needed (refer to BSE/OVR Tools and Guidance Document).
- Perform outreach activities that help inform LEAs, students with disabilities, and their families about the VR program, including purpose of program, VR eligibility requirements, referral and application procedures, and the scope of services that may be provided to eligible individuals.
- Provide supported employment services to a student in their final 6 months of high school to secure permanent competitive, integrated employment if it is an identified service in their IPE.
- - BSE Responsibilities:
 - Ensure the provision of FAPE, including transition services.
 - Provide the student with FAPE, and transition services under IDEA. [34 CFR §300.43 (Authority: 20 U.S.C. 1401(34))]
 - (a) Transition services means a coordinated set of activities for a child with a disability that:

- (1) is designed to be within a results-oriented process, that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child’s movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including Supported Employment), continuing and adult education, adult services, independent living, or community participation; and
- (2) is based on the individual child’s needs, taking into account the child’s strengths, preferences, and interests; and includes—
 - (i) instruction;
 - (ii) related services;
 - (iii) community experiences;
 - (iv) the development of employment and other post-school adult living objectives; and
 - (v) if appropriate, acquisition of daily living skills and provision of a functional vocational evaluation.
- (b) Transition services for children with disabilities may be special education, if provided as specially designed instruction, or a related service, if required to assist a child with a disability to benefit from special education.
- Ensure that LEAs’ coordinated set of activities supports career and post-secondary education and training options.
- Ensure that LEAs collaborate with OVR in the provision of transition services and pre-employment transition services.
- Ensure that LEAs collaborate with OVR in determining the student’s needed pre-employment transition activities based upon the student’s current assessment and secondary transition post-secondary goals.
- Ensure that LEAs provide opportunities for students to develop employment skills and participate in community experiences.
- Ensure that LEAs provide available student information to assist in VR eligibility determination and receipt of pre-employment transition services.
- Ensure that LEAs assist OVR staff with access to students and their school environment and with identifying opportunities to work with students.
- Ensure that LEAs invite OVR staff to the student’s IEP meeting.
- Ensure that LEAs collaborate with OVR to determine who will be responsible for providing services that are both special education services and VR services.
- Ensure LEAs are not contracting with an entity for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage.
- For students with disabilities who are seeking subminimum wage employment after high school exit, ensure that LEAs provide OVR documentation of completion of appropriate transition services under IDEA.
- Ensure that LEAs implement special education requirements for transition planning services specified in IDEA as evidenced by the development and implementation of IEPs for students with identified needs.

- Designate BSE personnel to be responsible for the provision of technical assistance and consultation, and the development of statewide program strategies and procedures applicable to students with disabilities transitioning from school to post-school activities.
- Coordinate a network of professionals focused on assisting schools with implementing effective transition planning and services.
- Provide technical assistance and consultation to OVR through formal and informal training, joint problem-solving, and exchange of information on policies and procedures.
- In accordance with applicable law, share data related to students with disabilities regarding transition services, post-secondary goals, post high school outcomes, and exiting environment data.
- Provide representation on the VR State Rehabilitation Council and relevant committee participation.
- - Mutual Responsibilities:
 - Training and Technical Assistance: OVR will provide consultation and technical assistance to LEAs that will assist in the planning and transition of all students with disabilities who are eligible or potentially eligible from school to post-school activities, including employment. OVR will develop and provide common training and professional development opportunities to improve transition and employment results for youth.
 - Planning and Coordination: OVR and BSE will collaborate in the development of a work group (Pre-Employment Transition Activities Task Force) that targets the improvement of transition to employment outcomes in integrated, community settings for students with disabilities. This taskforce will also explore and identify pre-employment transition services and transition-related services (work-based learning, internships, apprenticeships, dual enrollment programs, industry recognized credential programs, and college programs). Further, OVR and BSE agree to work collaboratively to coordinate with and engage employers on pre-employment transition services for students with disabilities and transition services for youth with disabilities.
 - OVR and BSE will continue to collaborate and lead in the PA Secondary Transition Community of Practice and related State Leadership Team.
 - Data Sharing: OVR and BSE will share of data, within the bounds of applicable law, of potentially eligible and/or eligible students with disabilities regarding transition services and outcomes.
 - OVR and BSE will post this MOU and provide training and technical assistance to VR and Education staff at the state and local level that is recorded and archived on their respective websites.
 - OVR and BSE will minimize redundant services and maximize resources in both systems.
 - OVR and BSE will provide a copy of this MOU to the following key stakeholders:
 - - all LEA superintendents or chief school administrators;
 - all directors of special education;
 - all OVR District Administrators;

- the DLI Office of Developmental Programs;
 - Pennsylvania Rehabilitation Council (PaRC);
 - State Board of Vocational Rehabilitation;
 - Client Assistance Program (CAP); and
 - other entities as identified.
- OVR and BSE will mutually develop and distribute notices, memorandums, and other information regarding transition to key stakeholders.
- Transition Services/Accommodations: OVR and BSE will identify and disseminate information about pre-employment transition services and transition services, accommodations, employment services, effective practices/strategies that create positive employment outcomes to program staff, partners, families, individuals, employers, and public and private stakeholders.
- Assistive Technology (AT): BSE will work with OVR on identifying the AT needs of students eligible for OVR services.
- OVR and BSE will encourage students with disabilities to gain targeted skills necessary to compete in the workforce through specialized technical education programs, trade schools, pre-apprenticeships/apprenticeships, industry-based skills trainings, and internships.
- OVR and BSE will investigate additional funding sources for high school students with disabilities, such as statewide WIOA Title I programs for supplemental assistance through individual training accounts (ITAs).

D. D. Procedures for outreach to and identification of students with disabilities who need transition services.

In the draft MOU, it is stated:

OVR and BSE will support outreach activities that will ensure referrals to OVR to provide eligible and potentially eligible students with disabilities a smooth school-to-work transition.

Outreach activities of VR counselors are primarily focused on providing information about VR to school staff, students, parents, community professionals, and others interested in pre-employment transition services and 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 following:

- VR program purpose;
- eligibility requirements;
- application procedures;
- scope of services that may be provided to eligible students; and
- pre-employment transition services that may be provided to potentially eligible or eligible students.

OVR can provide information to BSE and LEAs regarding OVR services that can be disseminated to students and their families. OVR staff may conduct outreach in the following manner:

- providing VR brochures and business cards to the school;
- presenting at the first open house, parent information nights, or orientation held at the school;

- conducting regularly scheduled school visits (co-location);
- participating in transition and job fairs at the school;
- attending IEP meetings, when invited; and
- speaking about pre-employment transition services and VR services at school staff meetings, teacher in-service training, student/parent group meetings, or interagency meetings.

OVR should work with LEAs to ensure referrals of students with disabilities to the VR program at the beginning of the school year. Referral for pre-employment transition services should begin at age 14 for all students with disabilities who may need them. Although OVR does not impose an age limit on when a student can apply for VR transition services, they encourage students to do so at least two years prior to graduation or school exit. This should allow enough time for determining eligibility, identifying OVR service needs, referring students to community services, and developing the approved IPE prior to the student's exit from school.

Cooperative Agreements with Private Nonprofit Organizations. *Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.*

OVR maintains negotiated LOUs, as well as AMs and provider agreements with more than 200 community service providers covering more than 1,000 different rehabilitation, independent living and related services. OVR is currently converting LOUs to an AM or a provider agreement. Many of these organizations are private and/or not-for-profit CRPs.

Through these various agreements, OVR defines service programs and the corresponding conditions of purchase, including fees and effective/expiration dates, which exist between a rehabilitation service provider and OVR. An agreement entered into between OVR and a community service provider creates a locally developed, locally negotiated, and locally sensitive response to the rehabilitation service needs of persons with significant disabilities in the diverse areas of the Commonwealth.

These agreements are neither a contract nor a grant agreement, but an agreement between the parties that sets forth the services and rates that will be acceptable for OVR payment. They do not commit either provider or OVR to the sale or purchase of the defined services, or a guarantee of provision or business. The use of an LOU or AM for OVR customer service allows OVR to provide customer choice, to respond to a customer's satisfaction with the service, to control affordability of service fees, and the ability to provide alternative services when needed.

In addition to the agreements described above, OVR, Pennsylvania Academic, Career and Technical Training (PACTT) team members, and staff from BJJJ joined together in development of a MOU to leverage state and federal funding to further support efforts to provide services. The parties work together in partnership with PACTT Affiliate agencies and county juvenile probation offices to assist youth and students with disabilities who are involved with juvenile court. This collaboration provides a wide range of services identified through Agency Support Plans, including but not limited to: the creation of summer programming; increased pre-employment transition services; paid work experiences; joint training programs; outreach to families and community partners focused on employment/education objectives;

targeted curriculum & training development; and a host of other opportunities developed to expand innovative programming designs that aim toward improved education and employment outcomes for youth.

Arrangements and Cooperative Agreements for the Provision of Supported Employment Services. *Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.*

OVR has coordinated with other State agencies such as ODP, OMHSAS, Office of Long Term Living (OLTL), and other entities to provide SE services and extended employment services. In February 2019, a joint bulletin between OVR and ODP was issued outlining referral processes for SE cases in which a customer is eligible for OVR services and waivers through ODP. OVR will continue to communicate and collaborate with these agencies to provide quality SE services and provide referrals and information regarding mutual customers. OVR will provide current information and training to State agencies and other entities to ensure the provision of services and extended services.

OVR has been diligently working with interested service providers to convert short-term Innovation & Expansion (I&E) projects into ongoing fee-for-service program options for customers based on customer need. The revisions in the definition and requirements of SE brought about by WIOA, have necessitated a more comprehensive and thorough review and assessment of long standing employment support programs such as OJT and other adaptive work training programs utilizing both wages and stipends.

One program initiative that OVR has focused on, in collaboration with ODP, has been the employment program staff certification programs through the Certified Employment Support Professional (CESP™) credentialing process. This training credential recognizes individuals who have demonstrated a sufficient level of knowledge and skill to provide integrated employment services to a variety of populations. OVR will continue to support the provision of quality supportive employment services by adequately trained and properly credentialed staff either directly, through other state and local government agencies, or private service agencies, as appropriate.

DLI and the DHS are in the process of developing an MOU for SE Services. The MOU for SE services will guide a partnership to establish the collaborative framework for OVR and DHS to develop, expand, and improve opportunities for competitive employment for individuals with disabilities, including individuals with the most significant disabilities. OVR and DHS will fund SE services, including Customized Employment, by committing to the implementation of complementary programs to assist with the provision of these services to individuals with the most significant disabilities, including youth with the most significant disabilities, to enable them to achieve an employment outcome of SE in competitive integrated employment. This MOU will ensure a smooth transition from SE services to extended services.

Coordination with Employers. *Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:*

(1) VR Services; and

OVR routinely engages with employers and businesses to better understand their workforce needs so OVR can prepare individuals with disabilities with industry skills to best meet industry skill demands required by businesses and employers to be successful in competing in the global marketplace. OVR has Central Office staff who are available to meet with an employer to listen and explore their organization's unique culture to learn about the services or products they produce, to learn about employee skill needs, and how the leadership of a company or organization envisions their future workforce succession planning and the inclusion of VR talent throughout all levels of their organization. Where possible, OVR will coordinate business outreach with local workforce boards, CareerLinks®, economic development partners, community rehabilitation agencies, DHS ODP, OMHSAS, OLTL and other DLI Bureau of Workforce Partnership & Operations (BWPO) multi-employer workforce partnerships.

1. In response to an organization's workforce talent needs, OVR can suggest a recruitment process to bring qualified pre-screened individuals with a disability into their organization.
2. OVR will work with each business to target career ladders and pathways for quality competitive integrated employment in career pathways matched to each VR consumer customer's financial needs, unique aspirations, capacities and the talent succession plans of an employer.
3. OVR will keep the process simple by using a SPOC approach modeled after the Council of State Administrators of Vocational Rehabilitation (CSAVR) use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania workforce regions.

Partnering with Workforce Agencies to Align with Regional Employment Sectors

OVR Business Services and Outreach Division (BSOD) staff and District Office business services teams will participate in regional planning processes in partnership with local workforce development boards. Within each of Pennsylvania's workforce development areas, data analysis will be conducted to identify employment sectors that are most likely to account for job growth and expansion in the next five years.

OVR and Workforce partners will target employers in the key expansion sectors for the highest level of business engagement, which will include discussions around establishment of work-based learning experiences. In addition, all OVR business services staff will utilize and share Labor Market Intelligence (LMI) published monthly from DLI's Center for Workforce Information and Analysis (CWIA) with their district office VR Counselor's (VRC's) to promote career based IPEs likely to lead to successful employment and skill training to prepare for expansion or 'super' sector jobs in each region of Pennsylvania.

The following are OVR employer outreach and networking strategies to work with employers to increase competitive integrated employment and career exploration opportunities:

1. national and in-state outreach to employers/businesses to recruit and hire people with disabilities will consistently be encouraged through engagement or registration with CWDS, CSAVR, National Employment Team (VR-NET), and the VR-NET Talent Acquisition Portal;

2. employer outreach by BSOD Western and Eastern Specialists through in-person meetings, regional and statewide RSA allowable Chamber of Commerce membership, networking, and Society of Human Resource Manager statewide and local organization involvement;
3. outreach to employers to recruit and hire people with disabilities through local combined agency District Offices and HGAC. HGAC business services staff will identify and coordinate with the district referring VRCs to find a suitable job match for customers. This will include identifying any measurable skill gains that result from the customers acquisition of an industry recognized credential. Local combined agency business teams will actively coordinate employer recruitment, work-based learning experiences, internships, apprenticeships and pre-apprenticeships, OJT and other on-boarding supports for any qualified pre-screened OVR new hire. Local office business services staff, in consultation with VRC's, will monitor successful job performance and follow-up with the OVR customer and employer to ensure job retention;
4. no-cost consultation to employers will be provided on disability etiquette, accessibility, and accommodation needs by BSOD specialists, HGAC staff or combined bureau staff upon request. Referral assistance to help retain an employer's workforce following an injury or the onset of a disability will also be provided. OVR staff trained in the mid-Atlantic TransGen, ADA Leadership models from Cornell University and a BSOD specialist trained on the use of the Misericordia University, Comprehensive Accessibly Kit, and the Americans with Disability Act Architectural Guidelines standards, will provide non-legal, best practice disability etiquette training, and on-site accessibility compliance reviews;
5. BSOD specialists will provide no-cost compliance consultations to CRPs of 14C Federal Ability One, or State operated Inspiritec set aside vendors, to ensure work settings are fully integrated before federal VR funds are used in placement supports or on-boarding;
6. OVR business services will conduct bi-annual employer/business satisfaction surveys to measure effectiveness in business engagement; and
7. BSOD specialists and combined local bureau staff will continue to promote and support National Disability Employment Awareness Month events. These events will include employer champions who actively recruit and retain persons with disabilities in their workforce.

(2) Transition services, including pre-employment transition services, for students and youth with disabilities.

OVR continues to expand its collaboration with employers, industry partnerships, and other multi-employer workforce partnerships to provide students and youth with disabilities opportunities for career exploration to promote competitive, integrated employment. Students and youth with disabilities will be given opportunities to complete work-based learning experiences to develop soft skills and work-related skills. Students and youth with disabilities may be afforded opportunities to complete mock interviews with employers, job shadowing experiences, career days, disability mentoring days with employers, and other pre-employment transition services to prepare students for competitive employment.

Interagency Cooperation. *Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:*

(1) The State Medicaid plan under title XIX of the Social Security Act;

In Pennsylvania, the Department of Human Services (DHS) is the agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act. OVR collaborates with this department on a number of initiatives. First, OVR is a key member of the Pennsylvania Employment First State Leadership Mentoring Project (EFSLMP), a project initiated in 2014 and sponsored by a grant administered by the Office of Disability Employment Policy within DHS. The goal of the project is to ensure that the employment needs of individuals with disabilities are met, that cost services are comprehensive, effective, innovative and not duplicative, and that every individual with a disability who wants to work to achieve self-support will be given the opportunity to do so. An OVR representative also participates in the provider VOICE Community of Practice conference calls and monthly webinar series developed by the EFSLMP project for partner agencies.

Secondly, since 2014 OVR has collaborated with ODP, OMHSAS, OLTL, and the Bureau of Supports for Autism and Special Populations, all within DHS, to develop the interagency training program titled "Experience the Employment Connection (EEC)." PDE's BSE has also been a key partner in the planning committee. The first training program was initiated in 2014 as an inter-agency in-person training for all partner agency employees, supports coordinators, providers, families, educators, and individuals with disabilities. In 2017 in-person sessions were suspended due to funding limitations and the interagency planning committee has been in the process of planning for a possible video recorded training series that may be utilized by all involved organizations to promote competitive integrated employment and interagency collaboration. A useful interagency tool developed from earlier sessions was a graphic "roadmap" specific to School-to-Work Transition. This tool continues to be updated annually by the planning committee, remains an important resource for all partner agencies, and is available through a link for EEC on the OVR website.

Thirdly, OVR participates in cross agency collaboration and coordination with DHS as part of the Pennsylvania Employment First Act (Act 2018-36). This is a Governor inspired initiative to ensure individuals with disabilities have the opportunity to achieve economic independence through competitive integrated employment. Cross-agency collaboration between OVR and OLTL demonstrate continued partnership and commitment to Act 2018-36, where competitive integrated employment, including self-employment, shall be the first consideration and preferred outcome when serving persons with disabilities who are of working age. This cross-agency collaboration between OVR and OLTL is important because agencies may have shared customers who are seeking/receiving employment services to obtain or maintain competitive integrated employment, and overall will increase efficiency and effectiveness across programs. OLTL may fund extended services for customers receiving waiver services through OLTL to assist with long term SE services to maintain competitive integrated employment.

The Office of the Governor, in collaboration with the Governor's Cabinet for People with Disabilities, have developed an initial three-year plan of which OVR and DHS are key participants, along with PDE. A few of the priorities of Act 2018-36 include promoting a vision of Employment First for all Pennsylvanians, promoting paid work experiences, ensuring effective use of transition funding, promoting self-advocacy, offering professional training, increasing pre-employment skill development, promoting Discovery and Customized Employment opportunities, and encouraging case information sharing among agencies. OLTL, within DHS, is one of the key agencies, along with OVR, helping to implement the Pennsylvania Employment First Act.

Fourth, since the Center for Medicaid and Medicare Services Technical guide (Version 3.5, January 2015) was published, OLTL, under DHS, has added Employment Services to their menu of available services. The OLTL program is charged with implementing the new Community HealthChoices (CHC) delivery, a capitated Medicare managed care program for adults eligible for Medicaid and Medicare (dual eligible), older adults and individuals with physical disabilities. The Commonwealth is rolling out CHC in three (3) regional phases, to be fully implemented by January 2020. Cross-agency collaboration will be vital for a successful transition. OVR is in the discussion stage with DHS/OLTL about development of a training program for OVR staff to further inform them about the CHC program, potential dual customers with DHS/OLTL, and how OVR can support these individuals to seek and receive employment services to obtain or maintain competitive integrated employment.

(2) The State agency responsible for providing services for individuals with developmental disabilities; and

OVR also collaborates with DHS/ODP through Section 511 of the WIOA. Section 511 of WIOA amends the Rehabilitation Act, and has added new requirements that place limitations on the payment of subminimum wages by entities holding special wage certificates under Section 14(c) of the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* The provisions of Section 511 require more involvement from OVR with individuals working in Section 511 subminimum wage jobs and services for those under 24 years old prior to placement in a Section 511 employment position. DHS/ODP provides the license to the facilities that OVR must visit and monitor. Section 511 of WIOA requires that certain criteria must now be satisfied before an entity hires individuals with disabilities who are age 24 or younger (youths) at subminimum wage or continues to employ individuals with disabilities of any age at the subminimum wage level. OVR's role is to ensure that individuals with disabilities have access to information and services that will enable them to achieve competitive integrated employment.

OVR provides services to individuals working in Section 511 subminimum wage jobs in the form of Career Information and Referral Sessions. OVR's Section 511 Career Information and Referral Sessions focus on: reassuring individuals that they do not need to make any changes; promoting informed choice and independent decision making about competitive integrated employment; increasing awareness of OVR services; and providing information about other agencies that can help them to achieve their goals for personal growth and independence.

Since December 2016, OVR's successful implementation of Section 511 services has been accomplished by providing Career Information and Referral Sessions to all persons engaged in subminimum wage employment in Pennsylvania. In addition, Section 511 Specialists and clerical support tracks Section 511 data and issues letters of attendance documentation to the participants. OVR is developing within CWDS a function to track Section 511 activities as well as referrals to OVR that are generated as a result of Section 511 trainings. To date, over 160 facilities have been visited on an annual basis and more than 3,000 Career Information & Referral Sessions have been delivered to more than 10,000 participants.

(3) The State agency responsible for providing mental health services.

DHS's OMHSAS is responsible for providing mental health services in Pennsylvania. OVR uses many avenues to ensure collaboration and partnership in the delivery of SE and extended services with OMHSAS. An MOU was initiated in November 2017 between OVR and OMHSAS. This MOU provides a goal

to increase Certified Peer Specialist (CPS) training opportunities for individuals with mental health conditions. Through the MOU, OVR and OMHSAS will expand training opportunities to those individuals who are deaf and hard of hearing with a mental health condition. These trainings will allow those individuals to obtain competitive integrated employment as a CPS. OVR and OMHSAS agree that assisting individuals with serious emotional disturbances and serious mental illnesses to secure and maintain competitive integrated employment includes: paid work experiences; training; postsecondary education; seamless transition from secondary education to adult life; outreach and awareness activities targeted to individuals, families, and businesses; pre-employment activities; and other programs and initiatives that lead to or result in competitive integrated employment. Individuals with mental health impairments continue to comprise a large percentage of the impairment cause in our open cases on an annual basis. OVR will continue to offer, through IPEs, services for restoration, guidance and counseling, training, placement assistance, and employment supports to help individuals with mental health impairments achieve a competitive integrated employment outcome.

Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development. *Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:*

(1) Data System on Personnel and Personnel Development

(A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

(i) The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The OVR Recruitment and Retention Specialist collects and analyzes, on an annual basis, data on qualified personnel needs and personnel development. OVR works through the Pennsylvania Office of Administration Human Resources Division for managing personnel issues and filling vacant positions. In addition, an annual training needs assessment is completed by the OVR Training Director, to identify focus areas for personnel development activities for the upcoming year. Information collected from this assessment is also used for planning the budget requirements of staff training and development.

As of May 1, 2019, OVR had 930 filled salaried positions and 115 vacancies. This figure includes 153 filled salaried positions at the HGAC. Statewide, OVR had a total of 363 filled VRC positions, 17 Vision Rehabilitation Therapist positions, and 13 Orientation and Mobility Specialists positions. We continue to evaluate each salaried position prior to posting for hire to ensure that it is essential to operations before approving the position. The current complement of VRCs requires that OVR maintain an OOS and implement a waiting list for all new individuals determined eligible to adequately serve and meet the needs of eligible VR customers as of July 1, 2019.

(ii) The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

OVR is continuing to closely monitor hiring, with an evaluation of each position prior to posting for hire as part of cost containment measures given our current fiscal situation. OVR is further challenged since the demand for VR services exceeds available and projected resources. OVR regularly reviews staffing patterns and caseload size to determine coverage needs. Projection data indicates that there is an existing population of students with disabilities transitioning from school to post-secondary activities, including work, that may require additional staff to adequately serve. These requirements will be monitored and adapted to meet any changing needs. OVR anticipates needing the following personnel:

- VRCs: 363 positions
- Vision Rehabilitation Therapists: 17 positions
- Orientation and Mobility Specialists: 13 positions
- Early Reach Coordinators: 28 positions
- Business Service Representatives: 22 positions

(iii) Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Projections by personnel category are as follows:

- VRC: 71 projected vacancies in next 5 years;
- VRC Deaf and Hard of Hearing: 0 projected vacancies in next 5 years;
- Vision Rehabilitation Therapist: 2 projected vacancies in next 5 years; and
- Orientation and Mobility Specialists: 4 projected vacancies in next 5 years.

OVR projects that in the next five years, approximately 71 VRCs will become eligible to retire. This will be an average of 18 VRCs retiring per year, in addition to an unknown number of counselors who leave as part of general turnover. If the number of customers seeking VR services remains the same, or slightly increases or decreases, OVR projects that an average of 20-25 new VRCs will need to be hired per year over the next 5-10 years. OVR realizes the need for continued recruitment and training of qualified personnel. Succession planning is a necessary part of OVR's preparation to address projected hiring needs and is included within the annual analysis of qualified personnel needs and personnel development.

(B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- (i) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;*
- (ii) the number of students enrolled at each of those institutions, broken down by type of program; and*
- (iii) the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

The OVR Recruitment Specialist maintains regular contact with the institutions of higher education within Pennsylvania who offer programs to develop VR professionals and annually collects information on

student enrollment. There are four Pennsylvania Universities that are accredited by the Council on Rehabilitation Education (CORE) and the Council Accreditation of Counseling and Related Educational Programs (CACREP): Pennsylvania State University, University of Pittsburgh, University of Scranton, and Edinboro University of Pennsylvania. When these universities are combined, these programs graduate approximately 42 students per year with a Master’s Degree in Rehabilitation Counseling. See chart below.

CORE & CACREP Universities: Enrollment and Graduate Numbers

Institutions	Students Enrolled	Graduates sponsored by RSA	Graduates from the previous year
Penn State University	20	6	9
University of Pittsburgh	44	0	20
Edinboro University of PA	23	0	7
University of Scranton	18	0	6

A student successfully achieving graduation from one of these universities would be eligible to apply for the Commission on Rehabilitation Counselor or CRCC certification exam, a nationally recognized professional certification in the field of vocational rehabilitation.

(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel. Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

OVR Counselor Recruitment

In addition to the available students graduating from in-state programs, OVR’s Recruitment Specialist can recruit students from CORE/CACREP-approved universities that offer a Master’s Degree in Rehabilitation Counseling nationwide. OVR has obtained permission from the Pennsylvania Office of Administration to have Pennsylvania residency requirements waived under the State Civil Service system for the VRC Internship position and other VRC classifications in OVR. This waiver provides OVR with an opportunity to recruit students nationwide and offer paid VRC Intern positions to interested master’s degree students who are in their final semester of graduate school. The paid internship allows OVR to attract and recruit candidates for VRC positions who have a Master’s Degree in Rehabilitation while they are still in school and before they are recruited by other agencies. The residency waiver and the paid Internship position also assist in OVR’s efforts to recruit and hire individuals with disabilities and those from diverse and minority backgrounds.

OVR’s Counselor Internship program continues to serve as an example among state VR agencies that seek to attract rehabilitation counseling students for employment. While surrounding states offer internship opportunities to students with competitive compensation, none in the northeastern region offer permanent positions to interns upon satisfactory completion of the probationary period and/or successful completion of the rehabilitation counseling graduate degree.

Through collaborative initiatives with higher education institutions, OVR will continue to expand recruitment and outreach to students with disabilities for entry-level VRC positions. Collaboration with universities on federal RSA grant applications that seek to provide scholarship opportunities for students with disabilities will further this initiative. This includes supporting the efforts of university programs to apply for and implement Long Term Training Grant programs to train VRCs to work for the public VR program in Pennsylvania. In addition, OVR will continue the following activities as part of its overall VRC recruitment initiative:

- continuing to build and maintain relationships with all CORE/CACREP program coordinators at graduate training programs, including Historically Black Colleges and Universities (HBCUs) that offer rehabilitation counseling disciplines, with campus visits, onsite presentations, use of telecommunication technology, and one-on-one meetings with students;
- maintaining appointed membership on Coppin State University and the University of Maryland Eastern Shore Rehabilitation Counseling Program Advisory Committees. Both are HBCUs in the Mid-Atlantic region that prepare increased numbers of minority individuals for careers in the public VR program. OVR will also maintain a membership commitment to local advisory committees with Edinboro University;
- maintaining active membership with the National Association of Multicultural Rehabilitation Concerns and the National Council on Rehabilitation Education; and
- visiting colleges, universities, and appropriate job fairs in conjunction with the DLI Office of Equal Opportunity to recruit potential job applicants who are from diverse cultural backgrounds and applicants with disabilities.

Orientation and Mobility Specialists and Vision Rehabilitation Therapists

OVR recruits from accredited university programs in Pennsylvania that train Orientation and Mobility (O&M) Specialists and/or Vision Rehabilitation Therapists (VRTs), including: Salus University, the University of Pittsburgh's Vision Studies Program, and Kutztown University. These programs graduate a combined total of approximately 35 students per year. Graduates of these approved university programs are eligible for certification in Vision Rehabilitation Therapy or in O&M from the Academy for the Certification of Vision Rehabilitation and Education Professionals. In addition, OVR is able to recruit and hire VRTs and O&M Specialists who are being trained at universities nationwide and who reside outside of Pennsylvania.

OVR worked with the State Civil Service Commission to make test announcements for the O&M Specialist Intern and VRT Intern positions available as of July 22, 2015. BBVS continues to offer paid internships for O&M and VRT students during their last semester of study. The O&M and VRT hourly wage is equivalent to the VRC Intern at Group 5 Step 1. This initiative will continue to increase the candidate pool of available O&M and VRT professionals who are available for employment with OVR BBVS upon successful completion of their academic training.

VRC Trainee

OVR collaborated with Human Resources, the Office of Administration and Bureau of Talent Acquisition (former Pennsylvania State Civil Service Commission) to launch the VRC Trainee position in December 2017. As of May 2019, OVR has hired 27 VRC Trainees; currently, eight trainees have successfully completed their one year training program and been promoted to an entry level VRC, in addition to 19

trainees presently in the process of completing this training. Regarding this position, OVR continues to hire candidates with Master's Degree in social work, clinical mental health counseling, community counseling, career counseling, psychology, disability and human development, special education, or rehabilitative science, which includes three graduate credits in theories and techniques of counseling.

In December 2018, due to a small candidate pool, OVR began the process of expanding the minimum education and training requirements (MeTs) for the VRC Trainee position to include 5 additional master degrees: Counseling, Rehabilitation Services, Human Services, School Counseling, and Substance Abuse and Behavioral Health Disorder Counseling. These master degrees are currently in the process of being reviewed and approved by the Office of Administration and the Service Employees International Union. Once completed, the Office of Administration will move forward in adding these changes to the current VRC Trainee posting.

(3) Personnel Standards. Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

(A) Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

Section 101(a)(7) of the Rehabilitation Act, Comprehensive System of Personnel Development (CSPD), requires State VR agencies establish personnel standards for rehabilitation staff, including VRCs, that are consistent with any national or state-approved or recognized certification, licensing or registration that applies to a particular profession. The purpose of an agency's CSPD is to ensure the quality of personnel who provide VR services and who assist individuals with disabilities to achieve competitive employment outcomes through the VR program.

New VRCs

In 2002, OVR raised the entry-level requirements for VRC positions to reflect the requirements established by the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselors (CRC). Specifically, all newly hired VRCs were required to possess a Master's Degree in Rehabilitation Counseling, Rehabilitation Administration or Rehabilitation Education, or CRC credentials or documented proof from CRCC of eligibility to obtain CRC credentials. The revised Civil Service Announcement for VRC positions became effective on October 4, 2002. As of May 2019, a total of 846 VRCs and VRC Interns were hired under the new entry-level requirements. All 846 new VRCs and Interns met CSPD standards for qualified rehabilitation professionals upon being hired.

On July 1, 2017, all CORE programs merged under CACREP. The intent of this merger is to assure students receive appropriate counseling coursework, streamline state counseling licensing processes, and increase skill development while improving employment opportunities. Currently, universities are increasing graduation requirements from 48 credits to 60 credits to include Traditional Rehabilitation Counseling, Clinical Rehabilitation and Clinical Mental Health counseling. The students graduating from these programs should have better developed skills in counseling techniques and applications which will lead to increased employment opportunities in both public and private sectors of vocational rehabilitation. This

benefit for the student may have unintended negative consequences for the state VR agencies if more graduates from these programs consider applying their skills in the private sector vs. public sector.

Currently, OVR is maintaining its primary standards in hiring candidates with a Master's Degree in the mentioned fields; however, OVR is strongly considering a review of the current MeTs for the entry level VRC as it relates to the CACREP standards.

Therefore, OVR continues to provide the following recruitment incentives for VRCs:

- A Designated Recruitment Specialist actively recruits qualified VRC's, including those with disabilities, diverse cultural backgrounds and underrepresented groups, from all CORE/CACREP programs nationwide. The Recruitment Specialist has developed a plan that will continue to be proactive in adequately supplying VRCs trained to provide services to specialty caseloads such as Counselors for the Deaf and Hard of Hearing and Counselors for the Blind and Visually Impaired.
- OVR continues to support and utilize its salary-based internship program, that includes in-state and out-of-state candidates currently enrolled in a CORE/CACREP accredited master's degree program in Rehabilitation Counseling, Rehabilitation Administration and Rehabilitation Education.
- OVR continues to support the recruitment and hiring incentive for the southeastern district offices in Norristown and Philadelphia regarding the increase in pay scale for VRC Interns and Counselors at a Pay Scale 5, Step 9 for interns and Pay Scale 7, Step 5 for counselors.

(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.

OVR ensures that personnel have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities through staff training, professional development and continuing education on LMI and trends. Training and continuing education is also provided on assessment, rehabilitation technology, Social Security work incentive programs, including programs under the Ticket to Work and Work Incentives Improvement Act of 1999, facilitation of informed choice under this program, and improving provision of services to culturally diverse populations.

OVR continues its plan to enhance professional growth and skills of staff on emerging practices relevant to job readiness/soft skill competencies, job search skills, transferrable skills, when to disclose a disability to an employer, how to address criminal history, how to request an accommodation, tax credits, OJT, and resources that focus on developing effective relationships with employers in the public and private sectors. To train and retain qualified personnel, OVR will continue to provide training by university faculty, experts in the field of rehabilitation, and statewide and nationally known speakers on understanding the medical and psychosocial aspects of various disabilities, case management, best practices on developing effective relationships with employers, and understanding the effective utilization of rehabilitation technology.

To increase understanding of the needs of individuals with disabilities, OVR will continue to work collaboratively with local community colleges, career and technical schools to explore the development of training programs that are implemented with universal design to train individuals with disabilities for competitive integrated employment in jobs that meet local labor market demand. In addition to VRCs, OVR's expanded rehabilitation team includes Business Services Representatives (BSRs) and Early Reach

Coordinators (ERCs). ERCs promote successful outcomes for students and youth with disabilities by increasing awareness of OVR services and the benefits of early career planning beginning at age 14. BSRs represent OVR and our customer talent during outreach to employers and businesses throughout the geographic area of their assignments to develop job opportunities and foster good working relationships with the business community. A subset of BSRs focus on employer engagement related to transition and pre-employment transition services.

(4) Staff Development. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

(A) A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

OVR is committed to offering a plan for a comprehensive system of staff development and training. The goal is to ensure staff development for OVR personnel in areas essential to the effective management of OVR's program of VR services. OVR will continue to provide for the training and development of personnel necessary to improve their ability to provide VR services leading to employment outcomes for individuals with disabilities, especially those with the most significant disabilities.

With the implementation of WIOA amendment to the Rehabilitation Act, overall training areas include: (1) Functional Limitations, Employment Implications, and Accommodations; (2) Vocational Assessment: Tools, Interpretation, and Application; (3) Counseling and Guidance; (4) Caseload Management, Case Practices, and Service Planning; (5) Employer Engagement, Job Development and Job Placement; (6) Diversity, Inclusion, and Multicultural Competency; and (7) Leadership Development.

OVR continues to offer a regularly scheduled monthly Virtual Training Series to update staff on a variety of topics of interest, as well as policy and procedural updates. In 2019, OVR initiated an additional bimonthly Virtual Training Series focused entirely on Business Services and Placement. OVR will complete an internal survey to determine additional training needs identified by professional and paraprofessional staff. OVR is committed to focusing on certain priorities identified as "Customer Service," "Ethics," "Confidentiality," and "Transition" as they relate to the primary training topics outlined by WIOA.

OVR continues to collaborate with Penn State University on the 2018-2020 Diversity & Inclusion Project. The research for this initiative has been completed as of March 3, 2019. All focus groups, key informant interviews and statewide assessments have been concluded as of December 2018. All data has been reviewed and compiled, and a written report with recommendations was submitted to the OVR Executive Team and prospective unions in early April 2019. The recommendations will serve as a framework for professional trainings for advancing OVR's diversity and inclusion goals. These trainings will define: the concept of diversity and inclusion; understanding barriers for underrepresented/underserved populations; an outline of the value and importance of diversity and inclusion; and provide substantial resources for our staff in providing services to the communities we serve.

OVR has developed and implemented a structured training program for employees hired under the VRC Trainee classification. It involves a combination of archived in-house virtual training sessions, readings

from the Disability Handbook, direct instruction from VR Supervisors, and online modules from CRCC e-University, VR Development Group, MyODP, Mississippi State University's National Technical Assistance Center of Blindness and Visual Impairment, and Hadley. Training from additional community resources is also utilized.

(B) Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

OVR will capitalize on the in-house expertise offered by existing agency staff to share policy and procedure updates and information about best practices with their colleagues through webinar training opportunities. OVR supports various training opportunities and coordinates efforts with various professional associations such as the Pennsylvania Workforce Development Association, Pennsylvania Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, Pennsylvania Rehabilitation Association and the Association for Education and Rehabilitation of the Blind and Visually Impaired to train and retain qualified personnel.

OVR continues interagency training efforts through "EEC: Possibilities in Action (EEC)." EEC is a joint training initiative between OVR, ODP, OMHSAS, and PDE's BSE. Driven by the Governor's Executive Order on Employment First, EEC's goal is to increase competitive, integrated employment for Pennsylvanians with disabilities by connecting professionals across systems. Participants learn about staff roles, policies, procedures, funding requirements, and emerging practices.

In addition, OVR is committed to focus on certain priorities identified as "Customer Service" and "Multicultural Competency," in addition to the priorities included with the implementation of WIOA amendments to the Rehabilitation Act of providing business services, transition services, and SE. Particular attention will be devoted to offering training on assessment, vocational counseling, job placement, and rehabilitation technology. As in past years, as part of developing a training plan, OVR will complete an annual internal survey to determine the training needs of professional and paraprofessional staff.

(5) Personnel to Address Individual Communication Needs. Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Most OVR district offices have at least one Rehabilitation Counselor for the Deaf and Hard of Hearing population. Entry-level requirements for Rehabilitation Counselors for the Deaf and Hard of Hearing require that candidates pass the Sign Language Proficiency Interview before offered a formal interview for employment. OVR district offices, in geographic areas where there are large numbers of individuals who speak Spanish, recruit and hire VRC who can speak both Spanish and English. In instances where there are no VRCs who can communicate with a customer in his or her native language, an interpreter is hired to assist with communication.

To illustrate inclusivity, OVR employees can access services through a language line-phone service that provides interpreting and translation services in more than 200 languages. When a customer is identified as needing translation services, the OVR employee will contact the translation service organization to arrange for services to begin and inform the customer of how the service will work. This service is utilized

as a resource for customers and staff who serve a high concentration of underrepresented/underserved populations.

OVR plans to continue efforts to work with the blind and deaf communities to recruit and hire qualified individuals who are deaf, blind, deaf-blind and hard of hearing. This includes recommendations and assistance provided by the OVR Advisory Committee for Persons who are Deaf and Hard of Hearing and the Advisory Committee for the Blind of Pennsylvania. In addition, OVR has a Rehabilitation Specialist assigned to coordinate the Deaf, Hard of Hearing and Deaf-Blind Program in OVR. This specialist assists with recruitment and outreach to these populations to attract qualified OVR candidates for employment.

Additionally, OVR will incorporate 2016-2018 CSNA recommendations and strategies to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities. Specifically, OVR will increase training in culturally competent strategies for serving these communities. OVR will strive to provide more staff, materials, resources and services in languages other than English, which may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities, as well as refugee communities.

(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

Transition Counselors and ERCs within OVR work regularly with educators in local school districts who are working under IDEA. Training on OVR's Transition policy is provided for the benefit of new counselors and ERCs with the intention of helping them to understand their role within both VR and IDEA. The OVR Transition Resource Manual supports this policy and is available as a reference for all OVR staff. Updates and additions are made as necessary.

As a way to coordinate under IDEA and offer information to educators, new OVR transition brochures are planned to be posted on the PaTTAN website, secondarytransition.org. Future updates to new and existing brochures and informational handouts will be developed and posted as necessary.

Any OVR employee entering a school and working with youth, is required to complete the Mandated Reporter Training, which is available online through DHS and the Rehabilitation & Community Providers Association. The training is required for any personnel working with youth.

OVR Counselors regularly participate in local Transition Council meetings. This is an important connection between professionals and allows for collaboration between priorities of VR and IDEA so that students and their families receive the best available services.

Statewide Assessment.

(1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

OVR contracted with the Institute on Disabilities, Pennsylvania's University Center for Excellence in Developmental Disabilities, to conduct and interpret the CSNA required for FFY 2015-2018. The purpose of the CSNA is to inform OVR and PaRC regarding issues and needs of the disability community in the

Commonwealth. Specific requirements of the CSNA can be found in the Rehabilitation Act of 1973, at Section 101(a)(15) and at federal regulation 34 CFR § 361.29. The CSNA is required to be completed every three years and assists OVR and PaRC in the development of the State Plan. Section 361.29 of the regulations outlines the specific topics to examine, including specific populations and the cooperation of stakeholders and providers.

A steering committee comprised of OVR staff, members of PaRC, and the Client Assistance Program participated in an initial meeting to review and approve customer satisfaction surveys. These participants remained as vital collaborators in the development and review phases of the CSNA process.

(A) with the most significant disabilities, including their need for supported employment services;

Comparison of Pennsylvania to National Population Statistics

See information in the chart below, taken from the CSNA report, represents the estimated percentage of individuals in various age, sex, and race/ethnicity categories that have generalized disability identifications in Pennsylvania and across the nation in 2014 and 2016 (2014 and 2016 1-Year Estimates of the American Community survey).

Disability Identification Across Demographic Variables, PENNSYLVANIA vs. U.S.

Disability Identification across demographic variables	U.S. % Est (2014)	U.S. % Est (2015)	U.S. % Est (2016)	U.S. % Est (2017)	PA % Est (2014)	PA % Est (2015)	PA % Est (2016)	PA % Est (2017)
Total civilian noninstitutionalized population	12.6	12.6	12.8	12.7	13.8	13.9	14.2	14.1
Population under 5 years	0.8	0.8	0.7	0.7	0.6	0.7	0.5	0.9
Population 5 to 17 years	5.4	5.4	5.6	5.5	7.1	6.8	7.1	7.0
Population 18 to 34 years	10.5	6.0	6.3	6.4	11.2	6.9	7.3	7.0
Population 35 to 64 years	10.5	13.0	13.1	12.7	11.2	13.8	14.2	13.9
Population 65 years to 74 years	36.0	25.4	25.3	25.0	34.6	24.0	24.6	24.0
Population 75 years and older	36.0	49.8	49.5	48.7	34.6	47.9	48	47.9
Male	12.5	12.5	12.7	12.6	13.6	13.4	14.1	13.8
Female	12.8	12.7	12.9	12.8	14.0	14.3	14.4	14.4
White alone	13.1	13.1	13.4	13.3	13.8	13.8	14.3	14.1

Black or African American alone	13.8	14.0	14.1	14.0	15.5	16.6	16.0	16.6
American Indian and Alaska Native alone	16.3	16.8	17.0	17.3	24.6	24.8	23.8	20.8
Asian alone	6.9	6.9	7.1	7.1	6.3	7.1	7.0	7.0
Native Hawaiian and other Pacific Islander alone	-	10.6	11.1	10.3	-	27.7	N	N
Some other race alone	8.2	8.0	8.3	8.0	16.0	13.6	14.0	12.7
Two or more races	11.1	10.9	11.3	11.1	13.5	11.4	13.5	13.0
White alone, not Hispanic or Latino	13.9	13.9	14.1	14.0	13.8	13.8	14.4	14.2
Hispanic or Latino (of any race)	8.8	8.8	9.1	9.0	14.3	14.1	14.0	12.7

Source: 2015-2017 American Community Survey 1-Year Estimates

Compared to the estimated national rate of disability identification in 2014 (12.6%), 2015 (12.6%), 2016 (12.8%), and 2017 (12.7%), Pennsylvania has a slightly higher rate of disability identification in its total civilian population (13.8% in 2014, 13.9% in 2015, 14.2% in 2016, and 14.1% in 2017). Up until 2014, the Census reported upon disability identification for those 18-64 years old (10.5% in U.S. and 11.2% in Pennsylvania) and 65 and older (36.0% in US and 34.6% in Pennsylvania). Beginning in 2015, the Census began reporting disability identification rates for 18-34 years old, 35-64 years old, 65-74 years old, and 75 years and older. In 2015, Pennsylvania civilians ages 18-34 and 35-64 years had a slightly higher than national average rate of disability identification (Pennsylvania: 6.9% and 13.8% vs. U.S.: 6.0% and 13.0%). This trend continued in 2016, with Pennsylvania civilians ages 18-34 years old (Pennsylvania: 7.3% vs. US: 6.3%) and 35-64 years old (Pennsylvania: 14.2% vs. U.S.: 13.1%) and in 2017 with, Pennsylvania Civilians ages 18-34 years old (Pennsylvania: 7.0% vs. US: 6.4%) and 35-64 years old (Pennsylvania: 13.9% and US:12.7%).

The estimated percentage of individuals who identified as having a disability in the labor force was 40.7% nationally, compared to 40.9% in Pennsylvania. The national average of individuals identifying as having a disability who were employed in 2014 was 34.5%, and 34.7% in Pennsylvania. The rate of unemployment for individuals with disabilities across the United States was 14.9%, compared to 15.1% in Pennsylvania in 2014 (American Community Survey, 2014).

Customer satisfaction surveys were developed as part of the CSNA to determine future VR needs of those customers with the most significant disabilities and their need for SE services. These surveys were designed and used to elicit feedback from customers in Status 26 Closed Rehabilitated, Status 28 Closed after IPE Initiated, Transition Services for youth and students with disabilities, and for those currently undergoing job coaching. Data collected from these surveys will be used to demonstrate successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities. Unfortunately, the CSNA does not detail the current needs of individuals with the most significant disabilities or their need for SE services. It will be up to OVR to review these surveys on a regular basis to gather this information. Data collected from these surveys is currently reviewed on a

quarterly basis between OVR and PaRC to determine successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities.

(B) Who are minorities;

According to the 2010-2014 American Community Survey 5-Year Estimates, and evaluated as part of the CSNA, 81.8% of Pennsylvanians with disabilities identify as Caucasian or white; 12.4% of Pennsylvanians with a disability identify as African American; 6.2% of Pennsylvanians with disabilities identify as Hispanic or Latino; 0.3% of Pennsylvanians with a disability identify as American Indian and Alaska Native; and 1.4% Pennsylvanians with a disability identify as Asian/Pacific Islanders.

Qualitative data was collected as part of the CSNA through site visits to district offices and face-to-face interviews with VR administrators. During these interviews, OVR staff suggested that lack of English fluency has not presented significant barriers to ethnic and cultural minorities in receiving services and supports. Administrators and VRCs at multiple district offices cited familiarity and access to, but little utilization of, Language Line interpretation services. According to the October 2015 Census Report “Detailed Language Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Pennsylvania: 2009-2013,” about four percent of those individuals reportedly speak English less than “very well.” Consequently, lack of utilization of interpretation services may align with statewide language demographics, but may also signal a population underserved by OVR. Attention to this potential disparity is imperative as multiple VRCs identified that they served refugee communities, many of which come from countries with official languages other than English. Findings were that OVR staff could benefit from trainings oriented to cultural competency regarding the Pennsylvania Dutch, Amish, and Quaker populations, as well as refugees.

(C) Who have been unserved or underserved by the VR program;

Individuals with disabilities that are considered unserved and/or underserved include those with multiple disabilities (such as deaf/blind), those in rural areas, transition age youth, individuals with disabilities that are concurrently customers of other state systems (such as corrections, educational, and/or other human services systems), minorities, and veterans. Survey results from CRPs indicated that the most underserved communities, in order of significance, are customers with dual diagnoses, followed by aging customers, those in the criminal justice system (victims, defenders or parolees), those with low socioeconomic status, immigrants, and non-English speaking or English as a second language customers. Youth were ranked as the least underserved, followed by veterans, rural communities, racial or ethnic minorities, and finally state center residents. Transportation barriers were identified throughout the research as presenting the greatest challenge to the unserved or underserved communities in seeking employment.

(D) Who have been served through other components of the statewide workforce development system; and

OVR staff work closely with our PA CareerLink® partners in the State Workforce Development System. CareerLink® offices are one-stop facilities in Pennsylvania that assists individuals seeking Commonwealth and employment services, and where workforce development professionals focus on employment with an emphasis on high demand occupations. Data gathered from site visits to district offices suggests that OVR is working collaboratively with the CareerLinks®, but that that VRCs may benefit from receiving cross-

training on high demand occupations as a way to better serve their customers. BCOD staff have recommended that dual customers may benefit from collaboration across organizations to improve the referral process.

Unfortunately, OVR and workforce development customers were not interviewed as part of the CSNA to determine their specific needs. This missed opportunity will be given greater attention in the next CSNA developed.

(E) Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

OVR, in collaboration with PaRC, developed and began using a customer satisfaction survey for transition age youth in mid-2017. These surveys are sent out to randomly selected transition age youth monthly. OVR will need to develop a more formal plan to capture and summarize the results from these surveys. Future analysis of these results can reveal the extent to which transition age youth are being served satisfactorily or unsatisfactorily by OVR. An informal review of the responses is currently being done on a quarterly basis by OVR staff and PaRC during PaRC Policy and Customer Satisfaction Committee meetings. Recent information received highlights the important role communication plays in the relationship between counselor, student, and their family.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

According to results in the CSNA, through DLI, there are currently 106 certified CRPs operating in Pennsylvania, placing the Commonwealth in the 94th percentile of number of established CRPs throughout the United States. As of August 2017, Pennsylvania ranks only below Ohio, Illinois, and California. CRPs are private, community-based, non-profit organizations that provide rehabilitation services to individuals with disabilities. While Pennsylvania is fortunate to have a sufficient number of CRPs, there were gaps in services noted from the CSNA. Transportation services, especially in rural communities is one of the greatest needs identified by the CSNA. Barriers for transportation included: lack of flexibility with scheduling and planning for para-transit services; lack of reliability and consistency with para-transit services; lack of cultural competency and awareness for disability on the part of transportation workers; a general assumption that people with disabilities have no interest in employment or being active; and lack of institutional or societal interest or investment in transportation for people with disabilities.

Interagency referrals are another area identified as a problem for individuals with disabilities seeking services from multiple agencies. The referral process for each organization or CRP in Pennsylvania is different and can be overwhelming for individuals with disabilities. There is a workgroup currently facilitated through the PA Workforce Development System, which OVR participates in, that is looking at ways to improve co-enrollment across funding streams.

The HGAC is designated as a CRP within the state, and its continual operation will be critical for OVR to meet the needs of individuals identified under the unserved and underserved category, including individuals with multiple disabilities, students and transition age youth with disabilities, individuals with disabilities who live in the rural part of the state, and individuals with disabilities that are concurrently customers of other state systems (such as corrections, educational, and/or other human service systems).

HGAC provides a comprehensive program of services including the integration of pre-employment transition services, education on campus at the Commonwealth Technical Institute, counseling, vocational evaluation, and physical restoration in a barrier-free environment for individuals with disabilities leading to competitive integrated employment. The continual maintenance and improvement of HGAC will be necessary to maintain its operation in the most effective and cost-effective manner possible.

(3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

Surveys and interviews to identify barriers to and strategies for increasing services and support opportunities for students and youth with disabilities were conducted with workforce professionals. Unfortunately, only ten people responded to this survey. It does not appear from the CSNA that any OVR customers were surveyed as part of this assessment. This is a missed opportunity that will be corrected in the next CSNA assessment cycle. In terms of improving engagement, interviewees reported that pre-employment transition services are seen as a complement to the entitlement of school services provided under IDEA. Interviewees also noted that pre-employment transition services introduce eligible and potentially-eligible students to VR services and supports earlier, subsequently students engage in the VR process sooner and often with more direct school support.

As uncovered through the CSNA interviews, OVR plays a major role in pre-employment service efficacy and availability. Interviewees cited that it is essential that schools make the connection between students and OVR. OVR's presence in schools, as part of a network of service providers including the special education coordinator, teachers, paraprofessionals, and aids, and active registration of students, improves student outcomes.

Also learned through the CSNA is that OVR administrators and transition staff were concerned about local school districts understanding the services that OVR could offer to transition age youth that would support services already in place under IDEA. The CSNA recommended OVR work to develop more holistic and equitable relationships and communication with school districts across the Commonwealth to grow quality, selection, and knowledgeability of pre-employment transition services options and to improve access and connection to the workforce development system under WIOA. OVR has a regular and strong presence of ERCs, Transition Counselors, BSRs, and VRCs visiting local school districts. Since the implementation of WIOA, these relationships have continued to strengthen and OVR is considered an important ally in transition planning. OVR staff attend IEP meetings, meet with students and parents individually, and provide a wide array of pre-employment transition services per the WIOA amendments to the Rehabilitation Act. Pre-employment services to students have significantly increased from the time of the prior CSNA to present, and are expected to continue to be evaluated in more detail in the next CSNA cycle.

Annual Estimates. *Describe:*

(1) The number of individuals in the State who are eligible for services.

According to the 2017 Disability Status Report for Pennsylvania published by Cornell University's Institute on Employment and Disability, more than 855,000 individuals ages 21 to 64 (working age) in Pennsylvania

reported one or more disabilities, representing 11.8% of the working-age population in the state (Source: [2017 Disability Status Report – Pennsylvania, Yang-Tan Institute on Employment and Disability, Cornell University](#), using data from the U.S. Census Bureau’s American Community Survey).

(2) The number of eligible individuals who will receive services under:

(A) The VR Program;

FFY 2020: 46,596

OVR is targeting January 2020 to reopen the OOS for customers who have a Most Significant Disability. The above FFY 2020 estimate is a projection of how many customers are anticipated to receive services during the remainder of FFY 2020 if the Order of Selection remains closed for all priority categories through December 31, 2019. Using historical data, this figure was projected by increasing the number of VR participants who had open cases with IPEs at the end of FFY 2019 by the projected number of new IPEs that will be developed during the period of January 1, 2020 and September 30, 2020.

FFYs 2021-2024, annually: 46,096

(B) The Supported Employment Program; and

The following estimates project the number of individuals expected to be served annually during FFYs 2021-2024 for each of the priority categories within the SE Program (Title I and Title VI Funds):

Total anticipated to be served annually during FFYs 2021-2024: 7,065

- Most Significant Disability: 7,015
- Significant Disability: 50
- Non-Significant Disability: 0

Annual estimates of the number of SE customers to be served and projected Title VI expenditures during FFYs 2021-2024:

- Anticipated Total Number to be Served via Title VI Funds: 250
- Anticipated Annual Expenditure – Title VI Funds: \$650,000
- Total Number Served under Age 25 via Title VI Funds: 250
- Anticipated Annual Expenditure – Title VI Funds (under age 25): \$650,000

Annual estimates of the number of SE customers to be served and projected Title I expenditures during FFYs 2021-2024:

- Anticipated Total Number to be Served via Title I Funds: 6,815
- Anticipated Annual Expenditure – Title I Funds: \$11,007,500

Since the four-year State Plan submission (2016-20) and the two-year modification State Plan submission (2018-20), OVR’s new SE Policy went into effect on July 1, 2018. The effort to implement the new SE policy has been a significant undertaking with many moving parts that impact the financial, provider, and participant subsystems in CWDS, as well as, staff and provider activities at the district level. Some of the main changes included electronic reporting/billing, new service-menu options for customers to assist in

obtaining/retaining employment, and provider credentialing. OVR specialists continue to provide regular follow-up webinars for providers and staff alongside continued individual consultation.

(C) Each priority category, if under an order of selection.

FFY 2021-2024, annually:

- Most Significant Disability: 46,084
- Significant Disability: 12
- Non-Significant Disability: 0

(Total = 46,096)

Using both current and historical data, OVR projects that 46,084 individuals categorized as having a Most Significant Disability and 12 individuals categorized as having a Significant Disability will receive services annually during FFYs 2021-2024. OVR also projects that the number of individuals categorized as having a Significant Disability who are receiving services will decline over the next four years as their cases are closed. OVR will continue to conduct outreach and accept applications from individuals who meet the functional limitation criteria of all categories, and projects that 16,961 new customers categorized as Most Significant Disability, 24 new customers categorized as Significant Disability, and 9 new customers categorized as Non-Significant Disability will be added to the OOS wait list annually during FFYs 2021-2024. Worth noting, staff will receive training on OOS determinations and to use OOS more appropriately and effectively.

(3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

OVR closed the OOS for all priority categories effective July 1, 2019. As of the end of FFY 2019, there are a total of 3,010 customers eligible for VR services who are not receiving such services due to the closing of the OOS: 2,097 designated as Most Significant Disability, 100 designated as Significant Disability, and 3 designated as Non-Significant Disability.

(4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

1. For the Most Significant Disability category, the number projected to be made eligible annually is 16,961, while the number served will be 46,084. The number rehabilitated will be 7,400, of which 100% will be rehabilitated into the competitive labor market. The total cost of services is expected to be approximately \$64,000,000.
2. For the Significant Disability category, the number projected to be made eligible annually is 24, while the number served will be 12, which will decrease down to 0 as these cases are closed. Expenditures under this category are anticipated to be negligible and isolated to services for the 12 individuals currently receiving services, outreach, processing of new applications, and eligibility determinations.
3. For the Non-Significant Disability category, the number projected to be made eligible annually is 9, while the number served will be 0. OVR does not anticipate opening the Non-Significant Disability category to receive services during the next four years. Expenditures under this category will be negligible and isolated to outreach, processing of new applications, and eligibility determinations.

State Goals and Priorities. *The designated State unit must:*

(1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The state goals and priorities for the VR Services Portion of the Pennsylvania Combined State Plan were developed jointly with OVR Executive staff and the PaRC Policy and State Plan committee during a teleconference meeting exchange on May 10, 2019. Any projections, program continuations, etc. in this description are subject to the availability of funding in the plan year.

(2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Goal 1: Increase Competitive Integrated Employment Opportunities for Individuals with Disabilities

1. Expand the availability of apprenticeships, internships and OJT for individuals with disabilities.
2. Partner with the BWPO to ensure programmatic and physical accessibility of the PA CareerLink® centers for equal access for individuals with disabilities.
3. Increase SE and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.

Goal 2: Improve Transition Services for Students with Disabilities

1. Revise the model for pre-employment transition services for students with disabilities.
2. Increase opportunities for students to gain workplace skills and community-integrated work experiences.
3. Enhance collaborative relationships with DHS, PDE and higher education institutions.

Goal 3: Increase Community Education and Outreach.

1. Work with PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.
2. Continue to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs of unserved/underserved individuals with disabilities from cultural and ethnic minorities.
3. Promote accessibility and technology based upon universal design principles.

(3) Ensure that the goals and priorities are based on an analysis of the following areas:

(A) The most recent comprehensive statewide assessment, including any updates;

These goals were developed using the 2016-2018 CSNA which included targeted goal areas on: customer satisfaction; increasing services and support opportunities for students and youth with disabilities; identifying barriers and strategies to improve services to the broad spectrum of ethnic and cultural minorities with disabilities; development of more holistic and equitable relationships and communication with school districts across Pennsylvania; and supporting the use of new technology to benefit customer service.

(B) The State's performance under the performance accountability measures of section 116 of WIOA; and

These are new performance indicators for the VR program, and because there is insufficient or no historical data available the first two years of the plan, a baseline will be established using the actual performance that will be reported during the 2020-2023 period.

(C) Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

OVR underwent RSA monitoring in August 2019 but has not yet received a report on these activities. Once a report is received, interpreted and understood, these findings and recommendations will be implemented and changes to any goals or priorities will be incorporated into the two-year modification of the VR Portion of the Combined State Plan.

OVR received a letter dated May 20, 2019, from PaRC expressing their concern about the closing of the Most Significant Disability category of the OOS. OVR appreciates and understands this position and has a sincere commitment to making necessary programmatic and fiscal changes to open the OOS for the Most Significant Disability category as soon as possible.

Order of Selection. *Describe:*

(1) Whether the designated State unit will implement and order of selection. If so, describe:

(A) The order to be followed in selecting eligible individuals to be provided VR services.

OVR received approval from RSA to close all categories under the OOS as described below.

First Priority: Most Significant Disability; Second Priority: Significant Disability; Third Priority: Non-Significant Disability.

Description of priority categories

First Priority: Most Significant Disability

- The physical, mental, or sensory impairment(s) must seriously limit three or more of the individual's functional capacities; and
- the individual must be expected to require two or more VR services that are expected to last six months from the date of the IPE or be needed on an ongoing basis to reduce an impediment to employment.

Second Priority: Significant Disability

- The physical, mental, or sensory impairment(s) must seriously limit one or more of the individual's functional capacities; and
- the individual must be expected to require multiple VR services that are expected to last six months from the date of the IPE or be needed on an ongoing basis to reduce an impediment to employment.

Third Priority: Non-Significant Disability

- The individual has a physical, mental, or sensory impairment that does not meet the definition for Most Significant Disability or Significant Disability.

The OOS shall not be based on any other factors, including:

- any duration of residency requirement, provided the individual is present in the State;
- type of disability;
- age, gender, race, color or national origin;
- source of referral;
- type of expected employment outcome;
- the need for specific services or anticipated cost of services required by an individual; or
- the income level of an individual or an individual's family.

Pre-Employment Transition Services and the OOS:

Students, families, advocates, and educators are advised to carefully consider the need to begin pre-employment transition services as early as possible in the transition process, and prior to an eligibility determination. Potentially eligible students with disabilities (i.e. students who may or may not have applied for VR services (non-applicants and applicants) that only receive pre-employment transition services) will not be affected by the OOS and will continue to receive pre-employment transition services.

(B) The justification for the order.

The Rehabilitation Act, *as amended*, requires that an OOS for services be instituted any time that limited resources impede the agency from providing services to all eligible individuals. Because OVR does not believe it will be able to serve all eligible individuals with the available resources, it has adopted an OOS. The OOS in Pennsylvania gives priority first to individuals with Most Significant Disability; second to individuals with Significant Disability; and third to individuals with Non-Significant Disability.

OVR has operated under an OOS since March 1, 1994. OVR has provided VR services only to customers who have a Most Significant Disability. With the use of ARRA funds, beginning on October 18, 2010, OVR expanded the OOS to include individuals who have a Significant Disability. Consistent with OVR's policy on the OOS, OVR evaluated its ability to meet the second priority category and, from a fiscal and programmatic standpoint, OVR determined that it was unable to do so. On Monday, April 23, 2012, the Significant Disability and Non-Significant Disability categories were closed to all new customers. OVR has been serving only Most Significant Disability customers since 2012.

The WIOA amendments to the Rehabilitation Act require that the Designated State Unit must expend at least 15% of a state's federal allocation for VR (which averages approximately \$20 million annually for OVR) to be set aside for pre-employment transition services for students with disabilities between 14 and 21 years of age. This reserve has resulted in decreased funding for other existing programs. This 15% represents the minimum amount that must be utilized for these services. OVR anticipates exceeding the 15% reserve in the current FFY based on current obligations and spending patterns. There are also currently 147,000 Commonwealth students with disabilities who might be eligible to enroll in pre-employment transition services. While OVR regularly evaluates availability of funds and administers fiscal forecasting, the inability to accurately predict the number of potentially eligible students will make budgeting for the pre-employment transition services and VR programs challenging.

The WIOA amendments to the Rehabilitation Act prohibit restricting the provision of pre-employment transition services, which resulted in Pennsylvania's program enrollment nearly doubling from 13,946 in fiscal year 2016 to 25,601 in fiscal year 2017 – with the cost to provide these services far exceeding the 15% set-aside. To date, OVR has had to invest approximately \$93 million in the program.

Due to a budgetary shortfall in FFY 2019, OVR reevaluated its OOS and determined that OVR's available and projected resources will not be adequate to ensure the provision of the full range of VR services to all eligible individuals. OVR consulted with the PaRC at their March 6, 2019 Full Council meeting and consulted with the director of the Client Assistance Program on budgetary concerns, analysis, and the need to seek approval from RSA to close the OOS which will result in the establishment of a waiting list for the VR program. At the March 7, 2019, OVR State Board meeting, the Board voted unanimously to allow OVR to proceed with taking necessary steps to close the OOS.

With approval from RSA, OVR closed Priority Categories Most Significant Disability, Significant Disability, and Non-Significant Disability on July 1, 2019. OVR shared this plan with RSA, PaRC, the OVR State Board & the Client Assistance Program, and at statewide public meetings on May 22, 2019, to inform consumers and stakeholders.

The Pennsylvania Bulletin issued on May 4, 2019, announced a 30-day public comment period from May 4, 2019 to June 4, 2019, on the proposed amendment to close all categories of the OOS in description (m) of the VR Services Portion of Pennsylvania WIOA Combined State Plan. OVR provided the public, including individuals with disabilities, the opportunity to provide input regarding OVR's request to temporarily close the OOS. Interested persons were invited to submit written comments by mail to OVR or by email to an OVR resource account until 5:00 p.m. on June 4, 2019. In-person public meetings were held statewide at OVR district offices on May 22, 2019, and individuals who wanted to participate but were unable to attend in-person were offered the opportunity to participate via phone. The total number of participants at the public meetings included 320 in-person participants at the OVR district offices and a total of 150 lines connected for those participating virtually via AT&T phone lines.

When the comment period ended, OVR had received and recorded a total of 150 verbal comments from individuals participating in person at the public meetings and 98 comments that were emailed/mailed. Also, there were articles in two local newspapers on the proposed changes to VR services that would create a waiting list for new customers. The public comment process and resulting dialogue emphasized impacts on current OVR customers, students with disabilities, and external stakeholders/partners that included the following general "themes": communicate with stakeholders to include business, general, OLTL/ODP, providers; funding; OOS Category; parent concerns; provider concerns; pre-employment transition services; question/Frequently Asked Questions; and service disruption to customers, schools, and providers.

New customers determined eligible and assigned to a closed priority category on or after July 1, 2019, will be placed on a waiting list until the resources are available to provide the full range of services. However, services will continue for all customers with approved IPEs with an effective date prior to July 1, 2019. OVR will continue to provide pre-employment transition services to potentially eligible students and OVR eligible students who began receiving them prior to eligibility determination and placement in a closed OOS priority category.

1. Individuals applying for services after the date the OOS is closed on July 1, 2019, will be interviewed and their eligibility and OOS determination will be made. Eligible customers will be placed on a waiting list per category. When financial resources are available, first priority will be given to customers with a Most Significant Disability, second priority to customers with a Significant Disability, and third priority to customers with a Non-Significant Disability. Rationale for placement will appear in the customers case file.
2. Each customer placed on a waiting list will be notified in writing of the priority categories, his or her assignment to a particular priority category classification, and be informed to alert OVR regarding possible reclassifications due to a change in the individual's circumstances or due to any misclassifications. The individual will also be informed of their right to appeal the category assignment through informal or formal review and of the availability of assistance from the Client Assistance Program.
3. For eligible customers who do not have approved IPEs with an effective date prior to July 1, 2019, and are not in an open priority group:
 - a. Information and referral services will remain available. Individuals will be given information and referrals to other appropriate Federal and State programs, including programs carried out by other components of the Statewide Workforce Development System, such as the one-stop centers known in the Commonwealth as PA CareerLink®, best suited to address the specific employment needs of the individual.
 - b. No IPE will be written to provide such services to these individuals until such time their OOS category opens and they receive notification we can serve them.

Procedure for processing applications:

1. Upon receipt of referral, counselor meets with applicant to complete application and informs them about OOS and resources that can assist them while they are on the waiting list.
2. Counselor will input data and application date; scan and upload documents in OVR's CWDS database systems and determine eligibility within 60 days from the date of application.
3. After eligibility determinations are made, customers will be assigned to an OOS priority category based on their functional limitations and need for multiple VR services over an extended period of time (currently defined as 6 months).
4. CWDS will add the case to a waiting list in the system, not allowing services to proceed. Notice of such (as outlined above) will be sent to the customer.

Procedure for putting customers on the waiting list:

1. For each priority category, customers will be put on the waiting list based upon application date.
2. OVR Central Office will maintain this list through the CWDS.

Procedure for taking customers off the waiting list:

1. OVR will determine when to open each category based upon financial availability and will evaluate the ability to open categories quarterly. One priority category will be opened at a time to clear the waiting list for that priority category before opening the next priority category.
2. If OVR is unable to serve everyone in a specific category, customers will be taken off the list by month of application, starting with the customers who have been waiting the longest to receive services.
3. A monthly list will be generated by CWDS. Each quarter, based on financial availability, OVR will determine how many customers will be taken off the waiting list for the recently opened priority category.

4. Notice will be provided to district offices that they can begin developing plans for customers in a certain range of dates, based on the application date.
5. The District Administrator will ensure customers are assigned to counselors.
6. Counselors will complete an IPE within 90 days from the date the client was taken off the waiting list.

(C) The service and outcome goals.

As noted above, due to a budgetary shortfall in FFY 2019, OVR reevaluated its OOS and determined that OVR's available and projected resources will not be adequate to ensure the provision of the full range of VR services to all eligible individuals. OVR consulted and informed RSA, PaRC, the OVR State Board and the Client Assistance Program of the fiscal situation, outcome data, and the need to close the OOS. Statewide public meetings were held May 22, 2019, to inform and obtain comments, and feedback from consumers and stakeholders. With RSA approval, OVR moved forward to close Priority Categories Most Significant Disability, Significant Disability, and Non-Significant Disability on July 1, 2019.

New customers determined eligible and assigned to a closed priority category on or after effective date the OOS is closed will be placed on a waiting list until the resources are available to provide the full range of services. However, services will continue for all customers with approved IPEs prior to the effective date the OOS is closed. OVR will continue to provide pre-employment transition services to students with disabilities who were receiving such services prior to being determined eligible for VR services. Each customer placed on a waiting list will be notified in writing of the priority categories, their assignment to a particular priority category classification and be informed to alert OVR regarding possible reclassifications due to a change in the individual's circumstances or due to any misclassifications.

OVR's outcome and service goals are projected as follows for **FFY 2020**:

1. For the Most Significant Disability category, the number eligible is expected to be 17,000, while the number served will be 41,961. The number rehabilitated will be 8,000 (from DLI Performance Plan), of which 100% will be rehabilitated into the competitive labor market.
2. For the Significant Disability category, the number accepted is expected to be 100 Significant Disability continue on the waiting list as OVR continues to conduct outreach and accept applications from individuals who would meet category II of the OOS.
3. For the Non-Significant Disability category, the number accepted is expected to be 15 Non-Significant Disability continue on a waiting list as OVR continues to conduct outreach and accept applications from individuals who would meet category III of the OOS.

Using both current and historical data, OVR projects that 100 individuals categorized as Significant Disability and 15 individuals categorized as Non-Significant Disability will be on the OOS wait list throughout FFY 2020. OVR will continue to conduct outreach and accept applications from individuals who meet the functional limitation criteria of the Significant Disability and Non-Significant Disability categories, OVR's outcome and Service goals are projected as follows for FFY 2021:

1. 1. For the Most Significant Disability category, the number eligible is expected to be 17,000, while the number served will be 42,000. The number rehabilitated will be 8,000 (from DLI Performance Plan), of which 100% will be rehabilitated into the competitive labor market.

2. 2. For the Significant Disability category, the number accepted is expected to be 100 Significant Disability continue on the waiting list as OVR continues to conduct research and accept applications from individuals who would meet category II of the OOS.
3. 3. For the Non-Significant Disability category, the number accepted is expected to be 15 Non-Significant Disability continue on a waiting list as OVR continues to conduct outreach and accept applications from individuals who would meet category III of the OOS. Using both current and historical data, OVR projects that 100 individuals categorized as Significant Disability and 15 individuals categorized as Non-Significant Disability will be on the OOS wait list throughout FFY 2021. OVR will continue to conduct outreach and accept applications from individuals who meet the functional limitation criteria of the Significant Disability and Non-Significant Disability categories.

(D) The time within which these goals may be achieved for individuals in each priority category within the order; and

The time frame in which goals are to be achieved is approximately 30 months for the Most Significant Disability priority of service category.

(E) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

In keeping with federal mandates, it is the policy of OVR to operate on an OOS when the agency is unable to provide services to all eligible individuals in the same state who apply for services. The OOS in Pennsylvania gives priority first to individuals categorized as Most Significant Disability; secondly, to individuals categorized as Significant Disability; and third to individuals categorized as Non-Significant Disability. All new applicants for services must be notified about the OOS. With all categories closed, it would be expected that Most Significant Disability would be included in these Priority Category breakout on projections listed here for the remaining period of FFY 2021.

The determination of the level of significance is made by the VRC based upon a review of data developed to make the eligibility determination, and to the extent necessary, an assessment of additional data.

Significance of disability is defined based upon the presence of functional capacities and the requirement of multiple VR services, defined as two or more services that are expected to last 6 months from the date of the IPE or be needed on an ongoing basis to reduce an impediment to employment.

With all categories closed, a letter is sent to the individuals who do will be placed on a waiting list for services indicating that they have been determined Most Significant Disability, Significant Disability or Non-Significant Disability. VRCs provide information and referral services regarding the most suitable services to assist the individual on the waiting list and this is documented within a case progress note or the waiting list letter sent to the individual.

Throughout the year, OVR senior management will evaluate the agency's available resources on a quarterly basis to serve all eligible individuals with disabilities. OVR will determine when to open each category based upon financial availability. One priority category will be opened at a time to clear the waiting list for that priority category before opening the next priority category. If OVR is unable to serve everyone in a specific category, customers will be taken off the list by month of application, starting with the customers who have been waiting the longest to receive services. If resources are available, the OVR District Offices will be informed that they can move individuals from waiting into an active status with OVR. A monthly list will be generated by CWDS. Each quarter, based on financial availability, OVR will determine how many customers will be taken off the deferred list for the recently opened priority category.

(2) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

Any applicant who has been determined eligible due to their disability, is in immediate risk of losing the job due to the disability, and is determined to be in a category not currently being served, may only receive the services or goods needed to maintain the job.

1. The job must be in a competitive integrated setting. If services are needed for other purposes, they may not be delivered and the applicant must wait until their name is removed from a waiting list category and placed into active service. This means that if the individual needs services that are not directly tied to maintaining current employment, the individual's ability to receive those services from the VR program depends on the individual's placement on the waiting list.
2. Immediate need means that the individual would almost certainly lose their current job if not provided specific services or equipment in the very near future that would enable them to retain that employment.
3. Immediate risk of losing the job due to the disability does not include economic conditions and non-disability related factors.

Goals and Plans for Distribution of title VI Funds.

(1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

OVR provides SE services to eligible customers with the most significant disabilities who have been determined to require on-going support services to maintain employment. OVR has an on-going, overarching goal of providing quality SE service which are delivered in an effective, efficient and timely manner. To that end, OVR initiated many changes/enhancements to the SE policy and procedures in 2018. The goals and priorities identified in this policy reflect: an expansion of types of SE services to better meet the diverse needs of customers; a move to an entirely online system for more streamlined referral, reporting, billing and tracking of SE cases; and incentives to providers for working with unserved/underserved populations including rural, transition-aged, veterans, Social Security Administration (SSA) recipients and others. During 2020 and 2021, OVR expects to provide SE services to 400- 500 individuals utilizing Title VI funds. Increased costs and limited Federal SE funds were considered in making this projection. PA OVR offers SE services to several thousand individuals using regular VR funds each year.

In addition, over 160 CRPs have signed a SE Provider Agreement with OVR to render SE services to customers. New credentialing requirements have been put in place for CRP staff to better ensure OVR's goal of a consistent and quality customer experience for those receiving SE services. An emphasis on job stability as the driver of case success, as opposed to only meeting days of employment milestones, was another notable shift in OVR policy designed to meet the goal of improved, long-lasting placements.

(2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

(A) The provision of extended services for a period not to exceed 4 years; and

A determination of the need for extended services for youth, up to age 25 with a disability, begins during the initial assessment phase of a case. At that time, the rehabilitation team comprised of the youth, the youth's family, OVR staff, Case Manager/Supports Coordinator (if applicable), local education agency staff and others, determine possible long-term support needs and resources. As the case progresses, and the youth obtains employment, the individual's stability on the job informs the determination of the need for extended services and the timing of provision. Those who reach 80% or better independence on the job are considered job stable, and the case is followed for 90 days to ensure the expected progression to full independence with natural supports in place. For those at 80% or lower independence on the job after intensive job supports have been provided, there is an expectation of need for continued coaching and extended support services. If no other source of funding is available for the individual, OVR can provide extended services for up to 48 months for youth with disabilities using federal VR dollars. For cases with alternative funding, OVR must continue to follow-along for a minimum of 90 days after the case transitions to extended services. For those individual's with ODP funding, OVR entered into a joint bulletin that dictates when the case can move to ODP-funded extended services and documentation requirements.

(B) How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

OVR will seek opportunities to leverage other public and private funds to increase resources for extended services and expand SE opportunities for youth with the most significant disabilities. This will be done by exploring innovative partnerships and enhancing service coordination with agencies such as ODP, OMHSAS, OLTL and BJJS, as well as LEAs.

OVR has entered into a MOU with BJJS, in collaboration with PACTT affiliates, that leverages state and federal funding. These funds are targeted to provide a wide range of services such as the creation of summer programming, increased pre-employment transition services, and paid work experiences to promote career pathways in the underserved population of students/youth with the most significant disabilities who are involved with the juvenile justice system.

Funding for extended services is often available for customers eligible for Medical Assistance waiver programs administered through ODP and OLTL. Procedures are now in place for a youth's rehabilitation team consisting of the youth, the youth's family, OVR staff, Case Manager/Supports Coordinator (if applicable), LEA staff and others, to identify these resources at an early point in an OVR case. A joint

bulletin between OVR and ODP now details when and how a case moves from OVR to ODP funding, including cases for youth with disabilities.

OVR has initiated an Employer Service Premium (ESP) for providers as an incentive to work with unserved/underserved populations including transition-age youth. Two of the 13 qualifiers for the ESP are the Age Premium Qualifier, which applies to OVR customers under the age of 25, and the Transition Premium Qualifier for customers who become employed within two years of graduation from secondary education.

State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

(1) The methods to be used to expand and improve services to individuals with disabilities.

Goal #1: Increase Competitive Employment Opportunities for Individuals with Disabilities.

In June 2018, Pennsylvania adopted the Employment First Act, Act 2018-36, 62 P.S. § 3401 *et seq.*, to ensure that individuals with a disability be given the opportunity to achieve economic independence through jobs that pay competitive wages in community integrated settings. The statute also created the Governor's Cabinet for People with Disabilities and the Employment First Oversight Commission. The Governor's Cabinet for People with Disabilities will review existing regulations and policies to recommend changes to laws, regulations, policies, and procedures that ensure implementation of Employment First. OVR has a key role in this initiative and, through the sub-goals below, will participate fully to increase employment opportunities for Pennsylvanians with disabilities.

1. Expand the availability of apprenticeships, internships and OJT for individuals with disabilities.

OVR's Business Services Division is well prepared to continue outreach to employers to increase opportunities for apprenticeships, internships, and OJTs for individuals with disabilities. OVR will keep the process simple by using a SPOC approach modeled after the CSAVR use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania Workforce regions. OVR BSOD staff and District Office business services teams will participate in regional planning processes in partnership with local workforce development boards. Within each of Pennsylvania's workforce development areas, data analysis will be conducted to identify employment sectors that are most likely to account for job growth and expansion in the next five years.

In addition, the HGAC in Johnstown, Pennsylvania is consulting with the Pennsylvania Apprenticeship & Training Office to develop a pre-apprenticeship training program. A short-term, pre-apprenticeship training program will be designed to provide the necessary preparatory safety, skills, and certifications to individuals who are interested in entering registered apprenticeships. HGAC will provide the pre-apprenticeship training on site and registered employers will provide the technical training. Specific preparatory skills and certifications will be determined by participating employers, based on their industry's respective needs for skilled workers.

HGAC also offers internship/externship opportunities for credit within nine of the existing CTI programs, and additional externship opportunities with local businesses are in development.

2. Partner with the BWPO to ensure programmatic and physical accessibility of the PA CareerLink® centers for equal access for individuals with disabilities.

The District Administrators and some Assistant District Administrators in OVR's 21 District Offices participate in their local Workforce Development Board meetings regularly to further collaboration of efforts with the goal to lead to increased employment opportunities for Pennsylvanians with disabilities.

To promote programmatic accessibility, the BSOD has developed a comprehensive disability awareness and etiquette training that is delivered across the Commonwealth to interested PA CareerLink® partners and businesses. OVR has also made available to all Commonwealth employees an "Introduction to OVR" training to inform staff about the services OVR can offer to individuals with disabilities. OVR staff has received Leadership Training on the Americans with Disabilities Amendments Act to include strategies and modules for training businesses and customers on the Act.

3. Increase SE and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.

A monitoring procedure is being established that will examine both internal and external factors of the SE program with the goal of improving the program and ultimately increasing outcomes. Internal monitoring will look at each OVR district office regarding utilization patterns of SE services: adherence to established procedures for referral; authorizations; report acceptance; invoice processing; and customer satisfaction and customer employment outcomes. Externally, OVR will monitor provider performance regarding timeliness of service provision and billing, adherence to established procedures throughout the process, customer and OVR satisfaction, and customer employment outcomes. Technical assistance and training will be offered by OVR staff to providers based on monitoring outcomes.

Recent changes to OVR's SE policy intended to increase/improve SE outcomes include: requiring provider staff to be credentialed; increasing the communication between OVR and provider staff working with a customer; offering a wider range of services to meet customer needs; and inclusion of extended supports.

Goal #2: Improve Transition Services for Students with Disabilities.

OVR staff will remain at the forefront working with PDE personnel to increase pre-employment transition service opportunities for students with disabilities, as well as increasing opportunities for the development of workplace skills and community integrated work experiences.

1. Revise the model for pre-employment transition services for students with disabilities.
Improve the Pre-Employment Transition Services program so that it provides services to students with disabilities in an efficient, documented, and cost-effective manner that aligns with federal regulations.
 - a. Develop internal controls that ensure services are provided to students based on an assessment of need.
 - b. Develop and utilize a continuum of services based on evidence based practices to demonstrate student progress.

- c. Develop monitoring and program evaluation procedures to identify best practices that can be replicated throughout the state.
- 2. Increase opportunities for students to gain workplace skills and community integrated work experiences.
- 3. Enhance collaborative relationships with DHS, PDE and higher education institutions by:
 - a. ensuring that each secondary school in Pennsylvania has a point of contact;
 - b. participating in the Statewide Leadership Team;
 - c. collaborating in the development of the Pennsylvania Community on Transition Conference each year; and
 - d. participating in cross-training and attending partner conferences.

Goal #3: Increase Community Education and Outreach.

- 1. Work with PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.

OVR will continue to work closely with PaRC on developing ideas and plans to increase customer satisfaction. OVR provides PaRC with a monthly summary of the results from the customer satisfaction surveys. In addition, OVR staff participate in PaRC Customer Satisfaction Committee conference calls on a quarterly basis to discuss the results of these summaries. There have been some technical changes made in CWDS in an attempt to increase customer participation in this process, with minimal improvement. OVR is dedicated to working with PaRC to find additional creative ways to improve customer participation in the survey process.

- 2. Continue to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs of unserved/underserved individuals with disabilities from cultural and ethnic minorities.

During 2018-2019, OVR conducted research on diversity and inclusion needs of unserved and underserved populations through a contract with the Pennsylvania State University Research Team. The research included three different phases: focus groups with representation from all 21 OVR District Offices; staff surveys; and key informant interviews of individuals who have a special knowledge or perspective on OVR and performance as it relates to diversity and inclusion. The outcome of this research, and associated benchmarks, will be used to guide OVR in the development of in-service training for staff, as well as future programmatic adaptations to stretch OVR's reach to those identified as unserved or underserved in Pennsylvania. A diversity and inclusion webinar training series is being planned for Spring 2020. In addition, recommendations were made by the research team for OVR to create a diversity and inclusion task force to develop a plan for continual implementation and monitoring of diversity and inclusion integration across the Commonwealth. OVR's goals during this next four-year plan will be to complete staff training in diversity and inclusion, and to develop a task force for continued implementation of a diversity and inclusion focus.

- 3. Promote accessibility and technology based upon universal design principles.

An important part of the rehabilitation process is evaluating the accessibility and technology needs of OVR customers. This takes place during the initial intake interview, continues throughout the life of the case, and is most important at the time when the individualized plan for employment is developed. Each

customer has individualized needs and although not everyone will require assistive technology, this is an important practice. OVR has an AT Specialist onboard to assist staff with maximizing the use of AT and provide information about how AT can assist OVR customers to achieve their educational and employment goals. This specialist also supports OVR staff who have accessibility needs on-the-job when the organization is transitioning to new software or hardware devices.

The OVR Training Division is committed to ensuring that all training materials for OVR staff or external participants are available in accessible format before being released. In addition, the OVR Training Director schedules a Communication Access Realtime Translation (CART) service for each staff webinar or video conference training. CART service is also provided for any OVR scheduled public meeting, in addition to sign language interpreter services being available at every OVR district office. In the near future, a staff training series is being planned to demonstrate how to create accessible materials, and how to make sure that content and power-point presentations are universally accessible.

In addition, OVR collaborates with the DLI's BWPO via PA CareerLink® offices to better assist veterans who have disabilities in obtaining assistive technology (AT) to remove barriers in locating and maintaining employment. OVR staff attends Pennsylvania Cares meetings to learn about AT and training programs offered by various community and state agencies and higher education institutions. OVR staff then disseminate this information statewide to OVR Veteran Coordinators and Veteran Counselors who provide AT equipment and training to OVR customers who are veterans with disabilities.

(2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

The Center for Assistive and Rehabilitative Technology at the HGAC in Johnstown, Pennsylvania is an available AT resource to OVR customers throughout the Commonwealth. Highly trained professionals evaluate and support people in the following areas of assistive technology: positioning and mobility; computer access; augmentative communication; environmental controls; driver evaluation; vehicle modification; devices for activities of daily living; devices for visual and/or auditory impairment; and home and work modifications. The Learning Technology Program assesses student's needs in the classroom and trains them in the use of assistive technology, if necessary.

OVR collaborates with PIAT at the Institute on Disabilities at Temple University to participate in training, to maintain the Pennsylvania Assistive Technology Lending Library, and to develop AT resources for Pennsylvanians with disabilities. PIAT's Lending Library provides the opportunity for any Pennsylvanian to borrow and assess the usefulness of an AT device prior to purchase. Devices may also be borrowed as a temporary accommodation (for employment, post—secondary education, or similar purposes). The centralized inventory for this program is located on the HGAC campus; devices are shipped to/from borrowers at no cost from this location. The regional subcontractors of PIAT facilitate the selection, borrowing, and use of these devices across the state.

Specific AT policies include: the Home Modification Policy, the Vehicle Modification Policy and the Farming and Agriculture Rehabilitation Management policy. These policies provide a wide range of AT evaluation and services detailed to meet the needs of OVR customers in removing environmental barriers to employment.

The VR customer can be provided AT services and devices throughout the rehabilitation process. Most important is that an assessment always precedes use of any AT device or service to ensure provision of such items is appropriate and necessary to meet the vocational needs of the individual.

OVR works with vendors who are Rehabilitation Engineers and AT Specialists on a "fee-for-service" basis throughout the Commonwealth. Most providers, including staff from HGAC's Center for Assistive and Rehabilitative Technology, can travel to the OVR customer's home and/or worksite to provide AT evaluation and training services.

In accordance with OVR's policies, OVR purchases AT devices and services to support its customers in their vocational goals. OVR also provides information and referral services regarding other resources when the agency is unable to provide funding for AT devices and services. OVR's Statewide AT Coordinator regularly distributes information electronically to OVR's District Offices regarding non-VR funded AT services, programs, and resources.

Low interest loans are available through the Pennsylvania Assistive Technology Foundation for customers who have a disability or any older or state resident who has need for AT.

OVR also collaborates with BWPO via the PA CareerLink® sites to better assist veterans who have disabilities obtain AT to remove barriers in locating and maintaining employment. The Statewide Veterans Coordinator attends Pennsylvania Cares meetings monthly to learn about assistive technology/training programs offered by various community and state agencies and higher education institutions. This information is transmitted statewide to OVR Veteran Coordinators and Veteran Counselors in each field office who provide AT equipment and training to OVR customers who are veterans with disabilities.

OVR has collaborated with Penn State's AgrAbility Program and the Department of Agriculture in developing a policy to address the rehabilitation needs of farmers/ranchers with disabilities. This policy is known as Farming and Agriculture Rehabilitation Management which is designed to assist farmers with disabilities. VRCs, with technical assistance and guidance from Pennsylvania's AgrAbility Program, are able to assess the rehabilitation needs of farmers/ranchers with disabilities to provide the specialized rehabilitative and assistive technologies they may need to maintain their employment.

(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

In addition, OVR will incorporate 2016-2018 CSNA recommendations and strategies to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities. Specifically, OVR will increase training in culturally competent strategies for serving these communities. OVR will continue to strive to provide more staff, materials, resources, and services in languages other than English which may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities as well as refugee communities.

(4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary

life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

OVR will collaborate with LEAs to assist youth in the attainment of competitive, integrated employment by increasing paid work experience opportunities and other career exposure experiences, such as job shadowing, mentoring, and employer mock interviews, in addition to SE services.

OVR has experienced significant growth and interest in customer participation in its Summer Academy programs. What started as an extended “freshman orientation” to college campus life for students with disabilities has evolved into numerous highly specialized, short-term programs for students and youth. The popularity of these programs has led OVR to the point where these programs need to be restructured, to allow specialized service vendors to share with OVR and its customers their specialized programs and curricula to meet OVR customer individual needs in the most community integrated and least restrictive settings as possible.

OVR has also implemented a pre-employment transition services Workflow for the 2019-2020 school year that emphasizes OVR’s role in meeting with school districts to assess their resources and the needs of their students. Once it is determined what services are needed by the school, OVR will work to fill that role with our staff. If we do not have the staff available, OVR will seek a provider to complete the service.

(5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Starting in 2017, OVR, in collaboration with ODP, investigated and put into place the Certified Employment Support Professional (CESP™) ACRE, a credentialing process that recognizes individuals who have demonstrated a sufficient level of knowledge and skill to provide integrated employment services to a variety of populations. Specifically, ACRE certification endorses competency-based training in 2 areas:

1. Employment Services (basic and professional levels); and
2. Employment Services with an Emphasis on Customized Employment (basic and professional levels).

OVR has been encouraging the use of CRPs for benefit counseling, by finalizing a Benefits Counseling Provider Agreement on March 1, 2018. Benefits counseling services are provided by CRPs across Pennsylvania and are considered an integral component in the development of employment goals. Individuals with disabilities seeking services through Pennsylvania OVR who receive Supplemental Security Income or Social Security Disability Insurance require skilled personnel to assist in the decision-making process. Certified benefits planners are sought to assist customers in identifying the potential impact of employment in the pursuit of independence. Having this type of support and individualized information can help individuals pursue their career goals with a better understanding and less worry about their benefits. These certified benefits planners are employed by CRPs. Information was disseminated to OVR field staff and CRPs through webinar trainings, in an effort to establish these services in additional CRPs across Pennsylvania.

Notations from a May 20, 2019, service review identified 47 service authorizations initiated for Benefits Consultation or Work Incentives Benefits Analysis within CWDS. The review also indicated three community rehabilitation programs have been approved and one community rehabilitation program is

awaiting approval. Field staff are additionally encouraged to enroll new CRPs and to encourage customer engagement in the process. OVR Comprehensive Assessment at the time of eligibility prompts the VRC to document the discussion concerning the availability of benefits counseling services. VRCs may review benefits counseling services throughout the life of the case and document their actions in a case progress note.

OVR has also been working to improve CRPs through the monitoring of contracts and grants. The monitoring of VR programs awarded through I&E contracts and/or AMs or provider agreements are routinely monitored by OVR using a standardized process and standardized tool. This process is outlined in the VR Services Manual. Both the vendor, as well as the local District Office, are afforded the opportunity to provide input regarding issues that have an impact on projected customer outcomes. This monitoring information is used by OVR to establish, develop, improve, and realign community vocational rehabilitation services, and has been used to help with problem situations. This input is also of fundamental importance when OVR reviews and considers programmatic existing service contract renewals, amendments, and new service bids especially at the time of service and/or customer case review.

In addition, a SE Provider Agreement was developed to streamline the approval and onboarding of new SE (including Customized Employment) providers. Regular technical assistance and training calls, an SE provider email list, and SE resource accounts for technical and policy questions have been established and are being utilized for communication with and to support community rehabilitation programs. Efforts will be made to develop a standard monitoring tool and procedure with a timeline so that all of OVR's SE providers can benefit from direct feedback and technical support.

(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

OVR has implemented a variety of measures to assist with the employment rate, measurable skills gains, and credential attainment of people with disabilities as indicated in Section 116 of WIOA.

1. OVR has implemented a comprehensive revision of our SE and Customized Employment programs which offers additional assistance, services, and short and long term follow up services to ensure that customers are placed appropriately and are able to maintain their employment.
2. OVR has required that SE and Customized Employment vendors have minimal credentials to provide these services to ensure better quality outcomes for our customers.
3. OVR has developed a comprehensive measurable skills gain training and documentation process within CWDS.
4. OVR routinely invests significant resources in training activities across the Commonwealth to ensure that customers are able to become employed in their chosen career field.
5. OVR has partnered with the Office of Administration in offering a Commonwealth Internship program for our students in the Harrisburg area to work in a variety of Commonwealth agencies related to their degree.
6. OVR has partnered with CIL partners to offer internship opportunities at a variety of CIL locations across the state.
7. OVR has partnered with a variety of institutions of higher learning to offer supported education programs for customers on the autism spectrum to ensure that they are able to successfully complete their college degrees and obtain community integrated employment post-graduation.

8. OVR continues to offer several summer academies that allow our customers to utilize AT, and be better prepared for college life and expectations which enables them to obtain credentials and lead to community integrated employment post-graduation.
9. OVR is partnering with ODP to share data to better track shared services and utilize long term supports to ensure mutual customers that become employed have the supports necessary to stay employed long term.
10. OVR has also introduced a variety of customer satisfaction surveys related to transition, SE, status 26 and status 28 closures to learn from our customers what services or supports were most impactful.

OVR has also implemented a comprehensive business services approach to serving the business community.

1. OVR’s statewide business service team serves as a SPOC for staff and businesses. In this role as a SPOC, business service staff offer training and technical assistance on business engagement, ADA consultation, placement trends, and activities. A SPOC also interfaces with business and industry to provide support and develop programs and partnership locations.
2. OVR has established local business SPOC for businesses for ADA questions and consultations, the placement of customers, and reasonable accommodation consultations, etc.
3. OVR has created multiple partnerships with businesses that are leading to placements and long-term opportunities for training and measurable skill development, or credential attainment for OVR customers.
4. OVR is working on an update to CWDS to track business engagement activities referred to as “indicator” #6 in WIOA Title I-IV. These business engagement activities measure common program effectiveness in serving employers, and are currently being developed by L&I Workforce System partners that include: OVR, PA CareerLink® sites, the Statewide Workforce Development Board, CWIA, and Title II Adult Education Programs. See comparison chart below.

WIOA Common Measures of Effective Business Services by WIOA Categories:

- a. Workforce Recruitment Assistance;
- b. Strategic Planning/Economic Development Activities;
- c. Untapped Labor Pools Activities;
- d. Training Services;
- e. Incumbent Worker Training Services:
 - i. Rapid Response/ Business Downsizing Assistance; and
 - ii. Planning Layoff Response; and
- f. Employer Information and Support Services.

WIOA Title I-IV Performance Indicators

WIOA Core Partner Crosswalk of Business & Employer Engagement

WIOA Title I-IV Performance Indicators

Service Categories	Reporting Specifications/Instructions	Workforce-Title I & III	OVR- Title IV
Workforce Recruitment Assistance	Enter the total number of establishments that, during the reporting period,	Event Attendance Job Development Website Technical	Total number of employers that

	<p>received workforce recruitment assistance from staff or remotely through electronic technologies. Organizing, conducting, and/or participating in job fairs;</p> <p>Providing employers with meeting/work space at the One-Stop Career Center (or an affiliate site) for screening or interviewing;</p> <p>Conducting pre-employment testing, background checks and assistance in completion of the I-9 paperwork; and</p> <p>Providing employers with job and task analysis services, and absenteeism analysis.</p>	<p>Assistance (CWDS) Mass Recruitment</p>	<p>received OVR assistance with:</p> <ol style="list-style-type: none"> 1. Contacts regarding OVR talent pipeline for qualified pre-screened candidates. 2. Job fairs and hiring events for OVR talent in collaboration with One-Stop staff and partners at CareerLinks® and OVR District Offices. 3. Coordination of talent acquisition with OVR partners. 4. OVR outreach to CSAVR VR-NET out of state partners on talent. 5. Job and task analysis. 6. ADA accessibility of worksite and accommodation reviews.
<p>Engaged in Strategic Planning/Economic Development</p>	<p>Enter the total number of establishments that, during the reporting period, were engaged in either workforce investment strategic planning or business growth and economic development strategic planning. These activities could include, but are not limited to, participating in community based strategic planning, sponsoring employer forums, securing information on industry trends, providing information for the purpose of corporate economic development planning, and partnering in collaborative efforts to identify workforce</p>	<p>Job Analysis Job Development</p>	<p>Number of employer planning meetings, outreach events and trainings:</p> <ol style="list-style-type: none"> 1. Promote collaboration for employment of persons with disabilities. 2. Business RoundTable discussions on finding talent, meeting business needs for growth, and human capital. 3. Overcoming transportation barriers for persons with disabilities.

	challenges and developing strategies to address those challenges.		
Accessing Untapped Labor Pools	Enter the total number of establishments that, during the reporting period, established pipeline activities in partnership with the public workforce system. Activities include, but are not limited to, outreach to youth, veterans, individuals with disabilities, older workers, ex-offenders, and other targeted demographic groups; industry awareness campaigns; joint partnerships with high schools, community colleges, or other education programs to improve skill levels; and programs to address limited English proficiency, and vocational training.	Federal Bonding Prisoner Reentry Programs Veterans Program	Number of inter-agency contacts, meetings, outreach events and trainings: 1. Promote collaboration for student paid work-based learning experiences. 2. Hiring of veterans with disabilities. 3. Hiring of older workers with disabilities. 4. Hiring of ex-offenders served by OVR.
Training Services	Enter the total number of establishments that, during the reporting period, received publicly funded training assistance, including customized training, OJT, and incumbent worker training.	Accessibility Analysis & Solutions Disability Awareness & Diversity Training Programs Information	Consultation or trainings on: 1. ADA as Amended accommodation. 2. Accessibility. 3. Disability awareness. 4. Section 503 Federal Workforce diversity goals. 5. OJT wage reimbursement. 6. Pre-employment transition services work-based learning experiences. 7. Supported or customized employment and business based models to on-board

			qualified persons with disabilities. 8. Use of Federal Schedule A in federal hiring and on-boarding.
Incumbent Worker Training Services	Enter the total number of establishments that, during the reporting period, received publicly funded incumbent worker training assistance.	TBA	Incumbent worker must be Most Significant Disability and OVR eligible. Consultation to employer on referral to OVR
a. Rapid Response/Business Downsizing Assistance	Enter the total number of establishments that, during the reporting period, received an initial on-site visit or contact to either (a) discuss the range of rapid response services and other assistance available to workers and employers affected by layoff, plant closures, or natural disasters, or (b), as required by WIOA section 3(51) (A), plan a layoff response following notification of a current or projected permanent closure or mass layoff, including natural or other disasters.	Rapid Response Information Service	Consultation and support to any affected business and their employees with a disability who may need OVR assistance.
b. Planning Layoff Response	Of the total number of establishments reported in Row C.6, enter the total number of establishments that received an initial on-site visit or contact, as required by WIOA section 3(51)(A), to plan a layoff response following notification of a current or projected permanent closure or mass layoff, including natural or other disasters.	Trade Information Service Trade Petition Filed WARN Information Service	Consultation on OVR application process for any affected employee with a disability.

Employer Information and Support Services	Total number of establishments that, during the reporting period, received staff-assisted services designed to educate them about and engage them in the local job market/economy and the range of services available through the local One-Stop delivery system. Information may be provided in a variety of service interventions including orientation sessions, workshops, or other business consultations (e.g., initial site visits). These services include, but are not limited to, providing information on: State and Federal tax credits or workforce investment incentives.	OJT Contract Workforce Apprenticeship Contract Tax Credit Workshop LMI	Number of workshops, presentations to businesses on: <ol style="list-style-type: none"> 1. State or Federal persons with disabilities hiring Tax Credits (WOTC-VR credit). 2. General availability of OVR talent pipeline on current status 20 job ready customers. 3. OVR local plan to assist businesses in talent acquisition of high volume or high demand positions with One Stop CareerLink® and CRP collaboration.
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(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

WIOA has mandated that six federally funded programs work together to improve alignment, coordination, cooperation and collaboration in services to businesses. Programs included in this alignment include: Title I Workforce programs for Youth, Adults and Dislocated Workers; Title II Adult Education and Literacy programs; Title III Wagner-Peyser Act of 1933 Employment Services (American Job Centers known in Pennsylvania as PA CareerLink®), and Title IV, the public VR program as defined by the Rehabilitation Act of 1973, *as amended*. This has led to a greater emphasis on student/youth career pathways, competitive integrated employment for persons with disabilities, and increased business engagement.

OVR will coordinate business outreach with PA CareerLink® staff, Pennsylvania economic development partners, community rehabilitation agencies, DHS ODP, OMHSAS, OLTL and other DLI BWPO multi-employer workforce partnerships.

OVR BSOD staff and District Office business services teams will participate in regional planning processes in partnership with local workforce development boards. Within each of Pennsylvania’s workforce development areas, data analysis will be conducted to identify employment sectors that are most likely to account for job growth and expansion in the next five years.

1. The employers in these key expansion sectors will be those that OVR and Workforce partners target for the highest level of business engagement, including discussions around establishment of work-based learning experiences.
2. All business services staff will utilize and share LMI published monthly from DLI's CWIA with their district office VRC's to promote career based IPEs likely to lead to successful employment and skill training to prepare for expansion or 'super' sector jobs in each region of Pennsylvania.

In response to an organization's demand side workforce talent needs, OVR can suggest a recruitment process to bring qualified pre-screened individuals with a disability into their organization. OVR will work with each business to target career ladders and pathways for quality competitive integrated employment in career pathways matched to each VR consumer customer's financial needs, unique aspirations, capacities and the talent succession plans of an employer. OVR will keep the process simple by using an SPOC approach modeled after CSAVR's use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania Workforce regions.

BSOD specialists or combined bureau staff will provide no-cost consultation to employers on disability etiquette, accessibility, accommodation needs and referral assistance to help retain an employer's workforce following an injury or the onset of a disability upon request. OVR staff trained in the mid-Atlantic TransCen ADA Leadership models from Cornell University and BSOD specialists trained on the use of the Misericordia University Comprehensive Accessibility Kit and the Americans with Disability Act Architectural Guidelines standards will provide non-legal, best practice disability etiquette training and on-site accessibility compliance reviews to employers and State agencies, upon request.

(8) How the agency's strategies will be used to:

(A) Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The 2015-2018 CSNA Report, jointly conducted by the Institute on Disabilities at Temple University, along with OVR, and PaRC, was used to develop the goals and priorities for this plan, along with the strategies that will contribute to the achievement of the goals for the 2020-2024 Pennsylvania WIOA Combined State Plan. A steering committee, including seven OVR employees and nine members of PaRC, met to discuss the requirements of the CSNA, and to develop the Statement of Work to guide the focus of the CSNA. An essential factor of this CSNA plan was to encompass the overall rehabilitation needs of people with disabilities throughout Pennsylvania, including those individuals served by other parts of the statewide workforce investment system. The goals and strategies described above align with goals and strategies recommended from the CSNA.

The continued focus on improving transition services for students with disabilities in this plan is consistent with a goal recommended from the CSNA, that OVR work to develop more holistic and equitable relationships and communication with school districts across the Commonwealth. OVR transition staff, including Early Reach Coordinators will continue to participate in activities in local school districts, work with students, and attend transition planning meetings.

OVR's goal to invest in a Diversity and Inclusion project is also supported in recommendations from the CSNA. OVR will use the research from the recently completed Diversity and Inclusion project with Penn State University to develop training for OVR staff beginning in 2020 directed toward: defining the concept of diversity and inclusion; understanding barriers for underrepresented/underserved populations; an

outline of the value and importance of diversity and inclusion; providing substantial resources and strategies for our staff in providing services to the communities we serve. In addition, to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities, OVR will increase training in culturally competent strategies for serving these communities. OVR will continue to strive to provide more staff, materials, resources and services in languages other than English that may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities as well as refugee communities.

Customer Satisfaction continues to be an important topic from the CSNA and as described above in a renewed goal to continue work with PaRC to evaluate and improve on customer satisfaction surveys. OVR, in coordination with PaRC, will continue to evaluate ways the customer satisfaction surveys can be used to identify trends and patterns for service provision, will share this information with PaRC during customer satisfaction committee calls, and will work together to make improvements to the surveys and improve customer response rates.

Finally, the strategies planned through OVR's Business Services and HGAC to increase competitive integrated employment opportunities aligns with goals and priorities in the CSNA and the Employment First Act, Act 2018-36. OVR's BSOD will continue to develop innovative partnerships with eligible educational and workforce providers beyond what is already established.

(B) Support innovation and expansion activities; and

OVR will renew two I&E projects serving high school students with the most significant disabilities for another year of operation. These two I&E projects have been very successful in meeting the goals established for the past 3 years, and will be renewed for Year IV. One of these projects provided 39 students with a 90-hour work-based learning experience, which lead to a permanent competitive placement for 23 of those students. The second project developed, and is operating, Project SEARCH with an area hospital and school district. Eleven interns have completed the project and have been competitively employed.

(C) Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

Transportation rose as the most significant barrier to service provision and employment in the CSNA for both OVR customers and OVR staff. Many OVR customers live in rural counties with limited transportation options and these rural counties present similar difficulty for OVR staff who may have to travel two to three hours to visit a customer. OVR collaborates with employers to adjust work schedules and local transportation authorities to adjust and/or expand service routes that better enable OVR customers to get to work. OVR staff are encouraged to schedule multiple customer visits went traveling to rural counties. A second closely related barrier is the availability and use of technology such as texting and email. Some VR staff reported to still rely on paper mail as their primary form of communication with customers in rural areas. This can be problematic in areas where the postal system has stopped daily delivery of mail. Additional staff training on creative forms of communication and more clearly defined expectations in OVR polices related to communication is being considered. This can also benefit a third barrier related to counselor caseload size. While the average caseload size within OVR is 120 customers,

some counselors have caseloads of 200 to 250 customers. With the closing of the OOS, we are recognizing the challenges staff are facing with increasingly complex case-management. Staff training is planned in the near future to begin to address some of these challenges and offer improved case-management strategies. A final barrier identified in the CSNA is related to inconsistent practice among OVR District Offices in the implementation of service provision to customers. Future staff training is again an avenue to improve the delivery of equitable and consistent services throughout Pennsylvania.

OVR has seen a significant increase in the provision of pre-employment transition services to potentially eligible and eligible students with disabilities between 14 and 21 years of age (transition age in Pennsylvania). WIOA amendments to the Rehabilitation Act prohibit restricting the provision of pre-employment transition services, which resulted in Pennsylvania's program enrollment nearly doubling from 13,946 in Program Year 2016 to 25,601 in Program Year 2017. OVR is projected to again exceed 25,000 this year based on existing numbers, with the cost to provide these services far exceeding the minimum 15% set-aside. To date, OVR has had to invest approximately \$93 million in the program as specified in the Bureau of Central Operations report for the June 2019 Pennsylvania State Board of VR quarterly meeting.

Evaluation and Reports of Progress: VR and Supported Employment Goals.

Describe:

(1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

(A) Identify the strategies that contributed to the achievement of the goals.

1. Employment Opportunities for Individuals with Disabilities.

- a. Expand the availability of apprenticeships, internships, and OJTs for individuals with disabilities.

OVR partnered with DLI's Apprenticeship & Training Office to increase apprenticeship opportunities. Over the past 13 months, 21 OVR customers have attended and graduated from the Syncreon Talent Academy. It is anticipated that 4 additional OVR customers will graduate on October 11, 2019. To date, 18 customers were offered employment at Syncreon, and 17 were hired. An additional customer has been offered a job and should start working in a few weeks. The Talent Academy is currently operating a 6-week pre-apprenticeship program.

Two additional OVR customers have entered apprenticeship programs at other employment sites.

Over the past four years, 185 OVR customers participated in several internship programs:

- i. **2018 to present: The Commonwealth Summer Internship Program for College Students** was coordinated by OVR and the Office of Administration. In 2018, approximately 18 OVR college students participated; in 2019, approximately 23 students participated. These paid, full-time 10-week summer internships were sponsored by OVR and offered to college students in good standing. Students were paid \$13.56/hour with the goal to provide relevant paid work experiences that matched each student's area of study and exposed the student to employment in public service.

Strategies:

1. In December 2017, the OVR Business Service team met with Human Resource to review a plan to offer OVR customers who have completed their freshman year of college a paid internship in an aligned state position that matches their college major. All participating state agency supervisors received training on disability awareness, accommodations, and effective communication strategies with student interns who are deaf, hard of hearing, low vision or blind, or who have cognitive impairments.
2. Recruitment materials and applications for the Commonwealth Internship Program were shared with all potential OVR customers from the Harrisburg and York district offices.
3. A video conference presentation about the program was offered to the participating district offices to outline how customers can apply and the selection process.
4. OVR Internship Specialist and Office of Administration staff interviewed all applicants. Final selections were made based on a competitive interview scoring.
5. OVR customers and counselors were notified of their selection and state office internship assignment.
6. Over the course of the internship, weekly OVR Specialist and Office of Administration staff educational group sessions were offered on topics, including disability disclosure and requesting accommodations, financial management, state civil service careers, OVR business services resources, and job search and placement upon graduation.

- ii. **Annual Summer Pennsylvania Outdoor Corps.** The Corps works with Pennsylvania's Department of Conservation and Natural Resources to conduct land and resource management activities in the State Park and Forest system. Since 2015, this program has been promoted within OVR. Annually, OVR has approximately 5-10 youth customers participate.

Strategies:

1. Announcement on sites and dates for paid summer internship opportunities were sent to all OVR district office administrators, business services staff, and VR Counselors to share with OVR customers.
2. Both college and high school aged youth were eligible. If hired, these individuals were supported with OJT wage reimbursement.
3. These internships can lead to civil service jobs and careers in the PA Park system operated by the Dept. of Conservation and Natural Resources.

- iii. **Centers for Independent Living (CIL) paid summer internship.** Starting in 2019, OVR, with the assistance of the Center for Independent Living in Harrisburg, PA, reached out to all CIL's within Pennsylvania to explore their interest in offering paid summer internships for OVR customers graduating from high school or in college. Approximately 6 CIL's participated, offering 6 OVR customers a ten-week paid internship.

Strategies:

1. OVR Business Services Specialist sent information to all regionally aligned OVR district office administrators, business services staff, and VR counselors to share with customers.
2. Each OVR district office and their regional CIL reviewed and selected customers to participate.
3. Both college and high school aged youth were eligible. If hired, the individuals were supported with OJT wage reimbursement.

4. These internships can lead to entrance level jobs in community human services organizations.

Over the past four years, approximately 1,721 customers participated in OJT wage reimbursement employment opportunities that resulted in either:

- i. **Acquiring a work experience and job reference.** This has included summer and seasonal time limited employment in retail establishments, amusement parks, health care, municipal maintenance, and clerical positions.
- ii. **Starting a permanent job leading to a successful rehabilitation outcome.** These cases are reflected in OVR's annual 911 report highlighting the number of individuals placed into competitive integrated employment.

OVR's Business Services and Outreach Division staff have supported the Commonwealth Technical Institute/HGAC to explore eligibility of current certification programs and certificate skill trainings to become registered Apprenticeships or Pre-Apprenticeships:

- i. **Department of Labor and Industry Apprenticeship Training Office (ATO) collaboration.** Business Services Specialist, Center staff, and ATO region staff met to review potential registered apprenticeship status for the CVS retail associate and pharmacy technician, welding, logistics, and construction trades programs. Staff have also met with CVS to help promote the opportunity for "stackable skills training" for pre-apprenticeship in pharmacy technician and in building trades. Follow-up meetings between HGAC staff and ATO are on-going.
- b. OVR partnered with BWPO to ensure programmatic and physical accessibility of the PA CareerLinks®.

In 2019, the OVR Business Services Team and OVR District Administrators offered training to all PA CareerLink® sites on Disability Etiquette and ADA Leadership Training. These services were offered and provided by OVR staff trained in the mid-Atlantic TransCen ADA Leadership models from Cornell University, the Misericordia University Comprehensive Accessibly Kit, and the Americans with Disability Act Architectural Guidelines standards. These training programs were provided using a non-legal, best practice on disability etiquette training and on-site accessibility compliance standard to any employer or State agency, upon request.

Actionable items:

1. This plan and offer of support has been communicated by each combined bureau district administrator to their regional CareerLink® site administrator. An approved PowerPoint presentation developed by the OVR Business Services Division staff in collaboration with the Office of Administration is used.
 2. On August 13, 2019, OVR ADA accessibility reviews and assistance to each CareerLink® location was reviewed in a presentation to the quarterly meeting of the State Workforce Development Board on OVR WOIA Title IV services and collaboration with Title III CareerLink® partners.
- c. Create and expand IGAs between OVR and local Career and Technology Centers and other community-based organizations.

A second IGA was developed between SDoL and OVR to provide school-to-work transition services for OVR eligible students with disabilities enrolled in education supports at SDoL. Services provided through this IGA are divided into two separate paths. Pathway One is identified as “Employability and Career Readiness” and Pathway Two is identified as “College and Career Readiness.”

During the past two school years (2017-18 and 2018-19) of the Employability and Career Readiness Program at SDoL: 83 OVR eligible students with disabilities received employability skills, career readiness training, and transition services; 47 students participated in at least one form of work-based learning experience; 5 students were employed by employers and were provided small group training; and 5 students were employed with employers and were available for individual high needs students cases. Of the students who received services, 39 students participated in extended work site training (job coaching), and 15 students were placed in competitive, community integrated employment consistent with their IPE.

During the past two school years, the SDoL College and Career Readiness Program provided 24 OVR eligible students with college/career readiness training and transition services, and 17 of these students were placed in post-secondary education consistent with their IEP.

2. Increase/Improve Transition Services for Students with Disabilities

a. Increase pre-employment transition services for students with disabilities.

1. OVR continues to approach pre-employment transition services implementation through three avenues: staff, fee-for-service agreements, and contracts. The WIOA amendments to the Rehabilitation Act require that a minimum of 15% of VR Funds must be used for pre-employment transition services, and this results in an increase in the amount of VRC time and responsibilities dedicated to services for transition-age youth. Pre-employment transition funds for the FFY 2019-2020 are estimated to be \$20 million. In the previous FFY, OVR spent more than 15% of its VR funds on pre-employment transition services. OVR has increased pre-employment transition services for students by expanding the number of summer programs since the previous State plan. In addition to the Summer Academies for Visual Impairment, Deaf and Hard of Hearing, and the AACHIEVE Program that is a collaboration with BSE, most of the local district offices offer summer programs for post-secondary training or work experiences. OVR has developed Pre-Employment Transition Services Provider Agreements so that OVR can utilize over 150 providers to ensure as many students as possible are being served, in addition to the services being provided by OVR staff.
2. Increase opportunities for students to gain workplace skills and community-integrated work experiences. OVR works to increase customer outcomes (26 closures and work-based learning experiences) through: increased engagement with multiple employers; use of permanent and non-permanent OJT’s; increased awareness of internships, both paid and nonpaid, and apprenticeships; and involvement with Work Partners at Career and Technology Centers (example: BCTC). BCTC served 68 students to date in FFY 2019: 100% of the students received workplace readiness instruction; 84% of the students participated in at least one form of work-based learning experience prior to graduation; 100% of the students received job development and placement services and career training services prior to graduation; and

89% of the graduates were placed in community-integrated employment or post-secondary education.

- b. Enhance collaborative relationships with DHS, PDE, and higher education institutions.

Experience the Employment Connection – OVR continues interagency training efforts through Experience the Employment Connection (EEC): Possibilities in Action. Continuing in 2019, EEC is a joint training initiative between OVR, ODP, OMHSAS, and PDE’s BSE. Driven by the Governor’s Executive Order on Employment First, EEC’s goal is to increase competitive, integrated employment for Pennsylvanians with disabilities, including students with disabilities, by connecting professionals across these systems. Participants learn about staff roles, policies, procedures, funding requirements, and emerging practices related to improving services to adults and high school students. The Roadmap, developed by the joint agencies, explains available interagency supports for customers, families, and other professionals. Close to 4,000 interagency professional staff have participated in these training sessions aimed at identifying needs, improving services and competitive employment opportunities for adults and students with disabilities.

- c. Expand BBVS Overbrook School for the Blind Summer Transition Initiative to create summer employment opportunities for transition age students who are blind.

The Overbrook Summer Transition Institute served a total of 21 students in 2018 and 2019. This program provided opportunities for students who are blind or visually impaired to engage in paid work experiences not otherwise available to them. The Institute ran for three weeks using braided funding with BBVS and Overbrook funds covering the program costs in 2019. Students participated in various career exploration and work experience activities including a 4-day internship. The students worked at the following 5 locations: Lighthouse Café, Farm to Table Development Office, Couch Tomato Café, Cold Stone Creamery and Weston School. Each student earned \$164.00 for 16 hours of work experiences.

- d. Research best practices for the implementation of peer mentoring opportunities.

As of September 1, 2019, the Pennsylvania Certification Board is overseeing the certification process for Certified Peer Support Specialists. Peer Support Training was provided to 137 individuals who were 18 years old & over during the period of July 1, 2017 through June 30, 2019. OVR is working with OMHSAS to identify formal pathways within which to develop training and implementation of Peer Supports within Pennsylvania.

3. Increase Community Education and Outreach

- a. Work with PaRC to share best practices and outreach methods to increase participation in the Citizens Advisory Committee meetings.

OVR District Office Administrators continue to be involved in supporting the organization and planning for local Citizen Advisory Committee meetings. OVR Central Office representatives participate regularly on the PaRC Citizen Advisory Committee conference calls and follow-up as needed with local planning.

- b. Continue to grow OVR’s social media presence.

In collaboration with DLI’s Press Team, OVR’s Social Media Coordinator works to ensure OVR has active Facebook, Twitter, Instagram and LinkedIn accounts. As of September 2019, OVR has **7,749** followers across all social media channels. From July 1, 2018 to June 30, 2019, OVR’s posts reached **675,695** individuals. OVR’s social media accounts are as follows – Facebook: @PAVocRehab; Twitter: @PA_OVR; LinkedIn: OVR; and Instagram: @PA_OVR.

- c. Educate staff on accessibility and technology based upon universal design principles.

Within OVR, we continue to promote accessibility by reviewing forms and presentation materials, revising as needed. We’ve also advocated for, and achieved revisions to, Human Resource forms (e.g., the request for accommodations), continuing to do so as issues are identified. In October 2018, all OVR staff were invited to attend a virtual training session titled “Designing Accessible Presentations: An Ethical Obligation.” To extend information beyond just OVR, OVR staff met with the Commonwealth’s Web-Based Training (WBT) team in March 2019 to educate and advocate for accessibility of mandatory Commonwealth trainings. Revisions and collaboration have been ongoing, enhancing the accessibility of WBT training products. In May 2019, OVR extended information beyond Commonwealth staff by offering a similar training to all scheduled presenters for the 2019 Community on Transition Conference to enhance conference accessibility. OVR is an active participant in accessibility based reviews of current and upcoming Commonwealth WBTs. Since 2017, OVR has, and will continue to, offer web accessibility consultation to the Governor’s Office regarding the development of pa.gov and governor.pa.gov sites and content. In 2019, OVR provided accessibility specific reviews of the employment.pa.gov site that hosts employment opportunities for Pennsylvanians. OVR continues to support the ongoing development of CWDS by working with developers to remediate existing accessibility failures, and provide feedback regarding future developments. OVR continues to support staff who use assistive technology by offering in-house or contracted training opportunities to increase staff proficiency. OVR has also developed a partnership with the Bureau of Administrative Services and the Office of Information Technology to remediate in a timely manner DLI forms identified as inaccessible. Raising awareness of document accessibility is an ongoing need that can be addressed one document, one website, one person at a time. The OVR teams actively seize opportunities to enhance accessibility as they arise.

(B) Describe the factors that impeded the achievement of the goals and priorities.

With the low unemployment rate over the past few years, there have been many entry level, lower wage jobs available. However, Supplemental Security Income/Social Security Disability Insurance recipients are reluctant to give up their benefits for a job that will not replace the income and benefits they are currently receiving.

Transportation remains a difficult issue for many job candidates. Since many customers do not have a driver’s license or do not own a vehicle, they are dependent upon family and friends, public transportation or other special transportation services to get to and from work. OVR is collaborating with employers to adjust work schedules and with transportation authorities to adjust and/or expand services that better enable OVR customers to become gainfully employed. OVR staff participate on the local transit advisory

committees. For example, the Capital Area Transit Persons with Disabilities Advisory Committee has developed a subcommittee related to Travel Training for elderly individuals and people with disabilities. OVR is providing training consultation along with disability knowledge and expertise to this committee. The Secretary of Labor and Industry sits on the Governor's Employment First Cabinet Transportation Committee. OVR staff also attend these meetings to support the need for accessible, affordable transportation across the Commonwealth for persons with disabilities seeking gainful employment.

Staff turnover continues to adversely impact the agency's job placement expertise. OVR has renewed its emphasis on quality employment outcomes by reinstating targeted staff training regarding effective employment strategies. The six-part training webinar series focuses on Basic Business Services, Labor Market Intelligence, Customer Job Readiness, Enhancing the Job Search, Effective Business Outreach, and Business Services and Ethical Considerations. It is intended to quickly advance the skills of newly hired VRCs and reinforce the knowledge skills of more experienced staff.

(2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

(A) Identify the strategies that contributed to the achievement of the goals.

SE services are a vital part of OVR programming. SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. It is anticipated that approximately 7,065 Pennsylvanians with the most significant disabilities will receive SE services in FFY 2020. Of this number, approximately 250 youth with the most significant disabilities will be funded out of the approximate \$650,000 in Title VI Funds anticipated for distribution to Pennsylvania in FFY 2020.

A completely revamped OVR SE policy and related procedures were introduced in 2018. The new policy contains changes designed to address OVR's goals of increasing services to unserved/under-served populations, ensuring successful employment outcomes by emphasizing job stability, increasing communication and partnerships among OVR partners, and ensuring quality service provision by requiring provider credentialing and offering provider incentives. All referral, reporting and billing activities were moved to an online, paperless system for more efficient and streamlined processes.

(B) Describe the factors that impeded the achievement of the goals and priorities.

A significant decrease in Title VI funds allocated to OVR impeded the achievement of the goals projected for 2019. Additionally, outcome measures were impacted due to the extensive training and technical assistance that was needed for the changes detailed above, along with converting cases over to OVR's new SE system. As year one of the new process comes to a close, OVR hopes to use the enhanced ability to collect data through the online system to aid in gathering performance feedback for OVR District Offices and CRPs that can be used for future improvements and enhancements.

(3) The VR program's performance on the performance accountability indicators under section 116 of WIOA.

During Program Year (PY) 2018-19, OVR served nearly 70,000 individuals with disabilities, worked with over 6,000 employers, and assisted more than 7,400 individuals with disabilities to obtain or maintain competitive integrated employment. Additionally, OVR and our partner providers continue to deliver an extensive array of pre-employment transition services to over 25,000 students with disabilities annually across Pennsylvania.

In accordance with WIOA Section 506(b), the performance accountability system requirements of WIOA Section 116 took effect July 1, 2016. However, the U.S. Department of Education exercised its transition authority under WIOA Section 503 to ensure the orderly transition from the requirements under the Workforce Investment Act to the requirements under WIOA. As such, the performance accountability system requirements for the WIOA Title IV VR program went into effect July 1, 2017, at which time OVR began collecting and reporting data related to certain performance indicators under WIOA through the quarterly submission of the federal RSA-911 report.

Only one of the six performance indicators is currently being reported and published by the RSA in the WIOA Statewide and Local Performance Reports (WIOA Annual Reports): Measurable Skill Gains. Data driving the remaining five performance indicators will be progressively available and reported as part of OVR's WIOA Annual Report over the next four years. As part of the PY 2018 WIOA Annual Reports, expected to be published by the RSA in Spring 2020, two additional performance indicators under WIOA Section 116 will be reported: Employment During the 2nd Quarter after Exit and Median Earnings During the 2nd Quarter after Exit.

The RSA published PY 2017-18 WIOA Annual Reports for each state in April 2019, which contained the Title IV performance under the Measurable Skill Gains indicator. For PY 17-18, OVR's published Measurable Skill Gains rate was 15.9% of participants who met the criteria to be included in the indicator.

The 6th indicator, "Effectiveness in Serving Employers," will be piloted using 2 of the 3 approaches identified by Section 116 of WIOA. The following 6 Measures will be used to develop the data needed to report on the "Effectiveness in Serving Employers" indicator.

Measure #1. Employer Information and Support Services (future use of CWDS Business Design Tool)

Total estimated number of employers that received annual OVR assistance with:

1. contacts regarding OVR talent pipeline for qualified pre-screened candidates – 4000;
2. job fairs and hiring events for OVR talent in collaboration with One-Stop staff and partners at CareerLinks® and OVR District Offices - 100;
3. coordination of talent acquisition with OVR partners - 100;
4. OVR outreach to CSAVR VR-NET- 50;
5. job and task analysis - 100; and
6. ADA accessibility of worksite and accommodation reviews - 20.

Measure # 2. Engaged in Strategic Planning/Economic Development

Estimated number of employer planning meetings, outreach events, and trainings:

1. promoting collaboration on persons with disabilities employment - 100;
2. Business RoundTable discussions on finding talent, meeting business needs for growth and human capital - 8; and
3. overcoming transportation barriers for persons with disabilities - 10.

Measure # 3. Accessing Untapped Labor Pools

Estimated number of inter-agency contacts, meetings, outreach events and trainings:

1. promoting collaboration on student paid work-based learning experiences - 2888;
2. hiring of veterans with disabilities - 5;
3. hiring of older workers with disabilities - 10; and
4. hiring of ex-offenders served by OVR - 25.

Measure # 4. Training Services

Estimated consultations or trainings on:

1. ADA as Amended accommodation, accessibility - 50;
2. disability awareness - 50;
3. Section 503 Federal Workforce diversity goals - 10;
4. OJT wage reimbursement - 1241;
5. pre-employment transition services work-based learning experiences - 25,000;
6. supported or customized employment and business based models to on-board qualified persons with disabilities - 4000; and
7. use of Federal Schedule A in federal hiring and on-boarding - 10.

Measure # 5. Incumbent Worker Training Services, Rapid & Layoff Response

Incumbent workers must be Most Significant Disability and OVR eligible.

Estimated consultation to employer on referrals to OVR - 0.

Measure # 6 Employer Information and Support Services

Estimated number of workshops, presentations to businesses on:

1. state or Federal persons with disabilities hiring Tax Credits (WOTC-VR credit) - 300;
2. general availability of OVR talent pipeline on current status 20 job ready customers – 300; and
3. OVR local plan to assist business in talent acquisition of high volume or high demand positions with One Stop CareerLink® and CRP collaboration - 1000.

All BSOD specialists and combined bureau staff will be trained in the use of the CWDS business design tool to create a statewide OVR business services case management system to track the following: all employer contacts, consultations on disability issues, ADA accessibility compliance, people with disabilities recruitment, job fairs, job shadowing, development of work-based learning experiences, and development of apprenticeship and pre-apprenticeship trainings. All apprenticeships and pre-apprenticeships will be eligible for local workforce board approved Eligible Training Provider List designation and individual training accounts that are also accessible to CareerLink® served TANF, dislocated workers, veterans, youth, and returning to work homemaker participants.

(4) How the funds reserved for innovation and expansion (I&E) activities were utilized.

Since January 1, 2016, OVR has awarded more than \$11M to providers to support the development and operation of 24 I&E projects. Of these projects, 23 provided pre-employment transition services to high school students with significant disabilities. The remaining I&E project, supported by joint OVR and ODP funds, provided for staff from 12 community rehabilitation providers to receive training and certification in Discovery and Customized Employment.

To date, 4,801 students with significant disabilities received services through the 23 I&E projects: 302 students entered competitive employment; 74 students entered post-secondary education; and 3 students entered military service. Three I&E Projects provided “transition from school to work” related education, information, support and services through informational sessions and workshops to a total of 4,146 students, parents/family members of transition aged youth, and transition professionals, to facilitate the understanding of and participation in the “school to work transition” process. The

informational sessions and workshops were attended by 1,835 high school students with their parents or a transition professional.

Ten I&E projects provided 2,680 high school students with a work-based learning experience and 2,081 students successfully completed a 90-hour work-based learning experience in a competitive employment site in the community. For most of these students, this work experience was their first opportunity to learn work skills, specific job tasks, workplace safety and to interact with employers and co-workers on the job. These 10 I&E contractors exceeded the expectation of providing students with a paid 90-hour work-based learning experience; as successful outcomes, well beyond the scope of these projects, resulted as 197 students obtained competitive employment, 55 students participated in post-secondary education and 3 students entered the military.

Quality, Scope, and Extent of Supported Employment Services.

Include the following:

(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

OVR provides SE services to Pennsylvanians with disabilities, including youth up to age 25, through a network of CRPs. Services provided through these vendor partners are described below.

Background Beginning in the early 1980s, OVR developed a system of SE services using a fee-for-service payment system. Initially, 17 CRPs of SE services were funded through a 5-year, OSERS, Title III SE State Change Grant. In the 1990s, SE services expanded to include transitional employment for individuals with significant mental health disabilities through the Clubhouse model and the addition of contracts with CRPs fluent in American Sign Language to serve OVR customers who are deaf. In 1999, OVR moved to a milestone SE method called “Performance Based Job Coaching” (PBJC), the format of which was developed based on research OVR did in the mid-1990s to determine best practices for provision of SE services. PBJC went through review and revision in 2013-14 to improve the format. In 2015, OVR piloted Discovery and Customized Employment to further expand the range of SE services to better serve individuals with the most significant disabilities. A complete overhaul of OVR’s SE policy and procedures occurred from 2016-18 brought about by recommendations of a SE Workgroup and new regulations stemming from WIOA. Changes included a revision of the PBJC milestones and pay structure to correspond with a customer’s job stability, a move from LOUs with CRPs to a SE Provider Agreement, the inclusion of Discovery/Customized Employment in SE policy, the addition of new SE services to better meet the diverse support needs of OVR customers, and an enhancement of extended services to align with WIOA regulations and improve long-range outcomes. The entire SE process, from referral to reporting and invoicing, was moved to a computerized system which was rolled out July 1, 2018. There are now more than 160 approved SE providers, with 40 providers approved to render Discovery/ Customized Employment services.

Quality Standards OVR provides extensive, ongoing training and technical assistance for internal staff and CRP staff on the SE policy and procedures. Trainings are offered in-person and virtually through webinars, videoconferences and conference calls. Since March 2018, 6 in-person presentations, 9 webinars, 3 statewide videoconferences, 3 conference presentations, a series of email information blasts, and on-

going internal and external Skype conference calls have been utilized to introduce OVR's new SE policy and procedures and provide ongoing support.

Previously, CRPs became SE providers for OVR through an LOU. Monitoring of these CRPs was conducted on a two- and four-year cycle by OVR's Contracts and Grants division through the use of provider report cards, staff surveys, and desk and on-site reviews. With the move to the new SE system, procedures are under development for monitoring both internal processes and CRPs. Internal monitoring will involve OVR statewide and District Office "report cards" based on data from electronic tracking of service authorizations and payments and individual case reviews with a focus on SE processes and outcomes. External monitoring will include: provider report cards, a District Office survey of provider performance, and on-site monitoring visits.

Scope and Extent SE services include assessment, planning/coordinating, job customization, placement, coaching, mentoring, and retention. All services are provided on an individualized basis and specific vocational goals are determined by the individual's needs and preferences. Populations receiving SE includes individuals with developmental and intellectual disabilities, mental illness, physical disabilities, blindness, deafness, autism and traumatic brain injury. SE services are also available within the special education, mental health and developmental disability service systems. OVR is actively engaged in collaborative relationships with these systems to ensure the provision of effective services, to reduce duplication of efforts, to share resources, and improve employment outcomes for those mutually served by multiple systems.

In Pennsylvania, sources of funding for extended services are available to ensure long term supports for those who require them. For example, ODP and OLTL have funding for extended services for those customers who receive waiver funding through these agencies. Actual funding available from ODP and OLTL varies from county to county. OVR also has a limited amount of funds through state VR money for customers who do not have other sources of long-term funding. Other resources sought for extended service funding are natural supports, SSA work incentives, and private foundations.

(2) The timing of transition to extended services.

The determination of an individual's need for extended services begins during the initial assessment phase of a case. At that time, the rehabilitation team – the customer, the customer's family, OVR staff, Case Manager/Supports Coordinator (if applicable), and others – determine possible long-term support needs and resources. As the case progresses, the individual's stability on the job informs the determination of the need for extended services and the timing of provision. Those who reach 80% or better independence on the job are generally considered job stable and the case is followed for 90 days to ensure the expected progression to full independence with natural supports in place. For those at 80% or lower independence on the job, there is an expectation of need for continued coaching and extended support services. If no other source of funding is available for the individual, OVR can provide extended services up to 24 months for adults using only state appropriated funds and 48 months for students with disabilities using federal VR dollars. Regardless of alternative funding source, OVR continues to serve individuals for a minimum of 90 days after transitioning to extended services. For those individual's with ODP funding, OVR entered into a joint bulletin that dictates when the case can move to ODP-funded extended services and documentation requirements.

Vocational Rehabilitation (Combined or General) Certifications

Certifications

States must provide written and signed certifications that:

1. The Office of Vocational Rehabilitation is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA,14 and its supplement under title VI of the Rehabilitation Act;

Assurance(s) or Attachment(s): Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the Office of Vocational Rehabilitation agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Assurance(s) or Attachment(s): Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, 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;

Assurance(s) or Attachment(s): Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

Assurance(s) or Attachment(s): Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

Assurance(s) or Attachment(s): Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

Assurance(s) or Attachment(s): Yes

7. *The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;*

The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry. Shannon Austin, OVR Executive Director

Assurance(s) or Attachment(s): Yes

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

The Executive Director of The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry.

Assurance(s) or Attachment(s): Yes

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.*

Assurance(s) or Attachment(s): Yes

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

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.*

Assurance(s) or Attachment(s): Yes

2. *Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.*

Assurance(s) or Attachment(s): Yes

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:

(a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

(b) the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected):

Pennsylvania selects option (B), a State Rehabilitation Council.

(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.

(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).

(e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/No)

(f) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (Yes/No)

(g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan.

(h) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

(i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.

(j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

(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.

(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.

(m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

Assurance(s) or Attachment(s): Yes

4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:

(a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

(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.

(c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)

(d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

(e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

(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.

(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.

(h) comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.

(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

(j) with respect to students with disabilities, the State,

(i) has developed and will implement,

(A) strategies to address the needs identified in the assessments; and

(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

(ii) has developed and will implement strategies to provide preemployment transition services (sections 101(a)(15) and 101(a)(25)).

Assurance(s) or Attachment(s): Yes

5. Program Administration for the Supported Employment Title VI Supplement:

(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.

(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.

(c) The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

Assurance(s) or Attachment(s): Yes

6. Financial Administration of the Supported Employment Program:

(a) The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

(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.

Assurance(s) or Attachment(s): Yes

7. Provision of Supported Employment Services:

(a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

(b) The designated State agency assures that:

i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act

ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Assurance(s) or Attachment(s): Yes

Section VII – PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAM

Career and Technical Education Programs Authorized under Perkins V(20 U.S.C. 2301 etseq.)).

(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)

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.

The Pennsylvania Department of Education (PDE) engaged local stakeholders in Pennsylvania’s career and technical education (CTE) community to gain their input regarding the 4-year state plan for Strengthening Career and Technical Education for the 21st Century Act of 2018 (Perkins V). The selection of the stakeholders began with the Department’s internal Perkins V Planning Committee (Committee) identifying the required stakeholders group and determining who could assist in identifying the members to invite. The Department identified 146 diverse stakeholders, as required under Section 122(C)(1)(A), to serve on this cross-sector planning committee.

To ensure each category of stakeholder was invited, an excel spreadsheet was developed that includes the agency the stakeholder represents, the category the stakeholder fulfills, name, title, email and phone number. The internal PDE team during weekly meetings would review the list and work with partners to ensure each category had multiple representatives on the stakeholder’s committee. All identified stakeholders were invited to all scheduled meetings. Meetings were held at the statewide and regional levels. Participation of stakeholders was tracked using two methods. An electronic registration was used, which required each stakeholder to register their attendance at each meeting. The second method was use of an on-site sign-in sheet at each meeting. The sign-in sheet listed each of the registrants and their affiliation. Participants signed in at each meeting to verify attendance.

Once the stakeholders were identified and contact information was obtained, PDE invited stakeholders to attend an initial convening on March 19, 2019 in State College, PA, to begin assisting the Department with developing the State Plan. The invitation and initial communications noted stakeholders' role in determining how the state will implement the new regulations and use federal Perkins funds, as well as provided background on the Perkins law for context. A total of 77 individuals from across the state attended the initial Committee meeting on March 19. The agenda included numerous topics and sought feedback on all areas of the plan.

In addition to the initial Committee meeting, PDE held three stakeholder sessions across the state:

1. • April 9, 2019: Butler County Community College, Butler, PA
2. • April 10, 2019: Bucks County Community College, Newtown, PA
3. • April 11, 2019: Harrisburg Area Community College, Harrisburg, PA

Among the 255 individuals who attended the three sessions, 11 percent were business and community members, 24 percent were postsecondary education representatives, and 5 percent were education partners or agencies. Table 1 provides an overview of the attendees by type and location.

Table 1. Overview of Stakeholder Group Attendees by Type, by Location Stakeholder Group Types Represented

Location	Stakeholder Group Types Represented					Total
	Business/Community	Postsecondary Education	Secondary Education	Education Partners	PDE	
State College, PA	10	15	35		13	73
Butler, PA	7	19	22	6	3	57
New Hope, PA	5	10	31		4	50
Harrisburg, PA	7	18	35	6	9	75

At each meeting, attendees were asked for feedback on policy decisions related to program accountability and defining meaningful progress. The stakeholders assisted in determining which program quality indicator to select, how flow-through funds should be allocated to Perkins recipients, and whether the state should reserve funds for subawards to eligible recipients in rural areas, areas with high percentages of CTE concentrators or participants, and areas with high numbers of CTE concentrators or participants.

In addition to the Committee meeting and statewide stakeholder sessions, stakeholders had an opportunity to review and submit comment to PDE on preliminary draft state determined performance levels (SDPLs) from November 22-December 6, 2019. Stakeholder Committee members also were invited to participate in a meeting on December 3, 2020 where PDE staff explained the process for establishing the baseline for each indicator and for establishing the SDPLs. PDE used the feedback from the December 3 meeting and the written comment period to develop and establish the SDPLs. The final draft proposed levels then were disseminated to the stakeholders for their review on December 17, 2019. As required under Perkins V, stakeholders had until December 27, 2019 to review the process and baseline and submit written comments regarding how the established levels of performance:

1. Meet the requirements of the law;
2. Support the improvement of performance for all CTE concentrators including each subgroup of students and special population; and
3. Support the needs of the local education and business community.

PDE gathered written public comments on the SDPLs and baselines for each indicator through a designated email account managed by the PDE Bureau of Career and Technical Education (BCTE). The email account link was posted on the Department's website and provided to all stakeholders.

Written stakeholder comments and the Department's response are found in Appendix E.

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.)

The Pennsylvania State Board for Career and Technical Education (State Board) is the eligible agency to submit the Perkins V state plan. The State Board is responsible for adult career and technical education, postsecondary career and technical education, and secondary career and technical education. The State Board is responsible for the planning and development of the Perkins V state plan. Consultation with a different state agency was not necessary.

The State Board was provided a copy of the preliminary draft plan January 8, 2020 which coincided with the public comment period that began January 2, 2020. The State Board reviewed the preliminary draft state plan and took action on the state plan March 18. The State Board did not have any objections. Other state agencies were invited to review and provide comment. Other state agencies did not provide comment or provide objections to the state plan during the public comment period or during the State Board January and March meetings during their public comment period.

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

In October 2019, Pennsylvania conducted regional hearings. The public and interested organizations and groups were invited to attend the hearings and present their views and make recommendations regarding the draft state plan. The hearings were held on October 15, 2019 at the Chester County Technical College High School in West Grove, PA; on October 16, 2019 at Harrisburg Area Community College in Harrisburg, PA; and on October 17, 2019 at Westmoreland County Community College in Youngwood, PA.

The Department carefully considered each comment and written statement provided at the hearings and used that feedback to inform the next draft of the Perkins V state plan. The Department summary of the recommendations made at the hearings are covered in the State Plan.

The Department posted the draft state plan on the Department's website in an easily accessible, ADA-compliant form. The Department then used a variety of communication methods to notify the field and the public that the draft state plan was available for review (e.g., Pennsylvania Bulletin, email, website, Penn*Link email system, statewide distribution lists, etc.). The Department also announced the availability of the state plan at meetings of the State Board of Education, Commission for Agriculture

Education Excellence, the Pennsylvania Workforce Development Board, and the Governor's Keystone Workforce Development Command Center, and requested input from the attendees.

PDE accepted public comment on the proposed Perkins V State Plan from January 2-February 3, 2020 under the required 30-day comment period prescribed pursuant to Perkins V, sec. 122. Individuals also had the opportunity to provide public comment in person during the State Board meeting on January 8, 2020.

All public comments were considered and, where applicable, used to inform development of the Perkins V State Plan. The final revision of the draft Perkins V state plan incorporated public comments.

(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 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)

(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 13225 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)*

(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

(I) Meeting the Needs of Special Populations (1) 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)

(J) Preparing Teachers and Faculty

(i) 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)

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.)

State-supported workforce development activities can be characterized broadly in two ways: 1) the activities cross various sectors of the economy and government, and 2) state efforts are targeted to the specific places and populations which most need and benefit from state support in order for Pennsylvania to have a thriving workforce. Career and Technical Education (CTE) exemplifies the cross-sector nature of workforce preparation, bringing together education and industry to ensure students are prepared for in-demand occupations. Other state agencies including PDE, the Pennsylvania Department of Labor and Industry (L&I), and the Pennsylvania Department of Human Services (DHS) contribute to programs that meet the needs of special populations in Pennsylvania, as will be described in more detail below.

The Pennsylvania Workforce Development Board (PAWDB) advises the Governor on building a strong

workforce development system aligned with state education policies and economic development goals. The PAWDB is comprised of representatives of businesses as well as the leaders of state agencies who are highly engaged in workforce development activities, including PDE and L&I. Among its activities, the PAWDB supports CTE programs of study.

Career and technical education enables secondary, postsecondary, and adult students to pursue technical education, in conjunction with a comprehensive academic education, that prepares them for high-quality and high-priority occupations. In 2018-19, there were 140 schools and 84 career and technical centers (CTCs) offering 1,723 approved secondary CTE programs statewide, with over 67,000 secondary CTE students enrolled.

CTE is critical to workforce development because of the great number of students engaged, and because all PDE-approved CTE programs lead to industry-recognized credentials. Schools use the PDE [Industry-Recognized Certifications for Career and Technical Education Programs Guide](#) to identify industry-recognized credentials aligned to CTE programs in Pennsylvania's career clusters. The list is reviewed annually; in 2018-19, PDE added 12 certifications. In the same year, CTE students earned 39,235 industry credentials.

Pennsylvania has a robust system of [CTE Programs of Study](#). CTE Programs of Study are designed at the state level by PDE in collaboration with employers to provide students with the recommended academic and technical courses needed for employment in an in-demand occupation within one of thirteen career clusters. PDE works with secondary instructors and postsecondary faculty, as well as business and industry representatives, to develop statewide technical task grids that must be taught as part of the Program of Study.

By developing statewide technical standards aligned to industry expectations, Pennsylvania's Statewide Articulation Agreements (SOAR) allow qualified CTE students to receive postsecondary technical credit for coursework completed in high school. Since 2011, a total of 285 qualifying SOAR program graduates have been awarded 1,809 postsecondary credits. PDE has explored ways to expand students' and institutions' ability to take advantage of such articulation agreements in its plan for Perkins V, in order to decrease the cost of a postsecondary degree for CTE students, and enable them to enter the workforce more quickly, fully prepared for the economy's in-demand occupations.

CTE also exemplifies how different workforce development activities combine to better serve special populations of Pennsylvanians. Collaboration among postsecondary career and technical education programs and adult basic education programs encourages students without a high school diploma or equivalent to enroll in eligible career pathway programs.

Other populations specifically served by Pennsylvania workforce development initiatives include community college students, low-income postsecondary students, rural students, and students with disabilities. The career-readiness needs of Pennsylvania residents with disabilities are addressed by the L&I Office of Vocational Rehabilitation. Students attending any of Pennsylvania's 14 community colleges who are recipients of TANF or SNAP benefits can take advantage of holistic support to complete their academic program and obtain high-quality employment through a program offered by DHS called Keystone Education Yields Success (KEYS). A KEYS student facilitator assists eligible students with identifying career goals, scheduling courses, navigating financial aid, and meeting transportation and childcare needs.

The Pennsylvania Higher Education Assistance Agency (PHEAA) administers the PA-TIP program to provide need-based financial awards to students enrolling in certificate programs less than two years in length for high priority occupations (HPOs) in several industry sectors. PHEAA also has 14 Higher Education Access Partners strategically located throughout the commonwealth to provide postsecondary services to students, families, educators, schools, community partners, and the public. Services include free financial aid presentations and completion sessions, programs to assist students with planning and preparing for postsecondary education, and professional training for school counselors and advisors. The Pennsylvania College Advising Corps also places recent college graduates as full-time advisors in underserved, rural high schools across Pennsylvania to increase matriculation rates of their students.

A targeted regional approach to workforce development in rural areas, where fewer postsecondary resources exist, is provided by Community Education Councils (CECs). These Councils provide program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential-bearing training opportunities. CECs serve as an intermediary and broker of training programs based on identified need and demand.

The cross-sector PAsmart workforce development initiative promotes the expansion of Registered Apprenticeships and invests in postsecondary education and training in computer science and STEM fields. The Next Generation Sector Partnership program, also supported at the local level through PAsmart state grants, encourages trainings that result in a postsecondary credential by requiring all proposals to identify credentials/certifications to be obtained and by making credentials a required outcome measure. These state-funded grant initiatives reach pre-Kindergarten through 12th grade students, postsecondary students, and adult learners, in addition to Pennsylvanians already in the workforce seeking to gain relevant skills for an in-demand career in which they can earn a family-sustaining wage.

Finally, PDE has developed a long-term strategy to make workforce preparation available and equitable statewide to the youngest generation of Pennsylvanians. All K-12 schools integrate the Academic Standards for Career Education and Work (CEW standards) into curriculum, addressing career awareness and preparation, career acquisition, career retention and advancement, and entrepreneurship. Pennsylvania is the first state to include a true K-12 Career Readiness Indicator as part of its federal accountability system under the Every Student Succeeds Act. The Career Standards Benchmark identifies career readiness activities aligned with the CEW standards in all public K-12 schools. This emphasis on career readiness expands younger students' understanding of the career opportunities, and the relevant postsecondary education and training, available to them.

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.)

Pennsylvania's economic future depends on a strong, skilled workforce able to compete in today's global economy. To remain economically competitive, Pennsylvania must inform its workforce development policies, strategies, and goals using current labor market information and an understanding of the future workforce needs of workers and employers. The commonwealth has a diversified economy with numerous competitive industry clusters and strives to develop a skilled workforce that aligns worker

career goals to employer needs and serves those with barriers to employment. The commonwealth's capacity to provide an educated workforce is evidenced by approximately 375 postsecondary educational institutions which collectively enrolled more than 740,000 students in 2017-18. Pennsylvania is an ideal location for families and businesses given its mix of urban, suburban, and rural areas, its proximity to nearly one-half of the nation's population, and strong job markets. While these characteristics of the commonwealth's labor market contribute to its economic strength, they also create an opportunity to develop an increasingly skilled workforce to meet the demands of employers, the career goals of workers, and the needs of our evolving economy.

Pennsylvania's goals for preparing an educated and skilled workforce are expressed in the sub-goals of its state WIOA plan:

- Expanding registered pre-apprenticeship and apprenticeship programs;
- Increasing efforts to recruit apprenticeship participants from non-traditional populations, such as women, persons with disabilities, and re-entrants;
- Building a career pathways system by increasing public awareness of the career pathways model and program design;
- Increasing exposure for K-12, postsecondary, and adult learners to career awareness and exploration activities;
- Expanding access to programs that lead to credentials or certifications, such as career and technical education, online education and training programs, dual enrollment programs, or apprenticeships;
- Collaborating across state agencies on career readiness activities, building partnerships across education and business and industry for both students and educators; and
- Identifying and promoting evidence-based models and effective practices for engaging opportunity youth.

To achieve its workforce readiness goals for all Pennsylvania residents, commonwealth leaders recognize that offering support services to special populations is not additional, but integral, to the plan. A priority of the governor and of commonwealth agencies, as outlined in Governor Wolf's PAsmart Grants Framework: Principles and Funding Priorities, which was approved by the Pennsylvania Workforce Development Board in 2018, is "equity, diversity, and inclusion." Commonwealth workforce development efforts therefore seek to increase access to postsecondary and career and technical education specifically for historically under-represented and under-served students. State-led workforce development initiatives are a combination of meeting needs that already exist, and addressing foreseeable needs proactively by transforming educational systems and providing tailored supports to learners and workers. Information about workforce development efforts tailored to special populations is enumerated in greater detail above in the summary of State-supported workforce development activities.

Over the past four years, commonwealth agencies have engaged thousands of stakeholders across the commonwealth and worked with cross-sector partners from pre-K to postsecondary education, workforce development, and human services to improve career readiness for all students. There are now established structures that can continue to leverage the expertise and resources at the local, state, and federal levels for Pennsylvania's workforce development.

In 2017, Governor Wolf convened the Middle Class Task Force, comprised of leaders in education, workforce, and economic development systems. The outcomes of the Task Force's report led directly to the development of the PAsmart initiative, which has invested \$70 million in its first two years in education

and training needed for careers in high-growth industries. PAsmart supports the creation of regional workforce development and education partnerships such as STEM Ecosystems, the training of educators in computer science skills so that students are prepared for a high-tech digital economy, the expansion of Registered Apprenticeships, and next-generation industry partnerships. The governor's office also launched the PAsmart website to serve as a resource for commonwealth residents to identify the tools and resources they need to make education and career decisions.

The Task Force findings, and the governor's commitment to the vision of "jobs that pay" and "government that works," also led the governor to establish the Keystone Economic Development and Workforce Command Center. The Keystone Command Center is a group of state agency representatives from education, labor, industry, human services, and others, as well as representatives of labor and business. This cross-sector body elevates and seeks to align all workforce development efforts—whether the actions take place under the purview of education, labor and industry, economic development, or private industry partners—with the urgency that workforce issues demand in the current economic climate. The collaborative nature of the body facilitates the identification and elimination of barriers that confront residents of the state seeking to advance in their careers, as well as the barriers that face businesses and education and training institutions seeking to develop the workforce.

Collaboration between the PA Departments of Labor and Industry and Education has leveraged state workforce development policies and federal programs to initiate and grow self-sustaining local initiatives. L&I has partnered with Pennsylvania community colleges to apply for federal grants to increase access to post-secondary education for non-traditional, harder to serve individuals. Each of the community colleges is a Perkins postsecondary recipient and each is expected to leverage investments to enhance access to career pathways. Additionally, in 2019, PDE and L&I each contributed federal funding to a state initiative called Teacher in the Workplace that drives greater work-based learning and career-ready skills development in schools (including CTCs), while fostering self-sustaining local and regional partnerships between educational institutions and businesses.

Building partnerships between the education and industry sectors has been and will continue to be a key state strategy because it provides a mechanism for ensuring that education meets the skilled workforce needs of employers. In career and technical education, there is already communication and collaboration with business and industry representatives, e.g. through the work of Occupational Advisory Committees, making career and technical education programs models for other educational systems in the commonwealth.

In an effort to achieve successful outcomes for Pennsylvania students, workers, businesses, and communities:

- The commonwealth has examined disaggregated data to identify how postsecondary access and affordability vary for different subsets of the population. It found that economically disadvantaged families and single parent households faced some of the highest barriers to accessing and completing a higher education credential, and as a result, committed \$5 million in [the Parent Pathways initiative](#) to support low-income parents and families in pursuing higher education. The Parent Pathways model uses a multi-generational approach to provide wraparound services for parents pursuing a postsecondary credential. These supports may include case management, housing assistance, family programming, high-quality childcare, tutoring, help navigating the higher education landscape, and career counseling.
- Institutions that provide career and technical education have made concerted efforts to increase

the representation of students in non-traditional programs. These efforts have seen encouraging results so far: the number of female students enrolled in non-traditional CTE programs (i.e., those traditionally enrolled in by male students) rose 5.7 percent over the four years from 2014-15 to 2018-19. The efforts of CTE institutions are mirrored and supported by the efforts of the Pennsylvania Department of Labor and Industry's Apprenticeships and Training Office to increase the participation of underrepresented apprentices in nontraditional fields.

- The commonwealth has developed a first-of-its-kind program to help members of the state National Guard retrain and reenter the workforce. The Military Family Education Program, better known as the PA GI Bill, provides college benefits to active Pennsylvania National Guard Members. The PA GI Bill provides 10 semesters of tuition-free education to active members of the PA National Guard and their family members. Pennsylvania's commitment to serving National Guard members and their families exemplifies the broader statewide initiative to prepare the citizenry for an evolving workforce, while engaging adult learners and workers to actively drive Pennsylvania's economy forward.

And finally, Pennsylvania is committed to improving coordination and alignment of education and workforce development programs, services, and funding.

- In 2015, the State Board of Education adopted the goal that 60 percent of Pennsylvania residents have a postsecondary credential by 2025.
- CTE drives the commonwealth toward this goal. The number of industry credentials earned by students enrolled in CTE programs increased 43 percent over the four-year period of 2014-15 to 2018-19.
- The Middle Class Task Force, which the governor convened in 2017 to break down silos among education, workforce, and economic development systems, the PAsmart initiative, launched in 2018 to implement the recommendations of the Task Force, and the Keystone Economic Development and Workforce Command Center, established in 2019 to carry on the work by specifically addressing barriers across the state and across sectors, all have contributed to increased collaboration and centralization of workforce development programs, services, and funding. These initiatives have been led by the governor and have been supported by labor and business leaders. They have given state agencies opportunities that did not exist before to explore how programs, services, and funding can be better coordinated to serve specific populations.

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.)

Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of Perkins V for purposes under section 124 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.)

Federal Perkins V complements current state-supported workforce development activities including cross agency collaboration to align activities. One includes planning initiatives such as expansion of pre-

apprenticeship, apprenticeship, educator-in-the-workplace, and computer science course offerings.

The commonwealth has embraced state-local collaboration, cross-sector partnerships, and a focus on barrier remediation to achieve its vision of career pathways to self-supporting, family-sustaining careers. Pennsylvania recognizes the importance of postsecondary credentials as part of such pathways. In 2015, Governor Wolf established the goal that 60 percent of Pennsylvania residents have some form of postsecondary education by 2025, to meet industry demand for skilled workers. In 2016, Pennsylvania's State Board of Education Council on Higher Education passed a Motion to Support this postsecondary attainment goal. To meet this goal, Pennsylvania has aimed to produce nearly 820,000 additional postsecondary credentials between 2017 and 2025. Pennsylvania employs many strategies to help more residents earn recognized postsecondary credentials, including the following:

Pennsylvania employs many strategies to help more students of all ages earn recognized postsecondary credentials, including the following:

- **Fostering early awareness of postsecondary opportunities:** K-12 schools in Pennsylvania integrate the Academic Standards for Career Education and Work (CEW standards) into curriculum, addressing career awareness and preparation, career acquisition, career retention and advancement, and entrepreneurship. Pennsylvania is the only state to include a true K-12 Career Readiness Indicator as part of its federal accountability system under the Every Student Succeeds Act. The Career Standards Benchmark identifies career readiness activities aligned with the CEW standards in all public K-12 schools. This emphasis on career readiness expands younger students' understanding of the career opportunities, and the relevant postsecondary education and training, available to them.
- **Improving access to advanced coursework for all students:** PDE will work to expand the number of students enrolled in at least one advanced rigor course – including Advanced Placement (AP), International Baccalaureate, and dual enrollment courses – each year, and to identify opportunities to improve equitable access to such coursework. Governor Wolf established a goal to increase the number of AP tests given in high schools by 46 percent by 2020.
- **Leveraging networks and resources to guide postsecondary pathways:** Under Pennsylvania's ESSA Consolidated State Plan, LEAs may use Title IV, Part A, and other federal funds, such as Title I, Part A and Title II, Part A, to support college and career exploration and advising, including hiring school counselors and other support staff to help all students, and especially underrepresented students, have the information and tools they need to gain awareness of college and career pathways and make informed decisions regarding their postsecondary future. Recognizing the critical role school counselors have on student success, PDE also partners with the Pennsylvania Higher Education Assistance Agency (PHEAA), public and private postsecondary institutions, and the Pennsylvania School Counselors Association to identify opportunities for K-12 school counselors to explore data and connect with resources on postsecondary access and success.
- **Improving awareness of college resources through regional partnerships:** The Pennsylvania Higher Education Assistance Agency (PHEAA) has 14 Higher Education Access Partners strategically located throughout the commonwealth to provide postsecondary services to students, families, educators, schools, community partners and the public. Services include free financial aid presentations and completion sessions, programs to assist students with planning and preparing for postsecondary education, and professional training for school counselors and advisors. The Pennsylvania College Advising Corps also places recent college graduates as fulltime advisors in underserved, rural high school schools across Pennsylvania to increase matriculation rates of their students.

- **Career and technical education as a path to industry-recognized credentials:** All PDE-approved career and technical education (CTE) programs lead to industry recognized credentials. Schools use the PDE Industry-Recognized Certifications for Career and Technical Education Programs Guide to identify industry-recognized credentials aligned to CTE programs in Pennsylvania's career clusters.
- **Facilitating postsecondary credit transfer:** The Pennsylvania School Code was amended shortly in November 2019 to require all public institutions of higher education and all public school districts to provide the Pennsylvania Department of Education with the institutions' articulation agreements for inclusion in an electronic database that is web accessible. The amendment also requires the posting of all agreements that award credit for an industry-recognized credential. The purpose of posting these agreements on the web-accessible electronic database is to increase transparency to students and allow them the ability to better plan their educational career. This will improve student's movement among and between institutions and allow them to graduate more quickly by removing the need to re-take courses.

PDE also was a partner with the WIOA Combined State Plan writing. The Department including CTE staff were present at the weekly meetings to develop the WIOA state plan goals. There are five goals in the WIOA state plan. The goals are focused on (a) career pathways, (b) sector strategies and employer engagement, (c) youth, (d) continuous improvement of the workforce development system, and (e) strengthening the One-Stop Delivery system. Each goal aligns with Perkins V activities as well as other Department activities.

Specific Department CTE goals include:

- Increase academic achievement of students enrolled in CTE;
- Increase technical attainment of students enrolled in CTE;
- Increase business engagement in CTE; and
- Students enrolled in CTE have access to a minimum of one high value industry recognized postsecondary credential.

State Leadership funds support the development and offering of targeted technical assistance that is focused on improving the performance indicators associated with special populations, specifically nontraditional students. The technical assistance is designed for administrators with CTE programs and assists them in examining local data to determine gaps in performance of special populations' categories.

Funds also support regional professional development workshops that support local efforts to attract and retain students in their non-traditional programs. This technical assistance is offered to those schools that receive sanctions letters related to their nontraditional performance indicator. The goal is to provide tools faculty and administrators can use to recruit and sustain to graduation students that are underrepresented in career and technical education programs in both secondary and postsecondary educational institutions.

The funds support individuals in state correctional institutions. Annually, 1 percent of the Perkins program allocation is provided to the state corrections facilities in order to serve youth in Pennsylvania's detention and corrections facilities. The funds support instructional staff at two state correctional institutions (SCI) and Carbon-Lehigh Intermediate Unit (IU) #21. The SCIs and the IU provide career and technical education that leads to trade-based certifications in programs that offer employment opportunities in high demand occupations throughout Pennsylvania. Both provide occupational training, applied academics,

employability training, and assessment with the goal of improving the youths' chances of finding employment upon release. The grant recipients provide an annual report that outlines their accomplishments.

The State Leadership Funds also support the recruitment, preparation and retention of CTE teachers, faculty, specialized instructional support personnel and paraprofessionals. The Department has developed and implemented CTE teacher and administrator certification programs through contractual agreements with three state universities. Each university (Indiana University of Pennsylvania, The Pennsylvania State University, and Temple University) operates a Professional Personnel Development Center to focus on the CTE teacher and administrator certifications. Annually, the Centers provide pre-service and in-service professional personnel development services for career and technical educators in the respective regions of the Commonwealth. Each university ensures the certification programs are based on research and cover topics including curriculum development, integration, instructional practices, parental and community involvement, PDE initiatives, and current trends in education.

In Pennsylvania, all teachers and administrators must hold either an instructional or career and technical instructional certification to be employed in a secondary school entity. State standards exist for teacher preparation programs and the teacher preparation programs must align to state standards and ensure the certification programs meet state statutes or regulations. The three Professional Personnel Development Centers prepare CTE teachers and administrators and recommend them to the Department for certifications.

In all three regions of the state, Center staff meetings were held regularly to share "notes from the field" and discuss topics of interest to the schools. Also, professional development experiences are developed based on a comprehensive needs assessment with input from the following sources:

- Advisory groups made up of volunteers from the group for which the experience is intended; and
- Evaluative data collected from previous participants in similar activities.

Professional development activities include:

- Opportunities to acquire new knowledge and skills related to the instructors' occupational area so they can provide dynamic, innovative CTE instruction;
- Discussions related to educational delivery methods and instructional techniques;
- Resources and current information on PDE BCTE initiatives; and
- Collaborations and networking opportunities with other education professionals.

In addition, CTE educators are provided technical training on how to access, select, develop, and implement curricula materials that support statewide programs of study and rigorous challenging programs; career pathways; scope and sequence of courses, in accordance with Chapter 339; industry standards; articulation agreements; and other state and federal mandates. The professional development activities are designed to enhance the knowledge, academic integration proficiency, and skills or capabilities of career and technical instructors.

State Leadership Funds support the Pennsylvania Technical Assistance Program (TAP). This is a statewide initiative to increase the quality and impact of career and technical education in secondary schools and postsecondary recipients. The Department of Education offers a variety of high-quality, research-based activities, and professional education opportunities at no cost to the participating schools. A critical component of the TAP program, as assessed by the participating school administrators, is the deployment

of on-site consultants who assist with the implementation of the professional education opportunities. These consultants are called Career and Technical Distinguished School Leaders (CTDSLs). These distinguished leaders are retired superintendents and CTC administrators. They assist schools in increasing the academic and technical rigor of career and technical programs based on practical approaches learned because of authentic experience leading schools. The range of expertise has included high academic and technical curriculum standards, strategies for the delivery of quality instruction, connections to external resources, internal performance accountability, and promoting a culture of learning and professional behavior.

Integrating Mathematics into CTE Content

Integrating Math-in-CTE enhances the mathematical concepts that exist where math naturally intersects with CTE concepts and applications. Research shows that this model has a significant positive impact on student learning in mathematics with no loss to career and technical area content. Integrating math into CTE courses does not add more to the teachers' workload but enhances the rigor and quality of the instruction. Specialized training and coaching will be provided.

Integrating Pennsylvania Core Standards for Reading and Writing

The Pennsylvania Core Standards for Reading and Writing in Science and Technical Subjects provide the foundation for the work. The 20 standards, targeted toward technical reading and writing, are applicable across all program areas. However, in contrast to mathematics, the standards are broader and have a wider range of applications than, for instance, the mathematical concept of scope. Specialized training and coaching will be provided.

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.)

Under Perkins V, Pennsylvania will update the 43 state-developed Programs of Study (POS) using the following criteria:

- The POS is developed by stakeholders (business, postsecondary faculty and secondary teachers);
- The POS is based on Classification of Instructional Program (CIP) codes;
- The POS is aligned to industry standards to ensure relevancy to the workforce and to identify the required technical skills;
- The POS provides students with an opportunity to earn an industry credential;
- The POS is aligned to state academic standards;
- The POS is aligned to employability skills;
- The POS is aligned to labor market needs;
- The POS progresses in specificity;
- The POS includes multiple entry and exit points;
- The POS operates with credit articulation agreement; and
- Completion of the POS leads to a recognized postsecondary credential.

For each POS, a committee will be established which includes statewide representation from business and industry, secondary and postsecondary instructors and administrators, and other interested parties. Details of each POS are found on the PDE [website](#)¹.

Each POS is based on a CIP title and description. The POS begins with general information that covers all aspects of the industry associated with the POS and progresses to increased occupationally specific information throughout the duration of the program.

Each POS is designed to align to industry standards and credentialing requirements. PDE defines industry standards as standards established by state or national trade or professional organizations or state or federal regulatory bodies accepted by the Department that describe what learners should know and be able to do and describe how well learners should know or be able to perform a task in a specific occupation. PDE works with Perkins recipients to identify applicable industry credentials and certifications that add value to the CTE enrollees' opportunity to become employed. If students do not earn industry credentials/ certifications at the secondary level of the POS, they can earn the industry credentials/certifications at the postsecondary level.

Each POS competency task grid² will provide a link to the Pennsylvania In-Demand Occupations as well as a link to the [Industry-Recognized Credentials for Career and Technical Education Programs](#) guidebook. At the local level, if a CIP is not aligned to state or regional HPO, not on the [Pennsylvania In-Demand Occupations List](#), or not identified as a Priority or Opportunity Occupation in the Local Workforce Development Board (LWDB) regional plan, the local recipient must provide the results of the comprehensive needs assessment and how the program(s) meets local economic and education needs including in-demand industry sectors and occupations.

The Department works with academic and CTE instructors to align Pennsylvania Core Academic Standards to each POS. The POS-validated competency task grids include the academic crosswalk. Pennsylvania academic standards include the state academic standards for [Career Education and Work \(CEW\)](#), as adopted by the State Board of Education. Each POS addresses career preparation, career acquisition (getting a job), career retention, and advancement and entrepreneurship. Each POS competency task grid will include links to the academic PA Common Core standards, CEW academic standards, and recently released Career Ready Skills. The Department will ensure the POS, secondary through postsecondary, are inclusive of the academic standards and course work during monitoring reviews.

The Department collaborates with L&I to annually prepare labor market data including in-demand occupations. In-demand occupations are those with a large number of job openings or an above-average growth rate without already having an over-supply of existing workers. These occupations offer a qualified jobseeker a reasonable expectation of obtaining employment in the field.

Occupations on the [Pennsylvania In-Demand Occupation List \(PA IDOL\)](#) are presented in three categories: Today, Tomorrow, and Future. Jobs of Today require a short period of on-the-job training to become proficient and no formal postsecondary training. With some postsecondary training (i.e., certificate,

¹ [Development of Pennsylvania POS Framework](#)

² [Pennsylvania Program of Study Competency Task Grids](#)

apprenticeship or Associate degree), an individual can obtain employment in a Tomorrow occupation. Jobs of the Future require at least four years of postsecondary education resulting in a bachelor's degree or higher.

After students enroll in a POS, they progress through general information regarding all aspects of the industry associated with a POS to more specific occupational skills and knowledge. As students complete sections of the POS, they can sit for industry certification exams. As students earn recognized postsecondary credentials, they can exit and enter low-skill, semi-skill, middle skill, or advance skill positions. The design of the POS also allows students who exit prior to the advanced skill positions to reenter the POS where they exited.

Each secondary entity (school district, charter school, or CTC) may apply to PDE for approval to offer the state-developed program of study. The Perkins postsecondary entities have been partners in the development of the statewide articulation agreement and alignment of secondary and postsecondary coursework. Through this process, the secondary completers may earn postsecondary credit once enrolled in the postsecondary component of the program of study. Articulation agreements allow high school students to receive postsecondary credit that counts toward graduation for their technical coursework.

The process used to develop the Programs of Study includes the following elements:

1. Incorporate and align secondary and postsecondary programs to workforce needs as follows:
 - a. Using Pennsylvania approved Standard Occupational Classification (SOC) Codes;
 - b. By developing a competency list based on an occupational analysis using resources such as O*NET;
 - c. By aligning with Pennsylvania recognized industry-based credentials or certifications; and
 - d. By securing validation of the local Occupational Advisory Committee.
2. Include coherent and rigorous academic content aligned with the Pennsylvania Core Academic Standards and relevant CTE content integrated in a coordinated, non-duplicative progression of courses that align secondary and postsecondary education to adequately prepare students to succeed in careers.
3. Include the opportunity for secondary education students to earn postsecondary education credits through dual or concurrent enrollment, articulated credit, or other avenues which lead to a Pennsylvania recognized, industry-based credential, credit bearing certificate or associate or baccalaureate degree.
4. Establish all new state developed CTE programs of study based upon the current PA IDOL lists.
5. Develop articulation agreements between secondary and postsecondary educational institutions which shall include:
 - a. Content specified in courses offered by the secondary institution that aligns with course content at the postsecondary educational institution. Syllabi and/or competency lists of courses from the institutions involved must be maintained in the appropriate offices.
 - b. The operational procedures and responsibilities of each party involved in the implementation of the articulation agreement.
 - c. A student evaluation plan and process including descriptions of required proficiency levels and criteria for measurement.
 - d. An evaluation plan that includes a review of the agreement, and renewal date not to exceed three years.
 - e. A description of student admission requirements.

- f. Signatures of authorized representatives of participating institutions.
- g. On an individual basis, provide options for out of county students to articulate without sanction if equivalent articulation elements are satisfied.

Each of Pennsylvania's 43 programs of study was developed in phases and is reviewed every three years. Phase III Programs of Study were revised for the 2018-19 program year. Through this revision process, Pennsylvania ensures Programs of Study are aligned to key elements of Perkins V and meet the federal Perkins V definition.

Each POS offers a planned, non-duplicative sequence of academic and technical courses. Technical courses provide occupational skill and work-related tasks that would be performed in the workplace. The PDE-approved sequence is planned, non-duplicative technical instruction (simple courses to increasingly complex courses) within a specific CIP that progresses from general technical program knowledge of all aspects of an industry to occupationally specific content. A random menu of electives does not meet state or Perkins V requirements for a POS. Introductory competency tasks will be identified on each POS competency task grid. Students, parents, teachers, school counselors, and others will be able to identify postsecondary partners with programs of study aligned to secondary programs of study. To view current advanced credit opportunities articulated with postsecondary educational institutions, go to the equivalency search results at CollegeTransfer.net.

Each POS has multiple entry and exit points. Secondary students can enter and exit a POS throughout high school. Upon graduation, students who complete a POS exit with a high school diploma and an industry credential. Articulation agreements between secondary and postsecondary CTE programs of study allow students to continue with their POS after graduation and earn an advanced credential or degree.

Under Perkins V, the POS will be revised, where appropriate, to include technical dual enrollment or concurrent enrollment courses at the high school that lead to postsecondary credit or advanced standing in a postsecondary educational institution. Each Local Application will demonstrate how the federal Perkins funds will be used to expand opportunities for CTE concentrators to participate in accelerated learning programs that include dual and concurrent enrollment, early college high school, or early postsecondary opportunities.

Locally developed and implemented articulation agreements will be recognized in addition to the statewide articulation agreement. Articulation agreements are defined by the regulation as

- (4) ARTICULATION AGREEMENT.-- The term "articulation agreement" means a written commitment--
- (A) that is agreed upon at the State level or approved annually by the lead administrators of--
 - (i) a secondary institution and a postsecondary educational institution; or
 - (ii) a subbaccalaureate degree granting postsecondary educational institution and a baccalaureate degree granting postsecondary educational institution; and
 - (B) to a program that is--
 - (i) designed to provide students with a nonduplicative sequence of progressive achievement leading to technical skill proficiency, a credential, a certificate, or a degree; and
 - (ii) linked through credit transfer agreements between the 2 institutions described in clause (i) or (ii) of subparagraph (A) (as the case may be).

The local agreement must be developed by the secondary schools and postsecondary educational institutions that recognize secondary technical education for postsecondary credit that counts toward graduation. Secondary recipients will report dual credit earned in the Pennsylvania Information Management System.

The Department will maintain the current statewide articulation agreement that provides students enrolled in CTE with the opportunity to earn college credit that counts toward graduation for their secondary coursework if they enroll at the postsecondary partner. This aligns with the state requirement to implement articulation agreements as part of a CTE program of study. The criteria for the statewide agreement have changed and now require credit articulation with a minimum of 9 credits for secondary technical coursework that count toward graduation and CIP to CIP-related offering.

When a state-developed program of study does not exist, local articulation agreements will be developed by the secondary and postsecondary recipient. Each local articulation agreement will meet the federal definition of program of study and operate under a credit articulation agreement. The local agreement can award any credit amount greater than or equal to 6 credits, of which at least 3 credits must be for technical coursework. All credits included in the agreement must count toward postsecondary graduation. The local agreement can be CIP to CIP or CIP-related. This should expand the opportunity for students who seek to pursue postsecondary education.

When both the statewide and local agreements are not possible due to restrictions set by third party accreditors or lack of a secondary program, postsecondary institution(s) will engage secondary school(s) in alignment activities to ensure secondary students are ready to enroll in entry-level postsecondary coursework. Alignment activities may include, but are not limited to, the following:

- The postsecondary institution provides secondary students with the postsecondary entrance exam at the end of their junior year.
- The postsecondary institution provides a curriculum for low-performing students to take in the secondary setting in preparation to enroll directly in first-level courses at the postsecondary level.
- The secondary and postsecondary institutions develop a dual enrollment agreement.
- The institutions develop an articulation agreement that awards fewer than six credits which count toward students' postsecondary graduation.

The demonstrated alignment activities must be designed to ensure that CTE students are able to enroll in entry-level postsecondary coursework in their major of choice.

In summary, there are three avenues that lead to greater secondary and postsecondary alignment. The following is intended as a guide to secondary and postsecondary entities.

If

- the secondary and postsecondary POS are an exact CIP to CIP match, or a CIP to CIP-related match, and
- a minimum of 9 technical credits can be articulated, and
- all articulated credits count toward the student's postsecondary graduation,

then use the statewide articulation agreement.

If

- the secondary and postsecondary POS are an exact CIP to CIP match, or a CIP to CIP-related match, and

- a minimum of 6 credits can be articulated, and
- at least 3 of the articulated credits are technical credits, and
- all articulated credits count toward the student’s postsecondary graduation,

then use the local articulation agreement.

If

- fewer than 6 credits that count toward postsecondary graduation can be articulated, or
- fewer than 3 technical credits can be articulated (e.g., if an external accreditation or licensing body precludes the articulation of secondary technical credits),

then develop a local agreement that demonstrates alignment activities to ensure that secondary completers are prepared to enroll in the entry-level postsecondary courses.

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 132 will:

- Promote continuous improvement in academic achievement and technical skill attainment;**
- Expand access to career and technical education for special populations; and**
- Support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V).**

PDE will continue to use the existing secondary program approval process. Each secondary entity that seeks program approval must provide evidence that the CTE POS or CTE program aligns with local workforce development needs and that the program prepares students for employment and is supported by local employers.³ The Department will look for alignment to local workforce needs and representation from local or regional employers from the program related industries on the Occupational Advisory Committee (OAC). To receive funding, each Perkins recipient must offer programs of study in at least three different career fields.

During the 2021-2022 year, Perkins postsecondary recipients will seek approval through the electronic approval system. Until the system is finalized, the Department will utilize an existing [postsecondary database](#) that provides a list of Programs of Study that postsecondary educational institutions offer and are recognized as approved occupational programs. The occupational programs must meet the Perkins V definitions of Career and Technical Education and “Program of Study.” The list demonstrates that the programs have been approved by the institutions Board of Trustees, accrediting authorities (national, regional or program specific [NAECP] accrediting authorities), and PDE/State Board for Career and Technical Education.

The criteria found in the postsecondary electronic approval system include Labor Market Need, Summary of Comprehensive Needs Assessment, Program Content and Industry Standards, Student to Instructor Ratio, Equipment and Supplies, Safety Practices, Performance Indicators, Certifications Available to Students, and Instructor Credentials.

Since each CIP is aligned to Pennsylvania in-demand occupations, the postsecondary portion of the POS is aligned to workforce needs.

³ Program Approval – Section 339.4 (22 Pa. Code § 339.4)

According to PDE regulation, each secondary CTE program and POS is approved for a 5-year period. At the end of the 5-year cycle, the secondary school must seek re-approval. As part of the re-approval process, the secondary school must document the workforce needs and provide evidence that the program is supported by local employers and the local workforce development board. For each approved program the school also must provide data that demonstrates the program meets local economic and education needs including in-demand industry sectors and occupations. Schools must provide report(s) prepared by the local workforce development board demonstrating that the program prepares graduates for regional in-demand occupations.

Another standard that must be met for re-approval of a state secondary CTE program is to establish and meet levels of performance on several accountability indicators, as determined by the levels established for the Perkins local application. Each secondary recipient reports annually on the level of performance and examines the status of meeting the targets. Four of the indicators used for program approval and re-approval at the secondary level focus on academic and technical skill attainment. The school examines data related to challenging state academic standards adopted under the Every Student Succeeds Act (ESSA) as measured by the academic assessment and CTE concentrators who graduate high. In addition, the school examines data related to the state mandated end-of CTE POS assessment which measures student technical achievement. If they do not meet levels of performance, they must provide a compliance plan that indicates how they will meet levels of performance and promote continuous improvement over the coming year.

For state program re-approval, each secondary Perkins recipient's performance on accountability measures is reviewed at the recipient and program level. This review and analysis ensure the Perkins recipient is meeting the targets and allow the recipient to ensure the needs of each special populations category is being met. This method also allows the Department to determine if it needs to direct resources to address a category of special population to ensure all special populations' needs are being met. The Perkins recipient provides evidence of this when they submit their local application and during on-site reviews.

Additional state secondary CTE program approval criteria include:

1. Description of the program or POS and demonstration of standards-based philosophy;
2. Evidence that the instructional equipment is comparable to industry needs;
3. Evidence of the length of time students will be scheduled into a program;
4. Evidence that each secondary CTE teacher will hold a valid certificate for the teacher's assigned position;
5. Evidence that adequate resource material will be available to support the instructional program plan as required by program accrediting authorities, if applicable, or recommended by the OAC;
6. Evidence that supports, services, and accommodations will be available to disadvantaged, disabled, or limited English-speaking students;
7. Evidence that school entities will provide students adequate supports to meet academic standards; are consistent with the student's individual education plan (IEP), when applicable; and that instruction in these academic areas at all school entities where the student is enrolled is appropriate to the chosen area of occupational training;
8. Evidence of articulation between secondary and postsecondary educational institutions within a service area and system promoting seamless transition to ensure the maximum opportunity for student placement including opportunities for concurrent enrollment or dual enrollment or other

- strategies that promote acquisition of postsecondary credit while still in high school;
9. Evidence of program sponsorship or involvement, or both, in Career and Technical Student Organizations (CTSOs);
 10. Evidence, if a program submitted for reapproval is reduced in hours, that the reduction in hours will not result in a less effective education program being offered;
 11. Evidence that joint planning occurs between the CTC and school district of residence around the academic and other needs of attending students; and
 12. Evidence that students are following an educational plan and have a career objective.

As part of the annual local application submission, each recipient is required to address special population's student academic performance, technical skill attainment, and access to high-skill, high wage, high-demand education and training. The recipients indicate how Perkins funding accommodates students with disabilities, English Learners, and students who are economically disadvantaged as well as each category of special populations, as required under Perkins V. Department staff then ensure each Perkins recipient's local plan addresses the areas of need.

PDE is responsible for reviewing and approving Adult CTE programs. Similar to the secondary program approval process, Perkins recipients offering Adult CTE programs must demonstrate how each program meets local or regional labor market need. The program curriculum must be planned and developed in consultation with the community and business representatives. Each program must provide evidence that it is aligned to industry standards and that students are eligible to sit for industry credential exams. Each program also must have instructional materials and equipment that sufficiently meet industry standards.

Specific criteria for assessing the extent that the local application will promote continuous improvement in academic achievement and technical skill attainment are as follows:

The criteria for assessing the extent that the local application will promote continuous improvement in academic achievement and technical skill attainment are as follows.

Secondary Application Review Criteria:

1. The action plan demonstrates meaningful progress on performance indicators including all subgroups. These are the activities that will be carried out during the current fiscal year.
2. The end-of-year performance report demonstrates meaningful progress on performance indicators including all subgroups. The performance report explains how the grant recipient implemented activities to demonstrate meaningful progress.

Postsecondary Application Review Criteria:

1. Review the academic achievement and technical attainment objectives and ensure the activities support meaningful progress.
2. Review the academic achievement and technical attainment objective and review the outcome measures the recipient identifies, which can include graduation rate, completion rate, transfer out rate, occupational license or technical certificate earned, academic achievement, technical skill attainment.

Beginning with the 2020-21 school year, postsecondary Perkins recipients also will enter program information in the Department's electronic approval system and provide information on each program that Perkins V funds will support. PDE will review and act on each postsecondary program the 2021-2022

program year. Program approval includes information on: Labor Market Need, Summary of Comprehensive Needs Assessment, Program Content and Industry Standards, Student to Instructor Ratio, Equipment and Supplies, Safety Practices, Performance Indicators, Certifications Available to Students, and Instructor Credentials.

As the Department approves and re-approves secondary CTE programs, secondary Perkins recipients must demonstrate compliance with equity and access standards. This includes providing evidence that services and accommodations will be available to disadvantaged, disabled, or limited English-speaking students enrolled in CTE programs and supported by the district of residence, in accordance with applicable law, service agreements, and student IEPs. Re-approval requires evidence that school entities provide students with adequate support to meet academic standards, as determined by Pennsylvania State Board of Regulation Title 22, Chapter 4, and, when applicable, are consistent with the student's IEP, and that instruction in these academic areas at all school entities where the student is enrolled is appropriate to the chosen area of occupational training.

Review of the special populations section of the application will require the recipient to describe how the recipient is addressing the expansion of access to special populations.

The Department will use the following criteria for assessing the extent by which a Perkins recipient is expanding access to CTE for special populations:

1. Targeted activities support expansion of access for special populations to CTE, as demonstrated in the special population objectives and activities section of the application; and
2. Outcomes demonstrate meaningful progress to increase expanded access to special populations into CTE programs, as presented in the special populations objectives and activities and outcome measures sections of the application.

Pennsylvania collects data on special populations categories by Perkins recipient and by program. Based on the past three years of data, the overall enrollment in the special populations categories associated with Perkins V continues to increase. See Tables 2 and 3. Following are a list of specific state strategies used to approve CTE programs locally and the criteria used to determine the extent a local application will expand access to CTE for special populations:

1. Department emphasis on special populations and analysis of performance levels on each of the Perkins V indicators by Perkins recipient.

Through the Comprehensive Local Needs Assessment, the local Perkins recipients will conduct an evaluation of the use of Perkins funds, using both qualitative and quantitative methods. The evaluation will be part of the local application. Department staff will analyze each Perkins recipient's impact on each of the special populations categories including meeting locally determined levels of performance.

As part of the annual local application submission, each recipient is required to address special population's student academic performance, technical skill attainment, and access to high-skill, high wage, high-demand education and training. Recipients indicate how their use of funds accommodates students with disabilities, English Learners and economically disadvantaged students. Staff then ensures each Perkins recipient's local application addresses the areas of need.

2. Department review of Perkins performance levels during state re-approval of CTE POS and programs.

For state program re-approval, each Perkins recipient's performance on accountability measures is

reviewed at the building and program level. This review and analysis ensure the Perkins recipient is meeting the targets and allow the recipient to ensure the needs of each special populations category is being met. This method allows the Department to determine if it needs to direct resources to address a category of special population to ensure all special populations' needs are being met.

3. Department emphasis on equal access during on-site reviews.

PDE staff visit Perkins recipients to ensure compliance with federal and state regulations. The regulations outline the expected standards of development, admission, and operation of quality CTE programs. The qualitative review ensures recipients designed CTE programs to enable special populations to enroll without discrimination and to prepare for further education and training in occupations aligned to Pennsylvania industry sectors.

4. Department emphasis on equity in technical assistance and professional development.

The Department has a partnership with the Pennsylvania Association of Career and Technical Administrators (PACTA). PACTA representatives serve on the BCTE strategic planning committee and assist in identifying action steps the Bureau, with PACTA's assistance, can take to improve student academic and technical achievement, increase business engagement, develop K-12 pathways, serve special populations students, address academic and technical proficiency, and expand career development. Department provides PACTA with support and input into professional development and technical assistance for instructors and administrators in CTE settings.

Each year BCTE holds the statewide "Integrated Learning Conference: The School to Career Connection" to highlight academic and technical integration strategies. The conference has concurrent sessions and consists of six strands focused on the following educational topics: 1) programs of study; 2) school counselor; 3) special populations (non-traditional, English Learners, economically disadvantaged, homeless, youth aged out of foster care, etc.); 4) academic integration; 5) teacher effectiveness; and 6) instructional leader.

The Department also supports the Pennsylvania Association of Career and Technical Education Special Populations (PACTESP) annual conference. The purpose of the conference is to provide professional development to CTE and regular education personnel to increase and align support and services to special populations students. Sessions are designed for secondary and postsecondary settings. BCTE annually provides a pre-conference workshop on supporting special populations students so that they can be successful in CTE programs and future employment.

The Department's annual [Data Summit](#) offers attendees an opportunity to learn, network, ask questions about, and discuss education data with peers and leaders from across the state and nation. Keynote speakers and breakout sessions are strategically coordinated to provide attendees with information, resources, and tools on a wide variety of topics that change each year. Each year attendees explore topics such as data governance, data reporting and quality, data-informed decision making, and more. The goal is for each attendee to experience impactful professional learning opportunities, gain technical skills, and return to their school community with a better understanding of data and how they can use it to support and benefit the students they serve.

Regional professional development workshops are provided to support local efforts to attract and retain students in their non-traditional programs. These programs provide faculty and administrators with tools they can use to recruit and sustain to graduation students that are underrepresented in CTE programs in

both secondary and postsecondary recipients.

5. Department participation on the State Leadership Transition Committee.

The State Leadership Transition Committee is an interagency committee comprised of representatives from the Pennsylvania Departments of Education, Human Services, Health, and Labor and Industry. The committee established a Memorandum of Understanding (MOU) to promote interagency collaboration and cooperation to assist students and young adults with any type of disability as they transition to a job, postsecondary education, or independent living. The Transition Committee supports 70 Local Transition Coordinating Councils (LTCC) across Pennsylvania with identifying potential supports and services for transitioning students.

6. Department support and alignment of Nontraditional Occupations to POS.

Nontraditional occupations refer to jobs that have been traditionally filled by one gender. Within nontraditional occupations individuals from one gender comprise less than 25 percent of the individuals employed. Examples are males in nursing and childcare or females in technologies and plumbing. Promoting nontraditional career opportunities opens doors for every individual. A list of [Non-Traditional Occupations by POS is](#) located on the PDE website.

The Department has worked with Commonwealth Media Services to develop recruitment materials that can be used by the Perkins recipients. The recruitment materials will be completed by June 2020 and disseminated by August 2020.

In conjunction with the Pennsylvania Department of Labor and Industry, which has sought to expand the representation of nontraditional workers in apprenticeships, PDE has sought to expand access to, and equity and inclusion in, nontraditional fields for learners. A state workforce development initiative called PAsmart has invested \$70 million since 2019 in apprenticeships, industry partnerships, and STEM education, with an emphasis on expanding access and inclusion to nontraditional populations in technical career fields. \$40 million of PAsmart funds have been granted to pre-Kindergarten through postsecondary educational entities for projects designed to increase the participation of underrepresented students, including girls and women, in STEM and computer science.

Table 2: Secondary Enrollment in CTE by Special Populations Category by School Year

	2015-16	2016-17	2017-18	Overall Increase or Decrease
Total Secondary Enrollment (9-12th Grade)	546,617	541,921	538,117	-1.6%
Secondary CTE Enrollment	67,648	67,294	67,248	-0.6%
Percent Enrolled in CTE	12.4%	12.4%	12.5%	1.0%
CTE Participants (At least 10% of the program earned)	64,166	63,847	63,601	-0.9%
Female	26,714	26,574	26,562	-0.6%
Male	37,452	37,273	37,039	-1.1%

Race/Ethnicity				
American Indian/Alaskan Native	147	163	165	12.2%
Asian	820	872	884	7.8%
Black or African American	8,304	8,439	8,071	-2.8%
Hispanic	6,868	7,247	7,366	7.3%
Multi-Racial	1,089	1,114	1,230	12.9%
Native Hawaiian or Other Pacific Islander	34	38	48	41.2%
White	46,904	45,974	45,837	-2.3%
Disabilities Status	17,825	17,899	17,975	0.8%
Economically Disadvantaged	31,849	33,644	33,640	5.6%
Single Parents	302	231	213	-29.5%
Displaced Homemakers				N/A
Limited English Proficient	1,192	1,301	1,651	38.5%
Migrant Status	30	37	31	3.3%
Nontraditional Enrollees	8,255	8,183	8,295	0.5%

Sources: PA Enrollment Reports, CTE Enrollment, Consolidated Annual Perkins Report

Table 3: Postsecondary CTE Enrollment at Perkins-Allocated Institutions by Special Populations Category by School Year

	2015-16	2016-17	2017-18	Overall Increase or Decrease
Postsecondary CTE Enrollment	75,563	72,804	70,627	-6.5%
CTE Participants (At least one credit of the program earned)	70,247	67,088	65,656	-6.5%
Female	40,697	37,375	38,024	-6.6%
Male	29,550	29,713	27,632	-6.5%
Race/Ethnicity				
American Indian / Alaskan Native	214	195	193	-9.8%
Asian	1,821	1,814	2,265	24.4%
Black or African American	12,248	10,719	12,150	-0.8%
Hispanic	5,803	5,938	6,760	16.5%
Multi-Racial	1,320	1,451	1,643	24.5%
Native Hawaiian or Other Pacific Islander	92	81	79	-14.1%
White	41,715	40,140	37,344	-10.5%
Unknown	7,034	6,750	5,222	-25.8%
Disabilities Status	3,521	3,495	3,511	-0.3%

Economically Disadvantaged	32,382	30,087	31,279	-3.4%
Single Parents	5,865	5,391	5,695	-2.9%
Displaced Homemakers	618	614	452	-26.9%
Limited English Proficient	1,400	1,606	1,552	10.9%
Migrant Status				N/A
Nontraditional Enrollees	12,240	11,828	11,191	-8.6%

Sources: PA Enrollment Reports, CTE Enrollment, Consolidated Annual Perkins Report

Employability skills are addressed in each program of study through existing state regulation. At the secondary level each school district, charter school, and CTC must include the [CEW](#) academic standards adopted by the Pennsylvania State Board of Education. These academic standards include knowledge and skills of career awareness and preparation, career acquisition or getting a job, and career retention and advancement.

The state also developed a K-12 continuum for career readiness skills, in cooperation with the Department’s Office for Safe Schools and cross-sector committee comprised of representatives from Pennsylvania Office of Child Development and Early Learning (OCDEL), PA Keys, Pennsylvania Training and Technical Assistance Network, Berks Intermediate Unit, and L&I. The Career Readiness Skills (CRS) include self-awareness and self-management, establishing and maintaining relationships, social problem-solving skills. All schools are asked to incorporate the CRS into existing curriculum, and are found on [Career Ready PA](#)

All postsecondary Perkins recipients also must include employability skills in the CTE program of study. The state will collect and disseminate promising practices to assist postsecondary recipients to include employability skills in the CTE POS. The Department will provide a link to the employability skills on the finalized technical skills task grids.

Below are the criteria the Department will use to assess the extent to which the local application supports the inclusion of employability skills in programs of study and career pathways:

1. Review of the employability skills section and ensure the activities support inclusion of employability skills in the CTE program of study.
2. Review the employability skills section and review the outcome measures the recipient identifies as supporting the inclusion of employability skills in the CTE program of study.

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.

Pennsylvania has numerous resources that address programs of study and provide related guidance and advisement on careers. The materials are available to students, families, and secondary and postsecondary education partners in a variety of formats and languages and are ADA compliant.

Resources include:

- a. [Information on college credits earned through the CTE POS](#)⁴
- b. [SOAR Flyer](#)
- c. [SOAR Bulletin](#)
- d. [Spanish SOAR Bulletin](#)
- e. [Career Ready PA](#)

Each resource notes the availability of college credit for time spent in the secondary CTE program of study. Pennsylvania will revise the resources to reflect the revisions to programs of study required under Perkins V. The resources then will be disseminated by email and posted on the Department of Education's and partner websites. These materials are also duplicated and sent to secondary and postsecondary educational institutions offering the CTE POS.

The Department developed several toolkits to assist schools with providing Advanced Placement, dual enrollment, and work-based learning opportunities for students. The following toolkits are available on the PDE website:

- a. [Advanced Placement Program Toolkit](#)
- b. [Dual Credit Program Toolkit for Pennsylvania School Entities](#)
- c. [Independent Study Program Toolkit](#)
- d. [International Baccalaureate \(IB\) Program Toolkit](#)
- e. [Work-Based Learning Toolkit](#)

Pennsylvania is developing information on career pathways that will be used during the 2019-20 school year. The template can be used by the recipients with parents/guardians, student and others.

[Pennsylvania Career Pathways](#)

[Family and Consumer Sciences Scope and Sequence](#)

The Department continues to work with instructors, and career and school counseling staff as they implement the state CEW academic standards. Local schools are developing and finalizing comprehensive K-12 guidance plans that have been approved by the district school board. The Department also maintains a number of [resources for counselors](#)⁵ to use and are found on the Department website.

In addition, the Career Education and Work assessment continues to be available through NOCTI to address student understanding of the CEW academic standards areas – Career Awareness and Preparation, Career Acquisition, Career Retention and Advancement, and Entrepreneurship.

The Department provides resources to assist all K-12 schools in Pennsylvania with implementing the CEW standard strand of career awareness and preparation.

⁴ [POS Articulation](#)

⁵ [Counselor Resources](#)

[PA Career Zone](#) is a free, interactive website that middle school and high school students can use to explore the careers of interest and develop an individualized portfolio. The website has a skills profiler for students to assess their skills and interests and then connect with careers aligned to those strengths. They also can use the site develop a printable resume, find postsecondary programs, and determine if a given salary will support a preferred lifestyle.

In 2019, the Department expanded PA Career Zone to include an elementary section called [Up the Ladder](#). Up the Ladder using gaming elements and badges to encourage young students to exploring career pathways. The animated interface is especially colorful, interactive, and responsive. Students can go in depth into various careers and learn what it takes to succeed in each of them. The young students' experience is guided with an optional voice narration for lower reading levels. Up the Ladder is an excellent way to begin career discussions in the elementary grade levels and sets students up for success as they start exploring the rest of the PA Career Zone offerings in middle school.

The [Pennsylvania Academic Standards for Career Education and Work](#) are fully integrated into Up the Ladder and PA Career Zone. As such, they provide teachers essential tools to show the relevance of each student's educational experiences to their individually chosen career pathways.

In November 2018, Pennsylvania launched a new data dashboard called [Future Ready PA Index](#) to provide the public with a more comprehensive look at how Pennsylvania's schools are educating students. The dashboard illustrates student and school success using the following measures:

- State Assessment measures demonstrate student performance on state assessment exams and include data from the Pennsylvania Value-Added Assessment System (PVAAS), which represents the academic growth of students.
- On-Track measures highlight regular attendance and indicate progress in reading and math and in English Language proficiency.
- College and Career-Ready measures illustrate how well students are being prepared for postsecondary success by showing access to rigorous coursework (i.e., Advanced Placement, dual credit and CTE SOAR programs) and by identifying industry-based credentials earned by all public high school graduates. The Postsecondary Outcomes indicator shows the percent of high school graduates enrolling in postsecondary education, enlisting in the military and entering the workforce within 16 months of graduations.

The data for each indicator is disaggregated by student group – including economically disadvantaged students, English Learners, students receiving special education services, and racial and ethnic groups. This allows parents and their communities to better understand student performance among the different groups and for schools to identify student groups where additional support may be needed.

Based on a meeting with Community College representatives, the Department will design a strand for the Integrated Learning Conference for Perkins Postsecondary recipients that focus on promising practices on student engagement, Local Comprehensive Needs Assessment, data collection, sharing data, non-traditional, ADA, student retention.

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.

Programs of Study are developed at the state level. The Department organizes statewide committees comprised of secondary instructors and postsecondary faculty along with business representatives for each POS content area. The members of the statewide committees discuss their respective program content and define the technical content of POS, with particular focus on the needs of business and how the technical content is delivered at the secondary level and aligns to the postsecondary technical content. The Department continues to better align courses to increase flexibility of the courses and experiences so they can be shared across multiple Programs of Study and to shift with industry needs in general. During the statewide Programs of Study committee members identify potential courses and how the courses align to increase flexibility for students.

The Department continues to examine needs around the development and coordination of the Programs of Study. During state plan development process, stakeholders recommended developing or identifying resources that help students understand the full scope of careers within a pathway, the multiple entry and exit points, and how the full career pathway affects personal finances. The Department will ask the statewide committee to recommend resources that Perkins recipients can use to assist students in understand the full scope of careers within a pathway. The resources will be disseminated to the schools and postsecondary educational institutions.

The Department provides multiple opportunities for schools and postsecondary partners to highlight promising practices regarding collaboration. One example is the annual Integrated Learning Conference, which includes a Program of Study strand. The annual Standards Aligned Systems Conference also brings together secondary and postsecondary representatives to share their promising practices. The annual Department run Data Summit provides the opportunity for secondary and postsecondary to collaborate and meet to discuss the use of data to increase opportunities for students and improving student achievement.

The Department collects promising practices related to career development and postsecondary preparation, such as college and career pathways, employability skills, work-based learning, postsecondary transitions, and engagement of business, community, workforce provides these promising practices. The resources then are made available via the [CTE Resources](#).

During August 2019, the Department held a statewide meeting that examined the existing Program of Study development process and statewide articulation agreement. Based on the statewide meeting the Department is making the following changes that will lead to higher quality CTE as well as increase collaboration among secondary, postsecondary and business in the development and coordination of statewide Programs of Study.

Based on the August 14 postsecondary meeting and request for postsecondary to develop local articulation agreements, the Department will recognize locally developed and implemented credit articulation agreements in addition to the statewide articulation agreement. The local agreement must be credit articulation agreements as defined in Perkins V and recognize secondary technical education for postsecondary credit that counts toward postsecondary graduation. The local agreement can award any credit amount but not less than 6 credits, of which 3 credits must be technical credits. The local agreement can be CIP to CIP or CIP-related. This should expand the opportunity for students who seek to pursue postsecondary education. Secondary recipients will report dual credit earned in the Pennsylvania Information Management System.

Under Perkins V, the program of study will be revised, where appropriate, to include technical dual enrollment or concurrent enrollment courses at the high school that lead to postsecondary credit or advanced standing in a postsecondary educational institution. The articulation agreements will be limited to the programs of study and direct connection of classification of instructional program (CIP) to CIP or CIP-related program and the awarding of a minimum of 9 transcribed credits for secondary technical coursework that count toward postsecondary graduation.

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.

PDE asks each recipient to demonstrate how each program that benefits from federal Perkins funds meets workforce needs. The purpose is to set a standard of measure to determine the alignment of the POS to real-world industry need. The Department provides database links in the local application to ensure consistency in the alignment and has established a benchmark.

Below are the questions related to workforce need that recipients must complete as part of the local application:

a) What are the occupations for which this partnership will prepare participants?

Applicants should use the link to cite [SOC codes](#) for the relevant occupations:

Benchmark:

Evidence the occupation is connected to the Program of Study.

b) What is the anticipated Entry Annual Wage that an employee can receive by entering a specific occupation listed in question a.?

Applicants should use the link to cite the [wages for the relevant occupations](#):

Benchmark:

Evidence that the state Entry Annual Wage for each identified occupation is \$25,000 or higher.

c) What is the projected number of new job openings that are expected for the occupations listed in question a., between 2016 and 2026?

Applicants should use the link to cite the [projected number of job openings](#) for the relevant occupation:

Benchmark:

Demonstrate that the projected enrollment and graduate numbers meet or exceed workforce needs in the Workforce Development Board region.

iv. Ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations.

The Department ensures each secondary POS meets state and federal regulations. All secondary schools that offer Department-approved Programs of Study must have an admissions policy regarding entrance to a CTE program. The policy must state whether enrollment is unlimited or limited. If enrollment is limited, the admissions policy must include nondiscriminatory eligibility requirements for the purpose of predicting a student's success in a program. The admissions policy must include a nondiscriminatory

selection procedure, as required by current federal and state statutes, regulations and guidelines. Postsecondary recipients have open admissions policies where the only requirement is students have a high school diploma or a high school equivalency credential.

During on-site reviews, Department staff review the secondary school's admissions policy to confirm one exists and that it provides equitable access to the Programs of Study. When it is discovered that an admissions policy does not exist, the Department provides a sample admissions policy for secondary schools to use to develop their School Board approved admissions policy.

The Department also conducts Civil Rights reviews that ensures Programs of Study are accessible and that individuals are not discriminated against based on the ground of race, color, or national origin. The Department developed a review process to measure the compliance of publicly funded programs with Title VI of the Civil Rights Act of 1964 (race, color, national origin), Title IX of the Education Amendments of 1972 (sex), Section 504 of the Rehabilitation Act of 1973, amended in 1990 (handicap) regulations (nondiscrimination requirements in the provision of career and technical education programs) and the Age Discrimination Act of 1975. Guidelines explain the civil rights responsibilities of recipients of federal financial assistance that offer or administer CTE programs.

Conducting these on-site reviews at secondary and postsecondary sites allows the Department to focus attention on the above issues. As a result of the visits, subrecipients reevaluate their policies and practices in these areas, increase their compliance with requirements set by the Office of Civil Rights, and improve access to educational benefits and services for all beneficiaries.

Disaggregating data by special populations category and by POS will allow the Department to examine data to ensure there is equal access provided to each special populations category by POS. The Needs Assessment used by the Local Recipients includes a chart that looks at race and special populations by program. The chart will allow recipients to identify possible areas of restricted access and substantiate the need to look at processes of recruitment.

The local application requires recipients to examine data by each special populations category. The reviewer asks them to establish areas of priority and to determine the strengths and improvement steps for each special populations category.

The Department also provides a special populations strand during the annual Integrated Learning Conference. Annually, the topics ensure equal access is covered and remains a focus.

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.

The Department worked with L&I to develop the Combined WIOA state plan. Primary goals of Pennsylvania's Combined WIOA state plan is developing a comprehensive career pathways system in Pennsylvania and expanding career pathways as the primary model for skill, credential, degree attainment, with an emphasis on those with barriers to employment, to earn a family-sustaining wage and advance their career. The Local Workforce Development Boards (LWDB) are supported by the Departments as they develop the career pathways.

The local Perkins recipients are required to work with the LWDBs. Secondary recipients include LWDB members on their school wide local advisory committees and on the individual Programs of Study advisory committees. Under Perkins V, the Perkins recipients also include LWDB representation on the stakeholders committee. Perkins postsecondary recipients partner with the LWDB on the One-Stop Centers, and the Department has LWDB representation on the state Perkins Stakeholders Committee.

The State Board for Career and Technical Education meets eight times a calendar year. Department staff request input from and provide reports to the Board as well as the board's CTE committee. The reports are provided during each Committee and Board meeting. Committee and Board members are actively engaged in the meetings and provide input into the direction the Department pursues.

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.

The Department also administers competitive grant programs in which career and technical education providers can participate, in collaboration with other community partners, and which often benefit career and technical education students. One such initiative, the PAsmart Computer Science and STEM Advancing Grant, provides up to \$500,000 per award for regional, cross-sector, collective impact approaches to expanding computer science and STEM education following the national STEM Ecosystem model. Funded projects have included a postsecondary-secondary-industry partnership in which high school students earn computer science credentials by high school graduation, and a postsecondary-secondary-industry partnership in which rural students in a regional robotics network apply drone operations skills to needs in agriculture. Another career readiness initiative is Teacher in the Workplace, which provides local education agencies with funding and technical assistance for educators to establish and maintain relationships with regional businesses, to engage in hands-on career experiences, and to modify their educational offerings to better prepare students for high-priority occupations. Outcomes of Teacher in the Workplace include more project-based learning relevant to career skills for pre-kindergarten through twelfth grade students, and students' increased awareness, especially at the elementary level, of available careers and the career applications of the core curriculum.

All local applications address all aspects of an industry with each Perkins secondary and postsecondary recipient responding how they use Perkins funds to support all aspects of an industry. Activities include, but are not limited to, the following: purchasing equipment that is recommend by the Occupational Advisory Council (OAC) and is used in industry; job shadowing; field trips/site visits to businesses related to the POS; internships, externships, pre-apprenticeships and industry mentoring programs; and cooperative education.

Pennsylvania requires all secondary Programs of Study to provide students the opportunity to participate in work-based learning and to acquire experience in appropriate work situations related to their POS. When the traditional shop or laboratory cannot simulate the work situation, the classroom may be extended to a cooperating agency or business if the educational objectives are being met. Health occupations curriculum preparing individuals for direct patient care must provide clinical experience as an integral part of the curriculum.

Postsecondary recipients require internships, field placement, and service learning as part of their portion

of the POS. Pennsylvania is supporting all aspects of an industry, which includes work-based learning opportunities for postsecondary students. Therefore, only programs that provide all aspects of an industry are eligible for Perkins funds.

The Department assists secondary schools and postsecondary institutions with developing and offering all aspects of an industry including work-based learning.

The Department is committed to providing regular updates on the implementation of its approved ESSA Consolidated State Plan and the Future Ready PA Index. The Industry-Based Learning Indicator – one of six College and Career Measures on the Future Ready PA Index – evaluates how students are engaging in work- and classroom-based activities by 12th grade. Effective the 2017-18 school year, all LEAs began reporting student level data for this indicator; prior to 2017-18, data was limited to CTE students.

The Department supports the implementation of all aspects of the industry by providing guidelines and promising practices to schools.

- The Department has guidelines to help educators connect to business and establish advisory committees for CTE program. Business partners can help educators on program improvement and curriculum content, and support CTE programs through work-based learning experiences. [Advisory Committee Guidelines](#)
- The Department developed guidelines for implementing work-based learning to assist administrators and cooperative education teacher-coordinators in complying with federal and state laws regarding [cooperative education](#). The guidelines address regulations and operational issues that should be followed to ensure an effective work-based learning environment for all students.
- The Department's [Work-based Learning Toolkit](#) provides teachers and school administrators with a basic understanding of the many types of experiential learning and how to implement those programs into their schools.

Other resources are found on the CTE Resources website that support local collaboration such as promising practices on [engagement of business](#).

Forums such as the PDE Standards Aligned System (SAS) Institute highlight how education is connecting with employers and establishing career pathways that include work-based learning experiences. The SAS Institute has general and breakout sessions designed for postsecondary, secondary and business collaboration. The Department also uses state funds to support the development of business education platforms that connect students with employers. This includes speakers, work-based opportunities, and career exploration.

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.)

The Department will review the disaggregated data by Perkins recipient and by POS. This will allow the Department to identify POS areas that are successful and those that would benefit from Department resources. Targeted technical assistance will be designed and focused on improving the performance indicators and educational outcomes associated with special populations.

The Department is providing the special populations subgroup data to each Perkins recipient. This will

enable the recipients to evaluate their learners' performance on federal accountability measures and to review the data with their stakeholders. The Local Comprehensive Needs Assessment template will request information regarding special populations subgroup data. The recipients will identify the areas of strength and challenge. The recipients will identify action steps that will lead to improvement of student performance.

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.)

State regulation requires every approved secondary CTE program to articulate with a postsecondary CTE program. Each approved secondary CTE program demonstrates a planned process of curriculum development, instructional strategies and administrative procedures, which link educational agencies with other education agencies and with industries. The linkage helps students transition from a secondary school to postsecondary educational institution, or a registered apprenticeship without experiencing delays in or duplication of learning. During program evaluation and Perkins visits, the Department looks for seamless transition to ensure the maximum opportunity for student placement including opportunities for dual enrollment that promote acquisition of postsecondary credit while still in high school. Evidence includes articulation agreements and dual enrollment agreements. Because this is part of Department regulations and is a measure under the ESSA Career Ready Indicators, the Department will continue to support dual enrollment opportunities under Perkins V.

When the postsecondary Perkins recipient submits a local application, it will identify which Program(s) of Study it offers and identify dual enrollment agreements associated with the Programs of Study. The compliance visits will examine each dual enrollment agreement and student transcripts.

Current monitoring process looks for dual enrollment opportunity. When dual enrollment does not exist, the Department recommends that the Perkins recipient pursue the development of dual enrollment agreements/programs. Resources have been developed by the Department that can assist secondary and postsecondary recipients to develop dual enrollment agreements. The Department will work with recipients to identify promising practices around dual enrollment and disseminate the promising practices. Currently, the Department has developed a [toolkit](#) that has been disseminated on establishing dual enrollment.

CTCs may become postsecondary private licensed schools in Pennsylvania. Once the CTC obtains approval through the State Board of Private Licensed Schools, the CTC may establish dual enrollment opportunities for the students enrolled in the secondary CTE programs. The Department will continue to support CTCs that seek private licensure and will engage other CTCs to seek private licensure in areas where postsecondary opportunities are limited or do not exist.

The Department will continue to encourage current dual enrollment activities. Perkins postsecondary will work on dual enrollment with regional Perkins secondary recipients.

The Department will allow Perkins secondary recipients in areas where Perkins postsecondary recipients do not exist to work with non-Perkins postsecondary recipients to establish dual enrollment agreements. During Department on-site visits, the Department will verify that local dual enrollment agreements exist.

The Department collects data on dual enrollment, which is an indicator that is displayed on the Future Ready PA Index. Dual enrollment credit falls under the [Rigorous Courses of Study](#) indicator and is applicable to all secondary education.

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).

The Perkins V Statewide and Regional meetings held in 2019 engaged the required stakeholders. The participants provided input into the planning of the Perkins V 4-year state plan which also supports the planning and development of the CTE Programs of Study. The input received during the meetings has led to a revision of the statewide articulation agreement and method of developing the statewide Programs of Study. The State Plan process also provides opportunity for the stakeholders to provide public comment on the State Plan as well as the hearings.

Continued engagement of the required stakeholders will occur in a number of ways. After the 4-year state plan has been implemented for a 2-year period, the stakeholders will be re-engaged to evaluate the plan and actions taken during the first 2 years of implementation.

The local application guidelines ensure that at the local level each recipient engages the required stakeholders. The Department's review of the application as well as conducting on-site visits will ensure the required stakeholders are engaged in the planning, development, implementation and evaluation of the CTE Programs of Study.

The Department engages secondary teachers, postsecondary faculty and administrators in the development and revisions of the CTE Programs of Study. During the revision process, the committee members evaluate the implementation of the POS and plan the next steps in the revision of the POS. Department staff participate in several conferences (academic counselor/career guidance, CTE administrators, academic teachers, CTE teachers, paraprofessionals, parents, special education educators) to provide updates on the CTE Programs of Study and solicit their input in the planning, development and implementation. The input received during the update sessions leads to improved processes.

Department staff also participate on the Pennsylvania Apprenticeship Council and provide updates on the POS. The Council is comprised of labor union and business representatives. They are provided the opportunity to provide input into the planning, development and implementation of the POS.

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(v) of Perkins V.

See Appendix B for the Secondary Local Application template.

See Appendix C for the Postsecondary Local Application template.

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 3 for the requirements of the comprehensive local needs assessment under 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

See Appendix D.

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.

Size

Size is based on the number of CTE Programs of Study available at the eligible recipient, not on enrollment in a specific CTE program. To be eligible for funding, a Perkins recipient must have at least three CTE Programs of Study in not fewer than three different career fields, each of which must serve a minimum of eight students. An eligible recipient also must have laboratories and classrooms that are readily accessible to all students, as well as a non-discriminatory admissions policy that is board approved and implemented.

Scope

The scope of a CTE Program of Study is defined as a curriculum that covers all aspects of the industry and meets the criteria listed in the POS definition of Perkins V, including:

1. One secondary technical course per year is offered (definition of a course is 240 technical instructional hours);
2. Postsecondary programs will not have less than 50 percent occupational credit hours;
3. Secondary and postsecondary academic and technical content are aligned, leading to a sequence of courses that lead to nonduplicative course content offering;
4. Work-based learning opportunities are available to students; and
5. A credit articulation agreement exists between the secondary CTE Program of Study, and the corresponding postsecondary portion of the CTE Program of Study. A transcript review fee is acceptable, but a charge for the credits is not acceptable. When a statewide or local articulation agreement is not an option (i.e., due to restrictions set by a third party accreditor or lack of a secondary CIP), postsecondary institution(s) will engage secondary institution(s) in early postsecondary opportunities that prepare students to enroll in entry-level postsecondary coursework in their chosen major.

Quality

Quality of secondary programs of study is based on the state regulations for approved programs. See Title 22 Education, Chapters 4 and 339.

Quality is determined by examining the postsecondary database maintained by the Department for the 2021-2022 program year. Programs listed in the database have been approved by the institutions’ Board of Trustees, accrediting authorities (national, regional or program specific accrediting authorities, and PDE/State Board for Career and Technical Education).

Perkins postsecondary then will begin to enter program information in the electronic approval system and provide information on each program that Perkins V funds will support. This includes information on:

Labor Market Need, Summary of Comprehensive Needs Assessment, Program Content and Industry Standards, Student to Instructor Ratio, Equipment and Supplies, Safety Practices, Performance Indicators, Certifications Available to Students, Instructor Credentials.

I. Meeting the Needs of Special Populations

1. 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.**
- 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.**

Department regulations require Perkins recipients to have nondiscriminatory admissions policies, that state whether enrollment is unlimited or limited. If enrollment is limited, an admissions policy must include nondiscriminatory eligibility requirements for the purpose of predicting a student's success in each program. When the number of students predicted to be successful in each program is less than the number of openings available in that given program, the openings may be available to adults or students at another school district. When the number of students predicted to be successful in each program exceeds the number of openings available, the admissions policy must include a nondiscriminatory selection procedure, as required by current federal and state statutes, regulations, and guidelines. During compliance and technical assistance visits, Department staff verify admissions policies exist.

Additionally, if a selection procedure is necessary to select and reject qualified applicants, as judged by established and publicized eligibility requirements, the procedure shall be nondiscriminatory under the federal and state statutes and regulations and guidelines.

Recipients must develop a recruitment program and the program must include announcements concerning CTE and must exemplify freedom from occupational stereotypes and to the extent possible the philosophy of equal access.

The Department also requires guidance personnel to provide students the information necessary to make informed decisions regarding the selection of appropriate occupational programs and discuss the importance of high school academic achievement and postsecondary education and training to career success.

The Department visits recipients to ensure compliance with federal and state regulations. The regulations outline the expected standards of development, admission, and operation of quality career and technical education programs. The qualitative review ensures the Perkins recipients have designed the CTE programs to enable the special populations categories to enroll without discrimination and to prepare for

further education and training in occupations that are aligned to Pennsylvania industry sectors.

The Department's strategies also ensure technical assistance activities and professional development are inclusive of special populations and equity. These activities have been outlined in an earlier section.

The Department's review of Perkins recipients includes the on-site evaluation to determine that the admissions policy is nondiscriminatory. The Department also conducts Civil Rights reviews. The Department works with the U.S. Office for Civil Rights and has developed a review process that measures the compliance of the publicly funded programs with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973 amended in 1990 regulations and the Age Discrimination Act of 1975. The guidelines explain the civil rights responsibilities of recipients of federal financial assistance that offer or administer CTE programs. The Civil Rights on-site reviews focus on the identified Department regulations require approved secondary CTE programs to provide services and accommodations to disadvantaged, disabled or limited English-speaking students enrolled in CTE programs. The district of residence is required to provide services and accommodations in accordance with applicable law, service agreements and student IEPs. The Department examines specific evidence during on-site reviews and program evaluations, which includes student IEPs and service agreements.

Members of special populations are provided equal access to CTE Programs of Study (POS) and to the services available at the secondary schools and institutions of higher education. Each Perkins recipient has demonstrated that the POS they offer is preparing students for high-skill, high-wage or in-demand industry sectors or occupations. Department staff verify the alignment during the review of the applications as well as during on-site reviews. Annually, data will be provided to the Perkins recipients. They will review the data and ensure individuals in each special populations category are meeting or exceeding the SDLPs. If the individuals are not meeting SDLP the Perkins recipient identifies actions, it will take in the local application to improve performance of individuals who are members of special populations. The Department will review the actions, which could be the development or implementation of programs designed specifically for a category of special populations. If the actions appear to address the needs of the individuals, the local application will be approved. On-site monitoring of the Perkins recipient will ensure the approved program/actions are implanted and individuals are making meaningful progress. The recipients' annual performance report requires the recipient to explain how the SDLP was or was not met and what further actions will be taken to continue to demonstrate meaningful progress.

Additionally, the Department requires entities with approved secondary CTE programs to provide students adequate supports to meet academic standards as determined by Title 22, Chapter 4 Academic Standards and Assessments and, when applicable, consistent with the student's IEP, and that instruction in these academic areas at all school entities where the student is enrolled is appropriate to the chosen area of occupational training. Evidence that the Department examines during on-site reviews and approved program evaluations includes transcripts, course sequences, student IEPs, support plans, and operating agreements.

The Department will require the same expectations for any postsecondary recipient applying for a Perkins V grant. The postsecondary recipient must provide evidence that appropriate services and accommodations are available and provided to each special populations category.

Integrated setting means work in a job where the person with a disability is more likely to engage with

the co-workers who are not disabled. This contrasts to a job where most co-workers are persons with a disability as traditionally found in sheltered employment settings or federal/state 'set-aside' contracts for agencies that use and hire individuals with disability to perform the work. On-site monitoring will ensure the Perkins recipients include work-based learning for students and that students are in an integrated setting. The Department's approved program evaluation and approval/reapproval at the secondary level requires approved programs to provide work-based learning, which is learning associated with the CTE POS and is in an integrated setting. The approved program evaluation and Perkins on-site monitoring visits will ensure students with disability are engaged in integrated employment.

J. Preparing Teachers and Faculty

i. 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).

The Department has developed and implemented CTE teacher and administrator certification programs through contractual agreements with three state universities: Indiana University of Pennsylvania, The Pennsylvania State University, and Temple University. Each university operates a Professional Personnel Development Center to focus on the CTE teacher and administrator certifications. The Centers provide pre-service and in-service professional personnel development services for career and technical educators in the respective regions of the commonwealth. Each university ensures the certification programs are based on research and cover topics including curriculum development, integration, instructional practices, students with disabilities, English learners, parental and community involvement, Department initiatives, and current trends in education.

All teachers and administrators must hold either an instructional or career and technical I instructional certification to be employed in a Pennsylvania secondary school entity. State standards exist for teacher preparation programs and the programs must align to state standards and ensure the certification programs meet state regulations. The three Professional Personnel Development Centers prepare CTE teachers and administrators and recommend them to the Department for career and technical instructional certifications.

In all three regions of the state, Center staff hold regular meetings to share notes from the field and discuss topics of interest to the school. Also, professional development experiences are developed based on a comprehensive needs assessment with input from the following sources:

- a. Advisory groups made up of volunteers from the group for which the experience is intended.
- b. Evaluative data collected from previous participants in similar activities.

Professional development activities include:

- a. Opportunities to acquire new knowledge and skills related to the instructors' occupational area so they can provide dynamic, cutting-edge CTE instruction.
- b. Addressing the needs of special populations students.
- c. Discussions related to educational delivery methods and instructional techniques.
- d. Resources and current information on PDE BCTE initiatives.
- e. Collaborations and networking opportunities with other education professionals.

In addition, career and technical educators are provided with technical training on how to access, select, develop, and implement curricula materials that support statewide programs of study and rigorous challenging programs; career pathways; scope and sequence of courses, in accordance with Chapter 339; industry standards; articulation agreements; and other state and federal mandates.

The professional development activities are designed to enhance the knowledge, academic integration proficiency, and skills or capabilities of career and technical instructors. For example, the following objectives are important in determining professional development programming:

- a. Engage the teacher-learner, rather than rely on PowerPoint presentations.
- b. When possible, conduct on-going group activities, rather than stand-alone workshops.
- c. Create events that meet the needs of all teachers, including incumbents.
- d. Promote teacher involvement in Domain 4 (Professional Responsibilities) of the PA Framework for Effective Educators.
- e. Complement, but not duplicate, PDE BCTE initiatives and objectives of the Technical Assistance Program or the Integrated Learning Conference.

The Department continues its partnership with PACTA. The partnership includes the Department's support and input into professional development that leads to viable professional development and technical assistance for instructors and administrators in CTE settings. PACTA representatives also serve on the BCTE's strategic planning committee and assist in identifying action steps for the BCTE, with PACTA's assistance, can take to improve student academic and technical achievement, increase business engagement, develop K-12 pathways, serve special populations students, address academic and technical proficiency, and expand career development.

The Department's BCTE conducts the annual Integrated Learning Conference: The School to Career Connection. This conference highlights academic and technical integration strategies. The conference is designed to share successful strategies that encourage the implementation of educational initiatives that enhance learning opportunities for all students. Over 75 concurrent sessions, three pre-conference workshops, and a variety of meetings and professional development activities are scheduled during the conference.

More than 500 participants attend the conference including instructors, administrators, counselors, postsecondary partners, and exhibitors. Presenters cover instructional strategies and showcase promising practices of career and technical education programs that improve the academic and technical skills of students through the integration of academics with career and technical education.

The Technical Assistance Program provides sustained professional development to postsecondary and secondary recipients. The sessions are inclusive of paraprofessionals, teachers, administrators and postsecondary faculty.

(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 for each eligible recipient 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 for each eligible recipient 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)

(C) 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) If the eligible agency will award reserve funds to eligible recipients under section 112(c) of Perkins V, describe the process and criteria for awarding those funds.

(9) 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)

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)

Each eligible agency will submit a local application to the Department that includes a section focused on academic achievement. The eligible recipient will use information from the local needs assessment to identify needs specific to the recipient's students' academic achievement and determine action steps that will increase student performance. Academic achievement is not a postsecondary performance measure but will still be part of the local application and requirement for receipt of Perkins V funding. The Department's process includes program approval outlined in the previous section and data collection related to student attainment for each Perkins recipient.

Approved CTE programs are required to be aligned to industry standards. The standards are those established by state or national trade or professional organizations or state or federal regulatory bodies accepted by the Department that describe what learners should know and be able to do and describe how well learners should know or be able to perform a task in a specific occupation.

The Department's process includes program approval outlined in the previous section and annual data collection related to student skill attainment including the collection of students earning a recognized postsecondary credential for each Perkins recipient.

The results of the comprehensive local needs assessment (CLNA) are part of the local application. The criteria the Department will use to ensure recipients are meeting local economic and education needs will be based on the review of the results of the CLNA.

Specific criteria for assessing the extent that the local application will promote continuous improvement in academic achievement and technical skill attainment are as follows:

Secondary Criteria

- The action plan demonstrates meaningful progress on performance indicators including all subgroups. These are the activities that will be carried out during the current fiscal year.
- The end-of-year performance report demonstrates meaningful progress on performance indicators including all subgroups. The performance report explains how the grant recipient implemented activities to demonstrate meaningful progress.

Postsecondary Criteria

- Student learning outcomes are demonstrating continuous improvement in academic achievement and technical skill attainment. E-grant/local application include student learning outcomes provided to accreditor(s).

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)

Funds received under Section 111 for allocations to secondary and postsecondary eligible recipients are divided as follows: 70 percent to secondary recipients, 30 percent to postsecondary recipients. This funding ratio was determined by the following criteria.

1. History of set aside amounts.
2. Number of career and technical enrollees.
3. Number of career and technical programs.
4. Consideration of full-time and part-time enrollment.
5. Consideration of overlap of facilities for programs.
6. Amounts of other state/federal reimbursement.
7. Stakeholder input.

During the state and regional stakeholders meeting the current split of funds was discussed. The discussion included how the secondary and postsecondary recipients are supported by state funds, local tax dollars, and tuition funds. The Department has accepted the conclusion of the discussion and is retaining the current split of funds. Secondary Perkins recipients will receive 70 percent of the allocation and postsecondary recipients including the adult recipients will receive 30 percent of the allocation. Secondary CTE begins with the all aspects of the industry and leads to technical skills that enable secondary students to sit for credential exams. Secondary students also learn and gain technical skills to the extent that through the POS, they earn college credits for the high school technical courses. The funding amounts serve a greater geographical area and is a greater means of developing a pipeline to postsecondary experiences (apprenticeship, certificate, or degree) for high school graduates (apprenticeship, certificate, or degree).

All Perkins recipients (secondary and postsecondary) must align the academic and technical programs. The alignment is accomplished through the Department's statewide articulation agreements and through local articulation agreements where statewide agreements do not exist. The statewide agreement allows a high school graduate in eastern Pennsylvania to enroll in an institution of higher education located anywhere in the state if there is a direct program to program (carpentry to carpentry) offering. Therefore, there isn't a need for local or regional consortia to form. Statewide and local agreements and early postsecondary opportunities provides additional opportunities for students. This means each eligible Perkins recipient (secondary and postsecondary) remains an eligible agency and consortia are not formed. Because consortia are not formed, a consortia formula will not be developed and implemented.

3. For the upcoming program year, provide the specific dollar allocations for each eligible recipient 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)

Allocation total will be updated once USDE releases a state allocation amount.

During the 2020-2021 program school year, \$26,843,412 will be made available to secondary consortia. Pennsylvania will continue to utilize the current formula to allocate Perkins funds to the local consortia, as USDE approved the formula and deemed it to be an objective and equitable means of allocating the funds.

Allocations are calculated based on the following formula:

- a. After elimination criteria, calculate the percentage of individual population age 5-17 by dividing the individual population age 5-17 by state total population age 5-17.
- b. Calculate the percentage of poverty age 5-17 by dividing individual poverty for age 5-17 by state total poverty for age 5-17.
- c. 70% allocation = poverty percentage × (allocation amount × 0.7)
- d. 30% allocation = individual population percentage × (allocation amount × 0.3)
- e. Total allocation = 70% allocation + 30% allocation

Allocations are summed and enrollments collected using PIMS, the state longitudinal data system for education data, and a unique identification number for each student.

Percentages of total student enrollments for each member of the consortia are collected by dividing each individual member of the consortia against the total number of all enrollments within the consortia to get a final percentage for each school. Total allocation then is divided by this percentage and allocated to the consortium fiscal agent. A consortia file is generated from the PDE Office of Data Quality, which drives the distribution to the fiscal agent.

Fiscal Agent	Tentative Allocation 2019-2020
A W Beattie Career Center	\$292,611
Admiral Peary AVTS	\$138,133
Beaver County CTC	\$320,444
Bedford County Technical Center	\$83,351
Berks CTC	\$513,200
Bermudian Springs SD	\$18,883
Bethlehem AVTS	\$343,406
Bradford Area SD	\$49,315
Bucks County Technical High School	\$419,335
Butler County AVTS	\$264,859
Carbon Career & Technical Institute	\$136,681
Career Institute of Technology	\$278,129
Carlisle Area SD	\$68,954

Fiscal Agent	Tentative Allocation 2019-2020
Central Montco Technical High School	\$282,996
Central PA Institute of Science & Technology	\$107,341
Central Westmoreland CTC	\$340,666
Chester County IU 24	\$770,368
Clarion County Career Center	\$102,407
Clearfield County CTC	\$128,226
Columbia-Montour AVTS	\$176,099
Connellsville Area Career & Technical Center	\$104,921
Corry Area SD	\$54,756
Crawford County CTC	\$168,142
CTC of Lackawanna County	\$517,183
Cumberland Perry AVTS	\$470,302
Dauphin County Technical School	\$658,965
Delaware County Technical High School	\$1,066,579
Delaware Valley SD	\$47,480
Eastern Center for Arts & Technology	\$268,854
Eastern Westmoreland CTC	\$110,134
Erie City SD	\$407,395
Erie County Technical School	\$338,736
Fayette County Career & Technical Institute	\$256,623
Forbes Road CTC	\$439,358
Franklin County CTC	\$352,573
Fulton County AVTS	\$32,523
Gettysburg Area SD	\$108,860
Greater Altoona CTC	\$289,451
Greater Johnstown CTC	\$115,826
Greater Johnstown SD	\$108,668
Greene County CTC	\$85,590
Hazleton Area Career Center	\$237,386
Huntingdon County CTC	\$102,604
Indiana County Technology Center	\$165,586
Jefferson County-DuBois AVTS	\$188,579
Jersey Shore Area SD	\$38,781
Keystone Central CTC	\$91,663
Lancaster County CTC	\$918,684
Lancaster SD	\$220,841
Lawrence County CTC	\$214,190
Lebanon County CTC	\$303,790
Lehigh Career and Technical Institute	\$909,040
Lenape Tech	\$142,090
Lycoming CTC	\$100,500
McKeesport Area Tech Center	\$97,541
Mercer County Career Center	\$258,136

Fiscal Agent	Tentative Allocation 2019-2020
Middle Bucks Institute of Technology	\$286,594
Mifflin County Academy of Science and Tech	\$179,256
Milton Area SD	\$35,418
Mon Valley CTC	\$143,471
Monroe Career & Tech Inst \$367,047	\$367,047
North Montco Tech Career Center	\$315,298
Northern Bedford County SD	\$15,789
Northern Tier Career Center	\$185,538
Northern Tioga SD	\$36,536
Northern Westmoreland CTC	\$135,064
Northumberland County CTC	\$99,246
Parkway West CTC	\$351,927
Philadelphia City SD	\$5,394,673
Pittsburgh SD	\$695,763
Pottstown SD	\$71,279
Reading Muhlenberg CTC	\$525,047
Saint Marys Area SD	\$29,021
Schuylkill Technology Centers	\$294,032
Selinsgrove Area SD	\$30,049
Seneca Highlands IU 9	\$120,700
Somerset County Technology Center	\$134,788
State College Area SD	\$74,168
Steel Center for Career and Technical Education	\$328,555
SUN Area Technical Institute	\$168,510
Susquehanna County CTC	\$119,738
Tunkhannock Area SD	\$25,118
Tyrone Area SD	\$16,699
Universal Audenried Charter School	\$366,764
Upper Bucks County Technical School	\$132,222
Upper Dauphin Area SD	\$27,621
Venango Technology Center	\$169,051
Wallenpaupack Area SD	\$43,779
Warren County AVTS	\$97,443
Wayne Highlands SD	\$40,011
Wellsboro Area SD	\$34,853
West Side CTC	\$227,029
Western Area CTC	\$214,665
Western Montgomery CTC	\$131,255
Wilkes-Barre Area CTC	\$436,562
Williamsport Area SD	\$141,168
York Co School of Technology	\$767,891
TOTAL	\$27,862,822

4. For the upcoming program year, provide the specific dollar allocations for each eligible recipient 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.

During the 2020-2021 program year, \$11,504,320 will be made available to postsecondary institutions. Allocation distribution is based on a percentage derived by dividing the individual number of each institution’s student career and technical Pell count by the total number of career and technical Pell counts for all postsecondary and adult CTE programs. The percentage of career and technical Pell per institution is then applied against the total allocation awarded to the state producing a percentage of the total to be allocated to each individual postsecondary and adult CTE program.

Allocation = (# of student career and technical Pell students at the institution ÷ Sum of career and technical Pell students for all postsecondary and adult CTE programs) × Allocation Amount

Fiscal Agent	Tentative Allocation 2019-2020
Bucks Co CC/ Main	\$135,052
Butler County Community Coll	\$143,514
Central PA Institute of Science & Technology	\$123,544
Community Coll of Allegheny Co	\$1,058,075
Community College of Beaver Co	\$263,334
Community College of Phila	\$1,929,310
Delaware County Community Coll	\$320,198
Greater Altoona CTC	\$106,620
HACC/ Main	\$1,082,783
Harcum College	\$359,461
Johnson College	\$89,019
Lackawanna College	\$258,595
Lancaster County CTC	\$225,086
Lehigh Carbon Community Coll	\$648,858
Lenape Tech	\$174,653
Luzerne County Community Coll	\$493,497
Manor College	\$69,387
Mercyhurst University	\$145,883
Montgomery County CC/ Main	\$615,010
Mount Aloysius College	\$74,465
Northampton Community College/ Main	\$667,474
Orleans Technical College	\$99,850
Peirce College	\$171,946
Penn College/PSU Affiliate	\$371,308
Pennsylvania Highlands Community College	\$145,206
Pennsylvania Inst of Tech	\$149,945
Pittsburgh Technical College	\$545,284
Reading Area Community College	\$527,006
Rosedale Technical College	\$121,174

Fiscal Agent	Tentative Allocation 2019-2020
Thaddeus Stevens Coll of Tech	\$189,546
Westmoreland County CC	\$522,945
Wilkes-Barre Area CTC	\$93,419
TOTAL	\$11,921,447

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.)

Distribution of funds is based on the formula. When a school district boundary changes, the formula is adjusted to reflect the changes. The formula is adjusted for the following program year and reflects the correct Census and enrollment data associated with the changed boundary.

The Department does not have local education agencies with Department approved CTE programs without geographical boundaries.

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).

Pennsylvania's current funding process meets the federal requirements and is viewed as the most equitable means of distributing the funds. Therefore, the Department is not seeking a waiver to the secondary allocation and did not request a waiver under 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).

Pennsylvania's current process meets the federal requirements and is viewed as the most equitable way of serving the students who can benefit from the allocation. Therefore, the Department is not seeking a waiver to the postsecondary allocation and did not seek a waiver under Perkins IV.

8. If the eligible agency will award reserve funds to eligible recipients under section 112(c) of Perkins V, describe the process and criteria for awarding those funds.

Pennsylvania is not electing to award reserve funds.

9. 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)

The 2017-18 fiscal effort per student was \$974.27.

Due to an increase in the 2019-20 Perkins State Allocation and based on guidance from USDE, Pennsylvania is not seeking to establish a new baseline for fiscal effort.

(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 workbased learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

(2) 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.

(3) 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.

The Department, working with the state and regional stakeholders committee, has decided to select the program quality indicator that examines the percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.

Numerator: Number of CTE concentrators who graduated from high school having attained a recognized postsecondary credential

Denominator: Number of CTE concentrators who graduated from high school.

Calculation: Match the 2018-19 CTE students with 480 or more cumulative hours who graduated to the last four years of CTE Industry Certification data. Determine the percent of students with a credential.

Source: CTE Industry Certification and CTE Student Fact in PIMS

The Department has also decided to retain the Perkins IV indicator for technical skill attainment.

This indicator examines the percentage of CTE concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Assessments, or other PDE approved tests in the reporting year.

Numerator: Number of graduating career and technical education concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Specific Assessments or achieve competency on other PDE approved tests in the reporting year.

Denominator: Number of graduating career and technical education concentrators who complete the NOCTI Job Ready Occupational Specific Assessments or other PDE approved tests in the reporting year.

Calculation: Match the 2018-19 CTE students with 480 or more cumulative hours who graduated to the NOCTI-NIMS data. Determine the percent of students who achieved a level of competent or advanced.

Source: NOCTI-NIMS Collection and CTE Student Fact in PIMS

(4) 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)

(5) 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).

(6) 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.

1. **To determine the State Determined Levels of Performance, the Department and assessment specialists met and developed an hour-based definition of a course. Completion of a course is defined as completing 240 technical instructional hours. A concentrator then is a CTE student who has completed two CTE courses or 480 technical instructional hours in a Department approved secondary CTE program. The school year in Pennsylvania is 990 instructional hours, and CTE enrollment is defined as more than one hour per day for full-time study. The team decided to present the SDLP as percentages. The team ensured the data provided are objective, quantifiable and measurable. In order to ensure the state makes meaningful progress, the team assisted the Department in defining meaningful progress. To determine meaningful progress, the Department formed a team of assessment professionals who had worked on the ESSA Plan. The work included performance level targeting using the meaningful progress standard. This team performed various scenarios using student level data from the Pennsylvania Information Management System (PIMS) data from previous years to model indicator methodology and meaningful progress targeting. Upon review of the scenarios, the team recommended to use the halfway to 100 percent over 12 years as the meaningful progress standard to apply to all Perkins V indicator baselines.**

As required data from states that have similar CTE programs, instruction, services, and comparable CTE concentrators was reviewed. The review considered how their levels of

performance aligned to Pennsylvania’s level of performance on the Perkins IV indicators. Data from New York, Ohio, Oklahoma, Virginia, and West Virginia were examined. These states were chosen because they established area CTCs, programs offered, definitions used, calculations and methodologies used. New York and Virginia have over 250,000 concentrators. West Virginia has approximately 20,000 concentrators compared to 40,000 to 100,000 concentrators in Oklahoma, Ohio and Pennsylvania. Pennsylvania has a student level data collection system. Methodology used by each state appears to be similar. The levels of performance vary except for Pennsylvania and Oklahoma. Based on the comparison, the Department’s established the SDPLs. Stakeholders were consulted pursuant to Section 113 of Strengthening Career and Technical Education for the 21st Century Act in order to develop the levels of performance. The Department provided proposed state levels of performance for Career and Technical Education (CTE) required indicators on November 22, 2019 and through December 6, 2019, requested written comments and input on the proposed goals for each indicator. The materials provided to the stakeholders explained the process for establishing the baseline for each accountability indicator and included the baseline for each indicator. Additionally, the stakeholders group was invited to participate in a meeting where the Department explained the process for establishing the baseline for each indicator and for establishing the SDPL. For those interested in discussing, raising questions or concerns, or offering comments on the process and baselines, they attended the meeting on December 3, 2019. During the meeting each of the performance indicators and the method used for establishing a baseline for each indicator was reviewed and discussed. The Department reviewed the initial comments on the preliminary SDPLs to develop and establish the levels. The SDPLs were subject to the public comment process described in Section 113 and the Department includes in this plan written response to comment provided by the stakeholders.

The final draft proposed levels were disseminated to the stakeholders for their review on December 17, 2019. Stakeholders were asked to review each indicator and provide written comment by December 27, 2019. The stakeholders were asked to review the process and baseline and provide written comment regarding either. Stakeholders were asked to submit written comments regarding how the established levels of performance:

- 1. Meet the requirements of the law;*
- 2. Support the improvement of performance for all CTE concentrators including each subgroup of students and special population; and*
- 3. Support the needs of the local education and business community.*

The Department gathered written public comments on the SDPL and baseline for each indicator through designated PDE email account. The email address was posted on the Department’s website and was provided to all stakeholders. Written stakeholder comments and the Department’s response are found in Appendix E. As a result of stakeholder comments, the Department revised the SDPLs before bringing forward a final set of proposed goals for a second opportunity for public comment when the full draft state plan was released.

The SDPLs also reflect the Department’s Perkins V goals.

- (6) 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.*

Written stakeholder comments and the Department’s response are found in Appendix E.

The Department modified three SDPL based on stakeholder feedback. Academic Proficiency in Science is not an accountability measure under Perkins V, nor are results on the Science assessment included in the federal accountability system required by ESSA, so it will not be required. Working with the U.S. Department of Education, it was determined to establish 25 percent as the target for the non-traditional indicators. For both the secondary and postsecondary Non-traditional Program Concentration indicator, the Department has developed a Performance Target Increment of .43 for Secondary Non-Traditional Program Concentration and .15 Performance Target Increment for Postsecondary Non-Traditional Program Concentration.

(8) 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),²⁶ 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.

- 1. The Department will analyze state level data to determine gaps and disparities between subgroups. The Department will also analyze secondary and postsecondary recipient data to determine which fiscal agents have the smallest and largest disparities to determine relevant best practices to publish and present at the Perkins workshops and technical assistance efforts. The Technical Assistance Program (TAP) will include activities that support closing gaps in performance for the subgroups. Currently the Department looks at each special populations category by accountability measure. The TAP activities are focused on closing the gaps and disparities among the various subgroups. TAP has been described in an earlier section of the State plan, and TAP services are evidence based.**

b The eligible agency assures that:

1. It made the State plan publicly available for public comment^[2] for a period of not less than 30 days, by electronic means and in an easily accessible format, prior to submission to the Secretary for approval and such public comments were considered in the development of this State plan. (Section 122(a)(4) of Perkins V.)
2. It will use the funds to promote preparation for high-skill, high-wage, or in-demand industry sectors or occupations and non-traditional fields, as identified by the State. (Section 122(d)(13)(C) of Perkins V.)
3. It will provide local educational agencies, area career and technical education schools, and eligible institutions in the State with technical assistance, including technical assistance on how to close gaps in student participation and performance in career and technical education programs. (section 122(d)(13)(E) of Perkins V.)
4. It will comply with the requirements of this Act and the provisions of the State plan, including the provision of a financial audit of funds received under this Act, which may be included as part of an audit of other Federal or State programs. (Section 122(d)(13)(A) of Perkins V.)

5. None of the funds expended under this Act will be used to acquire equipment (including computer software) in any instance in which such acquisition results in a direct financial benefit to any organization representing the interests of the acquiring entity or the employees of the acquiring entity, or any affiliate of such an organization. (Section 122(d)(13)(B) of Perkins V.)
6. It will use the funds provided under this Act to implement career and technical education programs and programs of study for individuals in State correctional institutions, including juvenile justice facilities. (Section 122 (d)(13)(D) of Perkins V.)

1.

b By submitting a Perkins V State Plan, consistent with 34 CFR 76.104, the eligible agency certifies that:

1. It is eligible to submit the Perkins State plan.
2. It has authority under State law to perform the functions of the State under the Perkins program(s).
3. It legally may carry out each provision of the plan.
4. All provisions of the plan are consistent with State law.
5. A State officer, specified by title in Item C on the Cover Page, has authority under State law to receive, hold, and disburse Federal funds made available under the plan.
6. The State officer who submits the plan, specified by title in Item C on the Cover Page, has authority to submit the plan.
7. The entity has adopted or otherwise formally approved the plan.
8. The plan is the basis for State operation and administration of the Perkins program.

1.

b The eligible agency certifies and assures compliance with the following enclosed forms:

1. [Assurances for Non-Construction Programs \(SF 424B\) Form \(OMB Control No. 0348-0040\).](#)
2. Disclosure of Lobbying Activities (SF LLL) (OMB Control No. 4040-0013).[\[3\]](#)
3. [Certification Regarding Lobbying \(ED 80-0013 Form\).](#)
4. [General Education Provisions Act \(GEPA\) 427 Form \(OMB Control No. 1894-0005\).](#)

[\[1\]](#) See page 11 of the [Committee Report](#).

[\[2\]](#) An eligible agency that submits a 1-Year Transition Plan in FY 2019 is not required to hold a public comment period on the 1-Year Transition Plan. Such agency must assure that it meets this public comment requirement prior to submitting its Perkins V State Plan in FY 2020.

[\[3\]https://apply07.grants.gov/apply/forms/sample/SFLLL_1_2-V1.2.pdf](https://apply07.grants.gov/apply/forms/sample/SFLLL_1_2-V1.2.pdf)

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)

2. 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.

3. 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.

The Department, working with the state and regional stakeholders committee, has decided to select the program quality indicator that examines the percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.

Numerator: Number of CTE concentrators who graduated from high school having attained a recognized postsecondary credential (industry-recognized certificate, apprenticeship completion certificate, professional license, or degree).

Denominator: Number of CTE concentrators who graduated from high school.

Calculation: Match the 2018-19 CTE students with 480 or more cumulative hours who graduated to the last four years of CTE Industry Certification data. Determine the percent of students with a credential.

Source: CTE Industry Certification and CTE Student Fact in PIMS

The Department has also decided to retain the Perkins IV indicator for technical skill attainment. This indicator examines the percentage of CTE concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Assessments, or other PDE approved tests in the reporting year.

Numerator: Number of graduating career and technical education concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Specific Assessments or achieve competency on other PDE approved tests in the reporting year.

Denominator: Number of graduating career and technical education concentrators who complete the NOCTI Job Ready Occupational Specific Assessments or other PDE approved tests in the reporting year.

Calculation: Match the 2018-19 CTE students with 480 or more cumulative hours who graduated to the NOCTI-NIMS data. Determine the percent of students who achieved a level of competent or advanced.

Source: NOCTI-NIMS Collection and CTE Student Fact in PIMS

4. 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)

5. 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.

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.)

6. 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.

To determine the State Determined Levels of Performance, the Department and assessment specialists met and developed an hour-based definition of a course. Completion of a course is defined as completing 240 technical instructional hours. A concentrator then is a CTE student who has completed two CTE courses or 480 technical instructional hours in a Department approved secondary CTE program. The school year in Pennsylvania is 990 instructional hours, and CTE enrollment is defined as more than one hour per day for full-time study.

The team decided to present the SDLP as percentages. The team ensured the data provided are objective, quantifiable and measurable.

In order to ensure the state makes meaningful progress, the team assisted the Department in defining meaningful progress. To determine meaningful progress, the Department formed a team of assessment professionals who had worked on the ESSA Plan. The work included performance level targeting using the meaningful progress standard. This team performed various scenarios using student level data from the Pennsylvania Information Management System (PIMS) data from previous years to model indicator methodology and meaningful progress targeting. Upon review of the scenarios, the team recommended to use the halfway to 100 percent over 12 years as the meaningful progress standard to apply to all Perkins V indicator baselines.

As required data from states that have similar CTE programs, instruction, services, and comparable CTE concentrators was reviewed. The review considered how their levels of performance aligned to Pennsylvania's level of performance on the Perkins IV indicators. Data from New York, Ohio, Oklahoma, Virginia, and West Virginia were examined.

These states were chosen because they established area CTCs, programs offered, definitions used, calculations and methodologies used. New York and Virginia have over 250,000 concentrators. West Virginia has approximately 20,000 concentrators compared to 40,000 to 100,000 concentrators in Oklahoma, Ohio and Pennsylvania. Pennsylvania has a student level data collection system. Methodology used by each state appears to be similar. The levels of performance vary except for Pennsylvania and Oklahoma. Based on the comparison, the Department's established the SDPLs.

Stakeholders were consulted pursuant to Section 113 of Strengthening Career and Technical Education for the 21st Century Act in order to develop the levels of performance. The Department provided proposed state levels of performance for Career and Technical Education (CTE) required indicators on November 22, 2019 and through December 6, 2019, requested written comments and input on the proposed goals for each indicator. The materials provided to the stakeholders explained the process for

establishing the baseline for each accountability indicator and included the baseline for each indicator.

Additionally, the stakeholders group was invited to participate in a meeting where the Department explained the process for establishing the baseline for each indicator and for establishing the SDPL. For those interested in discussing, raising questions or concerns, or offering comments on the process and baselines, they attended the meeting on December 3, 2019. During the meeting each of the performance indicators and the method used for establishing a baseline for each indicator was reviewed and discussed. The Department reviewed the initial comments on the preliminary SDPLs to develop and establish the levels. The SDPLs were subject to the public comment process described in Section 113 and the Department includes in this plan written response to comment provided by the stakeholders.

The final draft proposed levels were disseminated to the stakeholders for their review on December 17, 2019. Stakeholders were asked to review each indicator and provide written comment by December 27, 2019. The stakeholders were asked to review the process and baseline and provide written comment regarding either. Stakeholders were asked to submit written comments regarding how the established levels of performance:

1. Meet the requirements of the law;
2. Support the improvement of performance for all CTE concentrators including each subgroup of students and special population; and
3. Support the needs of the local education and business community.

The Department gathered written public comments on the SDPL and baseline for each indicator through designated PDE email account. The email address was posted on the Department's website and was provided to all stakeholders. Written stakeholder comments and the Department's response are found in Appendix E. As a result of stakeholder comments, the Department revised the SDPLs before bringing forward a final set of proposed goals for a second opportunity for public comment when the full draft state plan was released.

The SDPLs also reflect the Department's Perkins V goals.

7. 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.

Written stakeholder comments and the Department's response are found in Appendix E.

The Department modified three SDPL based on stakeholder feedback. Academic Proficiency in Science is not an accountability measure under Perkins V, nor are results on the Science assessment included in the federal accountability system required by ESSA, so it will not be required. Working with the U.S. Department of Education, it was determined to establish 25 percent as the target for the non-traditional indicators. For both the secondary and postsecondary Non-traditional Program Concentration indicator, the Department has developed a Performance Target Increment of .43 for Secondary Non-Traditional Program Concentration and .15 Performance Target Increment for Postsecondary Non-Traditional Program Concentration.

8. 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)⁶, 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.

The Department will analyze state level data to determine gaps and disparities between subgroups. The Department will also analyze secondary and postsecondary recipient data to determine which fiscal agents have the smallest and largest disparities to determine relevant best practices to publish and present at the Perkins workshops and technical assistance efforts.

The Technical Assistance Program (TAP) will include activities that support closing gaps in performance for the subgroups. Currently the Department looks at each special populations category by accountability measure. The TAP activities are focused on closing the gaps and disparities among the various subgroups. TAP has been described in an earlier section of the State plan, and TAP services are evidence based.

Assurances, Certifications, and Other Forms

Statutory Assurances

The eligible agency assures that:

1. It made the State plan publicly available for public comment⁷ for a period of not less than 30 days, by electronic means and in an easily accessible format, prior to submission to the Secretary for approval and such public comments were considered in the development of this State plan. (Section 122(a)(4) of Perkins V.)
2. It will use the funds to promote preparation for high-skill, high-wage, or in-demand industry sectors or occupations and non-traditional fields, as identified by the State. (Section 122(d)(13)(C) of Perkins V.)
3. It will provide local educational agencies, area career and technical education schools, and eligible institutions in the State with technical assistance, including technical assistance on how to close gaps in student participation and performance in career and technical education programs. (section 122(d)(13)(E) of Perkins V.)
4. It will comply with the requirements of this Act and the provisions of the State plan, including the provision of a financial audit of funds received under this Act, which may be included as part of an audit of other Federal or State programs. (Section 122(d)(13)(A) of Perkins V.)
5. None of the funds expended under this Act will be used to acquire equipment (including computer software) in any instance in which such acquisition results in a direct financial benefit to any organization representing the interests of the acquiring entity or the employees of the acquiring entity, or any affiliate of such an organization. (Section 122(d)(13)(B) of Perkins V.)
6. It will use the funds provided under this Act to implement career and technical education programs and programs of study for individuals in State correctional institutions, including

⁶ See page 11 of the [Committee Report](#).

⁷ An eligible agency that submits a 1-Year Transition Plan in FY 2019 is not required to hold a public comment period on the 1-Year Transition Plan. Such agency must assure that it meets this public comment requirement prior to submitting its Perkins V State Plan in FY 2020.

juvenile justice facilities. (Section 122 (d)(13)(D) of Perkins V.)

EDGAR Certifications

By submitting a Perkins V State Plan, consistent with 34 CFR 76.104, the eligible agency certifies that:

1. It is eligible to submit the Perkins State plan.
2. It has authority under State law to perform the functions of the State under the Perkins program(s).
3. It legally may carry out each provision of the plan.
4. All provisions of the plan are consistent with State law.
5. A State officer, specified by title in Item C on the Cover Page, has authority under State law to receive, hold, and disburse Federal funds made available under the plan.
6. The State officer who submits the plan, specified by title in Item C on the Cover Page, has authority to submit the plan.
7. The entity has adopted or otherwise formally approved the plan.
8. The plan is the basis for State operation and administration of the Perkins program.

Other Forms

The eligible agency certifies and assures compliance with the following enclosed forms:

1. [Assurances for Non-Construction Programs \(SF 424B\) Form \(OMB Control No. 0348-0040\)](#).
2. Disclosure of Lobbying Activities (SF LLL) (OMB Control No. 4040-0013).⁸
3. [Certification Regarding Lobbying \(ED 80-0013 Form\)](#).
4. [General Education Provisions Act \(GEPA\) 427 Form \(OMB Control No. 1894-0005\)](#).

Budget

Instructions

1. On the form in Item IV.B below, provide a budget for the upcoming fiscal year. As you prepare your budget, refer to the statutory descriptions and assurances in Section II.C and Section III.A, respectively, of this guide.
2. In completing the budget form, provide:
 - a. Line 1: The total amount of funds allocated to the eligible agency under section 112(a) of Perkins V. This amount should correspond to the amount of funds noted in the Department's program memorandum with estimated State allocations for the fiscal year.
 - b. Line 2: The amount of funds made available to carry out the administration of the State plan under section 112(a)(3). The percent should equal not more than 5 percent of the funds allocated to the eligible agency as noted on Line 1, or \$250,000, whichever is greater.
 - c. Line 3: The amount of funds made available to carry out State leadership activities under section 112(a)(2) of Perkins V. The percent should equal not more than 10 percent of the funds allocated to the eligible agency as noted on Line 1.
 - d. Line 4: The percent and amount of funds made available to serve individuals in State institutions, such as: (a) correctional institutions; (b) juvenile justice facilities; and (c) educational institutions that serve individuals with disabilities pursuant to section 112(a)(2)(A) of Perkins V. The percent of funds should equal not more than 2 percent of the funds allocated to the eligible agency as noted on Line 1.

⁸ https://apply07.grants.gov/apply/forms/sample/SFLLL_1_2-V1.2.pdf

- e. Line 5: The amount of funds to be made available for services that prepare individuals for non-traditional fields pursuant to section 112(a)(2)(B) of Perkins V. The amount of funds should be not less than \$60,000 and not more than \$150,000.
- f. Line 6: The amount of funds to be made available for the recruitment of special populations to enroll in career and technical education programs pursuant to section 112(a)(2)(C) of Perkins V. The percent of funds shall not be less than the lesser of an amount equal to 0.1 percent of the funds made available by the eligible agency for State leadership activities as noted on Line 3, or \$50,000.
- g. Line 7: The percent and amount of funds to be made available to eligible recipients [local education agencies (secondary recipients) and institutions of higher education (postsecondary recipients)] pursuant to section 112(a)(1) of Perkins V. The percent of funds should be not less than 85 percent of the funds allocated to the eligible agency as noted on Line 1.
- h. Line 8: The percent and amount, if any, of funds to be reserved and made available to eligible recipients under section 112(c) of Perkins V. The percent of funds should be not more than 15 percent of the 85 percent of funds noted on Line 7.
- i. Line 9: The percent and amount, if any, of funds to be reserved and made available to secondary recipients under section 112(c) of Perkins V.
- j. Line 10: The percentage and amount, if any, of funds to be reserved and made available to postsecondary recipients under section 112(c) of Perkins V.
- k. Line 11: The percent and amount of funds to be made available to eligible recipients under section 112(a)(1) of Perkins V. The percent and amount of funds should represent the funds remaining after subtracting any reserve as noted on Line 8.
- l. Line 12: The percent and amount of funds to be distributed to secondary recipients under the allocation formula described in section 131 of Perkins V.
- m. Line 13: The percent and amount of funds to be distributed to postsecondary recipients under the allocation formula described in section 132 of Perkins V.
- n. Line 14: The amount of funds to be made available for the State administration match requirement under section 112(b) of Perkins. The amount of funds shall be provided from non-Federal sources and on a dollar-for-dollar basis.

Budget Form

State Name: Pennsylvania

Fiscal Year (FY): 2020-2021

Line Number	Budget Item	Percent of Funds	Amount of Funds
1	Total Perkins V Allocation	Not applicable	\$45,114,979
2	State Administration	5%	\$2,255,749
3	State Leadership	10%	\$4,511,498
4	Individuals in State Institutions	0.9%	\$406,035
4a	Correctional Institutions	Not required	\$406,035
4b	Juvenile Justice Facilities	Not required	\$0
4c	Institutions that Serve Individuals with Disabilities	Not required	\$0
5	Non-traditional Training and Employment	Not applicable	\$150,000
6	Special Populations Recruitment	0.1%	\$4,511
7	Local Formula Distribution	85%	\$38,347,732
8	Reserve	0%	\$0
9	Secondary Recipients	0%	\$0
10	Postsecondary Recipients	0%	\$0
11	Allocation to Eligible Recipients	100%	\$38,347,732
12	Secondary Recipients	70%	\$26,843,412
13	Postsecondary Recipients	30%	\$11,504,320
14	State Match (from non-federal funds)	Not applicable	\$2,255,749

State Determined Performance Levels (SDPL)

Instructions

1. On the form in Item V.B below, provide State determined performance levels (SDPLs), covering FY 2020-23, for each of the secondary and postsecondary core indicators of performance for all CTE concentrators in the State described in section 113(b) of Perkins V (see Table 6). In preparing your SDPLs, refer to your narrative descriptions in Section II.D of this guide.
2. In completing the SDPL form, provide:
 - a. Column 2: Baseline level.
 - b. Columns 3-6: State determined levels of performance for each year covered by the State plan, beginning for FY 2020, expressed in percentage or numeric form and that meets the requirements of section 113(b)(3)(A)(III) of Perkins V. See Text Box 8 for the statutory requirements for setting State determined levels of performance under section 113(b)(3)(A)(iii) of Perkins V.
3. Revise, as applicable, the State determined levels of performance for any of the core indicators of performance—
 - a. Prior to the third program year covered by the State plan for the subsequent program years covered by the State plan pursuant to section 113(b)(3)(A)(ii); and/or
 - b. Should unanticipated circumstances arise in a State or changes occur related to improvement in data or measurement approaches pursuant to section 113(b)(3)(A)(iii).

Please note that, pursuant to section 123(a)(5) of Perkins V, an eligible agency may not adjust performance levels for any core indicators that are subject to, and while executing, an improvement plan pursuant to section 123(a) of Perkins V.

Table 4: Section 113(b) Core Indicators of Performance

Indicator Descriptions	Indicator Codes	Indicator Names
Secondary Level		
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).	1S1	Four-Year Graduation Rate
Percentage of CTE concentrators who graduate high school, as measured by extended-year adjusted cohort graduation rate defined in such section 8101.	1S2	Extended Graduation Rate
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 (ESEA) of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act.	2S1	Academic Proficiency in Reading/Language Arts
CTE concentrator proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the ESEA of 1965, as measured by the academic assessments in mathematics as described in section 1111(b)(2) of such Act.	2S2	Academic Proficiency in Mathematics
CTE concentrator proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the ESEA of 1965, as measured by the academic assessments in science as described in section 1111(b)(2) of such Act.	2S3	Academic Proficiency in Science
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.	3S1	Post-Program Placement

Table 4: Section 113(b) Core Indicators of Performance (continued)

Indicator Descriptions	Indicator Codes	Indicator Names
Secondary Level (continued)		
Percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.	4S1	Non-traditional Program Concentration
<i>The eligible agency must include at least one program quality indicator—5S1, 5S2, or 5S3—and may include any other quality measure(s) that are statewide, valid, reliable, and comparable across the State.</i>		
Percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.	5S1	Program Quality – Attained Recognized Postsecondary Credential
Percentage of CTE concentrators graduating from high school having attained postsecondary credits in the relevant career and technical education program or program of study earned through a dual or concurrent enrollment or another credit transfer agreement	5S2	Program Quality – Attained Postsecondary Credits
Percentage of CTE concentrators graduating from high school having participated in work-based learning.	5S3	Program Quality – Participated in Work-Based Learning
Percentage of graduating CTE concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Specific Assessments or achieve competency on other PDE approved test in the reporting year.	5S4	Program Quality – Technical Skill Attainment

Table 4: Section 113(b) Core Indicators of Performance (continued)

Indicator Descriptions	Indicator Codes	Indicator Names
Postsecondary Level		
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.	1P1	Post-Program Placement
Percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion. ⁹	2P1	Earned Recognized Postsecondary Credential
Percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields. ¹⁰	3P1	Non-traditional Program Concentration

State Determined Performance Levels (SDPL) Form

⁹ This means that a student gets counted under this indicator whether the student obtains the credential during participation or within 1 year of completion. The Department interprets “within 1 year of completion” to have the plain meaning of those words: that the student would be counted if the student obtains the credential in the 1 year following that student’s completion of the program.

¹⁰ This means that a student gets counted under this indicator if individuals from their gender comprise less than 25 percent of the individuals employed in the related occupation or field of work.

State Name: Pennsylvania

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
Indicators	Baseline Level	Performance Levels			
		FY 2020	FY 2021	FY 2022	FY 2023
Secondary Indicators					
1S1: Four-Year Graduation Rate	92.19	92.55	92.91	93.27	93.63
1S2: Extended Graduation Rate	94.39	94.65	94.91	95.17	95.43
2S1: Academic Proficiency in Reading Language Arts	50.8	53.04	55.28	57.52	59.76
2S2: Academic Proficiency in Mathematics	41.8	44.45	47.10	49.75	52.40
2S3: Academic Proficiency in Science	N/A	N/A	N/A	N/A	N/A
3S1: Post-Program Placement	92.48	92.82	93.16	93.50	93.84
4S1: Non-traditional Program Concentration	15.49	15.92	16.35	16.78	17.21
5S1: Program Quality – Attained Recognized Postsecondary Credential	65.56	67.13	68.70	70.27	71.84
5S2: Program Quality – Attained Postsecondary Credits	N/A	N/A	N/A	N/A	N/A
5S3: Program Quality – Participated in Work- Based Learning	N/A	N/A	N/A	N/A	N/A
5S4: Program Quality – Other ¹¹ Technical Skill Attainment	84.27	84.99	85.71	86.43	87.15

¹¹ The Perkins V State Plan Portal will allow an eligible agency to include on this form as many “other” program quality indicators as they choose.

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
Indicators	Baseline Level	Performance Levels			
		FY 2020	FY 2021	FY 2022	FY 2023
Postsecondary Indicators					
1P1: Post-Program Placement	93.11	93.42	93.73	94.04	94.35
2P1: Earned Recognized Postsecondary Credential	90.20	90.65	91.10	91.55	92.00
3P1: Non-traditional Program Concentration	21.66	21.81	21.96	22.11	22.26

Appendices

Appendix A

Public Comment from Public Hearings

Summary of Views and Recommendations Received During Public Hearings held October 15, 16, and 17, 2019 as authorized by Section 122(a)(3) of Perkins V.

Below is a summary of the written and oral comments received by PDE at regional hearings that provided all segments of the public and interested organizations an opportunity to present views and make recommendations regarding the Perkins V State Plan.

The written materials from the public and/or interested organizations below were received as testimony in conjunction with the public hearing and were referenced or summarized by the speakers during oral comments. Two attendees, Cumberland Perry AVTS and Westmoreland CTC did not provide testimony:

Chester County IU/Chester County Technical HS
Career and Technology Center of Lackawanna County
Community College of Allegheny County
Cumberland Perry AVTS
Delaware County Technical School
Dover Area School District
Johnson College
Lehigh Carbon Community College
Lycoming CTC
Octorara Area School District
Penn Highlands Community College
Universal Audenried High School
Westmoreland CTC

The following summary of comments, inclusive of view and recommendations, were provided, with Department response offered to provide further explanation regarding the comments:

Public Hearing: October 15, 2019

Chester County IU and Chester County Technical College HS:

Comment: “Program of Study Statewide Task Lists which set the standard for the statewide articulation system are valuable not only for that fact, but to also negotiate local articulated systems, create dual enrollment agreements, and to inform the public of the rigor of CT programs. Their continued use and revision are an extremely valuable to create college credit opportunities.”

Response: The Department agrees and will continue to use the statewide articulation system.

Comment: “Dual enrollment credits are reportable to PIMS for use in the Future Ready PA Index. Districts across Chester County are very different in how they support these credits. Some districts provide students with the opportunity to earn college credits in high school and permit those credits to replace required courses for high school graduation. Some districts do not allow this. With the cost of college tuition today, students who are taking the credits in high school are saving not just time but also tuition dollars.”

Response: The Department supports local authority and will continue to collect data on dual enrollment.

Comment: “When students earn dual enrollment credits for technical courses, the courses should be valued the same way as dual enrollment courses for general education/academic credits. PDE needs to recognize the value of technical dual enrollment credits and weigh them the same as general education dual enrollment credits.”

Response: The Department will examine the dual enrollment data collection and reporting in Future Ready PA Index.

Delaware County Technical School:

Comment: “Perkins funding is an essential component of CTE programs at the secondary level. Funding for CTE programs allows students to explore career pathways to be better informed for the working world or post-secondary opportunities and serves on the front line of training the future labor force for America.”

Response: The Department agrees.

Octorara School District

Comment: “Provide the process to access funding for CTE programs.”

Response: The Department process for applying for a Perkins V grant is outlined in the state plan in Appendix B.

Universal Audenried High School:

Comment: “The new Perkins V plan offers a great opportunity for my school in that we are a 98% free and reduced price lunch and serve many students who are homeless, parents as well as coming from homes that struggle with the many issues that challenge inner city communities.

The largest challenge we will face is the mandatory attendance of individuals for the comprehensive needs’ assessment. While it is an excellent source of feedback to empower our partners and engage the community, we have many parents, students and community partners who struggle with attendance. Is it possible to hold the comprehensive needs assessment meeting more than once in order to compile the data in order to improve our programming?”

Response: The regulation requires who should serve on the stakeholder’s group and exemptions are not permitted.

Public Hearing: October 16, 2019

Career and Technology Center of Lackawanna County:

Comment: “At the Perkins Regional Stakeholders meeting held April 10, 2019 at Bucks County Community College, there was a consensus among attendees that the total allocation for local grants, there should be no change in the allocation of 70% to secondary and 30% to postsecondary. One of the major reasons is that a secondary institution is dependent on local school district funding while postsecondary institutions can raise tuition when necessary. The group also did not find it necessary to set aside reserve funds from competitive grants. The reasoning was that it would just add another layer to the already rigorous grant process, and most would not have the time, or the personnel to complete another grant application that the school level or the state level.”

Response: The Department supports the stakeholders’ input, agrees, and has retained the 70/30 split.

Dover Area School District:

Comment: “Provide the process to access funding for CTE programs.”

Response: The Department process for applying for a Perkins V grant is outlined in the state plan in Appendix B.

Johnson College

Comment: “Please provide the justification for the 70 secondary/30 postsecondary split in allocation and why only SOAR students can benefit from the Perkins funds. The College would have to increase tuition in order to absorb the costs of the loss of Perkins funds. Students in the past have denied the SOAR credits because as hands on learners they want to take the classes. Local agreements benefit Johnson College as most students live in a 60-mile radius.”

Response: The State Plan outlines the justification for the 70/30 split in allocation. The State Plan allows for the statewide program of study and locally developed programs. The federal definition of program of study includes “integrate rigorous and challenging academic and career and technical instruction, and that link secondary education and postsecondary education for participating career and technical education students. If the program is articulated with a secondary program and meets the other requirements, students participating in the program of study are part of the reporting.

Lehigh Carbon Community College:

Comment: “Based on the comments presented at today’s meeting session, specifically the Program of Study and the Local Articulation information as guides for Perkins V funding – does that incorporate CTE programs (i.e., nursing, PTA ONA, Vet Tech) where POS nor local articulation agreement can’t be drafted because of restrictive admission requirements? Restrictive admission requirements that cannot be bypassed by an articulation agreement (SBOT?) How does Perkins V fund these CTE student programs?”

Response: The Department agrees and will recognize the local agreements developed between secondary and postsecondary partners.

Public Hearing: October 17, 2019

Community College of Allegheny County:

Comment: “The Community College of Allegheny County is opposed to discontinuing the current statewide articulation agreements known by the acronym SOAR (Students Occupationally and Academically Ready) that seamlessly link secondary and postsecondary Career and Technical Education, as it would discard extensive monetary and material efforts spent promoting SOAR, would incur additional costs at the local level, would disadvantage Rural CTCs or CTCs without access to a local partner, and would create a new and confusing patchwork system of local agreements from which no large-scale outcome or knowledge could be garnered.”

Response: The Department agrees.

Comment: “Postsecondary institutions do not have data on many of the Special Population categories outlined in Perkins V and will have to rely on incomplete or substitute data sets, because students have to self-disclose. If postsecondary institutions do not have access this information in full, they will underreport.”

Response: The Department recognizes the challenge.

Comment: “The Pennsylvania Bureau of Career and Technical Education has provided postsecondary schools with a list of 338 industry certifications that Postsecondary institutions will be required to track under Perkins V. Again, unless the students self-disclose that they have obtained these certificates, we will not be able to gather and report this data accurately.

Allowing students to use Perkins Grant funds for certifications is also problematic. Which certifications would we pay for and under what circumstances? How much of the budget should we devote to this endeavor? Doing this would still not guarantee that we would be able to gather complete and accurate”

Response: The Department recognizes the challenge.

Comment: “CCAC easily meets the definition of Size, Scope, and Quality. The complication with the definition is it could be easily interpreted to mean that Perkins Grant funds may be tied *only* to special needs students enrolled in programs with SOAR or local articulation agreements. CCAC is strongly opposed to this interpretation.”

Response: The Department has reviewed the definition to ensure interpretation is all students.

Lycoming Career and Technology Center:

Comment: “Data required for Perkins is already submitted by schools to PDE. PDE should put it in the

format required by Perkins and give it back to the schools. Allow Perkins Planning Committees draw from a certain percentage of stakeholders rather than a required number of members to help rural schools. Lift restrictions on purchasing program-required tools and equipment. Include a measure of gainful employment post-graduation”

Response: The Department will review the guidance provided to recipients.

Penn Highlands CTC:

Comment: “Set realistic performance indicators, (e.g., 4P1, Placement Follow Up is set at an unattainable 98%). Don’t penalize institutions for not being able to gather data that is self-reported by students, i.e. whether they belong to “special populations.” Find ways to use the data that institutions already report to lessen their reporting burden, (e.g. use what they report to regional accrediting agencies and PDE for Perkins).”

Response: The Department agrees and will work with stakeholders to establish the baseline.

Hamill Manufacturing Company:

Comment: “Hamill Manufacturing is a precision machining and fabricating company that supplies critical components used on submarines and aircraft carriers in the U.S. Navy fleet. We, like many other manufacturing companies here in western PA, are having a very difficult time finding employees to hire as beginner welders or machinists or apprentices, let alone fully qualified people. Over the years, our biggest supplier of entry level employees has been the local CTCs, i.e. Forbes Road, Central Eastern & Northern Westmoreland CTCs. It is imperative that their students be properly trained to the entry level basics at these facilities for local companies like us to pull from, to add to our workforce. We all know that the Perkins monies have played a major part in keeping these training facilities operating and supplying our needs. Therefore, we would hope that each CTC would continue receiving the support that they need.”

Response: The Department appreciates the support from Hamill Manufacturing Company.

Summary of General Input Received in Consultation with Stakeholders Following October 15, 16, and 17 2019 meetings as authorized in Section 122(c)(1)(A) of Perkins V

Below is a summary of written comments received by PDE based on consultation with stakeholders identified in Section 122(c)(1)(a) as part of the development of the state plan. The Department held a series of meetings with the stakeholders to discuss proposed decisions affecting groups involved or impacted by career and technical education. The following summary of comments were provided following the meetings, by the below participants, with Department response offered to provide further explanation regarding the comments:

Summary of General Input Received in Consultation with Stakeholders During State and Regional Stakeholders’ Meetings March 19, and April 9, 10 and 11, 2019.

Commission for Agriculture Education Excellence

Franklin County CTC

Hamill Manufacturing Company

Pennsylvania Partnerships for Children

Pennsylvania Statewide Afterschool Youth Development Network:

Commission for Agriculture Education Excellence

Comment: “The department should consider adoption of the AFNR standards for agricultural education program approval to replace the current system.”

Response: The Department recognizes all industry standards and requires all Department approved programs to align to the industry standards.

Franklin County CTC

Comment: “Nontraditional participation indicator relies on subjective factors which have proven difficult for recipients attempting to meet the required standard. Measure our efforts to attract non-traditional students. Our control of the situation cannot go beyond that.”

Response: Perkins V does not require nontraditional participation rate. The Department will not act on this comment.

Pennsylvania Partnerships for Children (PPC)

Comment: “PPC would like to see CTCs have access to the type of equipment students would be expected to use with employers upon graduation. PPC would like to see additional dollars allocated to programs for essential equipment purchases.”

Response: An additional \$2 million dollars was added to the supplemental equipment line item for the 2019-2020 school year. An additional \$7 million dollars was added to the CTE subsidy line item for the 2019-2020 school year. Legislative language ensures the CTE subsidy line item will be fully funded, removing the reduction factor language.

Comment: “CTE is not available to all students who want to attend because many school districts simply cannot afford to enroll all interested students in those programs. Because these methods differ so greatly between each school district, PPC would like to see guidance developed from PDE on a method to ensure students in each district are treated equitably when expressing interest in attending CTE related programming.”

Response: The Department will develop guidance on student access to career and technical education.

Pennsylvania Statewide Afterschool Youth Development Network:

Comment: “The law mentions the importance of employability skills in career development.

“Afterschool programs are well-positioned to help teach these skills and have the flexibility, unlike the school day, to specifically address this need.”

Comment: “Perkins V expands eligible uses to allow for career exposure, exploration, and preparation, and permits use of funds as early as fifth grade. Partnering with afterschool programs who are already serving students in these grades will help expose youth to careers earlier and choose CTE pathways.”

Comment: “The law mentions partnerships with community-based partners (non-profits that connect students with opportunities). We encourage PDE to include partnering with PSAYDN and community-based afterschool programs in its state plan to cast a wider net in accessing and preparing underserved, underrepresented youth for career pathway opportunities through CTEs.”

Comment: “The law for the first time explicitly lists partnerships with community-based and youth-serving organizations as eligible uses of local funds. Using this funding to allow partnerships with afterschool programs can help bridge increased access to CTE programs as the successful SHINE-CCTI model does.”

Response to all comments: The items requested are required uses of funds. Each local recipient can decide how to utilize funds in order to address the results of their comprehensive local needs assessment.

Appendix B

Perkins Secondary Local Application

Comprehensive Local Needs Assessment

This section will have three parts of the Comprehensive Local Needs Assessment (CLNA) to rollover into the local application. The elements in this section are view only, only after approved.

Stakeholders Section-List of participants. (Table with dropdown column)

Size, Scope and Quality Section-Table indicating in process or compliant. (Table/Questions)

Equity and Access Section- The progress that has been made toward implementation of equal access to high quality CTE programs of study for all students. (Table/Questions)

Standard Narrative

Describe the results of the comprehensive needs assessment. (Text Box 3300 characters)

Provide a list of the career and technical education program offerings and activities that the eligible recipient will provide with Perkins V funds, which is informed by the results of the comprehensive needs assessment (Text Box 3300 characters)

Describe how the results of the comprehensive needs assessment informed the selection of the specific career and technical education programs and activities to be funded. (Text Box 3300 characters)

Describe new programs of study that will be developed and submitted to the State for approval. (Text Box 3300 characters)

Describe how students, including students who are members of special populations, will learn about career and technical education course offerings and whether each course is part of a career and technical education program of study. Describe how the eligible recipient, in collaboration with local workforce development boards and other local workforce agencies, one-stop delivery systems, and other partners, will provide each of the following: (Label)

Career exploration and career development coursework, activities, or services. (Text Box 3300 characters)

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. (Text Box 3300 characters)

An organized system of career guidance and academic counseling to students before enrolling and while participating in a CTE program. (Text Box 3300 characters)

Describe how the eligible recipient will improve the academic and technical skills of students participating in CTE 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 CTE programs to ensure learning in the subjects that constitute a well-rounded education. (Text Box 3300 characters)

Describe how the eligible recipient will meet the following requirements: (Label)

Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency. (Text Box 3300 characters)

Prepare CTE participants for non-traditional fields. (Text Box 3300 characters)

Provide equal access for special populations to CTE courses, programs, and programs of study. (Text Box 3300 characters)

Ensure that members of special populations will not be discriminated against based on their status as members of special populations. (Text Box 3300 characters)

Describe the work-based learning opportunities the eligible recipient will provide to students participating in CTE programs and how the recipient will work with representatives from employers to develop or

expand work-based learning opportunities for CTE students. (Text Box 3300 characters)

Describe how the eligible recipient will provide students participating in CTE 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. (Text Box 3300 characters)

Describe how the eligible recipient will coordinate with the Pennsylvania 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. (Text Box 3300 characters)

Describe 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. If no meaningful progress has been achieved prior to the third program year, describe the additional actions that will be taken to eliminate those disparities or gaps. (Text Box 3300 characters)

Describe how the eligible recipient will use funds to develop and implement evaluations of the activities carried out with Perkins V funds, including evaluations necessary to complete the comprehensive needs assessment and the local report. (Text Box 3300 characters)

Local Negotiation

Pennsylvania is conducting negotiations with local eligible recipients on levels of performance for the secondary core indicators. The negotiations will be based on State-determined baseline data provided by PDE. (Table)

Click link below to view the “Expected Consortium Performance.”

Secondary Performance Level

Secondary Performance Indicators (only)

Indicators	1S1 Four-Year Graduation Rate	1S2 Extended Graduation Rate	2S1 Academic Proficiency in Reading Language Arts	2S2 Academic Proficiency in Mathematics	2S3 Academic Proficiency in Science	3S1 Post-Program Placement	4S1 Non-Traditional Program Concentration	5S1 Program Quality-Attained Recognized Postsecondary Credential	5S2 Technical Skill Attainment
State Baseline									
Consortium Baseline									
Year 1									
Year 2									

Requirements for Uses of Funds

Funds made available to eligible recipients under this part shall be used to develop, coordinate, implement, or improve CTE programs to meet the needs identified in the comprehensive needs assessment and shall be used to support career and technical education programs that are of sufficient size, scope, and quality to be effective. (Label)

This section **does not have to equal total allocation**. Indicate dollar amount and funding source for all six (6) Required Use of Funds. Each funding source **must** be a separate line item. The list provided is the short version of the six (6) Required Uses of Funds as they appear in the dropdown box. A detailed description

of all six “Required Uses of Funds” is available in the Perkins V guidelines. (Label)

Identify all funding sources that address any of the six (6) Required Uses of Funds in Perkins V, per Section 135(b).

Required Uses of Funds:

Career exploration and career development

Professional development

High-skill, high-wage, or in-demand occupations

Integration of academic skills

Programs that result in increasing student achievement of the local performance levels

Evaluation necessary to complete the comprehensive needs assessment and the local report

Required Uses of Funds (dropdown)	Percentage of Perkins Funding (1-100)	Funding Source(s)	Amount (numeric)
Select from dropdown list	Numeric (1-100)	Text	Numeric (1-10000)

Action Plan

Select from the dropdown box in the first column the “Performance Indicator” that is not meeting the State baseline. Select all that apply (one at a time). **Note:** Remember when completing the **Activity Table** to click the “Add” button on the right when each row is complete. At least one activity must be created for each objective. (Label)

Objectives/Select from Dropdown.

Secondary Performance Indicators (Dropdown):

1S1: Four-Year Graduation Rate

1S2: Extended Graduation Rate

2S1: Academic Proficiency in Reading Language Arts

2S2: Academic Proficiency in Mathematics

2S3: Academic Proficiency in Science

3S1: Post-Program Placement

4S1: Non-Traditional Program Concentration

5S1: Program Quality – Attained Recognized Postsecondary Credential

5S2: Skill Attainment

Activity Table

Objective (dropdown with performance indicators)	Activity (text or numeric)	Location/Site (text)	Funds Amount (numeric/dollar amount) formula	Timeline (numeric/date)
			Total Amount:	
			Grant Total:	

Risk Assessment

The State must conduct a risk assessment during the pre-award process to evaluate an applicant’s ability to execute the program for which they are applying , and may assign specific additional conditions within the grant award to develop the applicant’s ability to deliver and/or administer the grant program Risk factors that will be consider include, but are not limited to, the following: previous non-compliance; any major issues; correction of previous findings; new personnel; substantial system changes (e.g., grant accounting system); new grant recipient; and results of any federal monitoring with specific conditions required. (Label)

Risk Assessment is a process to identify potential problems that could lead to risks in the accountability, fiscal accounting, and grant operation. (Label)

The following questions will assist with the evaluation of the applicant’s risk level for the future pre-award process. (Label)

Is there a new Director/Superintendent in the past three-years? (Select No/Yes)

If so, provide contact information for Director/ Superintendent. (Text Box 300 characters)

Is there a new Business/Fiscal Manager in the past three-years? (Select No/Yes)

If so, provide contact information for Business/Fiscal Manager. (Text Box 300 characters)

Is there a new Perkins Administrator in the past three-years? (Select No/Yes)

If so, provide contact information for Perkins Administrator. Indicate number months or years as a Perkins Administrator in Pennsylvania. (Text Box 400 characters)

Were there any Perkins’ corrective actions in 2019-2020 fiscal year? (Select No/Yes)

If so, describe how all corrections identified in previous Perkins On-Site Compliance Reports have been completely satisfied and fully implemented. If they have not been corrected, provide a detailed explanation. If you have not received an on-site visit within the last two years, enter N/A. (Text Box 1000 characters)

Were there any Single Audit findings in 2019-2020? (Select No/Yes)

If so, have the findings and corrective actions been corrected? If not, identify the finding and provide a detailed explanation as to why it has not been corrected. (Text Box 1000 characters)

Budget Detail

Same as previous years

Will include 9 sections:

Salaries

Benefits

Purchased Professional and Technical Services

Purchased Property Services

Other Purchased Services

Supplies

Equipment
Indirect Cost
Budget Summary (view only)

Appendix C

Perkins Postsecondary Local Application

Comprehensive Local Needs Assessment

This section will have three parts of the Comprehensive Local Needs Assessment (CLNA) to rollover into Local Application. The elements in this section are view only, only after approved.

Stakeholders Section – List of participants. (Table with dropdown column)

Size, Scope and Quality Section – Table indicating in process or compliant. (Table/Questions)

Equity and Access Section – The progress that has been made toward implementation of equal access to high quality CTE programs of study for all students. (Table/Questions)

Standard Narrative

Describe the results of the comprehensive needs assessment. (Text Box 3300 characters)

Provide a list of the career and technical education program offerings and activities that the eligible recipient will provide with Perkins V funds, which is informed by the results of the comprehensive needs assessment (Text Box 3300 characters)

Describe how the results of the comprehensive needs assessment informed the selection of the specific career and technical education programs and activities to be funded. (Text Box 3300 characters)

Describe new programs of study that will be developed and submitted to the State for approval. (Text Box 3300 characters)

Describe how students, including students who are members of special populations, will learn about career and technical education course offerings and whether each course is part of a career and technical education program of study. Describe how the eligible recipient, in collaboration with local workforce development boards and other local workforce agencies, one-stop delivery systems, and other partners, will provide each of the following: (Label)

Career exploration and career development coursework, activities, or services. (Text Box 3300 characters)

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. (Text Box 3300 characters)

An organized system of career guidance and academic counseling to students before enrolling and while participating in a CTE program. (Text Box 3300 characters)

Describe how the eligible recipient will improve the academic and technical skills of students participating in CTE 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 CTE programs to ensure learning in the subjects that constitute a well-rounded education. (Text Box 3300 characters)

Describe how the eligible recipient will meet the following requirements: (Label)

Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency. (Text Box 3300 characters)

Prepare CTE participants for non-traditional fields. (Text Box 3300 characters)

Provide equal access for special populations to CTE courses, programs, and programs of study. (Text Box 3300 characters)

Ensure that members of special populations will not be discriminated against based on their status as members of special populations. (Text Box 3300 characters)

Describe the work-based learning opportunities the eligible recipient will provide to students participating in CTE programs and how the recipient will work with representatives from employers to develop or

expand work-based learning opportunities for CTE students. (Text Box 3300 characters)

Describe how the eligible recipient will provide students participating in CTE 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. (Text Box 3300 characters)

Describe how the eligible recipient will coordinate with the Pennsylvania 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. (Text Box 3300 characters)

Describe 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. If no meaningful progress has been achieved prior to the third program year, describe the additional actions that will be taken to eliminate those disparities or gaps. (Text Box 3300 characters)

Describe how the eligible recipient will use funds to develop and implement evaluations of the activities carried out with Perkins V funds, including evaluations necessary to complete the comprehensive needs assessment and the local report. (Text Box 3300 characters)

Local Negotiation

Pennsylvania is conducting negotiations with local eligible recipients on levels of performance for the postsecondary core indicators. The negotiations will be based on State-determined baseline data provided by PDE. (Table)

Postsecondary Performance Indicators (only)

Click link below to view the “Expected Consortium Performance.”

Postsecondary Performance Level

Indicators	1P1 Post-Program Placement	2P1 Earned Recognized Postsecondary Credential	3P1 Non-Traditional Program Concentration
State Baseline			
Consortium Baseline			
Year 1			
Year 2			

Requirements for Uses of Funds

Funds made available to eligible recipients under this part shall be used to develop, coordinate, implement, or improve CTE programs to meet the needs identified in the comprehensive needs assessment and shall be used to support career and technical education programs that are of sufficient size, scope, and quality to be effective. (Label)

This section **does not have to equal total allocation**. Indicate dollar amount and funding source for all six (6) Required Use of Funds. Each funding source **must** be a separate line item. The list provided is the short version of the six (6) Required Uses of Funds as they appear in the dropdown box. A detailed description of all six “Required Uses of Funds” is available in the Perkins V guidelines. (Label)

Identify all funding sources that address any of the six (6) Required Uses of Funds in Perkins V, per Section 135(b).

Required Uses of Funds:

Career exploration and career development

Professional development
 High-skill, high-wage, or in-demand occupations
 Integration of academic skills
 Programs that result in increasing student achievement of the local performance levels
 Evaluation necessary to complete the comprehensive needs assessment and the local report

Required Uses of Funds (dropdown)	Percentage of Perkins Funding (1-100)	Funding Source(s)	Amount (numeric)
Select from dropdown list	Numeric (1-100)	Text	Numeric (1-10000)

Action Plan

Select from the dropdown box in the first column the “Performance Indicator” that is not meeting the State baseline. Select all that apply (one at a time). **Note:** Remember when completing the **Activity Table** to click the “Add” button on the right when each row is complete. At least one activity must be created for each objective. (Label)

Objectives/Select from Dropdown.

Postsecondary Performance Indicators (Dropdown):

- 1P1: Post-Program Placement
- 2P1: Earned Recognized Postsecondary Credential
- 3P1: Non-Traditional Program Concentration

Activity Table

Objective (dropdown with performance indicators)	Activity (text or numeric)	Location/Site (text)	Funds Amount (numeric/dollar amount) formula	Timeline (numeric/date)
			Total Amount:	
			Grant Total:	

Risk Assessment

The State must conduct a risk assessment during the pre-award process to evaluate an applicant’s ability to execute the program for which they are applying , and may assign specific additional conditions within the grant award to develop the applicant’s ability to deliver and/or administer the grant program Risk factors that will be consider include, but are not limited to, the following: previous non-compliance; any major issues; correction of previous findings; new personnel; substantial system changes (e.g., grant accounting system); new grant recipient; and results of any federal monitoring with specific conditions required. (Label)

Risk Assessment is a process to identify potential problems that could lead to risks in the accountability, fiscal accounting, and grant operation. (Label)

The following questions will assist with the evaluation of the applicant’s risk level for the future pre-award process (Label):

Is there a new President in the past three-years? (Select No/Yes)

If so, provide contact information for President. (Text Box 300 characters)

Is there a new Business/Fiscal Manager in the past three-years (Select No/Yes)

If so, provide contact information for Business/Fiscal Manager. (Text Box 300 characters)

Is there a new Perkins Administrator in the past three-years? (Select No/Yes)

If so, provide contact information for Perkins Administrator. Indicate number months or years as a Perkins Administrator in Pennsylvania. (Text Box 400 characters)

Were there any Perkins' corrective actions in 2019-2020 fiscal year? (Select No/Yes)

If so, describe how all corrections identified in previous Perkins On-Site Compliance Reports have been completely satisfied and fully implemented. If they have not been corrected, provide a detailed explanation. If you have not received an on-site visit within the last two years, enter N/A. (Text Box 1000 characters)

Were there any Single Audit findings in 2019-2020? (Select No/Yes)

If so, have the findings and corrective actions been corrected? If not, identify the finding and provide a detailed explanation as to why it has not been corrected. (Text Box 1000 characters)

Program Approval

Postsecondary recipients will enter program information in the electronic approval system (CATs-Career and Technical Education Information System) and provide information on each program that Perkins V funds will support. Each postsecondary program will be approved by the 2021-2022 program year.

If you have an approved program in CATs, please upload the sign assurance sheet below. (Label with upload document)

WIOA

Each federal Perkins postsecondary recipient will address the mandated support of the One-Stop Center infrastructure costs in their Local Plan application. Each recipient that uses federal Perkins funds for administrative purposes (indirect costs) must engage in local discussion with all Local Workforce Development Board within the region. (Label question)

Describe how the Perkins postsecondary institution works with the Workforce Development Board to support the One-Stop Center. (Maximum length is 1500 characters)

Describe the calculation used to determine proportionate use and benefit of a One-Stop Center. (Maximum length is 1500 characters)

Describe how the postsecondary institution supports infrastructure cost to the One-Stop Center. Note: The amount of administrative funds (indirect cost) used to support One-Stop Center infrastructure may not exceed the WIOA mandated 1.5% maximum. (Maximum length is 1500 characters)

What infrastructure costs are supported at the One-Stop Center using the federal Perkins administrative funds (indirect costs)? (Maximum length is 1500 characters)

Provide the details of the Memorandum of Understanding (MOU) with the One-Stop Center. A copy must be on file with postsecondary eligible recipient. (Maximum length is 1500 characters)

Check the box to confirm the Perkins Postsecondary President/Chief Executive Officer assures that the Perkins postsecondary recipient will comply with WIOA.

Budget Detail

Same as previous years

Will include 9 sections:

Salaries

Benefits

Purchased Professional and Technical Services

Purchased Property Services

Other Purchased Services

Supplies

Equipment
Indirect Cost
Budget Summary (view only)

Appendix D

Perkins V Comprehensive Needs Assessment

The Pennsylvania Department of Education has provided information on the new Comprehensive Local Needs Assessment (CLNA) requirement in Perkins V. The first workshop, December 13, 2018, highlighted that federal funds must be used to reduce performance gaps associated with each performance indicator. To assist with the analysis of the performance gaps, states are required to provide data by special populations categories for recipients to use with the stakeholders. The recipients are to conduct a local comprehensive needs assessment using the data. This new requirement closely aligns the with ESSA and WIOA. During the March 2019, Perkins Regional Workshops, a Comprehensive Local Needs Assessment template was discussed along with the purpose of the CLNA. The CLNA template has been developed and provides guiding questions and tables for each eligible agency to utilize at the required Stakeholders Meeting. The information gathered (similar to this document) will be entered in the eGrants system mid-January 2020.

What is a Comprehensive Local Needs Assessment and why is it so important?

A “**need**” is a discrepancy or gap between “what is” and “what should be.”

A **Needs Assessment** is a systematic set of procedures that are used to determine needs, examine their nature and causes, and set priorities for future action. They are conducted to determine the needs of people – i.e., receivers of the services provided by an organization. In education, the receivers of the services are students and their parents.

A **Comprehensive Local Needs Assessment** takes into account needs identified in other parts of a system. In education, the Comprehensive Needs Assessment determines the needs of those who receive the academic service (students), the providers of the academic services (school staff), and the structure and system of the organization (academic programs, assessment and evaluation, resources).

A Comprehensive Needs Assessment consists of the following steps:

Identify Planning Team (stakeholders).

Identify data sources (stakeholders engage in a review of focused data).

Analyze the data.

Identify areas of growth and strength (what is working).

Identify areas of need (what is not working).

Prioritize needs.

How often must the Comprehensive Local Needs Assessment be complete?

The Local Needs Assessment must be completed on a biennial basis with a review of progress during the odd year. The assessment (or review) must be completed prior to the completion of the grant application and must be uploaded each year in the Related Documents area of the grant application before grants can be approved.

1. Local Discussion (Subgroup Data Provided) Prompts:

1. What data are trending positively over the last several years? Your strengths and improvement.

2. What data are stagnated or trending negatively? Your challenges.

3. Based on the performance indicators and student population data, what are our highest priority areas of focus? List in the table below.

Local CTE Program Summary Strengths/Improvements:

Challenges:

Proposed Strategies:

2. Describe progress that has been made toward implementation of equal access to high quality CTE programs of study for all students. [Perkins V Sec. 134 (c)(2)(E)] **Help: Individual student groups counts by CIP. The low counts prevent PDE from sharing this data.**

Question: What are doing to ensure equal access?

Program CIP									
Totals									
Male									
Female									
Disabled									
Economically Disadvantage									
Non-Trad									
Single Parent									
Out of Work Individuals									
English Learner									
Homeless									
Foster Care									
Military Family									

What strategies are helping students overcome barriers to learning that result in lower rates of access to, or performance gaps in, the programs for special populations?

What programs are designed to enable special populations to meet the local levels of performance?

What activities 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?

*A setting that enables individuals with disabilities to interact with non-disabled persons to the fullest extent possible.

What activities will be implemented to ensure programs receiving Perkins funds will close the achievement gap?

3. Describe how the CTE programs offered in our CTCs/School Districts/Postsecondary Institutions are of sufficient in size, scope, and quality to meet the needs of all students. [Perkins V Sec. 134 (c)(2)(B)(i)]

State SIZE, SCOPE and QUALITY Definitions	In-Progress	Compliant	Notes
SIZE Definition: Size is based on the number of programs of study available at the Perkins			

<p>institution, not on enrollment in a specific CTE program. To be eligible for funding, a Perkins recipient must have at least three programs of study in not fewer than 3 different fields, each of which must serve a minimum of eight students. An eligible school also must have laboratories and classrooms that are readily accessible to all students, as well as a non-discriminatory admissions policy that is board approved and implemented.</p>			
<p>SCOPE Definition: The scope of a program is defined as a curriculum that covers all aspects of the industry and meets the criteria listed in the POS definition of Perkins V, including:</p> <p>(a) One secondary technical course per year is offered (definition of a courses is 240 technical instructional hours);</p> <p>(b) At minimum, 50% of the postsecondary credit meets the definition of career and technical education:</p> <p>(c) Secondary and postsecondary academic and technical content are aligned, leading to a sequence of courses that lead to a nonduplicative</p>			

<p>program offering; (d) Is inclusive of work-based learning; and (e) A credit transfer articulation agreement exists between the secondary CTE program and the corresponding postsecondary CTE program.</p>			
<p>QUALITY Definition: Quality of secondary programs of study is based on the state regulations for approved programs. See Title 22 Education, Chapters 4 and 339. During the transition year, PDE will work with stakeholders to define high-quality postsecondary programs of study and to identify an approval process aligned to that definition. Postsecondary quality will be defined by: Review the postsecondary database where current approved postsecondary programs are listed. Programs listed in the database demonstrates that the programs have been approved by the institutions Board of Trustees, accrediting authorities (national, regional or program specific [NAECP] accrediting authorities), and Pennsylvania</p>			

Department of Education/State Board for Vocational Education.			
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Local Discussion Prompts:

1.How well are we meeting the state’s Size, Scope and Quality definitions?

2.In what ways can we improve?

4. Describe how the CTE programs offered in our CTCs/School Districts/Postsecondary Institutions are:
[Perkins V Sec. 134 (c)(2)(B)(ii)]

Help: Capture workforce, salaries and where the jobs are locally. Use the GIS, OAC members and local business (Stakeholders’ group) to assist with gathering the data for this table. PDE will not provide this data.

1. Aligned to State, regional or local in-demand industry sectors or occupations identified by the state workforce development board or local workforce development board, including career pathways.

2. Designed to meet local education or economic needs not identified by state boards or local workforce development boards.

CTE Program Name	# of Enrolled (Most recent year)	High Wage/In-Demand Occupations (Local/Regional)	# of Openings (Over last years)	High Wage/In-Demand Occupations (State)	# of Openings (Most recent period)

5. Evaluate progress toward the implementation of CTE programs and programs of study: [Perkins V Sec. 134 (c)(2)(C)] **Help: In this table “Year 1” would be 2017-2018 fiscal year, “Year 2” 2018-2019, so on. Once table has been completed determine need with your Stakeholders’ Committee.**

CTE Program Name	Enrollment Trend				Concentrator Enrollment				# Earning Dual Credits				Number of Certification/Credentials Earned				
	Year 1	Year 2	Year 3	Trend	Year 1	Year 2	Year 3	Trend	Year 1	Year 2	Year 3	Trend	Year 1	Year 2	Year 3	Trend	

Local CTE Program Summary Strengths/Improvement:

Challenges:

Proposed Strategies:

6. Describe progress being made to 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 these professions. [Perkins V Sec. 134 (c)(2)(D)] **Help: Identify the diversity in the staff for the past three years. PDE will not provide this data.**

Individuals in groups underrepresented	Number Working in Local CTE Program(s)				# Professional Development Workshops Offered			
	Year 1	Year 2	Year 3	Trend	Year 1	Year 2	Year 3	Trend
CTE teachers								
Other Faculty								
Instructional Support								
Paraprofessionals								
Counselors								
Others								

Local CTE Staff Summary of Recruitment Efforts:

Local CTE Staff Summary of Retention Efforts:

Professional Development Offered/Participated:

Title	Type (Workshop, Conference, Other)	Who Attended

Brainstorm Form of Required Stakeholders for Local Comprehensive Needs Assessment Discussions [Perkins V Sec. 134(d)]

In conducting the comprehensive needs assessment and developing the local application, the eligible recipient must involve a diverse body of stakeholders, including, at a minimum (the following):

		Name	Organization/Title	Email/Contact Information
(1) Representatives of career and technical education programs in a local educational agency or educational service agency, including	Teachers			
	Counselors			
	Principals/Admin			
	Support Personnel			
	Paraprofessionals			

teachers, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals				
(2) Representatives of career and technical education programs at postsecondary educational institutions, including faculty and administrators	Postsecondary Faculty			
	Postsecondary Admin			
(3) Representatives of the state board or local workforce development boards and a range of local or regional businesses or industries	Workforce Board Reps			
	Employers (Local)			
	Employers (Regional)			
(4) Parents and students	Parents			
	Students			
(5) Representatives of special populations	Special Pop Reps			
(6) Representatives of regional or local	Out of School Youth Reps			
	Homeless Youth			

agencies serving out-of-school youth, homeless children and youth, and at-risk youth (as defined in section 1432 of the Elementary and Secondary Education Act of 1965)	Rep			
	At-Risk Youth Rep			
(7) Representatives of Indian Tribes and Tribal organizations in the State, where applicable; and				
Others (Optional)				

Resources

Perkins V Special Populations Definition [Perkins V Sec. 3(48)]

Perkins V defines “special populations” as:

- (A) individuals with disabilities;
- (B) individuals from economically disadvantaged families, including low-income youth and adults;
- (C) individuals preparing for non-traditional fields;
- (D) single parents, including single pregnant women;
- (E) out-of-workforce individuals;
- (F) English learners;
- (G) homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- (H) youth who are in, or have aged out of, the foster care system; and
- (I) youth with a parent who—
 - a. is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and
 - b. is on active duty (as such term is defined in section 101(d)(1) of such title.

Perkins V Core Indicators of Performance [Perkins V Sec. 113(b)]

Secondary Performance Indicators

1S1 – Four-Year Graduation Cohort Rate

Section 113 (b)(2)(A)(i)(I) 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).

Numerator: Number of CTE concentrators who, graduated from 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).

Denominator: Number of CTE concentrators who, in the reporting year, were included in the State's computation of its graduation rate as defined in the State's Consolidated Accountability Plan pursuant to Section 1111(b)(2) of the ESSA.

1S2 - Extended-Year Graduation Rate

Section 113 (b)(2)(A)(i)(II) (At the State's discretion) The percentage of CTE concentrators who graduate high school, as measured by extended-year adjusted cohort graduation rate defined in such section 8101.

Numerator: The number of CTE concentrators who graduated from high school, as measured by the extended-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

Denominator: Number of CTE concentrators who, in the reporting year, were included in the State's computation of its extended-year cohort graduation rate as defined in the State's Consolidated Accountability Plan pursuant to Section 1111(b)(2) of the ESEA.

2S1 - Academic Proficiency in Reading/Language Arts

Section 113 (2)(A)(ii) 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.

Numerator: Number of CTE concentrators who achieved reading/language arts 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 described in section 1111(b)(2) of such Act; and whose scores were included in the computation of the State's secondary education Academic Achievement indicator.

Denominator: Number of CTE concentrators who took the ESEA assessments in reading/language arts whose scores were included in the State's computation of AYP.

2S2 - Academic Proficiency in Mathematics

Section 113 (2)(A)(ii) 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 mathematics as described in section 1111(b)(2) of such Act.

Numerator: Number of CTE concentrators who achieved mathematics 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 described in section 1111(b)(2) of such Act; and whose scores were included in the computation of the State's secondary education Academic Achievement indicator.

Denominator: Number of CTE concentrators who took the ESEA assessments in mathematics whose scores were included in the State's computation of AYP.

2S3 - Academic Proficiency in Science

Section 113 (2)(A)(ii) 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 science as described in section 1111(b)(2) of such Act.

Numerator: Number of CTE concentrators who achieved science 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 described in section 1111(b)(2) of such Act; and whose scores were included in the computation of the State's secondary education Academic Achievement indicator.

Denominator: Number of CTE concentrators who took the ESEA assessments in science whose scores were included in the State's computation of AYP.

3S1 Post-Program Placement

Section 113 (b)(2)(A)(iii) 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.

Numerator: The number 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.

Denominator: The number of CTE concentrators who left secondary education during the reporting year.

4S1 Nontraditional Program Concentrators

Section 113 (a)(2)(A)(v) The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

Numerator: Number of CTE concentrators, from underrepresented gender groups, in career and technical education programs and programs of study, that lead to non-traditional fields.

Denominator: Number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field, during the reporting year.

5S1 – Recognized Postsecondary Credential

Section 113 (b)(2)(A)(iv)(I)(aa) The percentage of CTE concentrators graduating from high school having attained a recognized postsecondary credential.

Numerator: Number of CTE concentrators who graduated from high school having attained a recognized postsecondary credential.

Denominator: Number of CTE concentrators who graduated from high school.

5S4 - Technical Skill Attainment

Section 113 (b)(2)(A)(iv)(II) The percentage of CTE concentrators achieving on any other measure of student success in career and technical education that is statewide, valid, and reliable, and comparable across the State. Please identify.

Numerator: Number of graduating career and technical education concentrators who successfully achieve competency levels at or above the Competent level on the NOCTI Job Ready Occupational Specific Assessments or achieve competency on other PDE approved tests in the reporting year.

Denominator: Number of graduating career and technical education concentrators who complete the NOCTI Job Ready Occupational Specific Assessments or other PDE approved tests in the reporting year.

Postsecondary Performance Indicators

1P1 – Postsecondary Retention and Placement

Section 113 (b)(2)(B)(i) The percentage of CTE concentrators who, in 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.

Numerator: Number 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.

Denominator: Number of CTE concentrators who completed their program in the reporting year.

2P1 – Earned Recognized Postsecondary Credential

Section 113 (b)(2)(B)(ii) The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.*

*This means that a student gets counted under this indicator whether the student obtains the credential during participation or within 1 year of completion. The Department interprets “within 1 year of completion” to have the plain meaning of those words: that the student would be counted if the student obtains the credential in the 1 year following that student’s completion of the program.

29 USC 3102 WIOA Definitions Section (52) Recognized postsecondary credential.

The term "recognized postsecondary credential" means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.

Numerator: Number of CTE concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.

Denominator: Number of CTE concentrators who left postsecondary education in the prior reporting year.

3P1 – Nontraditional Program Concentration

Section 113 (b)(2)(B)(iii) The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

Numerator: Number of CTE concentrators, from underrepresented gender groups, in career and technical education programs and programs of study that lead to non-traditional fields.

Denominator: Number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field, during the reporting year.

Appendix E

Stakeholder Comment on State Determined Performance Levels and Response

Stakeholder comments on SDPLs were due December 27, 2019. The Department received comments from four stakeholders.

Rosedale Technical College

Comment: 1P1: Post-Program Placement meets the requirements of the law but does not support the improvement of performance of all concentrators nor does it support the needs of the local education and business community. Employment should be related to the field of study to qualify. Otherwise the training program isn't achieving its goal. Then with the field of study condition, the numerical goals should be revised.

Response: The Department recognizes the value of the comment. Federal regulation does not require employment be related to the field of study. The regulation requires 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."

Comment: 2P1: Earned Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 3P1: Non-traditional Program Concentration meets the requirements of the law but does not support the improvement of performance of all concentrators nor supports the needs of the local education and business community. The "one size fits all" approach taken in the plan for 3P1 has zero value as an actionable metric. Expecting 21.66% female participation for Electricians is absurd, just as expecting 21.66% male nurses is way too easy. The plan for 3P1 is worthless and will do nothing to support the goals of the law.

Response: The Department is in communication with the US Department of Education to determine if alternative methodology would be acceptable while meeting the intent of the regulation.

AW Beattie Career Center

Comment: 1S1: Four-Year Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 1S2: Extended Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment :2S1: Academic Proficiency in Reading Language Arts does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 2S2: Academic Proficiency in Mathematics does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment:2S3: Academic Proficiency in Science does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 3S1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 4S1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 5S1: Program Quality – attained Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 5S4: Program Quality – Technical Skill Attainment does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 1P1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 2P1: Earned Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 3P1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Chester County Technical College High School

Comment: 1S1: Four-Year Graduation Rate does meet the requirements of the law and support the improvement of performance of all concentrators. It does not support the needs of the local education and business community. The PIMS reference guide states: EdNA classified Occupational CTCs do not receive a cohort graduation rate and the sending LEA must report this graduation/dropout information. Occupational CTCs data would be incomplete or non-existent if the data is collected directly from the Occupational CTCs Student template. Likewise, if the sending school fails to report the information in their templates for a graduating Occupational CTC student, then the information could be incomplete or non-existent.

Response: Graduate cohort data are federally defined and approved, and therefore, cannot change. The specific calculation is to match the 2017-18 CTE students with 480 or more cumulative hours to the four-year cohort graduate data.

Comment: 1S2: Extended Graduation Rate does meet the requirements of the law and supports the improvement of performance of all concentrators. It does not support the needs of the local education and business community. Continuing from 1S1, CTCs will have little impact on their own data and not be able to correct inaccurate information to ensure appropriate data is sent to the reporting agency.

Response: Graduate cohort data are federally defined and approved, and therefore, cannot change. The specific calculation is to match 2016-17 CTE students with 480 or more cumulative hours to the frozen cohort graduate data for extended year graduates.

Comment: 2S2: Academic Proficiency in Mathematics does meet the requirements of the law but does not support the improvement of performance of all concentrators or support the needs of the local education and business community. Considering when the student takes Algebra I, middle school or high school, the concentrator status does not match and therefore could significantly impact the performance indicator. CTE should not be responsible for tests before the students come to CTE: there is very little way to demonstrate growth.

Response: The best of 11th grade Keystone results have been federally approved for ESSA accountability reporting. The best of 11th grade results include remediation and retesting. The CTCs and sending districts should work together to ensure those students who are anticipated to reach CTE concentrator status have the opportunity to test, remediate, and retest. The calculation is a match of the 2018-19 CTE students with 480 or more cumulative hours to the 2018-19 Keystone/PASA Algebra best of 11th grade.

Comment: 2S3: Academic Proficiency in Science does meet the requirements of the law and supports the improvement of performance of all concentrators. It does not support the needs of the local education and business community. This Performance Indicator does not support the local education and business community since PA has chosen Biology as the content area for Science. This content area does not align with many CTE programs and therefore does not impact the career pathway to the business community.

It is encouraged that the state consider an alternative test to measure proficiency in Science.

Response: The Department is communicating with US Department of Education regarding the use of this indicator.

Comment: 4S1: Non-traditional Program Concentration does meet the requirements of the law. It does not support the improvement of performance of all concentrators or the needs of the local education and business community. A concentrator is a measure of student retention, which is where the state has struggled the most historically to reach above 12% and maintain it as measured by Perkins IV 6S2 completion data. By assuming a baseline of 15.49%, the state will set itself up for deficiency in meeting the indicator. Additionally, the performance target increment is set at 10% which is significantly above the ACTE recommendation of .5% or 1%.

Response: Under Perkins IV, the Department performed at 16.86% for 6S1 Non-Traditional Participation and 13.64% on Non-Traditional Completion on the 2018 CAR. The Perkins V Concentration Non-Traditional indicator is between the Perkins IV Participation Non-Traditional indicator and Completion Non-Traditional indicator with a baseline of 15.49%. The proposed baseline for Perkins V is a state average and the incremental increase of 1.57%.

Comment: 5S1: Program Quality – Attained Recognized Postsecondary Credential does meet the requirements of the law. It does not support the improvement of performance of all concentrators or support the needs of the local education and business community. This is an incomplete record of student post-secondary achievement. CTE students successfully complete technical dual enrollment courses (in addition to dual credit) and the CTC should be recognized when secondary students earn a college transcript. A college transcript should be added to the list of recognized post-secondary credentials along with industry recognized certificates or certification, and a license recognized by the state involved or federal government.

Response: The Department uses the federal definition, which does not include completion of postsecondary courses. “A credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.”

Sandra Himes, Career and Technical Distinguished School Leader

Comment :1S1: Four-Year Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 1S2: Extended Graduation Rate does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 2S1: Academic Proficiency in Reading Language Arts does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 2S2: Academic Proficiency in Mathematics does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 2S3: Academic Proficiency in Science does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment

3S1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 4S1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 5S1: Program Quality – attained Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 5S4: Program Quality – Technical Skill Attainment does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 1P1: Post-Program Placement does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 2P1: Earned Recognized Postsecondary Credential does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Comment: 3P1: Non-traditional Program Concentration does meet the requirements of the law, support the improvement of performance of all concentrators and supports the needs of the local education and business community.

Response: The Department recognizes the comment.

Temporary Assistance for Needy Families Program (TANF) (OMB Control Number: 0970-0145)

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:

(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).

Pennsylvania will comply with Section 402(a)(1)(A)(i) of the Social Security Act which states that all States must 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 and become self-sufficient.

Defining Needy Families

A needy family is defined as a minor child and his parent(s) or other adult specified relative with whom he lives who meet the income and resource standards established under this TANF State Plan. Eligibility for TANF is also extended to pregnant women who have no other children living with them.

Minor Child

A minor child is under age 18 or is age 18 and a full-time student in a secondary school or in the

equivalent level of vocational or technical training.

Specified Relative

A specified relative is defined as an adult who:

- Is exercising responsibility for the care and control of the child by making and carrying out plans for the support, education and maintenance of the child and applying for assistance on behalf of the child. The finding that a relative is exercising care and control of the child is made whether the relative is the parent or other relative of the child.
- Is maintaining a home in which the child lives with him or her or is in the process of setting up a home where the child will go to live with him or her within 30 days after receiving the first TANF payment.
- Is related to the child as follows:
 - A blood relative who is within the fifth degree of kinship to the dependent child, including a first cousin once removed. Second cousins and more remote cousins are not within the fifth degree of kinship. A first cousin once removed is the child of one's first cousin or the first cousin of one's parent. The fifth degree of kinship includes great-great grandparents and great-great-great grandparents. The fifth degree of kinship also includes other relationships prefixed by great, great-great, grand or great- grand. Blood relatives include those of half-blood.
 - A parent by legal adoption and any of the adopting parent's blood or adoptive relatives as described above.
 - Stepfather, stepmother, stepbrother, and stepsister.
 - A spouse of any of the relatives described above even though the marriage is terminated by death, separation or divorce.

Minor Parent: A minor parent is defined as:

A TANF eligible individual under 18 years of age who has never been married and is the natural parent of a dependent child living with the minor parent or is pregnant. A minor parent is required to live in the home of the minor parent's parent, legal guardian or other adult relative who is at least 18 years of age or in an adult-supervised supportive living arrangement unless exempt. If the minor parent cannot return to the home of a parent, legal guardian, or other adult relative, the Department, in consultation with the county children and youth agency, will provide assistance to the minor parent and dependent child in locating a second-chance home, maternity home or other appropriate adult-supervised supportive living arrangement unless the agency determines that the minor parent's living situation is appropriate. When both parents are living with a child, the family may qualify for TANF only if one or both parents are incapacitated, unemployed or employed with earnings that are low enough to qualify the family for supplemental TANF assistance. Certain individuals who live with the minor child must be included in the application for assistance. These members of the TANF mandatory budget group include the TANF child, the biological or adoptive parents of the TANF child and blood-related or adoptive siblings of the TANF child as long as they also meet TANF eligibility requirements.

A family, for purposes of the 60-month time limit, is defined as a minor child and his parent(s) or other adult specified relative with whom he lives and who is applying on the child's behalf. A family does not include a specified relative who is not included in the TANF mandatory budget group and is seeking TANF assistance only for the minor child.

Absence of a Minor Child

Under TANF, a specified relative may continue to receive benefits for an otherwise eligible minor child who is absent, or expected to be absent, from the home. The State may choose between several periods of temporary absence: Not less than 30 days, up to 45 days, up to 180 days or more than 180 days if good cause is established. Pennsylvania elects to define temporary absence as one that does not exceed 180 consecutive days.

A caretaker relative of a minor child who fails to notify the CAO of the minor child's absence by the end of the five-day period, that begins with the date it becomes clear to the specified relative that the child will be absent for more than 180 consecutive days, is ineligible for TANF for a period of 30 days.

Personal Responsibility - The Agreement of Mutual Responsibility

Pennsylvania exercises the TANF option to establish an individual responsibility plan, known as the Agreement of Mutual Responsibility (AMR). The AMR is a plan of action that the TANF recipient and the caseworker develop together. The purpose of the AMR is to direct the person's efforts toward self-sufficiency by identifying reasonable short-term and long-term goals and determining what activities the person will complete to achieve those goals. The plan addresses how the recipient will overcome identified barriers and lists participation activities and hours of required participation as well as supportive services provided by the Department. The following individuals are required to sign the AMR:

- Adult applicants and recipients who are requested to sign the Application for Benefits, whether or not they are exempt from or have good cause for not meeting the work requirements.
- An 18-year-old full-time high school student is required to sign an AMR at renewal when he or she signs the PA 600 or PA 600R. This may be at the next renewal after his or her 18th birthday or earlier if the student stops pursuing education leading to a high school diploma or General Education Diploma (GED).
- Pregnant teens or minor parents who sign the Application for Benefits on their own behalf.

The AMR stresses the temporary nature of cash assistance and focuses on the steps the recipient must take to establish a path toward self-sufficiency. The AMR also specifies the penalties for failure to comply and the actions to be taken by the Department to support the efforts of the recipient. An individual who refuses to complete or sign the AMR without good cause is ineligible for TANF cash assistance and removed from the cash grant. The person remains ineligible for cash benefits until he or she completes and signs an AMR. The entire family is ineligible if the individual had previously received 60 months of TANF cash assistance which is considered Extended TANF.

NOTE: The explanation of the Extended TANF program can be found in Section B "Special Provisions" of

this document. As part of completion of the AMR, the CAO determines whether the individual is exempt from or has good cause for not participating in work or work activities. For individuals required to participate in work and work activities, the AMR includes a requirement to conduct an initial job search or participate in a work activity. The initial activity assesses the skills, work experience and employability of each adult recipient.

In addition to the initial job search, the AMR is also used to outline other work participation activities and obligations for nonexempt clients. Penalties for noncompliance, without good cause, with work requirements set forth on the AMR, were applied beginning March 3, 1997. Pursuant to Act 35, the AMR will include the following obligations, when appropriate to the individual or family situation:

- Receive prenatal care as recommended by the doctor or clinic and/or ensure that children are immunized, receive periodic health screening and appropriate medical treatment.
- Take steps, if needed, which will improve a child's school attendance and improve his or her chances for earning a high school diploma.
- Submit to a substance abuse assessment by the local county drug and alcohol authority if the CAO determines that an individual may have a substance-abuse problem that presents a barrier to employment. If the assessment indicates that a drug or alcohol problem exists, the individual will be required to participate in and complete an approved treatment program as indicated by the local drug and alcohol authority. If an individual fails to enter or complete a program, he or she can comply by providing proof of substance-free status by submitting to periodic drug testing.
- Make appropriate payments to service providers from allowances provided to enable the individual to fulfill his or her commitment to engage in work or a work activity.
- Comply with work and work activity requirements.
- Meet other obligations specified on the AMR related to self-sufficiency and parenting responsibilities.

These obligations are basic personal and parental responsibilities which are important to the physical and mental well-being of the family. If not addressed, they not only represent potential barriers to employment, but could increase the likelihood that welfare dependency will be passed from one generation to the next.

The Department established penalties and good cause criteria for noncompliance before implementing sanctions associated with these obligations.

Time Limit and Work Requirements for Receipt of TANF

Receipt of TANF assistance is limited to a total of 60 months (five years) in the lifetime of an adult head-of-household or spouse of head-of household. The assistance received as an adult (age 18 and over) head of household or spouse of head of household counts towards the limit. Assistance received by a pregnant minor head of household, minor parent head of household or minor married to the head of household also counts towards the limit. Periods of receipt need not be consecutive to count towards the 60 months. If the TANF budget group includes only children, the 60-month limit does not apply. Beginning March 3, 1997, the Department activated both the 60-month TANF time clock and the pre/post-24-month clock which tracks the number of days of receipt of cash assistance. For applicants, these clocks are activated when cash assistance is authorized. For purposes of the TANF time limit, 60 months equals

1830 days. For purposes of applying sanctions for non-compliance with work/work activity requirements, 24 months equals 732 days.

Determining Eligibility

Pennsylvania is following rules, regulations and procedures in effect prior to the TANF implementation date, except for the following provisions that are authorized or required by State law P.L. 175, No. 35 (Act 35) and P.L. 549, No. 58 (Act 58) or by federal law:

Earned Income Disregard

The gross earned income of recipients is subject to a continuous 50 percent disregard. The disregard encourages recipient families to work and provides additional financial support as they make the transition from welfare to self-sufficiency. Applicants may qualify for the 50 percent disregard if they have received TANF in one of the four months prior to application or if their income is equal to or less than the standard of need. The deduction for the cost of dependent care for an incapacitated adult is made following application of the 50 percent disregard.

Reimbursement for Work Expenses

Effective March 28, 2009, all TANF families with earned income are eligible for \$50 a month as a reimbursement for work expenses.

Income Exclusions

Income is excluded as provided in state regulation at 55 Pa. Code §183.81. Funds deposited into a Saving for Education, Entrepreneurship and Down payment (SEED) account, including interest earned on the account, are excluded as income when determining eligibility. These accounts are currently being funded with private funds as a demonstration project. Funds may be withdrawn for qualified purposes only. If rolled over to a Roth IRA, the money is counted against the resource limit according to 55 Pa. Code Chapter 177, Resources.

The policy on SEED accounts became effective April 1, 2006.

Earned income from temporary employment with the U.S. Census Bureau is excluded. This policy became effective February 1, 2000.

Resources: Resources are excluded as provided in State regulation at 62 P.S. §432.5, and 55 Pa. Code §§177.21(a) and 177.22.

Funds deposited in SEED accounts, including interest, are excluded as a resource when determining eligibility.

The policy on SEED accounts became effective April 1, 2006.

Lump Sum Income

Lump sum income is counted as income only in the month that it is received. Any funds that remain from the lump sum in months following the month of receipt are counted as a resource. Final rulemaking for this change was published in the Pennsylvania Bulletin on August 23, 2002.

Budgeting Method: Semi Annual Reporting (SAR)

- The income of applicants and recipients affects the TANF benefit as follows:
- The income adjustment is based on the best estimate of the expected income (prospective budgeting). The estimate is based upon verified information provided by the client.
- Monthly income is determined by multiplying the gross average weekly income by four (4.0).
- Recipients are required to complete and submit a reporting form once every 12 months. Since eligibility must be reviewed no less often than every six months, a complete redetermination interview occurs in the alternate six-month period.
- Recipients are required to report increases in gross monthly earned income in excess of \$100 and all other changes such as household composition, address, job start, etc. within the first ten days of the month following the month of the change.
- Recipients are required to report increases in gross monthly unearned income in excess of \$50.
- There is no reconciliation of income. No overpayments (underestimates) will be processed unless it was due to a client's failure to properly report income or agency error. Underpayments (overestimates) will not be corrected unless they are the result of a worker error.
- An income adjustment that reduces or increases the grant will be made for the first TANF payment date for which the deadline can be met following proper notice to the client.

SAR was implemented in May of 2003. The Cash Assistance Handbook is updated to reflect the changes.

(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).

Participation in Work or Work-related Activities

To increase WPRs and to promote self-sufficiency Pennsylvania has adopted a work first approach to help clients succeed in their pursuit of self-sufficiency. Pennsylvania requires each adult, minor head of household or minor child age 16 or 17 who is not in school to engage in work or an approved employment and training activity. While the Department wants all clients to be engaged in activities, the focus is on those individuals who are required to participate in RESET.

Participation must begin within seven calendar days after authorization of assistance unless good cause is requested to make childcare and transportation arrangements. Participation includes full-time work, job search, education, or training. The work activity requirement may be met by participation in any one or combination of the following:

- Unsubsidized Employment;
- Subsidized Private Sector Employment;

- Subsidized Public Sector Employment;
- Work Experience;
- On-the-Job Training;
- Job Search and Job Readiness Assistance;
- Community Service;
- Vocational Educational Training;
- Job Skills Training Directly Related to Employment;
- Education Directly Related to Employment;
- Satisfactory School Attendance at Secondary School or in a Course of Study Leading to a High School Equivalency Credential; and
- Providing Child Care Services to an Individual Who is Participating in a Community Service Program.
- Enrolled in a KEYS Program Institution

After 12 months of participation in vocational education, a recipient may continue education or training, but must also participate in another core work activity. Individuals participating in a KEYS Program Institution at one of Pennsylvania’s 14 community colleges, 14 state-owned universities, and 108 Career and Technical schools receive a 12-month exception period, increasing their allowable vocational education time to 24 months. After the 24-month period, these individuals may continue to use vocational education in six-month increments if they meet all extension criteria:

- Must be engaged in a degree or certificate program that will likely lead to employment in a High Priority Occupation as defined by the Department of Labor and Industry;
- Must not be enrolled in any remedial courses;
- Must have a cumulative Grade Point Average (GPA) of 2.0 or above; and
- Must have completed average of 8 credit hours per semester

Since implementation of RESET in 1997, Pennsylvania has allowed individuals under the age of 22, including pregnant or parenting recipients, to meet the work participation requirement by attending high school or participating in a GED program.

Exemptions

To be considered exempt from RESET requirements, recipients must be:

- Under the age of 18 and pursuing a high school diploma or GED; or
- An individual with a verified physical or mental disability which temporarily or permanently precludes him from any form of employment or work activity; or
- The parent/caretaker relative of a child under the age of 6 for whom an alternate child care arrangement is unavailable; or
- The custodial parent in a one-parent household who is caring for a child under the age of 12 months. Pennsylvania exercises the option to allow this exemption, which is limited to a total of 12 months in the parent's lifetime. The 12 months do not need to be consecutive; or

- A parent with a medically-documented need to provide care for a disabled family member living in the home.

An individual who is exempt because of a physical or mental disability is required to participate in a work or work activity when the condition ceases.

A specified relative who is exempt for providing care to a child under the age of six is required to participate in a work or work activity as soon as child care is available.

An exempt individual under 18 years of age is required to participate in RESET upon:

- Becoming 18 years of age;
- Attaining a high school diploma or a certificate of high school equivalency; OR
- Ceasing to pursue a high school diploma or a certificate of high school equivalency

An exempt custodial parent in a one-parent household who is caring for a child under the age of 12 months is required to participate when the child becomes 12 months old, the parent chooses to end the exemption, or when the parent has exhausted the 12-month lifetime limit for this exemption.

A parent providing care for a disabled family member living in the home is not considered work eligible and is exempt from participation in RESET. Medical documentation must be provided to support the need for the parent to remain in the home to care for the disabled family member. When the medical need to remain in the home ceases or can no longer be documented, then the parent becomes work eligible and must comply with RESET requirements.

An individual who is exempt may volunteer to participate in RESET. Exempt volunteers may participate in the RESET activity of their choice, provided they meet the eligibility criteria for those activities or programs. Exempt individuals who volunteer to participate in contracted programs must meet all the requirements of those programs. Such requirements include, but are not limited to, attendance and participation. Exempt volunteers need not conduct an initial job search prior to beginning to participate and are not subject to sanction for noncompliance with the work requirements. Determinations of exemption will be made using the criteria found in 55 Pa. Code §165.21.

Good Cause

Clients who are mandatory to participate in RESET may be granted good cause from participation in work or work activities. Good cause may be granted due to circumstances beyond a client's control. When determining good cause, the Department will consider all the facts and circumstances. Even after the CAO has made a preliminary determination of the lack of good cause, an individual may offer evidence of good cause to avoid sanction. The Department may grant good cause for up to six months at a time.

Determinations of good cause will be made using the criteria found in 55 Pa. Code §165.52.

NOTE: The time an individual spends in “Exemption” or “Good Cause” status counts towards the 60-month time limit.

Special Allowances for Supportive Services (SPALs) for Work and Work Activities

Individuals who participate in work or work activities specified on their AMR may be eligible for supportive services provided by the Department. Except for child care, payments for SPALs, when approved, will be made by the CAO for actual costs up to the Department’s established maximums. The Department promotes the use of community and faith-based organizations when a recipient can obtain work supports through these types of organizations. Eligibility for child care is determined by the CAO and payments are made by Early Learning Resource Centers (ELRC). In many areas of the state, clothing is provided as required through PA WORKWEAR.

Monitoring of SPALs issued to recipients in support of their RESET participation is necessary to assure that expenditures are verified, required, and used for their intended purpose. If it is determined that a SPAL was issued in error or if the payment was misused, an overpayment referral may be filed.

Education Leading to Employment

Since the implementation of welfare reform in Pennsylvania, education in the form of literacy initiatives, pursuit of a high school diploma or equivalent, ESL, Adult Basic Education, post- secondary schooling, and vocational skill training has been a part of the continuum of work activities.

Employment always has been the primary goal of our TANF program. However, the role of education will continue to be emphasized so the clients can gain employment that can move them to self-sufficiency.

Some of our current refinements include:

- Counseling and case management provided by CAO and contractor staff. These activities focus on encouraging clients to pursue education that leads to employment in targeted industry clusters designated by the commonwealth’s workforce development partners. This assures clients will be educated in areas where there is a demand in the labor market.
- Contracted programs that currently include various courses of education. The Department will strive to maintain these and increase them when appropriate;
- Structured outreach efforts that began with post-secondary institutions and will be expanded to include community literacy programs;
- Programs and procedures that assist individuals in completing their educational activities; and
- Employment and training programs that will assist individuals enrolled in post-secondary education to stay in school and meet the challenges of parenthood as well as those associated with participation in education while working.

Effective January 1, 2020, Pennsylvania will continue to integrate employment and training efforts designed specifically for welfare recipients into the larger workforce development system at every appropriate point.

Noncompliance with the RESET Program

A sanction is imposed on any nonexempt individual required to participate in RESET who willfully, without good cause:

- Fails to accept a bona fide offer of employment in which the individual is able to engage;
- Voluntarily terminates employment;
- Fails or refuses to participate in or continue to participate in an available work activity, including work activities specified on the AMR;
- Fails to seek employment;
- Fails to maintain employment;
- Reduces earnings;
- Fails to participate for an average of at least 20 hours per week in work or a work activity; or
- Fails to apply for work at the time and in the manner as the Department may prescribe.

If good cause is not established, the individual will receive an Advance Notice advising of the proposed sanction. The sanctions for failure to comply with the work or work activity requirements are required by 62 P.S. §432.3.

Sanctions for Failure to Comply with RESET Requirements

A mandatory RESET participant who willfully fails to cooperate with the work or work activity requirement, participate in RESET or accept a bona fide offer of employment, or who terminates employment, or fails to apply for work, without good cause, shall be disqualified from receiving cash assistance.

The period of the sanction is:

- First occurrence: 30 days or until the individual is willing to comply with RESET, whichever is longer.
- Second occurrence: 60 days or until the individual is willing to comply with RESET, whichever is longer.
- Third occurrence: Permanently.

If the reason for sanction occurs in the first 24 months, the sanction applies only to the individual.

If the reason for the sanction occurs after the first 24 months, the sanction applies to the entire budget group.

In lieu of the sanctions set forth above, if an employed individual voluntarily, without good cause, reduces his earnings by not fulfilling the minimum work requirement, the cash grant is reduced by the dollar value of the income that would have been earned if the individual would have fulfilled his minimum hourly work requirement, until the minimum hourly work requirement is met.

The Department has opted not to impose a sanction on Medical Assistance benefits for recipients who fail to comply with work and work activity requirements.

Supporting Employment with Child Care

The Department has provided information about subsidized child care benefits available under the “Child Care Works” program in the Child Care Development Block Grant State Plan submitted for the period June 1, 2016 through September 30, 2018. Child care costs are paid through the Child Care and Development Fund (CCDF), except for child care costs of employed individuals who receive TANF, which are paid through commingled TANF funds. Support for child care costs for eligible TANF recipients participating in approved work activities provides access to a full range of child care opportunities.

To help ease the transition for individuals whose TANF benefits end but their need for child care continues, Pennsylvania has implemented Child Care Unification. Verification requirements are also less stringent for individuals who contact the ELRC in a timely manner to apply for Former TANF child care benefits.

During the period of November 1, 2006 through June 1, 2007, unification of subsidized child care services was implemented throughout the state. As a result, the ELRC agencies are responsible for the issuance of all subsidized child care statewide. The CAOs are still the eligibility agent for TANF recipients in need of child care but refer these families to the ELRC agencies for child care enrollment and payment.

Unification of the subsidized child care program promotes a local focus on clients and families, streamlined and provided through a single office that can more effectively manage resources and provide services to a greater number of eligible families. Unification insures that all low- income families get the help of professionals trained to assist with their child care needs and receive information on the benefits of quality child care and early education. It also provides subsidy providers with a single point of contact - the ELRC. All child care providers must now sign a provider agreement which results in payments going directly to the provider.

The ELRC agencies also determine eligibility and issue child care payments for working persons who previously received TANF cash assistance or that have income at or below 235 percent of the FPIGs for their family size. Individuals must either have previously received TANF cash assistance or have income at or below 235 percent of the FPIG and be meeting the work requirement established by DHS. To be potentially eligible for child care under the Former TANF program, the parent/caretaker must:

- Contact the ELRC within 183 days of the date his/her TANF benefits ended. If the ELRC is contacted on day 184 or later, the parent/caretaker is no longer eligible to receive Former TANF child care. Eligibility will then be assessed under the Low-Income child care program.
- Be working and have a need for child care. The parent/caretaker must be working an average of at least 20 hours per week (this may include training, but at least 10 hours per week must be work) no later than the 184th day following the date TANF ended.

When TANF cash assistance ends and a need for child care exists, verification requirements are less strict at the ELRC if the parent/caretaker contacts the ELRC within 60 days of TANF benefits ending. If no changes

have occurred for the parent/caretaker within the 60 days following TANF closing and the ELRC is contacted during that period, the parent/caretaker may self-certify required information. Additional verification is not required to receive Former TANF child care.

If the parent/caretaker contacts the ELRC within 60 days and changes have occurred since TANF closed, or contact with the ELRC is made beyond the 60-day period, the parent/caretaker must provide verification for all required information. Families who previously received TANF benefits may apply for and potentially be found eligible for Former TANF child care up to 183 days from the date TANF closed. Families applying for former TANF childcare within 183 days of TANF closing may receive immediate child care and are not subject to the waiting list.

Consumer education materials and information about minimal health and safety standards are available to all TANF clients and participating providers. Information about child care options, as well as availability and location of care, continues to be available through the Department's contracted ELRC agencies. ELRC agencies offer a parent counseling system that educates participants on the importance of quality early education and child care services. The counseling system also educates parents/caretakers on how to secure high- quality child care in the neighborhood.

ELRC agencies provide resource and referral services to all TANF clients participating in the Department's employment and training programs. These resource and referral services educate parents/caretakers about:

- ELRC services
- Child care choices
- Impact of child care choice on care and early development and the school readiness of children
- Impact of child care choice on ability to retain employment

Parent counseling is also available at the employment and training site on an optional basis to any TANF client seeking the service and on a mandatory basis for TANF clients demonstrating poor attendance at the program or an inability to retain employment due to unstable child care arrangements. This initiative meets TANF purpose number two: end dependence of needy parents on government benefits by promoting job preparation, work and marriage.

(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.

Pennsylvania will comply with Section 402(a)(A)(iii) of the Social Security Act which states that a parent or caretaker receiving assistance must be engaged in work once Pennsylvania determines the parent or caretaker is job-ready or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2). The County Assistance Office will assist all individuals who are required to work to find opportunities through the EARN program and the PA CareerLink® system. Both services can be locally accessed and each person will be able to get individualized services. These

services include job placement assistance, career counseling and training opportunities within a career pathway.

- Individuals who have some work experience will be referred to the EARN program, which assists with job placement and job training opportunities. At this stage of services, it is expected that individuals will be able to access Workforce Innovation and Opportunity (WIOA) services such as job training programs aligned with a career pathway, an On-The-Job training program, or a Transitional Job Program. Individuals with multiple barriers to employment are a priority under WIOA. This priority status will help individuals access the training services they may need to be employed.
- Individuals who need to rectify some barriers such as literacy, “soft skills” development and support services such as child care and transportation assistance, will be referred to a Work Ready provider. This contracted provider will assist the individual with barrier removal strategies and then refer him or her to the EARN program when he or she is ready.
- Individuals who could benefit from a training opportunity at a community college will be referred to the KEYS program. This program enrolls individuals who are ready to learn in a college setting. Once the individual has completed their education at the community college, he or she will be connected to the PA CareerLink® system for job placement assistance.

(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).

Pennsylvania continues to operate its welfare program in a manner that safeguards information about applicants, recipients, and non-applicant household members. Pennsylvania adheres to the provisions on the safeguarding of information in effect prior to implementation of TANF, with the addition of the following provisions:

- The Department of Human Services (DHS) receives information from the Pennsylvania State Police, the Pennsylvania Board of Probation and Parole, the State Department of Corrections, county law enforcement and corrections agencies, and local law enforcement and corrections agencies. This information is used for eligibility purposes, i.e., to identify individuals who have been sentenced for a felony or misdemeanor and have not satisfied the penalty imposed by law, fugitive felons and individuals convicted of drug-related felonies. Information received on individuals who have a drug related felony conviction is important only insofar as DHS may need to refer the individual to assessment/treatment.
- DHS will furnish the current address of a recipient to a Federal, State or local law enforcement officer who certifies that the location or the apprehension of the recipient is within his official capacity.
- However, DHS will furnish the address only on the request of the officer and only if the officer furnishes DHS with the name of the recipient and states that the recipient is fleeing to avoid prosecution, or custody, or confinement after conviction for a felony or high misdemeanor under

State law, or the recipient has information that is necessary for the officer to conduct his official duties.

- DHS will give information in response to a subpoena if directed by the Office of General Counsel.
- DHS will disclose information to entities outside of DHS when necessary for restitution or collection of assistance benefits; to cooperate with IV-D agencies to enforce child support orders and paternity determination; or to protect the welfare of children and adults who are unable to manage their own affairs or otherwise protect their rights when the information is needed to get services the client has requested and the services will advance the client's welfare and the client has authorized DHS to release specific information to the agency.
- DHS will protect the rights of individuals to reasonably ensure that the information will be used for purposes associated with assistance, that the receiving agency will use the information only for the purpose for which it was made available, and the standards of confidentiality are at least equal to that of the Department.

(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).

Pennsylvania has several initiatives in place aimed at preventing teen pregnancy (reducing out of wedlock births).

- Through a grant agreement with AccessMatters, reproductive health services are provided to high school students in Allegheny, Berks, Dauphin, Delaware, Fayette, Lackawanna, Lycoming, Lehigh, and Philadelphia Counties through the Health Resource Center (HRC) Program. Services include: counseling and education about abstinence, health, and sexuality, information about making responsible choices about reproductive health and relationships, sexually transmitted disease (STD) screening and pregnancy testing, and referrals to school, community-based resources, and the family planning network for free or low-cost reproductive health services. AccessMatters is in the process of implementing sites in Beaver and Venango Counties.
- In September 2010, the Department was awarded funding from the Administration for Children and Families for the Personal Responsibility Education Program (PREP). PREP is a statewide project that serves at-risk, high need adolescents in schools, not-for-profit 501(c)(3) organizations, city or county health departments, community-based health or human service agencies, licensed partial hospitalization or outpatient drug and alcohol facilities, licensed psychiatric residential treatment facilities, licensed residential substance abuse facilities, residential programs serving delinquent youth licensed by the Department of Human Services, office of Children Youth and Families (OCYF), OCYF Youth Development Centers, and OCYF Youth Forestry Camps. The goal of the PREP is to empower adolescents to change their behavior in ways that will reduce their risk of becoming infected with HIV, other STDs, and their risk for pregnancy. Implementation sites are providing education on abstinence, contraception, and at least three adulthood preparation subjects: healthy relationships, adolescent development, and healthy life skills by implementing an approved evidence-based teen pregnancy curriculum. Training is provided to staff at implementation sites on lesbian, gay, bisexual, transgender, and questioning (LGBTQ) cultural competency. The Department recently selected fourteen PREP implementations sites through a Request for Applications (RFA) to begin services October 1, 2018.

- Through Grant Agreements with Pennsylvania's four regional family planning councils, comprehensive reproductive health services are provided to sexually active adolescents 17 years of age and younger. These services include routine gynecological care, pregnancy testing, contraceptives, cervical cancer exams, screening and treatment for sexually transmitted infections, and education/counseling. These services are provided in every county in the commonwealth through a network of family planning provider sites.

The Department is using an approach that utilizes evidence-based or evidenced-informed programming that combines mentoring, adult-supervised activities, adult-led group discussions, and parenting education to increase the protective factors of youth ages 9-14. By utilizing the Search Institute's 40 Developmental Assets framework, youth will be provided with building blocks for healthy development to help them grow into healthy, caring and responsible young adults. The Search Institute's developmental assets framework includes 20 external assets organized under the following four categories: support, empowerment, boundaries and expectations, and constructive use of time; and 20 internal assets organized under these four categories: commitment to learning, positive values, social competencies, and positive identity. The developmental assets serve as protective factors to help youth avoid negative risky behaviors. The positive effects of these protective factors increase as the number of assets a youth has increases. Enhancing the developmental assets of youth provides an opportunity for them to transition into sexually healthy adolescents able to realize their individual potential around critical developmental tasks related to sexuality.

Services are focused on adolescents and provided by current contractors. These initiatives are funded with 100 percent federal funds.

According to the Department of Health, in 2016, there were 137,191 births in Pennsylvania, of which 56,179 or 40.9 percent were out-of-wedlock. Of the out-of-wedlock births, 6,005 or 10.7 percent were to women 19 years of age or younger. As outlined in the table below, even as the total number of out-of-wedlock births increased or decreased, the number of out-of-wedlock births to women 19 years of age or younger decreased gradually, but consistently, from 2002 to 2016. This is the most recent data as of July 2018.

Year	Births	Out-of-Wedlock	Out-of-Wedlock 19 years of age or younger
2016	137,191	56,179 (40.9%)	6,005 (10.7%)
2015	140,165	57,626 (41.1%)	6,790 (11.8%)
2014	140,979	58,070 (41.2%)	7,460 (12.8%)
2013	139,606	58,129 (41.6%)	8,180 (14.0%)
2012	140,146	58,744 (41.9%)	9,514 (16.1%)
2011	141,300	58,879 (41.7%)	10,292 (17.5%)
2010	141,681	58,727 (41.5%)	11,355 (19.3%)
2009	144,627	59,194 (40.9%)	12,037 (20.3%)
2008	148,166	60,269 (40.7%)	12,905 (21.4%)
2007	149,717	59,466 (39.7%)	12,966 (21.8%)

2006	148,706	56,749 (38.3%)	12,683 (22.4%)
2005	145,033	52,849 (36.5%)	12,036 (22.8%)
2004	144,494	50,487 (35.2%)	11,772 (23.4%)
2003	145,485	48,985 (33.9%)	11,833 (24.2%)
2002	142,380	47,519 (33.5%)	11,879 (25.0%)

(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.)

Prevention Education/Public Awareness Activities:

The Pennsylvania Coalition Against Rape’s (PCAR) effort to reduce sexual violence has shifted to changing societal norms that reinforce gender-based violence and promoting healthy relationships. Research provided by the Centers for Disease Control and Prevention consistently shows that while programming to teens is important, it is only one component of prevention. Perhaps the most important component is involving the community in prevention by teaching about how stereotypes reinforce gender-based violence (community could be defined as a city, town, college campus, high school, or peer group). Resources and training provided by PCAR assist rape crisis centers in developing comprehensive prevention plans that include parents, teachers, staff, students, and bystanders. PCAR is requiring multiple sessions with groups, rather than the single, risk reduction programming typically provided to schools. These prevention activities are funded by Title XX and Rape Prevention and Education.

PCAR’s network of rape crisis centers which serve all 67 counties in Pennsylvania continue to use PCAR’s initiatives and materials to enhance their own prevention education programming within their respective communities. The following initiatives continue to be used throughout Pennsylvania.

Please note that none of these initiatives are funded with TANF funds.

The network of rape crisis centers serving all 67 counties in Pennsylvania provide training to law enforcement officials regarding all forms of sexual assault related crimes, including statutory rape. In addition, all the services provided by the centers are also available to men, including prevention programming which addresses the role of everyone in the prevention of all forms of sexual violence.

Continuing initiatives include:

1. Use of Multi-media including Websites, Facebook, and Twitter

PCAR continues its use of several websites. These websites provide information about healthy relationships and sexual violence awareness and prevention, in addition to providing resources for teens to seek help. During FY 2016-2017, the PCAR website (www.pcar.org) had 268,661 page views. PCAR has also developed a Facebook page which it updates daily and has begun using Twitter (@PCARORG) to communicate upcoming events. As of June 30, 2017, the Facebook page

had 2,873 likes and PCAR has 6,398 followers on Twitter. Social media activity continues to be a growth area.

2. Sexual Assault Awareness Month

Sexual Assault Awareness Month: The 2017 theme for Sexual Assault Awareness Month was “Engage New Voices”. PCAR’s Communications team distributed promotional items to rape crisis centers throughout Pennsylvania for Sexual Assault Awareness Month. These items included a palm card, “How we respond to sexual violence matters”, static clings and coffee sleeves. The communications team also developed several blogs and social media efforts to engage the community regarding the topic of sexual violence.

3. Development and Distribution of Print materials: The PCAR Communications Department and Training/Technical Assistance Team worked together to develop the following materials during FY 2016-2017.

PCAR Resource Materials:

- 2015-2016 PCAR Annual Report
- 2016-2017 PCAR Annual Report
- The Resource (PCAR’s newsletter) – four editions

Manuals:

- Campus Orientation Training Curriculum
- PCAR Center Manual
- Campus-Related Crimes of Sexual Violence: Trial Packet for Pennsylvania Judges

Factsheets:

- Sexual Violence Protection Orders—What you need to know
- About the Pennsylvania Coalition Against Rape
- Investigating Sex Trafficking
- Identifying Human Trafficking
- Commercial Sexual Exploitation (Bench card)
- Mental illness (Bench card)
- Protection of Victims (Bench card)
- SORNA (Bench card)
- HB 1051- Safe Housing
- HB 1947- Child Sexual Abuse Statute of Limitations
- SB 851 Safe Harbor
- Connecting After a Disclosure of Sexual Abuse Within the Faith Community
- Making Connections with Faith Communities
- Sexual Violence in Communities
- Forensic Rape Exam Testing: Victim Notification
- Preventing Sex Trafficking and Strengthening Families Act
- Trauma-Sensitive Yoga for Survivors of Sexual Assault
- Bail (Bench card)
- Child Witnesses—Competency and Taint (Bench card)

- Children & Youth (Bench card)
- Expert Testimony (Bench card)
- Impeachment of Character Witness (Bench card)
- Mental Health Records of Service Providers (Bench card)
- Other Crimes (Bench card)
- Prompt Complaint (Bench card)
- Rape Shield (Bench card)
- Tender Years (Bench card)
- Act 27-Sexual Assault Testing & Evidence Collection
- HB 741- Mandatory Minimum Sentencing
- Protecting Survivors Healthcare
- SB 534-Protecting Young Victims from Sexual Abuse Act
- VAWA

Brochures:

- Child Sexual Abuse (Redesign and content update)
- Civil Protections Orders (multiple languages)
- Sexual Violence-Teens (redesign and content update)
- What is Sexual Violence (redesign and content update)
- Sexual Violence: A Guide for Healthcare Professionals
- How We Respond to Sexual Violence Matters (palm card)

Guides:

- Identifying Human Trafficking (pocket guides)
- Police Response to Sexual Assault
- Guide for Friends and Family of Sexual Abuse Survivors
- Civil Protection Orders in Pennsylvania: A Primer for Court Interpreters
- Lobbying, Advocacy, and Education: A Policy Resource for PA Rape Crisis Centers

Infographics:

- Statutes of Limitations Infographic

Technical Assistance Bulletins

- Celebrating Sexuality After Sexual Abuse
- Statutory Sexual Assault: What Advocates Need to Know
- Legislative Advocacy Made Easy: An Advocate's Guide to Connecting with Lawmakers
- Consent Capacity
- Considerations For Sexual Assault Programs That Employ Mental Health Therapists
- Guardianship and Individuals with Intellectual Disabilities
- Immigrant Survivors of Sexual Assault
- LGBTQIA
- Racism and Sexual Violence

Talking points

- High Profile Individuals Making Comments About Sexual Assault
- PCAR-PCADV Joint Advocacy Day
- Bill Cosby Trial Talking Points

- HB 1947 – Statutes of Limitation in Child Sexual Abuse Cases

4. Training/Resources to Increase the Capacity of Rape Crisis Center’s to Outreach in Their Communities:

This initiative includes PCAR’s provision of training at a prevention summit - *Putting the Pieces Together: A Unified Approach to Prevention*. The following workshops in the prevention track were offered at the conference:

- Hallmarks of Prevention
- Cultural Humility
- Foundational Skills of Prevention Education
- PowerPoint Best Practices & Adult Learning
- Using Evaluation for Data-Driven Decision Making
- Assessing Community Readiness
- Marketing Prevention
- Activities Based Evaluation

In addition to the Prevention Summit, PCAR provided a number of trainings to local rape crisis centers during FY 2016-2017. Some of the topics included:

- Healthy Sexuality
- Evaluating Prevention Programs
- Bystander Intervention
- Campus Sexual Violence Prevention
- Sexual Violence Protection Orders
- Misuse and Abuse of Alcohol and Sexual Violence
- Long-term Impact of Sexual Violence
- Media and Sexual Violence
- Vicarious Trauma

(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).

Pennsylvania continues to operate the TANF Program based on the rules and regulations for delivery of benefits in effect prior to implementation. Eligible recipients receive continuing benefits in two semimonthly cash payments delivered primarily through the Electronic Benefits Transfer (EBT) System.

Pennsylvania prevents assistance provided under the TANF program from being used in EBT transactions in liquor stores, casinos, and adult-oriented entertainment establishments, in which performers disrobe or perform in an unclothed state for entertainment, in the following manner:

- Pennsylvania statute 62 P.S. § 484, enacted December 2009, prohibits the purchase of liquor or alcohol with an EBT card. 62 P.S. § 483 violators will be guilty of a misdemeanor and sentenced to pay a \$100 fine and/or six months in jail. The Pennsylvania Liquor Control Board (PLCB) is responsible for enforcing this at PLCB Wine and Spirits shops. As such, they do not subscribe to QUEST with their point of sale devices and cannot accept EBT cash benefits. In addition, there are no ATMs located in PLCB Wine and Spirit Stores.
- In 2010, Pennsylvania's Gaming Control Board mandated third-party processors to block, voluntarily, the use of the EBT card BIN (Bank Identification Number) at their ATMs in all twelve of Pennsylvania's casinos. DHS completed initial testing of the voluntary agreement at four new Pennsylvania casinos in April 2011. The EBT Risk Management Unit (EBT RMU) performs ongoing testing by screening all EBT transactions to identify any conducted at the twelve casino addresses. In December 2015, the EBT RMU identified sixty EBT cash transactions at a Pennsylvania casino address. Upon further investigation, it was identified that EBT cards began being delivered to Columbia Date Services (CDS), Pennsylvania's EBT vendor, in another payment network BIN file. The logic of the processing platform is designed to seek alternative routes for authorization when the preferred route is unavailable. As a result, EBT transactions which previously only had the option of being automatically declined, obtained an alternate route that allowed them to be authorized. CDS has since implemented a new process that validates payment network BIN files to identify if they are now including EBT cards. This process was tested on January 21, 2016, and fully implemented in production on January 22, 2016. Due to this incident, 13 EBT Monitoring Letters went sent out reminding individuals not to use their EBT card at one of the prohibited locations.
- In December 2013, Pennsylvania added language to the signed affidavit page of Pennsylvania's Common Application and Benefits Review forms and on the Agreement of Mutual Responsibility, which prohibits the use of TANF funds through EBT transactions in liquor stores, casinos and places for adult entertainment. Pennsylvania also expresses this language on the electronic COMPASS application process. The Prohibitions and Penalties page of Pennsylvania's Common Application and Benefits Review forms also warns that misuse of the EBT care of PA Access Card, without good cause, may result in a fine, prison or both. DHS has not promulgated regulation to impose a penalty for using TANF assistance via EBT transaction in liquor stores, casinos or adult entertainment establishments; however, DHS is working with Pennsylvania's General Assembly to draft public law-making misuse punishable.
- To monitor the misuse of TANF assistance through EBT transactions, the EBT RMU developed a naming convention and address recognition protocol that identifies liquor stores, casinos and adult entertainment establishments. The EBT RMU screens all cash transactions on three randomly selected dates per month using the pre-determined key words. The EBT RMU also screens all cash transactions using the keyword "liquor" for the entire month. Staff reviews each questionable transaction to determine if the recipient used TANF assistance through EBT transaction in a liquor store, casino, or adult entertainment establishment. Staff reviews each location to see whether it meets the criteria for a retail establishment that provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.
- DHS has elected to send letters to individuals with prohibited transactions reminding them not to use their TANF assistance at one of the prohibited locations. Since 2014, DHS has sent 123 letters to individuals who have used their EBT card at an in-state liquor store, and two who had used

their EBT card at an establishment that provides adult-oriented entertainment in which performers disrobe. To date, we have not found any individual who, after receiving an EBT Monitoring Letter, made any additional EBT transactions at one of the prohibited locations.

(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).

Pennsylvania continues to provide access to TANF benefits and related services in each of the commonwealth's 67 counties based on the policies and procedures in effect.

During Fiscal Year 1997-98, Pennsylvania implemented a Statewide Electronic Benefits Transfer (EBT) system to replace the paper-based welfare benefits issuance system. EBT is a state-of-the-art means for electronically issuing welfare recipient benefits through a statewide network of automatic teller machines (ATM) and point-of-sale devices to electronically deliver cash assistance and SNAP benefits throughout the commonwealth.

Pennsylvania TANF recipients may access their benefits at ATMs located throughout all 67 counties in banks, grocery stores, shopping centers, and gas stations. The ATM tells the user that a surcharge will be charged and, if he or she does not want to pay it, the ATM provides the option to cancel the transaction. Many ATMs do not charge any transaction fee for use.

Pennsylvania's TANF recipients may use their EBT cards at any store that accepts the Pennsylvania EBT card. Use of the EBT card in stores is a cost-free transaction for the recipient. Recipients may access their benefits at no cost by requesting cash after a POS purchase and access their benefits without penalty.

Pennsylvania provides recipients information about using EBT to access benefits and potential fees:

- Online at the Pennsylvania EBT Website (<https://www.ebt.acs-inc.com/paebtclient/index.jsp>)
- When the recipient creates his or her unique EBT PIN at the County Assistance Office.
- On the Pennsylvania Department of Human Service website. (http://www.dhs.state.pa.us/foradults/supplementalnutritionassistanceprogram/electronicbenefitstransferebt/S_001060)
- In the Pennsylvania Cash Assistance Handbook, available to the public online.
- When making an ATM transaction, the ATM displays transactions fees. The transaction will not continue if the user declines the fees.

Pennsylvania provides a 24/7 toll-free EBT hotline (1-888-EBT-PENN or 1-888-328-7366) that recipients can call to:

- Find out where the EBT card can be used.
- Check SNAP and cash assistance account balances.

- Report that an EBT card has been lost or stolen.
- Report that the EBT card does not work.
- Ask question about using the EBT card.

(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)

Pennsylvania does not treat families moving into the state differently than current 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)

Pennsylvania is exercising the options available in Title IV of PRWORA to continue or to authorize TANF benefits for non-citizens who are "qualified aliens," as defined by PRWORA, and who meet all other eligibility requirements.

(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).

Earned Income: Sanctioned, Disqualified, or Otherwise Ineligible Individuals

The earned income of sanctioned, disqualified, or otherwise ineligible budget group members is now treated uniformly by computing their income as if these individuals were included in the budget group. This proposal ensures equitable treatment of all TANF households. This policy became effective August 2005. Individuals who have been sanctioned can get an appointment to discuss how to remedy the situation. It is the intention of the County Assistance Office to treat all persons fairly and help them to connect to services that leads to employment and hopefully self-sufficiency.

Right to Appeal: Pennsylvania will continue to follow the appeal and fair hearing regulations and procedures consistent with 55 Pa. Code Chapter 275.

(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.

Effective January 1, 2020, as established by Act 35, recipients of TANF in Pennsylvania are enrolled in an employment and training program known as the Road to Economic Self-sufficiency through Employment

and Training (RESET) to enable them to obtain employment and become self-sufficient. The primary means to achieve self-sufficiency is through employment. The program offers a continuum of services which can establish a work history, with increasing wages and benefits that lead, over time, to economic independence and self-sufficiency. Contracted providers utilize community partners to seek training opportunities available at low or no cost to TANF individuals. One incentive Pennsylvania avails to contracted providers is a pay-for-performance credentialing program where TANF participants are able to receive training in many areas such as a Certified Nursing Assistant (CNA), direct care nursing and general nursing, EKG technician, licensed practical nurse (LPN), medical assistant, medical/billing coding, nurse's aide, nurse assistant, pharmacy technician, and phlebotomy technician, but this could also include food services that may lead to employment in a care facility. Once the individual receives their accreditation, the provider is given a bonus payment for a successful credentialing. In addition, the KEYS program supports individuals as they work to obtain post-secondary degrees in many fields, among them are individuals working towards LPN, registered nurse (RN), and other practical and administrative medical degree programs.

A review of demographic data shows that the number of Pennsylvanians age 65 and older is rapidly increasing. This trend is projected to continue through the year 2020. In response to the anticipated need for trained workers to assist in providing quality service to this population, Pennsylvania is considering plans to best determine how to assist individuals to train for, seek, and maintain employment providing direct care in a long-term care facility or in other occupations related to elder care. Understanding that our system relies heavily on family caregivers who provide unpaid care to their loved ones in the home, beginning April 20, 2017 more than 1.6 million family caregivers across Pennsylvania will now receive critical assistance to help older loved ones remain at home with the implementation of the state's Caregiver Advise, Record, Enable (CARE) Act. The CARE Act helps family caregivers when their loved ones go into the hospital and as they transition home by providing caregiver training. In addition, TANF individuals who care for a disabled/elderly family member in their home may be eligible to receive payment as a caregiver through Long Term Care home waiver programs, in the same vein as the CARE Act, knows that elder family member are sometimes best served and cared for in the home by loving relatives.

Finally, Pennsylvania has united efforts across Departments and Offices to create the HealthCare Committee PA Workforce Development Board, which is a statewide effort to specifically address the shortage of healthcare workers in the Commonwealth.

(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).

Child Care Provided to Employed Families

This initiative is funded with commingled funds.

Effective July 2000, this initiative provides subsidized child care benefits to eligible employed families who need child care to participate in unsubsidized employment, subsidized employment and/or education/training activities.

Eligibility for this initiative is limited to needy families, as defined in this State Plan, who have a gross annual earned income that does not exceed 235 percent of the FPIGs. The parent or responsible adult must be a current or former TANF recipient and must be working a number of hours established by the Department as a means to support the parent's transition to self-sufficiency.

The Pennsylvania Pre-K Counts program provides high-quality early childhood education to Pennsylvania children in diverse settings, ranging from school-based programs, Keystone STARS 3 and 4 child care centers, private academic preschool and Head Start agencies. Eligibility does not exceed 235 percent of FPIG.

This initiative meets TANF purpose number two — end dependence of needy parents on government benefits by promoting job preparation, work and marriage.

The Education Leading to Employment and Career Training (ELECT) Initiative

The ELECT initiative is funded through TANF federal funds.

July 1, 2012, the ELECT initiative became a joint venture between the Pennsylvania Department of Education (PDE) and Office of Child Development (OCDEL). Effective July 1, 2015, the Office of Income Maintenance (OIM) acquired oversight of the ELECT program and will be working collaboratively with PDE to manage the program. Funds are now transferred from DHS to PDE through a Memorandum of Understanding for the administration of this program. The ELECT initiative is designed to assist parents of minor children, including expectant parents, to return to or remain in school, prevent repeat pregnancy, maintain attendance, obtain their high school diploma or equivalent, develop responsible parenting skills, and secure post-graduation employment, education, or training that will help them become successful parents and self-sufficient adults. Acknowledging paternity is not required to participate.

To be eligible for ELECT, an applicant must:

1. Be a student of a high school, cyber school, or high school equivalency program served by ELECT; AND
2. Be a custodial or non-custodial parent of a minor child; AND
3. Have gross earned income that does not exceed 235 percent of the FPIGs.
NOTE: The student does not have to be employed to qualify for services. The income of the student's parent(s) is not used to calculate eligibility; AND
4. Not be participating in any employment or training program funded through DHS, including the job retention periods required under those programs.

This initiative meets TANF purpose number two, which is to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage; purpose number three, which is to prevent and reduce the incidence of out-of-wedlock pregnancies; and purpose number four, which is to encourage the formation and maintenance of two-parent families.

Nurse-Family Partnership

This initiative is funded with commingled funds.

Effective October 2001, this initiative provides home visitation management services to eligible low-income, first-time mothers only. The home visitors are nurses who follow guidelines that focus on the mother's personal health, quality of care provided to the child and the parent's own life-course development.

The purposes of this initiative are as follows:

- Improve pregnancy outcomes by helping women engage in good preventative health practices including obtaining thorough prenatal care from their health care providers, improving their diets and reducing use of cigarettes, alcohol and illegal substances.
- Improve child health and development by helping parents provide more responsible and competent care for their children.
- Improve families' economic self-sufficiency by helping parents develop a vision for their own future, plan future pregnancies, continue their education and find jobs.

Eligibility requirements for this initiative are as follows:

- Must be enrolled into the program by 28 weeks gestation; pregnant with the first child; and
- Must have a gross annual earned income that does not exceed 235 percent of the FPIGs.

This initiative meets TANF purpose number two, which is to end dependence of needy parents on government benefits by promoting job preparation, work and marriage and purpose number three, which is to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies.

Head-Start Collaboration Project

This initiative is funded with TANF MOE funds.

This initiative offers classroom services or home visits to children from age three to five and their families. There are 40 grantees and 5,549 children served. Programs can serve children either as new enrollments or extending the day for existing children. If programs choose the latter, they must add a full half day to

make a full day. As mandated by the Head Start performance standards, Head Start grantees provide an educational program and comprehensive family-oriented services including parent education, early education enrichment, health, nutrition, family goal setting, literacy and intervention programs that support the child success in school and the community and support the family's education and training enabling them to make educated decisions.

Eligibility requirements for the Head Start Supplemental Assistance Program year funding are as follows:

- Must be a Head Start/Early Head Start grantee or delegate agency, and
- Must use the grant to provide Head Start services to children from low-income families who meet the Head Start eligibility criteria (whose incomes do not exceed 130 percent of the FPIGs).

This initiative meets TANF purpose number two, which is to end dependence of needy parents on government benefits by promoting job preparation, work and marriage and TANF purpose number three, which is to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies.

Pennsylvania Pregnancy and Parenting Support Services Program

This initiative is funded with 100 percent segregated Federal funds.

Effective July 2002, this initiative provides pregnancy and parenting support to women in need. The program primarily provides information and counseling that promote childbirth instead of abortion and assists pregnant women in their decisions regarding adoption or parenting. Services are free to women participating in the program.

Eligibility requirements for this initiative are as follows:

- A woman must be pregnant, or suspect she is pregnant, or be the parent of an infant less than 12 months of age; and
- Have a gross annual earned income that does not exceed 185 percent of the FPIGs.

This initiative meets all four TANF purposes.

Additional Information

A. General Provisions

Program Administration

The Department is responsible for administering the TANF program in 67 CAOs. While program requirements are applied consistently statewide, the maximum TANF benefit varies from county to county based on the four benefit schedules currently in effect.

The Department continues to use private contractors to supplement the work of the CAOs to provide services, such as job search, job-readiness preparation, education and training services, and to assist clients to enter the work force, retain jobs and advance in employment.

Individuals who receive TANF benefits on or after March 3, 1997, are subject to all requirements of the TANF program. Recipients are subject to the 60-month lifetime limit and the work requirements of Act 35 beginning March 3, 1997.

Defining Assistance/Non-Assistance

Assistance

For purposes of applying TANF time limits, work and work activity requirements and child support cooperation (including assignment) requirements, the term “assistance” is defined as cash payments, vouchers and other forms of benefits designed to meet a family’s ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items and general incidental expenses). Assistance also includes:

Supportive services such as transportation and TANF-funded child care provided to non-employed cash assistance recipients.

If a benefit falls within the definition of assistance, the benefit counts as assistance even when receipt of the benefit is conditioned on participation in work, community service or other work-related activities. Financial eligibility for TANF, Time-Out and Extended TANF cash assistance is determined by comparing the net countable income for a calendar month to the budget group’s Family Size Allowance (FSA), plus any special need allowances. If the income equals or exceeds the FSA plus any special needs allowances, the budget group is ineligible for cash assistance. Current FSA levels are found in 55 Pa. Code, Chapter 183, Income, Appendix B. Table 3. The resource limit is \$1,000.

Funding for TANF is commingled state and federal funds. Funding for Time-Out is segregated state funds and funding for Extended TANF is all federal monies.

Non-Assistance

The final Federal TANF Rules of April 12, 1999, include the potential for funding a class of benefits known as “non-assistance.” Pennsylvania excludes from the definition of “assistance” activities that support employed former TANF recipients or those who are eligible for, but not receiving “assistance.” For example, case management services, job retention programs, child care and wage subsidies may be provided as on-going supports to employed former cash assistance recipients. These services and benefits received by the family are considered “non- assistance,” and the family receiving them after leaving cash assistance is no longer using months of time-limited TANF assistance.

In Pennsylvania, the Department constantly reviews its programs to ensure they meet the needs of low-income families as envisioned in the four TANF purposes. The Department incorporated one non-assistance initiative included in the FY 2018-2019 budget that provide short-term benefits, work supports and other services to eligible low-income families and non-custodial parents. Although these short-term benefits, work supports and services are funded with TANF funds, they are excluded from the definition of “assistance” in 45 CFR §260.31 and do not count towards the 60-month TANF time limit.

In addition, individuals receiving these benefits are not subject to the TANF work requirement or to a federally-imposed child support requirement. Pursuant to 45 CFR §260.31, the term “non-assistance” is defined below:

Non-Assistance includes:

- Non-recurrent, short-term benefits that:
 - Are designed to deal with a specific crisis situation or episode of need;
 - Are not intended to meet recurrent or ongoing needs; and
- Will not extend beyond four months.

OR

- Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision and training);

OR

- Supportive services such as child care and transportation provided to families who are employed;

OR

- Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement and other employment-related services that do not provide basic income support.

In accordance with 45 CFR §260.31 and subject to the availability of resources, the Department intends to provide funding included in the FY 2018-2019 budget for the following non-assistance initiative to certain needy families, based on the program description and eligibility set forth below:

Diversion Component

This initiative provides funds to certain eligible families to meet a specific crisis situation or episode of need that is intended to eliminate a family's need for ongoing cash assistance.

To be eligible for a diversion benefit the applicant family must meet income/resource requirements and definitive conditions (minor child, specified relative and deprivation) for receipt of TANF.

The Diversion component provides a one-time non-assistance payment to eligible families. The adult in the family must have an expectation of receiving income and must have a recent work history or job skills training. A recent work history is defined as having worked within the 90-day period immediately preceding the date of application, or within 180 days of the date of application in areas qualified as waived areas for time limited SNAP benefits. The Diversion payment is equal to the FSA for one, two or a maximum of three months, depending upon a family's need. A family will be eligible for only one payment in a 12-month period.

Examples of a crisis situation or episode of need are:

- The threat of homelessness, eviction, or utility shut off.
- Employment, school, or training related needs.
- Car repairs, inspections, payments, insurance premium payments and other transportation cost.
- Costs to relocate to secure employment.
- Child care costs.
- This initiative meets TANF purpose number one, which is to provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives and number

two, to end dependence of needy parents on government benefits by promoting job preparation, work, and marriage. This initiative is funded with 100 percent federal funds.

Determining Eligibility

Penalty for Non-cooperation with Child Support Requirements

If a parent or other caretaker relative fails to cooperate in establishing paternity or in establishing, modifying or enforcing a child support order, without good cause in accordance with Act 58, state regulation provides that the cash assistance allowance, which is the monthly assistance grant, is reduced by 25 percent. The grant remains reduced until the parent or caretaker relative demonstrates cooperation or establishes good cause for noncooperation.

Penalty for Conviction of Welfare Fraud

An applicant or recipient who has been convicted of securing or attempting to secure or aiding or abetting or attempting to aid or abet any individual in securing TANF, Medical Assistance or Federal SNAP by means of a willfully false statement or misrepresentation, or by impersonation, or by willfully failing to disclose a material fact regarding eligibility either before or at the time of, or subsequent to the application for assistance is ineligible for cash assistance. The period of ineligibility is six months from the date of the first conviction, 12 months from the date of the second conviction, and permanently from the date of the third conviction. To identify instances of potential fraud the Commonwealth of Pennsylvania uses the Income Eligibility Verification System (IEVS), the Systematic Alien Verification for Entitlements (SAVE) Program and the Master Client Index (MCI). IEVS provides information on:

- Wages and unemployment compensation through the Pennsylvania Department of Labor and Industry.
- Supplemental Security Income and other income through the Social Security Administration.
- Both earned and unearned income through the Internal Revenue Service.
- Deceased person matches through the Department of Health.
- Simultaneous receipt of TANF benefits in multiple states through the Public Assistance Reporting Information System.
- Criminal history information through the Commonwealth Judicial Inquiry System.

Additionally, a data exchange for lottery winner's match is available.

The SAVE Program verifies citizenship, identity and immigration status for non-citizens. MCI matches the TANF file with the Child Care Management Information System and the Home and Community-Based Information System to defer fraud by the elimination of duplicate services across programs.

Satisfaction of Criminal Penalties

An individual who has been sentenced for a felony or misdemeanor offense and who has not satisfied the penalty imposed by the court is ineligible for TANF. An individual who is required to pay fines, cost and restitution, and who is in compliance with an approved payment plan, may be eligible for TANF.

Fraudulent Misrepresentation of Residence

An individual is ineligible for TANF for a period of ten years if he is convicted in a federal or state court of fraudulent misrepresentation of residence for the purpose of receiving TANF, Medical Assistance, SNAP or Supplemental Security Income in two or more states simultaneously.

Penalty for Conviction of a Felony Offense for Possession, Use or Distribution of a Controlled Substance

As permitted under federal law, Pennsylvania enacted legislation to opt out of the federal requirement that imposes permanent ineligibility on an individual who is convicted under federal or state law of a felony offense that was committed after August 22, 1996, related to the possession, use or distribution of a controlled substance. Act 44 was signed into law on December 23, 2003. An individual may receive cash assistance, but he or she must agree to assessment/treatment if assessment/treatment is needed based on his or her statement, current participation in a treatment program or other substantial evidence that the Department may have. The individual must comply with assessment/treatment if the treatment is necessary, available and appropriate for benefits to continue, unless there is good cause for not doing so.

Failure To Appear At Criminal Court Proceeding

An individual who, as a defendant, fails to appear at a criminal court proceeding when issued a summons or bench warrant is ineligible for TANF until he complies with the summons or bench warrant.

Fugitive Felon

An individual who is fleeing to avoid prosecution or custody or confinement following a conviction for a felony or who is violating probation or parole imposed under Federal or State law is ineligible for cash assistance. If the individual receives a Presidential pardon for the conduct the individual is not ineligible as a fugitive felon or probation/parole violation, for any month beginning after the pardon.

Violation of Probation or Parole

An individual who is in violation of the terms of probation or parole is ineligible for TANF until he or she complies.

Child Support Requirements

Prerequisites to receiving TANF cash benefits include cooperation with the Department, the Domestic Relations Section of the County Court of Common Pleas or the County Court of Common Pleas in identifying a non-custodial parent, establishing paternity and establishing an order for support. Cooperation is required unless the applicant/recipient establishes good cause for not doing so. To be eligible for benefits, applicants or recipients are required to:

- Furnish his or her social security number or provide proof an application has been filed to obtain a social security number.
- Assign to the Department support rights for all family members who are receiving benefits by affixing their signature to an application for benefits.

- Cooperate with the Department, Domestic Relations Section and the court in establishing paternity of a child, unless the applicant or recipient establishes good cause for failing to do so.
- Cooperate in obtaining support payments for the applicant or recipient and for the child, unless the Department determines that the applicant or recipient has good cause for failing to do so.

The Department may waive cooperation requirements for good cause. Good cause includes:

- The child was conceived as a result of incest or rape.
- Legal proceedings for the adoption of the child are pending before a court.
- The applicant or recipient is currently being assisted by a public or licensed private social agency while the decision is being made whether to relinquish the child for adoption and the discussions have not progressed for more than three months.
- Establishing paternity or obtaining child or spousal support increases the risk to the family of further domestic violence.

The applicant or recipient of cash assistance shall provide relevant verification of good cause. Applicants must appear before, and obtain from, the Domestic Relations Section of the County Court of Common Pleas, a certification of cooperation with child support enforcement requirements prior to authorization of TANF benefits. The Secretary of the Department may waive the personal appearance requirement for a county court or Domestic Relations Section following review of a written request from the county which establishes that another procedure would be as efficient and effective.

The applicant or recipient must cooperate and take the following actions:

- Identify the parent(s) of any child for whom assistance is sought or received. This includes an appearance by the applicant or recipient, with the child, for scheduled genetic testing.

The failure of the mother to identify by name the father of a child creates a presumption of noncooperation which may be rebutted only by clear and convincing evidence.

If an applicant or recipient provides the names of two putative fathers subsequently excluded from paternity by genetic testing, the second exclusion creates a presumption of noncooperation, which may be rebutted only by clear and convincing evidence.

- Keep scheduled appointments with the Department or Domestic Relations Section.
- Provide truthful and accurate information and documents requested by the Department or Domestic Relations Section.
- Sign and return any forms requested by the Department or Domestic Relations Section.

- Appear as a witness and provide testimony at judicial and other hearings as requested by the Domestic Relations Section.
- Pay to the Department any support payment received directly from the non-custodial parent after an assignment of support has been made.

The Department, the Domestic Relations Section of the Court of County Common Pleas or the County Court of Common Pleas may determine whether the applicant or recipient has failed to cooperate without good cause.

In accordance with Title 23 of the Pennsylvania Consolidated Statutes (23 Pa.C.S.) §4374(c)(1), the State may retain the support collected on behalf of a family receiving TANF up to the amount of the cumulative assistance paid to the family.

The State will distribute child support collected on behalf of families receiving TANF cash assistance as follows:

- Effective October 1, 2008, from the amount of current support collected, pass through to the assistance group the first \$100 per month for one child or the first \$200 per month for two or more children, or the first \$50 per month for spousal support, without decreasing the amount of cash assistance. In no case will an assistance group be paid more than one support pass through per month. The support pass through will be capped at \$200 maximum per month.
- Pay the federal government's share and retain the remainder of the amount collected to reimburse the commonwealth until the amount equals the amount of unreimbursed cash assistance paid to the assistance group.
- Pay to the assistance group receiving TANF any support collected in excess of the amounts distributed or retained as listed above.

In accordance with 23 Pa.C.S. §4352(a.1), TANF child support orders must be reviewed and adjusted, as necessary, on a 3-year cycle absent of any specific request from the Department.

Effective October 1, 2008, in accordance with 23 Pa.C.S. §4374(d), the state will pay support collected through the Federal Tax Refund Offset Program to families to whom current support or arrears is owed prior to retaining such collections to pay the federal or state shares of assigned support.

Specifically: For a family receiving cash assistance, arrears collected through the Federal Tax Refund Offset Program shall be retained by the commonwealth to the extent past due support has been assigned to the department as a condition of receiving assistance. For a family that formerly received cash assistance, arrears collected through the Federal Tax Refund Offset Program shall first be applied to the monthly support obligation, and the balance shall be

applied to arrears owed the family, including assignments of arrearages that accrued before the family received assistance from the commonwealth and that were executed between October 1, 1997 and September 30, 2009. Any remaining arrearages shall be paid to the department.

In accordance with 23 Pa.C.S. §4378(b), the state limits the assignment of support rights only up to the amount of cash assistance received during the period that a family received assistance. Effective October 1, 2009, the assignment shall exclude arrears that accrued prior to receipt of assistance.

Pennsylvania recognizes the need to strengthen the existing line of communication between the local CAOs and the local County Children and Youth Agencies (CCYAs). A workgroup developed a set of inter-agency protocols to coordinate efforts to serve mutual clients. The process eliminates development of conflicting service plans and eliminates the possibility of conflicting program requirements. The protocols require that the activities outlined on the AMR, prepared in the CAOs, should be coordinated with the Family Service Plan that is prepared at the CCYA.

All 67 CAOs and CCYAs implemented county protocols to ensure a local service delivery system that enables families to reach self-sufficiency while providing a safe environment for the child. Additionally, prior to the imposition of a sanction for non-compliance with the work requirement, CAOs are required to contact CCYAs to determine if a family may have good cause for such non-compliance.

Transfers of TANF Block Grant Funds

Pennsylvania continues to provide supportive and emergency services through TANF or other State programs as follows:

- Pennsylvania allocates TANF Youth Development Funds (YDF) from the TANF Block Grant to the Department of Labor & Industry. These funds are used for youth workforce development programs that include the following activities:
- After School Programs consisting of homework assistance, developing work skills, entrepreneurial activities, time management, career exploration, leadership training and mentoring programs.
- In-school career awareness focusing on Science, Technology, Engineering and Math (STEM) careers.
- Out-of-school youth programs focusing on internships and work experience.
- Activities for youth who are co-enrolled in Workforce Innovation and Opportunity Act (WIOA) of 2014 Title I Youth. These activities meet the WIOA Youth performances measures of: Placement in Employment or Education, Attainment of Degree or Certificate and Literacy and Numeracy Gains.

Eligibility for these programs is limited to TANF recipients or youth that have a personal monthly gross earned income that does not exceed 235 percent of the FPIG level. Only the personal monthly gross income of the youth will be used to qualify a youth for the TANF Youth Development Programming, unless the youth is legally married and/or has children. This initiative is funded with 100 percent federal funds and leveraged with WIA funds. This initiative meets

TANF purpose number two — end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.

- Pennsylvania reserves the option to transfer TANF funds to the Child Care and Social Services Block Grants.

Pennsylvania exercised the federal TANF option to certify that it will screen for and identify victims of domestic violence. Since 1997, the Department has collaborated with the Pennsylvania Coalition Against Domestic Violence (PCADV), its statewide contractor providing services to victims of this abuse, to develop a program to screen for and identify domestic violence victims among TANF applicants and recipients. This collaboration has taken place under the auspices of the Domestic Violence/TANF Task Force.

The Task Force developed a training program (including a video role play) that provides information on identifying and understanding victims of domestic violence as well as guidance on how a caseworker should use this information to perform his/her job. Victims of domestic violence may qualify for temporary waivers of TANF program requirements such as time limits on receipt of cash assistance, employment and training requirements and child support cooperation requirements.

To avoid asking each individual specific questions on domestic violence, the Task Force developed several forms of universal notification. Brochures and palm cards that explain domestic violence and contain the telephone numbers of local domestic violence agencies are available for distribution in the CAOs. These items may be dispensed by the caseworker or placed in areas of the CAO such as the women's restroom for discreet access. Two different domestic violence awareness posters are also available for posting in the CAOs. In addition, the Common Application Form includes a tear-out sheet explaining domestic violence, good cause and the possibility of being temporarily excused from certain program requirements.

The Department has also revised its regulations governing good cause for failing to cooperate with child support requirements based on a claim of domestic violence. Applicants/recipients who are unable to safely provide documentation of good cause within the established time frames for providing verification may sign an affirmation of this fact and be granted good cause.

TANF eliminated the automatic granting of Medical Assistance benefits to cash assistance recipients. However, it provided states the opportunity to maintain the link by ensuring that their TANF design is no less restrictive in certain financial and non-financial criteria. Since Pennsylvania's TANF program does ensure this, TANF cash recipients continue to receive Medical Assistance benefits.

Pennsylvania implemented several operational changes to ensure that individuals transitioning from TANF receive all Medical Assistance benefits for which they are eligible. The Department

instructed caseworkers to: 1) determine Medical Assistance eligibility when closing a cash case; 2) authorize Transitional Medical Assistance (TMA) as appropriate; 3) issue a notice of Medical Assistance eligibility when closing a cash case; and 4) determine Medical Assistance eligibility when rejecting a cash application. Also, computer enhancements were developed to: 1) have the system automatically review individuals for Medical Assistance when rejecting or closing a cash case; and 2) automatically open cases for TMA based on specific closing codes. These enhancements are supported by supervisory reviews and management monitoring of every cash case closing when an immediate opening of Medical Assistance does not occur.

The Department worked with the Pennsylvania Insurance Department (PID) to maintain a joint application for the federally-funded Children's Health Insurance Program (CHIP) and will continue to do so now that CHIP is administered by the Department. COMPASS is an online application for Pennsylvanians to apply for health and human services benefits and is also available as a myCOMPASSPA Mobile App. COMPASS automatically routes an application to the appropriate agency. Individuals can apply, renew and check the status of their application through COMPASS. An individual who receives benefits can establish a "My COMPASS Account" which allows them to view their benefits and report changes.

Pennsylvania implemented an electronic referral process between CHIP and Medical Assistance, known as the "Health Care Handshake". This process ensures that a child's application for health care coverage submitted to CHIP and who qualifies for Medical Assistance is referred to the Department. Pennsylvania engages in outreach efforts to support policy directives and initiatives. The Healthy Babies/Healthy Kids Hotline is available as an outreach resource. The hotline is also a referral and informational source for CHIP and Medical Assistance program.

Pennsylvania continues its commitment to provide families with the Medical Assistance coverage to which they are eligible.

Pennsylvania has joined with the United States Department of Agriculture Food and Nutrition Service (FNS) to provide funds, 50 percent from FNS and 50 percent from Pennsylvania, to 14 community-and faith-based organizations for SNAP outreach. This project is known as Supplemental Nutrition Assistance Program Participation Project (SNAP PP). The organizations complete and submit SNAP applications on behalf of clients to the CAO and provide information about the SNAP Program. A focus of this program is to introduce potentially eligible applicants to the on-line COMPASS application process. Through this on-line tool, individuals who receive SNAP benefits can reapply on-line from the convenience of their homes, thereby making SNAP that much more accessible.

Another outreach program, the Pennsylvania Supplemental Nutrition Assistance Program Education (SNAP-Ed) also referred to as PA TRACKS, provides nutrition education to low-income individuals and families who are eligible to receive SNAP benefits. The program aims to foster positive behavioral changes related to nutrition and physical activity. There are 18 TRACKS partners that deliver SNAP-Ed throughout Pennsylvania.

B. Special Provisions

Time-Out Initiative

The Department incorporated a segregated state-funded program in the Fiscal Year (FY) 2001-2002 budget, known as the Time-Out Initiative. This initiative provides incentives to families who are addressing barriers to self-sufficiency where an individual has been identified as a victim of domestic violence or kinship caregivers. By segregating state funds from federal TANF funds, individuals who otherwise qualify for TANF may receive cash assistance under the segregated state-funded program that does not count towards the 60-month lifetime limit (42 U.S.C.A. §609(a)(7)(B)(1)). In accordance with 42 U.S.C.A. §609(a)(7)(B)(1) and subject to the availability of resources, the Department intends to provide funding included in the FY 2018-2019 budget for the Time-Out Initiative. Eligibility for participation in the Time-Out initiative is limited to those families who meet the income, resource, and non-financial eligibility factors associated with the TANF program.

Domestic Violence

Victims of domestic violence may be eligible for up to 12 months of Time-Out in a life time. These individuals may receive benefits in the Time-Out program for six months with an additional six months, if the need still exists. The limit on the number of months an individual may receive Time-Out applies regardless of whether the months are consecutive.

Kinship Caregiver

A TANF family may qualify for Time-Out under kinship care with an adult who is:

- A non-parental caretaker who has received 24 months or more of cash assistance for himself/herself and a related minor dependent child, or has care and control of a related minor dependent child as a result of court-ordered placement by Children and Youth Services; and
- Is not receiving cash assistance for children of his/her own; and
- Is meeting the minimum 20-hour weekly work requirement, is exempt or has good cause for not meeting work requirements. This initiative meets TANF purpose number one — provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives, and TANF purpose number two — end dependence of needy parents on government benefits by promoting job preparation, work and marriage.

Extended TANF Cash Assistance

Pennsylvania's provision for receipt of TANF assistance beyond the 60-month federal time limit is known as Extended TANF (ETANF). Regulations at 42 U.S.C.A. §608(a)(7)(C) and 45 CFR §264.1(c) give states the option to extend TANF beyond the 60-month limit to families that have a hardship as defined by the state or include an individual who has been battered or subjected to extreme cruelty (domestic violence). The number of families that may receive ETANF is limited to 20 percent of the average monthly number of families receiving TANF during the current or receding fiscal year. Pennsylvania is exercising this option.

The ETANF program was implemented on October 28, 2002. ETANF families who exhaust the 60-month

time limit or who were granted ETANF during the contingency period are permitted to apply for ETANF cash assistance and meet eligibility requirements, as defined below. Among those who may qualify for ETANF are:

- Recipients who are exempt or have good cause for not meeting the work requirements;
- Recipients who are required and meeting the work requirements; and
- Recipients who are victims of domestic violence.

Families who exhaust the TANF time limit and have their cash assistance discontinued may apply for and receive ETANF at a future time, if they are otherwise eligible. Funding for ETANF is all federal monies.

Transitional Cash Assistance

In accordance with 42 U.S.C.A. §609(a)(7)(B)(i) and subject to the availability of resources, the Department intends to provide funding included in the FY 2018-2019 budget for the Transitional Cash Assistance grant. Benefits received for this temporary supplemental grant will not extend beyond a three-month period.

Effective March 28, 2009, certain families who are ineligible for continued assistance in the TANF, ETANF or Time-Out programs due to earned income may be eligible for a temporary supplemental grant, known as Transitional Cash Assistance (TCA). The purpose of TCA is to support families as they transition from dependence on welfare to self-sufficiency. Eligibility for this supplemental grant is limited to needy families, as defined in this State Plan, who have a gross annual earned income that does not exceed 235 percent of the FPIGs.

Eligibility rules are as follows:

- Families receiving assistance must become ineligible for assistance due to excess earned income.
- Families must meet the federal WPR at the time they no longer qualify for assistance.
- Families will receive \$100 per month (two semi-monthly \$50 issuances) for three consecutive months.
- Assistance received during this period does not count against the 60-month lifetime limit on TANF.

This program is funded with 100 percent state MOE funds.

This grant meets TANF purpose number two, to end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.

Community Service Option

Pennsylvania has opted out of the provision to require a parent or caretaker to participate in community service if that parent or caretaker has received assistance for two months, is not exempt from work participation, and is not engaged in work.

VII. Office of Children, Youth and Families

A. Other State Programs and Services Designed to Meet the Purposes of TANF

1. General Relationship to TANF Purposes

- TANF provides states the flexibility to develop and implement innovative approaches to address TANF purposes. Therefore, effective October 1, 1999, the Department, through the Office of Children, Youth and Families (OCYF), county children and youth agencies (CCYAs) and juvenile probation offices (JPOs) has operated a segregated TANF federally-funded program. The segregated TANF Federally-funded program is reasonably related to the TANF goals of providing assistance to needy families so that children may be cared for in their own homes or in the homes of relatives, preventing and reducing the incidence of out-of-wedlock pregnancies, and encouraging the formation and maintenance of two-parent families. These goals will be promoted through the provision of services described under sections 2 and 3 below. Services are also provided in any manner that Pennsylvania was authorized to use funds received under Title IV-A or Title IV-F of the Social Security Act, as such titles were in effect on September 30, 1995, including as specified in section 3 below.

2. Family Preservation, Reunification and Support Services Designed to Promote TANF Purposes

The services listed in this section are provided as non-assistance services to needy families. The services listed in this section are reasonably related to the goals of assisting needy families so that children may be cared for in their own homes or homes of relatives including children placed in the homes of relatives, encouraging the formation and maintenance of two-parent families and preventing and reducing the incidence of out-of-wedlock pregnancies, i.e., TANF purposes 1, 3 and 4. These services are intended to break the cycle of social, emotional and economic dependency by providing the necessary interventions, supports and services to families experiencing various forms of crises and dysfunction, e.g., substance disorder, lack of parenting skills, marital/relationship problems. The provision of services identified in this section will enable families and children to develop the skills and supports necessary to overcome their problems in functioning, thereby providing them with a stable foundation upon which additional competencies related to permanent and stable relationships and responsible parenting can be built. Stable relationships and responsible parenting skills are essential for creating an environment in which two-parent families can continue to exist or come into existence. The existence of stable relationships and responsible parenting skills is also essential to breaking the cycle of out-of-wedlock pregnancies. The following family preservation, reunification and support services are provided or arranged for families and for children residing in their homes (and for children who are temporarily in foster care and who are expected to return to the home within the temporary absence period established by the State) by OCYF, CCYAs or JPOs, as determined necessary and appropriate. The services are provided as non-assistance services to assist needy families. For purposes of this section, “needy” is defined as having a household income of less than 400 percent of the Federal poverty level.

- Parent/Child Visitation
- Intensive Family Preservation Services
- Casework/Case Management Services
- Diagnostic and Assessment Services

- Family Support Services including Respite Care
- Family Centers — collaborative community efforts to provide a range of services to children and their families at a single location. Centers that provide child welfare TANF services described in the plan provide those services to eligible children to promote keeping families together and to maintain children in their own homes. Child welfare TANF funds are directed to specific children served by the family centers and are not used to support the center’s administration.
- Counseling Services
- Parenting and Home Management Services
- Independent Living Services
- Preventive Services focused on promoting family stability and responsible behavior of individuals and reducing economic dependence
- Delinquency Prevention/Remediation Services
- Day Treatment and Protective Child Care Services
- Non-Medical Substance Disorder Services
- Other In-home Services
- Programs Promoting Responsible Fatherhood
- Adoption Services

3. Services provided to dependent and delinquent children who have been placed into residential care As authorized in the approved Title IV-A State Plan in effect as of September 30, 1995, TANF funds may be used to pay for non-Title IV-E eligible emergency shelter services, not to exceed 30 consecutive days and in accordance with 55 Pa. Code §§3130.37 and 3140.22(c) and the purchases of services provided to children temporarily placed in residential care provided that the services are not part of the per diem and are billed services. Eligible services include:

- Child Protective Services/Child Abuse
- Child Care Services
- Day Treatment Services
- Child Protective Services-General
- Information and Referral Services
- Service Planning
- Counseling/Intervention Services
- Homemaker/Caretaker Services
- Life Skills Education
- The cost for placement in a Juvenile Detention Facility can no longer be claimed under TANF.

FUNDING Section 403(a)(1)(A) provides that each eligible State shall be entitled to receive for each of the fiscal years 1996 through 2010, a grant in an amount equal to the State family assistance grant as defined in section 403(a)(1)(B).

I. Payments to Agency Administering the TANF Program. Please provide payment for the TANF Program to the same organization administering the TANF Program as of March 3, 1997.

II. State Payments for TANF Program Payments for the TANF Program are to be made to the Pennsylvania Department of Human Services. The Commonwealth of Pennsylvania’s estimate for each quarter of the fiscal year by percentage is: **For FY 2015 and Future Years**

- *1st Quarter - 25 percent*
- *2nd Quarter - 25 percent*
- *3rd Quarter - 25 percent*
- *4th Quarter - 25 percent*

Temporary Assistance for Needy Families (TANF)I. TANF Purpose This document outlines and updates the Commonwealth of Pennsylvania’s plan for providing assistance to families with children from funds provided under Title I of the Personal Responsibility and Work Opportunities Reconciliation Act (PRWORA) of 1996 (P.L. 104-193), and the TANF Final Rules published in the Federal Register on April 12, 1999. The Act amends Section 402 of the Social Security Act to require that states submit a plan to the U.S. Department of Health and Human Services that outlines how the state will provide TANF benefits. Implementation was effective March 3, 1997. Submission of this State Plan renewal commits Pennsylvania to continue operation of its TANF State Program. Implementation was effective October 1, 2018.II. Introduction On May 6, 1996, P.L. 175, No. 35 (Act 35) was signed into law. It was a dramatic welfare reform plan designed to move families off the welfare rolls and into the work force. The provisions of the Act encourage personal and parental responsibility, emphasize self-sufficiency through employment, strengthen child support requirements, and increase penalties for welfare fraud. It is a common-sense approach that provides Pennsylvania with the core components for reform of our welfare system. The TANF provisions of PRWORA provided the opportunity to make that reform a reality. When signed into law on August 22, 1996, PRWORA ended the 60-year federal welfare entitlement program known as Aid to Families with Dependent Children (AFDC) and the Federal Job Opportunity and Basic Skills employment and training program. In its place, each state was provided with a block grant for designing and operating its own welfare program within broad TANF requirements. These requirements include stringent work activity participation rates and a lifetime limit of five years for the receipt of benefits. The TANF Block Grant and the Final Rules published in the Federal Register on April 12, 1999, provided Pennsylvania with the opportunity to build on the core components of Act 35 to create a welfare system that makes the best use of welfare dollars. The Final Rule for reauthorization of TANF, published in the Federal Register on February 5, 2008, added definitions for each accountable core activity, defined a work-eligible individual, changed the base year for determining caseload reduction from FY 1995 to FY 2005 and required states to submit a Work Verification Plan explaining how hours of participation are documented for each core activity. Pennsylvania’s changes to the work requirements in this State Plan were necessitated by the Final Rule. The TANF program in Pennsylvania is designed to provide short-term assistance to families when the support of one or both parents is interrupted. It also provides supplemental support when family income from employment and other sources is not sufficient to meet basic needs. It is not intended to provide long-term support or become a way of life. Families undergo assessments of skills, employability and are required to engage in activities that enhance self-sufficiency and ensure the well-being of their children. The provisions of the TANF program are intended to meet one or more of the following basic purposes of this program as articulated in the federal statute and regulation:

- Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
- End the 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
- Pennsylvania's TANF program does not discriminate on basis of race, color, national origin, disability, age, or sex. Additionally, no person will be denied TANF services and benefits as the result of the inability or limited ability to communicate in the English language. III. Program Goals
The primary goal of Pennsylvania's TANF program is to provide support to families as they make the transition from dependence on welfare to self-sufficiency and, finally, to long-term self-support. The following goals provide the framework on which the program is designed:

Promote Personal Responsibility

Pennsylvania's TANF program is based on the principle that welfare should provide temporary cash assistance to families and individuals, providing basic support that enables them to move to self-sufficiency. Inherent in this belief is the notion that the welfare recipient must be personally responsible for taking the necessary steps to end his or her dependence on a welfare "check."

Ensure Participation in Work or Work-related Activities

As a result of the federal TANF Reauthorization legislation and to improve work participation rates (WPRs), Pennsylvania requires every adult, minor head of household and minor child age 16 or 17 who is not in school participate in approved activities as part of their plan for self-sufficiency. Refer to Section VI. A. General Provisions, 9. Work and Self-sufficiency, for further discussion.

Move Recipients into Jobs

For most recipients, the way to self-sufficiency and economic independence is through employment. Pennsylvania's approach provides the client with a range of services to build necessary skills and a work history. Pennsylvania will educate, train, and support TANF recipients in their family needs to help TANF recipients move from welfare to work.

Provide Work Incentives and Supports

If we are to encourage employment, families must be better off if they work than if they depend on welfare. By allowing eligible families to receive supplemental cash assistance in addition to a paycheck, Pennsylvania's TANF program rewards work and helps families establish a financial base that will support self-sufficiency. The TANF program also supports family efforts to work by providing allowances for work expenses, such as child care and transportation.

Break the Cycle of Dependence Through Education

A high school diploma is critical to both short-term and long-term prospects for independence through employment. It opens the door to meaningful, productive employment. Training in a skill or trade, on-the-job training, job-search and job-readiness preparation classes and workshops, among other activities, provide a menu of opportunity for long-term self-sufficiency. Pennsylvania's Road to Economic Self-sufficiency through Employment and Training (RESET) program encourages people to pursue education and training that is career specific as a means of, and in addition to, meeting work requirements. Additionally, it is important to educate parents regarding the role of high quality early learning experiences to help break the intergenerational cycle of poverty. Parents who work need to

understand that the choices they make when placing their children in early care and education programs can influence their child's readiness for school and later success in life.

Strengthen Families and Support Children

Both parents play a role in achieving self-sufficiency. The TANF program requires parents to fulfill their fundamental responsibilities to their children through a strengthened child support enforcement system.

Simplify Program Administration

Pennsylvania must be able to use resources productively -- to assist the client in developing and successfully implementing his or her own plan for self-sufficiency. As administrators of the public welfare system, we must have two goals: to help recipients of public assistance become self-sufficient and to ensure that tax dollars funding welfare programs are used wisely. IV. Measuring Results Monitoring implementation progress and evaluating attainment of program goals is an integral component of Pennsylvania's TANF program. The primary focus of monitoring and evaluating activities is to gather data about a comprehensive set of performance indicators and performance measures which are used to document clear, specific program outcomes. The detailing of a definitive set of performance indicators and measures continues to evolve as program planning decisions are made and modified. The ongoing program evaluation information system includes such performance indicators and measures as the following:

- Number and percentage of active adult TANF individuals who are employed.
- Number and percentage of mandatory TANF adults participating in an employment/training/education activity.
- Number and percentage of mandatory TANF adults not participating in an employment/training/education activity.
- Number of TANF adults with a sanction, exemption or good cause.
- Number of TANF adults in educational activities.
- Number of TANF adults in independent or contracted training activities.
- Number of TANF adults in job search activities.
- Number of TANF adults in transition to a work activity scheduled, but not yet started.
- Number of TANF adults who are self-employed.
- Number and percentage of job placements.
- Job placement rate.
- Cost per enrollment.
- Cost per outcome.
- Number and percentage meeting job retention.
- Number of individuals obtaining jobs with benefits.
- Number and percentage of TANF adults increasing hours of employment.
- Number of TANF adults graduating from community college.
- Number of students graduating from high school or obtaining a high school equivalency degree.
- Number of TANF adults who receive child care subsidies that select high quality early care and education programs. A primary focus of program evaluation efforts associated with implementation of the TANF program is to develop, maintain and refine, where necessary, an

integrated and comprehensive evaluation information system which provides data and information on outcome and performance measures related to key components of TANF. This data is then used to provide ongoing monitoring assessments of program implementation and to provide summary statements describing attainment of program goals. To ensure the appropriate degree of program accountability, the measures used are defined by data and information which are timely, accurate, valid, reliable, credible and easily communicated. This information system is composed of TANF data and available data for pre-TANF assistance programs. The information system is supplemented by those data and information necessary to track the provisions of the TANF legislation and satisfy mandated reporting requirements. This collection of data about TANF participants, combined with data detailing critical program components, provides documentation of specific outcome and performance measures established for the TANF goals. Additionally, analyses of the data available in this information system combined with data from other sources provide important information about the configurations of participant and program characteristics which produce the most favorable long-term outcomes. Comparisons of these relationships between participant and program characteristics and their effects on outcome measures across time permit systematic, evolutionary, incremental shaping of TANF programs to effectively meet the TANF goals. With an increased awareness of the need to strengthen accountability, promote program integrity, and limit fraud, monitoring of Special Allowances (SPALs) issued to recipients in support of their RESET participation is necessary to assure that expenditures are verified, required, and used for their intended purpose.

V. Public Involvement

Public Availability and Review

A Notice of Availability of the Commonwealth of Pennsylvania's TANF State Plan was published in the Pennsylvania Bulletin on September 8, 2018, to allow for the public comment period. Copies of the TANF State Plan are available at the 67 County Assistance Offices (CAOs) around the state and on the Department of Human Services' (the Department) website (<http://www.dhs.state.pa.us>). The Pennsylvania Bulletin is the official gazette of the Commonwealth of Pennsylvania and is the temporary supplement to the Pennsylvania Code, the official codification of agency rules and regulations. The Notice published in the Bulletin indicated that comments on the TANF State Plan are to be directed to the Department of Human Services, Office of Income Maintenance. The State Plan was also submitted to key stakeholder groups for review and comment. These groups include members of the legislature and the Governor's Cabinet, as well as associations representing county government, client advocacy groups, business interests, and community agencies providing a variety of services to recipients of public assistance.

Additional Outreach

The Income Maintenance Advisory Committee (IMAC) received a briefing on the TANF State Plan. IMAC is composed of current and former welfare recipients, representatives of welfare rights organizations, and other client advocates. IMAC advises the Department on policies, procedures and other activities related to the programs administered by the Office of Income Maintenance.

Public Comments

The Department of Human Services accepted comments on the TANF State Plan from the general public.

The Department's ongoing review of the TANF program includes review and consideration of public comments along with the tracking of outcomes of the TANF program. The Department will submit amendments to the State Plan on an as-needed basis.

Although the TANF program replaced the former federal cash benefits program AFDC, many of the rules and procedures under which the Department administered AFDC remain in effect as part of the TANF program. These rules and procedures are contained in Chapter 55 of the Pennsylvania Code of regulations (55 Pa. Code), Notices of Rule Change to the Code published in the Pennsylvania Bulletin, Office of Income Maintenance (OIM) Bulletins, OIM Operations Memoranda and Departmental Handbooks.

Financial eligibility criteria for Maintenance of Effort (MOE)-funded assistance and services are the same as for other TANF assistance and services, except MOE claimed for child care under the provisions of 45 CFR §263.3 follows the financial eligibility criteria established under the Child Care and Development Fund State Plan and associated state regulations.

New or revised rules and procedures are set forth in the state plan. These changes and revisions are adopted pursuant to the authority of PRWORA, Pennsylvania's Act 35, §§201(2) and 403(b) of the Public Welfare Code (62 P.S. §§201(2) and 403(b)) and Act 1997-58 (P.L. 549, No. 58).

Federal statute at 42 U.S.C.A. §609(a)(7)(B)(i) provides for the possibility of separate and segregated state programs. Stakeholders were consulted, and input was solicited. The decision to create a segregated state program is incorporated and included in this State Plan.

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:

1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);

Assurance(s) or Attachment(s): 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);

Assurance(s) or Attachment(s): 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)—

(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

Assurance(s) or Attachment(s): Yes

(B) have had at least 45 days to submit comments on the plan and the design of such services;

Assurance(s) or Attachment(s): 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);

Assurance(s) or Attachment(s): 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);

Assurance(s) or Attachment(s): Yes

6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act)—

(i) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;

Assurance(s) or Attachment(s): Yes

(ii) refer such individuals to counseling and supportive services; and

Assurance(s) or Attachment(s): Yes

(iii) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

Assurance(s) or Attachment(s): 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.

Yes

Jobs for Veterans' State Grants (OMB Control Number: 1225-0086)

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

(a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

Veterans and eligible persons receive employment, training, and job placement services at PA CareerLink® offices as do all other PA CareerLink® customers. Veterans and eligible persons receive veteran priority of service: they receive priority over non-veterans and other eligible persons when receiving employment, training, and job placement services for which they are eligible.

Customers will be prompted to self-identify their veteran status upon entering the PA CareerLink® office during check-in and will subsequently receive an initial assessment. Staff members conducting assessments and determining if veterans or other eligible persons qualify to see the Disabled Veterans' Outreach Program Specialist (DVOP) cannot be a JVSG-funded staff member. The DVOP assists veterans with significant barriers as currently specified in Veterans' Program Letters 03-14, 03-14/Change 1, 03-14/Change 2, 03-19, and any SBEs subsequently identified by Department of Labor. If the veteran lacks a significant barrier to employment and does not otherwise qualify to see the DVOP, then the veteran will be referred to the first non-grant funded staff member available for assistance.

DVOP staff will perform the following duties to provide employment, training, and job placement services to veterans and eligible persons:

- Provide targeted eligible veterans with comprehensive assessment of education, skills, and abilities.
- Identify employment barriers and appropriate employment goals.

- Provide group and individual career coaching.
- Train veterans in communication, interviewing, professional conduct, and personal maintenance skills.
- Develop an Individual Employment Plan for veterans receiving individualized career services to identify employment goals, objectives, and appropriate services.
- Enroll and assist veterans in enrolling in PA CareerLink® online.
- Contact veterans by phone, email, or mail to discuss programs and services, job matches, and/or to refer them to postings for which they are qualified.
- Review open/active files of current veteran customers and contact those with significant barriers or in Priority status.
- Provide outreach to eligible veterans as cited in current Veterans' Program Letters and other guidance at onsite and off-site locations as indicated operationally.
- Provide customized labor market information to veteran customers.
- Document all services provided to veterans in the system of record (Commonwealth Workforce Development System) and other applications.
- Provide data and information for federal Quarterly Manager's Report by established deadline.
- Establish and maintain professional relationships with local organizations that serve veterans (e.g., hospitals) for referrals.
- Establish and maintain professional, productive relationships with staff in local and neighboring PA CareerLink® and Board offices to ensure co-enrollment in WIOA Title I training services when applicable and appropriate.

Local Veterans' Employment Representative staff (LVERs) will perform the job placement and related following duties to promote and advocate for the hiring of all veterans and eligible persons to employers:

- Actively participate on local PA CareerLink® and regional business service and other teams to promote veteran hiring.
- Conduct employer outreach to explain the benefits of hiring veterans.
- Inform federal contractors of their responsibility to recruit/train qualified veterans.
- Coordinate with business organizations, unions, and apprenticeship programs to promote employment and training programs for veterans.
- Provide customized labor market information to business customers.
- Initiate and collaborate in efforts to hold career fairs; represent PA CareerLink® offices at job and career fairs.
- Document all services provided to veterans in the system of record (Commonwealth Workforce Development System) and other applications.
- Provide data and information for federal Quarterly Manager's Report by established deadline.
- Develop service delivery strategies, for initiatives and programs for veterans, with partners and providers.
- Establish and maintain professional relationships with staff in local and neighboring PA CareerLink® and Board offices.

(b) The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

The DVOP assists veterans with significant barriers as currently specified in Veterans' Program Letters 03-14, 03-14/Change 1, 03-14/Change 2, 03-19, and any SBEs subsequently identified by Department of Labor.

DVOPs provide Individualized Career Services to veterans with SBE's, eligible spouses and other priority groups designated by the Secretary of the Department of Labor. DVOPs evaluate veterans and eligible persons they assist for needs, knowledge, skills, and abilities; provide career guidance through vocational guidance or referrals to counseling; aid veterans in developing and documenting an individualized employment plan (IEP); and review and update the IEP during the active case management process. They coordinate supportive services with applicable providers; deliver technical assistance to community-based organizations for employment and training services; and assist PA CareerLink® partners in providing services to these veterans and eligible persons on a priority basis. **Additionally, two DVOPs have been identified to serve as Intensive Service Coordinators acting as the point of contact for Chapter 31 VR&E veterans to coordinate employment services in accordance with relevant federal guidance.**

LVERs promote the benefits of employing veterans to employers; work with employers; plan and participate in job/career fairs; and facilitate employer training. LVERs are fully integrated into the PA CareerLink® workforce development system and are active members of the business services team; they work with other partners and workforce development providers to communicate employer outreach and job openings.

LVERs work with employers to ascertain the jobs that employers need to fill and share this information with the PA CareerLink® center. Other PA CareerLink® staff members, in turn, make veterans aware of employment opportunities. LVERs play an important role in educating all PA CareerLink® partner staff with current employment initiatives and programs for veterans.

(c) The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or American Job Center;

Delivery of employment, training, and job placement services for veterans and eligible persons occurs in the commonwealth's American Job Centers; in Pennsylvania, these are branded as PA CareerLink® offices. As employees of the commonwealth's Bureau of Workforce Partnership & Operations (BWPO), which provides all WIOA Title III services and some WIOA Title I services in PA CareerLink® offices, DVOP and LVER staff have been integral and integrated members of the service delivery system in Pennsylvania since prior to implementation of the Workforce Investment Act of 1998. As bureau employees, they must complete the same training courses required (such as those on workforce development, case management, interviewing skills, customer service, workplace violence prevention) of other bureau staff who work in PA CareerLink® offices. DVOPs work with other PA CareerLink® staff on a common strategy for identifying veterans in their offices during the initial assessment, and LVERs work with other PA CareerLink® staff on strategies for "tagging" new job postings for veterans only. As PA CareerLink® staff,

DVOPs and LVERs are expected to attend all office staff meetings, training sessions, and workshops that keep all partners apprised of program updates, changes, revisions, accomplishments, and recommendations. As BWPO staff within the PA CareerLink® office, DVOPs and LVERs are expected to attend all meetings, trainings, and workshops called by their BWPO supervisor as well. DVOPs serve on jobseeker service teams, along with their BWPO and the Titles I, II, and IV coworkers, to ensure information-sharing about resources, services, and referrals. LVERs serve on business services teams, along with their BWPO and Titles I and IV coworkers, to promote job-ready veterans to employers; ensure information-sharing with employers about the benefits of hiring veterans; explain FJCL and other requirements to employers and partners-coworkers; and provide information on current job openings.

(d) The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

Pennsylvania does not participate in the incentive award program.

(e) The populations of eligible veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

1. A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3) or
2. Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a) and (b)) as amended or
3. A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months any point in the previous 12 months or
4. An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration or
5. Lacking a high school diploma or equivalent certificate or
6. Low-income (as defined by WIOA Section 3 (36) or
7. Veterans aged 18-24 or
8. Vietnam-era veterans or
9. Eligible **transitioning** service members, spouses, or caregivers

(f) How the State implements and monitors the administration of priority of service to covered persons;

Per the USDOL/VETS Grant Officer Memorandum 01-20, a response to this section is not required.

(g) How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff: (1) job and job training individualized career services, (2) employment placement services, and (3) job-driven training and subsequent placement service program for eligible veterans and eligible persons;

Per the USDOL/VETS Grant Officer Memorandum 01-20, a response to this section is not required.

(h) The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff;
and,

DVOP Specialists

Name	Hire Date	Mandatory Training Completion Date
Acker, Donna	5/4/2009	11/5/2010
Suarez, Gerardo	7/1/2019	
Clark, Robert	6/26/2010	5/6/2011
Curtis, Vicki, ISC	8/10/2007	6/6/2008
Williams, Antwonyne	8/5/2019	
McGoldrick, William	7/29/2019	
Cramsey, Kevin	8/26/2019	
Getz, William	7/15/2019	
Peaden, Porter	6/22/2002	10/18/1999
Sheaffer, Rachel	1/8/2018	4/8/2019
Boyer, Richard	3/31/2014	8/12/2014
Torres, Rafael	9/23/2019	
Fallon, William	7/3/2015	12/18/2015
Haefner, Robert	10/27/2014	5/8/2015
Mynczywor, Stanley	10/29/2018	
Haydu, John	4/29/2013	11/22/2013
Swartz, Gary	2/1/2019	
Bodnar, Joseph	6/17/2019	
Giocondo, Crystal	8/26/2019	
Hucik, Brian	9/23/2019	
Counts-Weaverling, Jill	10/1/2012	6/21/2013
White, Clifford Jr., ISC	1/14/2008	10/28/2008
Tanner, George	7/20/2015	12/18/2015
Jaeger, Kurt	9/9/2019	
Heilbrun, Carl	6/15/2015	12/18/2015
Paglia, Ryan	12/3/2007	12/2/2008
Pajovich, Jared	9/25/2017	12/12/2017
Evans, Roy	1/5/2015	5/8/2015
Moore, Norman	7/15/2019	
Miller, Justin	10/7/2019	
Royer, Joseph	11/18/2019	
Kane, Michael	11/25/2019	
Nobles, Marialice	10/15/2019	

Koppenhofer, Scott	4/21/2019	
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LVER Staff

Name	Hire Date	Mandatory Training Completion Date
Bates, Raymond	9/27/2003	1/11/2005
Bell, Joanne	4/18/2009	6/16/2009
Dukes, Stacy	7/15/2019	
Monroe, Douglas	10/19/2015	6/17/2016
Kuhn, Fae	8/21/2017	1/29/2019
Montalbano, Charles	1/7/1988	11/16/1999
Treadway, Ryan	11/3/2018	
Jones, Vincent	10/18/2010	5/27/2011
Hollenbach, Randal	3/8/2019	
French, Timothy	3/25/2017	5/26/2017
Crooks, Gregory	9/4/2002	1/25/2005
Gardner, John	3/27/2017	6/13/2017
Warholic, George	8/1/2018	1/29/2019
Magliocca, Norman	8/21/2017	1/29/2019
Swartz, John	1/30/2016	7/29/2016
Jocuns, Samuel	2/11/2019	5/6/2011
Doyle, Stefanie	8/14/2017	12/12/2017
Sutton, Bryon	5/8/2017	9/26/2017
Young, Carl	7/14/2007	9/9/2008
Zelinsky, Frank	10/22/2018	
McCullough, Hugh	9/24/2005	10/3/2006
Casamassima, William	3/18/2019	
Dandridge, Brian	10/21/2019	
Crouch, Alexander	10/7/2019	
Hoagland, Patrick	6/26/2010	5/27/2011

(i) Such additional information as the Secretary may require.

N/A

Senior Community Service Employment Program (SCSEP) (OMB Control No. 1205-0040)

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.)

Using the U.S. Census Bureau’s Local Employment Dynamics (LED) data, the first table below identifies the statewide industry long-term employment projections for occupations with the highest percentage of workers age 55 and older. Using the Census Bureau’s North American Industry Classification System (NAICS) codes, the Center for Workforce Information and Analysis used the staffing patterns to determine which occupations were most likely to be found in those industries with the highest percentage of older workers. The second table identifies the statewide occupational long-term employment projections for the top employing occupations in the industries with the highest percentage of workers ages 55 and older. Using these tables, NAICS code 4854, School and Employee Bus Transportation is an industry that employs a high percentage of older workers and is projected to grow between 2016 and 2022. The Standard Occupational Classification (SOC) code 53-3022 Bus Drivers: School or Special Client is an occupation in the School and Employee Bus Transportation industry that is projected to have 1,080 annual openings, and older workers are a good fit for these jobs.

Statewide Employment Projections for the Top 25 Industries with the Highest Percentage of Workers Aged 55+

NAICS Code	Industry Title	Empl. (2016)	Proj. Empl. (2026)	Volume Empl. Change (2016-26)	Percent Empl. Change (2016-26)
	TOTAL JOBS	6,181,960	6,523,990	342,030	5.5%
4855	Charter Bus Industry	2,040	2,360	320	15.7%
4854	School and Employee Bus Transportation	24,520	25,600	1,080	4.4%
8122	Death Care Services	7,260	7,330	70	1.0%
8131	Religious Organizations	73,130	72,830	-300	-0.4%
3131	Fiber, Yarn, and Thread Mills	300	270	-30	-10.0%
4853	Taxi and Limousine Service	2,240	1,480	-760	-33.9%
4531	Florists	3,220	2,460	-760	-23.6%
3159	Apparel Accessories and Other Apparel Manufacturing	540	450	-90	-16.7%
4911	Postal Service	28,080	23,200	-4,880	-17.4%
4871	Scenic and Sightseeing Transportation, Land	600	710	110	18.3%
4851	Urban Transit Systems	N/A	N/A	N/A	N/A
4859	Other Transit and Ground Passenger Transportation	4,100	4,970	870	21.2%
3346	Manufacturing and Reproducing Magnetic and Optical Media	1,090	810	-280	-25.7%

3152	Cut and Sew Apparel Manufacturing	3,570	1,630	-1,940	-54.3%
6112	Junior Colleges	18,020	18,700	680	3.8%
4831	Deep Sea, Coastal, and Great Lakes Water Transportation	250	230	-20	-8.0%
3333	Commercial and Service Industry Machinery Manufacturing	2,330	2,290	-40	-1.7%
4245	Farm Product Raw Material Merchant Wholesalers	660	680	20	3.0%
8139	Business, Professional, Labor, Political, and Similar Organizations	18,340	17,720	-620	-3.4%
2213	Water, Sewage and Other Systems	2,370	2,490	120	5.1%
4231	Motor Vehicle and Motor Vehicle Parts and Supplies Merchant Wholesalers	15,490	15,040	-450	-2.9%
3221	Pulp, Paper, and Paperboard Mills	3,270	3,020	-250	-7.6%
3132	Fabric Mills	2,460	2,290	-170	-6.9%
4811	Scheduled Air Transportation	11,960	12,550	590	4.9%
3344	Semiconductor and Other Electronic Component Manufacturing	9,950	9,420	-530	-5.3%

Source: Long-Term Industry Employment Projections (2016-2026)

Statewide Employment Projections for the Top-Employing Occupations in the Industries with the Highest Percentage of Workers 55-plus

SOC Code	Occupational Title	Educ. Level	Empl. (2016)	Proj. Empl. (2026)	Percent Empl. Change (2016-26)	Total Annual Demand	Entry-Level Wage (2018)	Average Wage (2018)
53-3022	Bus Drivers, School or Special Client	ST OJT	29,480	31,370	6.4%	3,820	\$20,470	\$30,720
21-2011	Clergy	BD	15,360	15,860	3.3%	1,724	\$26,880	\$49,920
43-5052	Postal Service Mail Carriers	ST OJT	13,860	11,620	-16.2%	627	\$37,080	\$51,540
43-6014	Secretaries	ST OJT	109,930	100,690	-8.4%	10,267	\$24,400	\$36,080
21-2021	Directors, Religious Activities & Education	BD+	9,190	9,420	2.5%	1,142	\$19,670	\$40,980
43-9061	Office Clerks, General	ST OJT	147,470	143,280	-2.8%	16,423	\$22,750	\$35,460
37-2011	Janitors & Cleaners	ST OJT	95,570	102,310	7.1%	13,339	\$20,020	\$28,730
43-5053	Postal Service Mail Sorters, Processors & Processing Machine Operators	ST OJT	5,390	4,300	-20.2%	234	\$36,710	\$51,710
13-1075	Labor Relations Specialists	BD+	5,100	4,730	-7.3%	429	\$34,150	\$78,320
43-3031	Bookkeeping, Accounting & Auditing Clerks	PS+	65,800	63,940	-2.8%	6,948	\$27,720	\$40,660
53-7062	Laborers & Freight, Stock & Material Movers	ST OJT	136,020	150,300	10.5%	20,759	\$22,100	\$31,590
53-3033	Light Truck or Delivery Services Drivers	ST OJT	37,640	39,410	4.7%	4,232	\$19,280	\$34,110
43-5051	Postal Service Clerks	ST OJT	3,810	3,190	-16.3%	211	\$37,960	\$50,390
49-9071	Maintenance & Repair Workers, General	MT OJT	60,990	65,300	7.1%	6,514	\$25,530	\$40,130
53-3041	Taxi Drivers & Chauffeurs	ST OJT	11,520	11,590	0.6%	1,160	\$19,130	\$26,390
11-1021	General & Operations Managers	BD+	72,410	77,680	7.3%	6,560	\$61,610	\$133,480
21-2099	Religious Workers, Other	BD	3,050	3,130	2.6%	418	\$17,440	\$50,920
27-2042	Musicians & Singers	LT OJT	5,430	5,490	1.1%	522	N/A	N/A
25-2011	Preschool Teachers	AD	17,590	18,790	6.8%	1,874	\$20,910	\$29,250
43-1011	Supervisors - Office & Administrative Support Workers	WK EXP	65,200	65,420	0.3%	6,326	\$39,180	\$60,800
27-2041	Music Directors & Composers	BD+	3,730	3,770	1.1%	359	\$20,900	\$46,010
39-9011	Childcare Workers	ST OJT	44,830	46,220	3.1%	6,675	\$17,580	\$22,920

39-4021	Funeral Attendants	ST OJT	2,250	2,290	1.8%	345	\$18,940	\$29,020
25-3021	Self-Enrichment Education Teachers	WK EXP	13,500	14,450	7.0%	1,601	\$21,320	\$39,640
37-3011	Landscaping & Groundskeeping Workers	ST OJT	41,710	44,680	7.1%	5,398	\$21,250	\$30,120
51-2022	Electrical & Electronic Equipment Assemblers	MT OJT	12,980	11,050	-14.9%	1,201	\$25,370	\$35,240
53-3021	Bus Drivers, Transit & Intercity	MT OJT	5,410	5,740	6.1%	699	\$24,140	\$36,550
43-4181	Reservation & Transportation Ticket Agents & Travel Clerks	ST OJT	2,830	2,920	3.2%	306	\$25,660	\$41,010
41-4012	Sales Representatives	MT OJT	65,680	68,120	3.7%	6,933	\$36,980	\$73,280
51-6031	Sewing Machine Operators	ST OJT	4,460	3,420	-23.3%	310	\$19,770	\$26,670
43-4051	Customer Service Representatives	ST OJT	116,990	119,420	2.1%	15,154	\$24,660	\$37,000
49-3031	Bus & Truck Mechanics & Diesel Engine Specialists	LT OJT	12,950	14,110	9.0%	1,303	\$32,480	\$46,960
43-4171	Receptionists & Information Clerks	ST OJT	39,910	41,810	4.8%	5,443	\$20,470	\$28,700
25-9041	Teacher Assistants	PS	45,390	48,160	6.1%	4,978	\$19,410	\$26,640
27-3031	Public Relations Specialists	BD	9,800	10,550	7.7%	1,049	\$35,700	\$61,510
13-2011	Accountants & Auditors	BD	57,850	62,820	8.6%	5,751	\$48,400	\$75,250
41-2022	Parts Salespersons	MT OJT	9,100	9,670	6.3%	1,208	\$22,270	\$33,450
27-1023	Floral Designers	MT OJT	1,890	1,610	-14.8%	133	\$20,150	\$26,230
41-2031	Retail Salespersons	ST OJT	178,950	181,320	1.3%	25,936	\$17,700	\$27,350
39-4031	Morticians, Undertakers & Funeral Directors	AD+	1,270	1,310	3.1%	162	\$30,270	\$50,330
43-6011	Executive Secretaries & Executive Administrative Assistants	WK EXP	21,860	17,890	-18.2%	1,714	\$39,620	\$59,210
49-3011	Aircraft Mechanics & Service Technicians	PS	2,850	2,940	3.2%	226	\$43,810	\$66,830
37-2012	Maids & Housekeeping Cleaners	ST OJT	51,710	54,460	5.3%	7,175	\$17,940	\$23,700
51-9196	Paper Goods Machine Operators	MT OJT	6,770	6,490	-4.1%	643	\$31,120	\$41,370
51-1011	Supervisors - Production & Operating Workers	WK EXP	27,590	28,290	2.5%	2,749	\$41,400	\$62,470
49-3023	Automotive Service Technicians & Mechanics	PS	35,810	37,520	4.8%	3,541	\$25,640	\$40,580
25-1011	Business Teachers, Postsecondary	PhD	5,910	6,890	16.6%	576	\$33,990	\$91,520
25-1194	Vocational Education Teachers, Postsecondary	BD+	4,780	4,880	2.1%	371	\$37,000	\$57,460
51-8031	Water & Wastewater Treatment Plant & System Operators	LT OJT	5,520	5,200	-5.8%	406	\$34,370	\$49,810
17-3023	Electrical & Electronic Engineering Technicians	AD	5,420	5,580	3.0%	483	\$36,980	\$56,240
33-9032	Security Guards	ST OJT	44,700	46,280	3.5%	6,064	\$20,550	\$28,750
13-1199	Business Operations Specialists, Other	BD	16,790	17,770	5.8%	1,636	\$50,980	\$80,910
53-1031	Supervisors - Transportation & Vehicle Operators	WK EXP	8,650	9,170	6.0%	951	\$38,830	\$60,820
43-5081	Stock Clerks & Order Fillers	ST OJT	89,530	92,190	3.0%	11,699	\$19,180	\$26,150
25-1123	English Language & Literature Teachers, Postsecondary	PhD	4,290	4,620	7.7%	367	\$36,670	\$75,970
51-9061	Inspectors, Testers, Sorters, Samplers & Weighers	MT OJT	20,450	19,260	-5.8%	2,226	\$27,510	\$41,850
25-2021	Elementary School Teachers	BD+	50,330	53,020	5.3%	3,886	\$45,670	\$66,860
43-5071	Shipping, Receiving & Traffic Clerks	ST OJT	24,360	24,750	1.6%	2,460	\$24,840	\$35,670
11-9131	Postmasters & Mail Superintendents	WK EXP	800	600	-25.0%	28	\$66,120	\$77,110
43-5061	Production, Planning & Expediting Clerks	MT OJT	13,590	14,460	6.4%	1,483	\$32,550	\$47,850
49-1011	Supervisors - Mechanics, Installers & Repairers	WK EXP	18,080	19,360	7.1%	1,698	\$47,560	\$71,190
43-5032	Dispatchers	MT OJT	7,380	7,370	-0.1%	657	\$27,540	\$41,630
39-9032	Recreation Workers	ST OJT	14,560	15,540	6.7%	2,588	\$17,900	\$26,770

25-1071	Health Specialties Teachers, Postsecondary	PhD	6,640	8,180	23.2%	708	\$42,380	\$95,160
13-1161	Market Research Analysts & Marketing Specialists	BD	25,590	28,550	11.6%	2,872	\$38,810	\$68,630
25-1121	Art, Drama & Music Teachers, Postsecondary	MD	6,090	6,640	9.0%	530	\$40,690	\$80,740
51-2092	Team Assemblers	MT OJT	37,830	33,320	-11.9%	3,646	\$23,480	\$34,760
25-1072	Nursing Instructors & Teachers, Postsecondary	PhD	3,170	3,910	23.3%	338	\$46,840	\$78,810
25-3097	Teachers & Instructors, Other, Except Substitutes	BD+	9,700	10,760	10.9%	1,208	\$21,800	\$45,750
25-1022	Mathematical Science Teachers, Postsecondary	PhD	2,940	3,170	7.8%	252	\$41,130	\$88,390
41-3099	Sales Representatives, Other Services	MT OJT	36,840	39,810	8.1%	4,817	\$34,460	\$66,800
11-9061	Funeral Service Managers	AD+	910	930	2.2%	66	\$68,120	\$114,030
15-1151	Computer User Support Specialists	PS	26,570	29,300	10.3%	2,278	\$35,550	\$52,370
13-1121	Meeting, Convention & Event Planners	BD	3,570	3,840	7.6%	444	\$29,000	\$48,670
51-6063	Textile Knitting & Weaving Machine Operators	ST OJT	870	770	-11.5%	92	\$23,570	\$31,970
53-7061	Cleaners of Vehicles & Equipment	ST OJT	11,980	13,170	9.9%	1,860	\$18,650	\$25,960

Source: Long-Term Occupational Projections (2016-26) and Occupational Wages (2018)

(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 CFR641.302(d))

The only other industry that has more annual demand is Laborers and Freight, Stock and Material Movers (20,759 annual demand) but this is a high physical impact employment that SCSEP participants cannot be safely trained in. SCSEP participants are mostly trained in modern office, clerical, and customer service skills in the NPOs in their training assignments. They are trained in modern computer software and clerical techniques. Some participants that show an interest and drive to succeed in maintenance/janitorial employment can also be trained in host agencies and have been very successful in finding unsubsidized employment through SCSEP training.

(3) Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR641.325(c))

The second table for response (1) above shows the highest annual demands of participants 55 years and older in the Office Clerks, General (16,423 annual demand), Customer Service Representatives (15,154 annual demand), and Janitors and Cleaners (13,339 annual demand). The customer service and office clerks require clerical skills, such as filing, computer skills, good written and verbal communication, and an ability to conduct yourself in a professional manner. The janitor and cleaner fields require minimal skills, as these jobs usual provide on the job training. They do require an employee that works independently and is dependable. As is outlined in the table below, these specific jobs provide short-term on the job training and require little training after high school.

Statewide Employment Projections for the Short- or Moderate-Term On-the-Job Training (OJT) Occupations

SOC Code	Occupational Title	Educ. Level	Empl. (2016)	Proj. Empl. (2026)	Percent Empl. Change (2016-26)	Total Annual Demand	Entry-Level Wage (2018)	Average Wage (2018)
35-3021	Combined Food Preparation & Serving Workers	ST OJT	145,800	170,000	16.6%	31,025	\$17,470	\$20,790
41-2011	Cashiers	ST OJT	147,220	142,990	-2.9%	26,497	\$17,520	\$21,160
41-2031	Retail Salespersons	ST OJT	178,950	181,320	1.3%	25,936	\$17,700	\$27,350
53-7062	Laborers & Freight, Stock & Material Movers	ST OJT	136,020	150,300	10.5%	20,759	\$22,100	\$31,590
35-3031	Waiters & Waitresses	ST OJT	98,740	106,060	7.4%	19,924	\$17,520	\$24,850
43-9061	Office Clerks, General	ST OJT	147,470	143,280	-2.8%	16,423	\$22,750	\$35,460
39-9021	Personal Care Aides	ST OJT	89,460	106,150	18.7%	15,355	\$21,040	\$24,880
43-4051	Customer Service Representatives	ST OJT	116,990	119,420	2.1%	15,154	\$24,660	\$37,000
37-2011	Janitors & Cleaners	ST OJT	95,570	102,310	7.1%	13,339	\$20,020	\$28,730
43-5081	Stock Clerks & Order Fillers	ST OJT	89,530	92,190	3.0%	11,699	\$19,180	\$26,150
43-6014	Secretaries	ST OJT	109,930	100,690	-8.4%	10,267	\$24,400	\$36,080
31-1011	Home Health Aides	ST OJT	47,040	59,670	26.8%	7,201	\$21,350	\$25,310
37-2012	Maids & Housekeeping Cleaners	ST OJT	51,710	54,460	5.3%	7,175	\$17,940	\$23,700
41-4012	Sales Representatives	MT OJT	65,680	68,120	3.7%	6,933	\$36,980	\$73,280
39-9011	Childcare Workers	ST OJT	44,830	46,220	3.1%	6,675	\$17,580	\$22,920
49-9071	Maintenance & Repair Workers, General	MT OJT	60,990	65,300	7.1%	6,514	\$25,530	\$40,130
33-9032	Security Guards	ST OJT	44,700	46,280	3.5%	6,064	\$20,550	\$28,750
47-2061	Construction Laborers	ST OJT	47,680	52,980	11.1%	5,604	\$27,200	\$41,260
43-4171	Receptionists & Information Clerks	ST OJT	39,910	41,810	4.8%	5,443	\$20,470	\$28,700
35-3011	Bartenders	ST OJT	32,270	33,070	2.5%	5,402	\$17,410	\$23,380
37-3011	Landscaping & Groundskeeping Workers	ST OJT	41,710	44,680	7.1%	5,398	\$21,250	\$30,120
35-2021	Food Preparation Workers	ST OJT	28,230	30,200	7.0%	5,065	\$17,750	\$23,100
41-3099	Sales Representatives, Other Services	MT OJT	36,840	39,810	8.1%	4,817	\$34,460	\$66,800
53-7064	Packers & Packagers, Hand	ST OJT	27,130	28,730	5.9%	4,332	\$20,490	\$28,580
53-3033	Light Truck or Delivery Services Drivers	ST OJT	37,640	39,410	4.7%	4,232	\$19,280	\$34,110
53-7051	Industrial Truck & Tractor Operators	ST OJT	31,740	34,730	9.4%	3,944	\$28,360	\$37,730
35-9031	Hosts & Hostesses: Restaurant, Lounge & Coffee Shop	ST OJT	16,330	17,540	7.4%	3,925	\$17,550	\$21,790
53-3022	Bus Drivers, School or Special Client	ST OJT	29,480	31,370	6.4%	3,820	\$20,470	\$30,720
51-2092	Team Assemblers	MT OJT	37,830	33,320	-11.9%	3,646	\$23,480	\$34,760
51-9198	Helpers--Production Workers	ST OJT	20,880	23,280	11.5%	3,527	\$20,950	\$30,560
35-9021	Dishwashers	ST OJT	20,320	21,310	4.9%	3,297	\$17,520	\$21,010
43-6013	Medical Secretaries	MT OJT	24,800	28,990	16.9%	3,278	\$26,930	\$35,550
45-2092	Farmworkers & Laborers, Crop, Nursery & Greenhouse	ST OJT	20,740	20,630	-0.5%	3,104	\$17,780	\$29,270
35-2012	Cooks, Institution & Cafeteria	ST OJT	20,390	21,800	6.9%	3,065	\$21,360	\$29,180
43-3021	Billing & Posting Clerks	MT OJT	24,990	27,460	9.9%	2,813	\$29,160	\$39,050
21-1093	Social & Human Service Assistants	ST OJT	21,350	23,260	8.9%	2,784	\$25,620	\$34,320
35-9011	Dining Room & Cafeteria Attendants & Bartender Helpers	ST OJT	15,010	16,130	7.5%	2,731	\$17,550	\$20,210
47-2073	Operating Engineers & Other Construction Equipment Operators	MT OJT	21,110	23,300	10.4%	2,624	\$35,900	\$53,320
39-9032	Recreation Workers	ST OJT	14,560	15,540	6.7%	2,588	\$17,900	\$26,770
39-3091	Amusement & Recreation Attendants	ST OJT	10,340	11,240	8.7%	2,511	\$17,430	\$20,980
43-5071	Shipping, Receiving & Traffic Clerks	ST OJT	24,360	24,750	1.6%	2,460	\$24,840	\$35,670
35-3022	Counter Attendants, Cafeteria, Food Concession & Coffee Shop	ST OJT	10,420	11,000	5.6%	2,357	\$17,610	\$20,690

39-9031	Fitness Trainers & Aerobics Instructors	ST OJT	12,650	13,570	7.3%	2,261	\$19,890	\$35,420
51-9111	Packaging & Filling Machine Operators	MT OJT	19,000	19,580	3.1%	2,251	\$24,030	\$35,200
51-9061	Inspectors, Testers, Sorters, Samplers & Weighers	MT OJT	20,450	19,260	-5.8%	2,226	\$27,510	\$41,850
43-3071	Tellers	ST OJT	23,220	20,130	-13.3%	2,193	\$23,680	\$29,360
53-3031	Driver/Sales Workers	ST OJT	18,590	18,310	-1.5%	1,912	\$17,560	\$27,210
33-3051	Police & Sheriff's Patrol Officers	MT OJT	27,850	29,000	4.1%	1,910	\$41,120	\$66,600
51-4121	Welders, Cutters, Solderers & Brazers	MT OJT	16,430	17,520	6.6%	1,887	\$31,880	\$43,630
35-3041	Food Servers, Nonrestaurant	ST OJT	11,390	12,700	11.5%	1,884	\$17,790	\$23,250
41-3021	Insurance Sales Agents	MT OJT	18,470	19,390	5.0%	1,879	\$35,270	\$80,970
53-7061	Cleaners of Vehicles & Equipment	ST OJT	11,980	13,170	9.9%	1,860	\$18,650	\$25,960
41-2021	Counter & Rental Clerks	ST OJT	13,370	14,160	5.9%	1,813	\$18,610	\$28,270
39-9041	Residential Advisors	ST OJT	8,590	9,310	8.4%	1,553	\$21,510	\$28,050
39-3031	Ushers, Lobby Attendants & Ticket Takers	ST OJT	6,010	6,390	6.3%	1,544	\$17,420	\$21,190
43-5061	Production, Planning & Expediting Clerks	MT OJT	13,590	14,460	6.4%	1,483	\$32,550	\$47,850
39-2021	Nonfarm Animal Caretakers	ST OJT	8,160	9,490	16.3%	1,448	\$17,670	\$23,960
29-2052	Pharmacy Technicians	MT OJT	16,430	17,670	7.5%	1,435	\$22,070	\$30,000
41-9022	Real Estate Sales Agents	MT OJT	14,520	15,100	4.0%	1,393	\$34,080	\$64,490
43-4081	Hotel, Motel & Resort Desk Clerks	ST OJT	8,380	8,830	5.4%	1,371	\$17,680	\$22,960
33-9092	Lifeguards, Ski Patrol & Other Recreational Protective Service	ST OJT	5,170	5,420	4.8%	1,318	\$17,520	\$20,320
43-9041	Insurance Claims & Policy Processing Clerks	MT OJT	11,670	12,570	7.7%	1,289	\$32,350	\$42,590
33-3012	Correctional Officers & Jailers	MT OJT	17,660	16,210	-8.2%	1,214	\$40,330	\$54,140
41-2022	Parts Salespersons	MT OJT	9,100	9,670	6.3%	1,208	\$22,270	\$33,450
51-2022	Electrical & Electronic Equipment Assemblers	MT OJT	12,980	11,050	-14.9%	1,201	\$25,370	\$35,240
33-9091	Crossing Guards	ST OJT	6,210	6,640	6.9%	1,192	\$18,520	\$30,210
43-4111	Interviewers	ST OJT	9,840	10,060	2.2%	1,175	\$22,980	\$34,390
53-3041	Taxi Drivers & Chauffeurs	ST OJT	11,520	11,590	0.6%	1,160	\$19,130	\$26,390
47-4051	Highway Maintenance Workers	MT OJT	10,850	11,310	4.2%	1,150	\$29,630	\$42,630
51-6011	Laundry & Dry-Cleaning Workers	ST OJT	8,320	8,470	1.8%	1,141	\$18,570	\$24,240
51-4011	Computer-Controlled Machine Tool Operators	MT OJT	10,900	11,400	4.6%	1,140	\$28,500	\$39,870
35-2011	Cooks, Fast Food	ST OJT	8,400	8,010	-4.6%	1,099	\$17,530	\$20,530
43-3011	Bill & Account Collectors	MT OJT	11,420	10,760	-5.8%	1,079	\$25,930	\$37,340
51-3092	Food Batchmakers	MT OJT	7,440	7,410	-0.4%	1,024	\$22,340	\$33,900
53-6021	Parking Lot Attendants	ST OJT	6,960	6,950	-0.1%	1,018	\$18,670	\$24,510

Source: Long-Term Occupational Projections (2016-26) and Occupational Wages (2018)

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))

There are varying degrees of involvement by the AAAs and the nine National SCSEP sponsors with the PA CareerLink® one-stop system. The AAAs and the nine National SCSEP sponsors are involved with the PA CareerLink® centers in the following ways: Refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in CWDS; refer SCSEP eligible individuals ages 55 and older to the AAAs and the nine National SCSEP sponsors for services; co-locate SCSEP staff at the PA CareerLink® centers on a full- or part-time basis; and co-locate SCSEP participants at the PA CareerLink® centers to serve as greeters, resource room aides, job developers, custodians, clerical aides, and customer service representatives. The PDA SCSEP program manager will also provide yearly training on the WIOA title I programs as cross training. The goal will be to provide SCSEP sub-grantees the necessary tools to provide useful referrals to local PA CareerLink® staff.

(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))

Since the Department of Aging also administers the other titles of the Older Americans Act (OAA), it is in a position to coordinate the activities of the OAA with SCSEP. The Department of Aging will make the national SCSEP sponsors aware of these activities through e-mail announcements. The PDA SCSEP program manager, who is in direct contact with the OAA services unit director, attends bi-monthly meeting with the OAA services team. During these meetings, updates are provided by the various OAA services department team members and updates of these changes will be shared with all local SCSEP sub-grantees. The PDA SCSEP program manager is also the single point of contact for all SCSEP sub-grantees with Area Agency on Aging throughout the state, and can assist all sub-grantees with answering questions and assisting with concerns about OAA programs.

(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 PA Link to Aging and Disability Resources (The Link) is a focal point for Pennsylvania residents seeking information and referrals for services to the elderly and adults with disabilities. The PA Link, through its collaborative network of partners including state and local, public and private agencies, improves access to information and linkages to long term living supports and services. Private and public entities and programs providing services to older individuals such as assisted living, nursing home, vocational rehabilitation, and transportation and providers serving persons with disabilities are just a few of the agencies that comprise the Link. Many SCSEP providers are members of the Link which will serve them well in learning about the myriad of local services available that can help SCSEP participants in general.

(D)Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

Each month, the Center for Workforce Information & Analysis (CWIA) provides the Department of Aging with Job Posting files by Local Workforce Development Area. The Department of Aging sends this

information to its SCSEP sub-grantees and National Sponsors. Senior staff from the CWIA have presented at annual SCSEP trainings in the past few years. The trainings consisted of an explanation of the many available labor market information products and how SCSEP coordinators can use these products to find SCSEP participants' jobs.

(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)

There are varying degrees of involvement by the AAAs and the nine National SCSEP sponsors with the PA CareerLink® one-stop system. The AAAs and the nine National SCSEP sponsors are involved with the PA CareerLink® centers in the following ways: Refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in CWDS; PA CareerLink® staff refer SCSEP eligible individuals ages 55 and older to the AAAs and the nine National SCSEP sponsors for services; co-locate SCSEP staff at the PA CareerLink® centers on a full- or part-time basis; and co-locate SCSEP participants at the PA CareerLink® centers to serve as greeters, resource room aides, job developers, custodians, clerical aides, and customer service representatives.

(F)Efforts to work with local economic development offices in rural locations.

In most rural job development areas, SCSEP program offices bring job development activities to the participants and applicants. Job developers attend local job fairs and employment activities at local agencies. They will also meet applicants and participant at local Area Agency on Aging (AAA) and senior centers in their area to provide information on the SCSEP and enroll potential participants. In a very rural three-county area in the Southwest corner of the commonwealth, the Southwest PA AAA maintains relationships with key individuals at local organizations involved in economic development, such as the Mon Valley Progress Council, the Middle Monongahela Development Association, and the Washington and Fayette County Chambers of Commerce, as well as the Washington Business District Authority, and the Washington County Foundation. The AAA has requested these organizations' participation in area job fairs and also to present during participant meetings on employment opportunities.

(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.)

SCSEP sub-grantees are provided with occupations in the commonwealth that require Short-Term On-the-Job Training (ST OJT) or Moderate-Term On-the-Job Training (MT OJT). Of the occupations that require ST OJT or MT OJT, many are classified as High Priority Occupations (HPO). HPO's are occupations that are in demand by employers, have higher skill needs and are most likely to provide family sustaining wages. SCSEP staff focus on companies that have HPOs that are appropriate for SCSEP participants. As partners in the local PA CareerLink® centers, SCSEP staff have access to employers. SCSEP staff also work with human resource managers to discuss their staffing needs and how SCSEP participants could potentially meet these needs. The Department of Aging, through the Pennsylvania Hall of Fame of Champions of Older Workers, annually honors one employer in the commonwealth that recognizes and values the

talents of the commonwealth's older workers. The Department of Aging and representatives from a few National SCSEP sponsors select the winner. Nomination forms are sent to all local WDB directors, PA CareerLink® administrators, AAAs, National SCSEP sponsors, and General Assembly members. The winner is honored annually in May during the PA Partners Conference Employer Recognition Luncheon. During this annual employer awards luncheon, the Pennsylvania Department of Labor & Industry, Office of Vocational Rehabilitation, Pennsylvania Department of Education and the Pennsylvania Department of Human Services also honor employers.

(3) The State's long-term strategy for serving minority older individuals under SCSEP. (20CFR 641.302 (c))

According to the *SCSEP Analysis of Service to Minority Individuals PY 2017, Volume II, July 23, 2019* the minority population in the commonwealth was 24.4 percent. Based on the Minority Report, 53.2 percent of the individuals served in the SCSEP were minorities, which is more than double the statewide percentage. The commonwealth's previous strategies in serving minorities will continue because minorities are being served at a much higher level than their proportionate share. SCSEP providers shall continue to make extensive outreach efforts to potential minority SCSEP participants and communities, specifically to community groups, senior centers, cultural/social groups, fraternal organizations, chambers of commerce, libraries, community-based media, community leaders and retail stores. Current partnerships with minority organizations will be renewed. Outreach to minority populations will continue to include paid advertisements and coordination with organizations that serve minority groups.

(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 task of identifying the types of community services that are needed and the places where these services are most needed is best left at the local level where there is a better understanding of each community's unique needs. As the commonwealth is a diverse state, each community has its own unique needs and the individuals comprising those communities that are most in need have varying degrees of factors that precipitate their individual situations.

(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))

In the past decade, the Department of Aging went from 52 SCSEP sub-grantees to its current 8. The Department of Aging will be issuing a Request for Grant Applications for SCSEP services in at least 42 of the 52 AAA Planning and Service Areas (PSAs) in December 2020. Selected providers will begin to provide SCSEP services in the four designated AAA PSA Regions on July 1, 2021.

(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))

All SCSEP grantees in the commonwealth will be invited to attend future SCSEP trainings conducted by the Department of Aging. The annual training addresses best practices to assist grantees to improve their performance in meeting the common measure performance goals of Employment rate-2nd quarter after exit, Employment rate-4th quarter after exit, and median earnings as well as the other goals of community service, most in need and service level.

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))

Projects are authorized in each county of the commonwealth. The number of SCSEP positions or slots that each county receives is based on a formula that considers the number of individuals ages 55 and older who are at or below 125 percent of the poverty level. Local decisions based on many factors determine which host agencies provide training to the participants. Some of these factors are: the host agency's ability to hire; does the host agency offer good training or provide a particularly important community service; does the host agency assist with the job search process through their contacts with other agencies and local businesses; and does the host agency provide a supportive environment for participants with multiple and/or significant barriers that can also offer short-term opportunities for participants prior to IEP development. Federal regulatory priorities of service govern what populations are served. Priority of Service is provided first to Veterans and qualified spouses with further preference to those persons 65 and older or individuals with: a disability; limited proficiency; low literacy skills; reside in a rural area; low employment prospects; failed to find employment through WIOA Title I services; homeless or at risk of homelessness.

(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.

The following lists the counties where the SCSEP project will take place in PY 2018 to include the number of SCSEP authorized positions and any change from PY 2017 to PY 2018: Adams 2; Armstrong 15 (+15); Bedford 0 (-1); Berks 9; Blair 5 (-1); Bradford 4 (-1); Bucks 13; Butler 25 (+20); Cambria 6 (-1); Cameron 0 (-1); Carbon 2; Centre 3; Chester 6 (-1); Clarion 3; Clearfield 3; Clinton 1; Columbia 3; Cumberland 7 (-2); Dauphin 5 (-1); Delaware 11; Erie 12; Fayette 7 (-2); Franklin 5 (-1); Fulton 1; Greene 1 (-1); Huntingdon 3; Indiana 5; Jefferson 3; Juniata 2; Lackawanna 6 (-1); Lancaster 15 (-1); Lebanon 3; Lehigh 10; Luzerne 13 (-2); Lycoming 5; Mifflin 5; Monroe 9 (+1); Montgomery 22 (+2); Montour 2; Northampton 5 (-1); Northumberland 4 (-1); Perry 3; Philadelphia 92 (-11); Pike 6; Potter 3; Schuylkill 5 (-2); Snyder 2 (-1); Somerset 17 (+11); Sullivan 1; Susquehanna 2; Tioga 2 (+1); Union 3; Venango 10 (+9); Washington 6 (-1); Wayne 3; Westmoreland 13 (-2); Wyoming 2 (+1); York 6. Effective 2/1/17, due to the SCSEP national completion slots were transferred between PDA and national SCSEP sponsors. Forty-seven slots were transferred from PDA to the National Urban League (44-Allegheny and 3-Beaver). Forty-seven slots were transferred from the National Urban League to PDA's contractor (21 - Butler, 16 - Armstrong, 10 - Venango). Fourteen slots were transferred from PDA to the National Council on Aging (Crawford - 4,

Lawrence - 4, Mercer -5 and Elk - 1). Fourteen slots were transferred from the National Council on Aging to PDA's contractor (14 - Somerset).

(3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

Pennsylvania has 15 counties over-served with a +5-slot variance and 16 counties under-served with a -5-slot variance. Counties such as Berks, Dauphin, and Mercer are over-served because there are larger eligible applicant pools, more viable job opportunities and higher placement outcomes for the population that we serve. Counties such as Montgomery, Cumberland, and Schuylkill are under-served due to the lack of an eligible applicant pool, transportation related issues and a lack of viable job opportunities. Pennsylvania unemployment rate is currently at 3.9%. Pennsylvania continues to add jobs, but they are not in the fields that SCSEP participants are well suited. According to data collected by PA Center for Workforce Information and Analysis, construction, mining and logging, and education and health services are the fastest growing industries in Pennsylvania.

The AARP Foundation has 3 counties over-served with a +5-slot variance and 3 counties under-served with a -5-slot variance. AANPP has one county that is under served with a -17-slot variance. ATD has 1 county over-served with a +13-slot variance and 8 counties under-served with a -5-slot variance. NCOA has 12 counties over-served with a +5-slot variance and 8 counties under-served with a -5-slot variance. NUL has one county that is under-served with a -12-slot variance. TWP has two counties that are under-served with an over a -5-slot variance. Most of these variances over-lap with the state programs. Lack of an eligible applicant pool, transportation related issues and a lack of viable job opportunities are the major reasons why the underserved counties are under-served, and over-served counties are overserved due to high population density and availability of eligible applicants.

(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.

All over enrolled areas have been instructed to start reducing participants through attrition and under enrolled areas have been instructed to increase outreach. On the state level, the Pennsylvania Department of Aging will continue to spread information of SCSEP at the state Workforce Development Board and the local workforce development boards whenever appropriate. PA Department of Aging will continue to provide technical assistance to all of our Pennsylvania project locations regarding the importance of achieving equitable distribution.

In areas that are under served by more than 5 like Philadelphia, Montgomery, and Cumberland, participants are underserved by the state grantee and the national grantee. This is also true for some of the over-served regions like Chester and Cambria. These counties are over served in both the state and national grantees. In Chester Co, the state program has been instructed to forward any referrals to the National grantee as TWP is under served in this county. In Northampton, the AARP Foundation is overserved as a National grantee but underserved as a state sub-grantee. They are in the process of

opening more participants on the state grant. NCOA overserved in most of their counties and the state programs are slightly underserved in the same counties. We have requested that NCOA forward any referrals in these counties to the state program.

(B) Equitably serves rural and urban areas.

The statewide distribution of eligible individuals who reside in rural and urban areas is 20 percent and 80 percent respectively. This data was obtained from the U.S. Bureau of Census, 2009-2013 American Community Survey. Based on the final FY 18-19 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 26 percent of the participants served resided in rural area and 74 percent resided in urban areas. In order to maintain this level of service, the program will continue to maintain current levels by reaching out to the eligible senior population at community centers, like local libraries and senior centers. We will also continue to reach out to non-profit agencies to give a wide range of training options to participants to help alleviate travel concerns.

(C) Serves individuals afforded priority for service under 20 CFR 641.520. (20CFR 641.302(a), 641.365, 641.520)

Please refer to the SCSEP priorities of service above. SCSEP providers use a variety of recruitment methods to reach out to individuals who must be afforded priority of service. Some of these methods are as follows: mailing postcards to zip codes that have a significant number of most in need individuals as defined by the SCSEP; networking with the Office of Vocational Rehabilitation, Veterans Administration, Adult Education Programs, and PA CareerLink® centers; working with agencies that specialize in immigrant and minority services; and hiring SCSEP staff who are bilingual.

(5) The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

Population for whom Poverty Status is Determined

Geography	Total Population for whom Poverty is Determined	Total Population 55 and Over	Under 125 Percent of Poverty Level (Number)	Under 125 Percent of Poverty Level (Percent)	At or Above 125 Percent of the Poverty Level (Number)	At or Above 125 Percent of the Poverty Level (Percent)
Pennsylvania	12,377,251	3,869,859	483,289	12.5%	3,386,570	87.5%
Adams County	97,347	32,887	2,734	8.3%	30,153	91.7%
Allegheny County	1,196,109	388,254	48,560	12.5%	339,694	87.5%
Armstrong County	66,006	24,038	3,535	14.7%	20,503	85.3%
Beaver County	165,522	59,419	6,817	11.5%	52,602	88.5%
Bedford County	48,268	17,640	2,783	15.8%	14,857	84.2%
Berks County	402,326	119,711	13,335	11.1%	106,376	88.9%
Blair County	121,889	41,150	6,037	14.7%	35,113	85.3%
Bradford County	60,656	21,075	2,879	13.7%	18,196	86.3%
Bucks County	618,095	199,617	14,054	7.0%	185,563	93.0%

Butler County	180,426	58,956	5,726	9.7%	53,230	90.3%
Cambria County	128,554	48,464	7,118	14.7%	41,346	85.3%
Cameron County	4,694	1,996	314	15.7%	1,682	84.3%
Carbon County	62,882	22,194	2,622	11.8%	19,572	88.2%
Centre County	142,864	37,265	3,239	8.7%	34,026	91.3%
Chester County	501,816	145,099	10,057	6.9%	135,042	93.1%
Clarion County	37,362	12,482	1,652	13.2%	10,830	86.8%
Clearfield County	74,774	26,105	4,256	16.3%	21,849	83.7%
Clinton County	37,308	11,774	1,503	12.8%	10,271	87.2%
Columbia County	61,879	20,781	2,958	14.2%	17,823	85.8%
Crawford County	83,022	28,949	4,100	14.2%	24,849	85.8%
Cumberland County	232,176	73,486	5,336	7.3%	68,150	92.7%
Dauphin County	268,653	79,973	9,326	11.7%	70,647	88.3%
Delaware County	542,641	160,683	16,707	10.4%	143,976	89.6%
Elk County	30,350	11,080	1,266	11.4%	9,814	88.6%
Erie County	265,377	82,030	11,089	13.5%	70,941	86.5%
Fayette County	129,203	45,708	7,955	17.4%	37,753	82.6%
Forest County	2,864	1,927	255	13.2%	1,672	86.8%
Franklin County	150,524	47,799	5,153	10.8%	42,646	89.2%
Fulton County	14,537	5,060	691	13.7%	4,369	86.3%
Greene County	33,849	11,555	1,690	14.6%	9,865	85.4%
Huntingdon County	40,426	14,345	2,034	14.2%	12,311	85.8%
Indiana County	80,656	26,983	3,202	11.9%	23,781	88.1%
Jefferson County	43,401	15,020	2,276	15.2%	12,744	84.8%
Juniata County	24,125	7,865	1,074	13.7%	6,791	86.3%
Lackawanna County	203,656	67,826	10,254	15.1%	57,572	84.9%
Lancaster County	523,009	154,370	14,028	9.1%	140,342	90.9%
Lawrence County	85,952	31,347	4,565	14.6%	26,782	85.4%
Lebanon County	134,152	42,622	4,455	10.5%	38,167	89.5%
Lehigh County	351,347	101,198	11,653	11.5%	89,545	88.5%
Luzerne County	306,391	101,941	14,045	13.8%	87,896	86.2%
Lycoming County	109,487	36,009	4,153	11.5%	31,856	88.5%
McKean County	38,887	13,305	1,641	12.3%	11,664	87.7%
Mercer County	106,187	38,369	4,220	11.0%	34,149	89.0%
Mifflin County	45,541	15,462	1,991	12.9%	13,471	87.1%
Monroe County	164,869	51,174	6,087	11.9%	45,087	88.1%
Montgomery County	797,257	241,879	18,261	7.5%	223,618	92.5%
Montour County	17,606	6,119	675	11.0%	5,444	89.0%

Northampton County	289,773	93,820	8,898	9.5%	84,922	90.5%
Northumberland County	88,859	31,284	4,432	14.2%	26,852	85.8%
Perry County	45,187	14,483	1,404	9.7%	13,079	90.3%
Philadelphia County	1,526,582	374,800	96,036	25.6%	278,764	74.4%
Pike County	55,094	20,141	1,773	8.8%	18,368	91.2%
Potter County	16,815	6,346	1,127	17.8%	5,219	82.2%
Schuylkill County	136,941	47,152	6,512	13.8%	40,640	86.2%
Snyder County	38,289	12,258	1,481	12.1%	10,777	87.9%
Somerset County	70,517	26,363	3,733	14.2%	22,630	85.8%
Sullivan County	5,986	2,699	396	14.7%	2,303	85.3%
Susquehanna County	41,224	15,685	2,083	13.3%	13,602	86.7%
Tioga County	40,773	14,360	2,262	15.8%	12,098	84.2%
Union County	35,804	12,089	1,191	9.9%	10,898	90.1%
Venango County	51,619	19,372	2,522	13.0%	16,850	87.0%
Warren County	39,399	14,722	1,813	12.3%	12,909	87.7%
Washington County	202,577	70,859	8,042	11.3%	62,817	88.7%
Wayne County	47,941	19,131	2,401	12.6%	16,730	87.4%
Westmoreland County	349,635	130,682	14,129	10.8%	116,553	89.2%
Wyoming County	27,008	9,440	1,203	12.7%	8,237	87.3%
York County	432,306	131,182	13,490	10.3%	117,692	89.7%

Source: American Community Survey 5-Year Estimates (2013-17)

(6) The relative distribution of eligible individuals who:

(A) Reside in urban and rural areas within the State

The statewide distribution of eligible individuals who reside in rural and urban areas is 20 percent and 80 percent respectively. This data was obtained from the U.S. Bureau of Census, 2009-2013 American Community Survey. Based on the final FY 18-19 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 26 percent of the participants served resided in rural area and 74 percent resided in urban areas.

(B) Have the greatest economic need

According to data from the U.S. Bureau of Census, 2017 American Community Survey, there were 483,289 individuals in the commonwealth who were age 55 and older and whose incomes were below 125 percent of the poverty level. Of this total, 303,760 individuals had incomes below the poverty level. Based on the final FY 18-19 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 88 percent of the participants served were below the poverty level. The percent of individuals served by the Department of Aging and nine national SCSEP operators in the commonwealth in FY 18-19 who were below the poverty level (88 percent) exceeded the statewide percentage of eligible individuals that are below the poverty level (67 percent).

(C) Are minorities

According to the *SCSEP Analysis of Service to Minority Individuals PY 2017, Volume II, July 23, 2019* the minority population in the commonwealth was 24.4 percent. Based on the final FY 18-19 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 51 percent of the individuals served were minorities, which is more than double the statewide percentage.

(D) Are Limited English Proficient.

According to data from the U.S. Bureau of Census, 2017 American Community Survey, 4.2percent of the SCSEP eligible population in the commonwealth did not speak English well. Based on the final FY 18-19 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 5 percent of the individuals served had limited English proficiency. The percent of individuals served by the Department of Aging and nine national SCSEP operators in FY 18-19 who had limited English proficiency (5 percent) exceeds the statewide percentage of eligible individuals who did not speak English very well (4.2 percent).

(E) Have the greatest social need. (20 CFR 641.325(b))

One of the Department of Aging's and the nine national SCSEP sponsors six performance goals is serving the most in need. This goal measures the average number of barriers per SCSEP participant. The barriers are: severe disability; frail; age 75 or older; old enough for but not receiving Social Security Title II; severely limited employment prospects and living in an area of persistent unemployment; limited English proficiency; low literacy skills; disability; rural; veterans; low employment prospects; failed to find employment after using WIOA Title I services; homeless; and at risk of homelessness. The total number of barriers divided by the number of participants served provides the average number of barriers per participant. Based on the final FY 18-19 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors all exceed their most in need targets.

(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))

SCSEP providers in the commonwealth will ensure the least disruption possible to participants when positions are redistributed or when new Census data becomes available or for any other reason. Participants can never be terminated because of changes in funding, slots, providers or any other reason. If changes are needed, they will be implemented gradually, and no participant will be adversely affected. SCSEP grantees in the commonwealth are not permitted to transfer slots from one county to another county or from one county to another state unless there is prior approval from the Department of Aging and the USDOL.

SCSEP Operations

(1) Administrative: describe the organizational structure of the project and how subprojects will be managed, including:

(A) identification of the key staff, including the primary responsibilities and the amount of time assigned to the SCSEP grant;

Key staff from the Department and the amount of time they are assigned to the grant are: Aging Services Specialist (100 percent), Budget Analyst 3 (8 percent), Budget Analyst 4 (3 percent), Budget Analyst 4 (3 percent) and Budget Analyst 5 (2 percent). All of the aforementioned key staff, with the exception of the Aging Services Specialist, are from the Department’s Bureau of Finance. Bureau of Finance staff compile and process grants for all sub-grantees; review expenditure reports for all sub-grantees; process payments for all sub-grantees; review budgets for all sub-grantees; and process quarterly reporting information to the Comptroller. The Aging Services Specialist is the SCSEP Program Manager and is housed in the Bureau of Aging Services. The Aging Services Specialist’s primary responsibilities are to monitor SCSEP sub-grantees; manage data collection and reporting; coordinate recognition events for SCSEP participants and employers; negotiate annual performance goals; conduct SCSEP data validation; and prepare the annual grant application for SCSEP funds. It should also be noted that Financial Representatives housed in the Bureau of Finance conduct financial monitoring of all SCSEP sub-grantees.

(B) Include an organization chart depicting any subgrantees or local affiliates implementing the grant. Include a table with authorized positions for each subgrantee or affiliate, if applicable;

Sub-grantees

Sub-grantee	County Location	Number of Authorized Positions
AAA of Westmoreland	Westmoreland	13
GECAC	Erie	12
Lancaster AAA	Lancaster	15
Luzerne/Wyoming AAA	Luzerne	13
Luzerne/Wyoming AAA	Wyoming	2
Philadelphia Corp on Aging	Philadelphia	94
Southwestern Pennsylvania AAA	Fayette	7
Southwestern Pennsylvania AAA	Greene	1
Southwestern Pennsylvania AAA	Washington	6
Lycoming/Clinton AAA	Clinton	1
Lycoming/Clinton AAA	Lycoming	5

Local Affiliates

AARP Region	County	Number of Authorized Positions
Northern Region AARP	Bradford	4

Northern Region AARP	Carbon	2
Northern Region AARP	Centre	3
Northern Region AARP	Columbia	3
Northern Region AARP	Juniata	2
Northern Region AARP	Lackawanna	6
Northern Region AARP	Mifflin	5
Northern Region AARP	Monroe	9
Northern Region AARP	Montour	2
Northern Region AARP	Northumberland	4
Northern Region AARP	Pike	6
Northern Region AARP	potter	3
Northern Region AARP	Schuylkill	5
Northern Region AARP	Snyder	2
Northern Region AARP	Sullivan	1
Northern Region AARP	Susquehanna	2
Northern Region AARP	Tioga	2
Northern Region AARP	Union	3
Northern Region AARP	Wayne	3
Central AARP	Adams	2
Central AARP	Cumberland	7
Central AARP	Dauphin	5
Central AARP	Franklin	5
Central AARP	Lebanon	3
Central AARP	Perry	3
Central AARP	York	6
Central AARP	Blair	5
Central AARP	Cambria	6
Central AARP	Fulton	1
Central AARP	Huntington	3
Central AARP	Somerset	17
Western Region AARP	Armstrong	15
Western Region AARP	Butler	25
Western Region AARP	Clarion	3
Western Region AARP	Clearfield	3
Western Region AARP	Indiana	5
Western Region AARP	Jefferson	3
Western Region AARP	Venango	10
Eastern Region AARP	Berks	9

Eastern Region AARP	Bucks	13
Eastern Region AARP	Chester	6
Eastern Region AARP	Delaware	11
Eastern Region AARP	Lehigh	9
Eastern Region AARP	Montgomery	22
Eastern Region AARP	Northampton	5

(C) describe training that will be provided to local staff;

The PA Department of Aging conducts an annual SCSEP training for local subgrantee staff on topics that are requested from local subgrantee staff or are deemed appropriate by the Department based on current SCSEP developments. The Department of Aging will be conducting quarterly meeting with all sub-grantees to review US DOL policy changes and provide technical assistance. The SCSEP training products on Workforce3One are also very helpful to both grantee and local staff.

(D) describe how projects will be monitored for program and financial compliance, including audit plans; and

Sub-grantees will be monitored every program year using a combination of remote monitoring and on-site monitoring visits. Each sub-grantee will be monitored on-site at least once every three years, except for the Philadelphia and AARP Foundation sub-grantee sites, which will be monitored on-site at least every other year. In addition, on-site monitoring will also occur for the following reasons:

- New sub-grantees will be monitored on-site within their first six months of operation
- If issues arise for a sub-grantee during data validation
- If participants file grievances against a sub-grantee about services
- If fiscal issues arise during the program year as reported during fiscal monitoring
- If a sub-grantee has not met their program goals over the previous three quarters.

During the first quarter of each program year, the Pennsylvania Department of Aging (PDA) SCSEP program manager will establish a review schedule for the program year and determine which sub-grantees are monitored on-site and which are monitored remotely. The reviews can be conducted at any time during the program year and the schedule can be altered if information arises that requires immediate investigation and action. The program year runs from 7/1/XX to 6/30/XX. Interviews with grant participants, sub-grantee staff, and host agency supervisors will be conducted in person or over the telephone for both remote and on-site monitoring.

Pre-visit activities

Every site will be informed of the monitoring visit at least two weeks in advance. An e-mail will be sent to the site administrator along with a Program Evaluation Questionnaire (PEQ) that must be completed and returned to the PDA SCSEP Program Manager one week before the monitoring (See Attachment 1). The PEQ requests information and documentation about program design and administration of the SCSEP grant, informs the program administrator of which paper files will be reviewed, and requests contact

information for potential participant and host agency interviewees. The PEQ requests electronic or paper copies of:

- Program manuals for participants and host agencies.
- Complete participant files equal to 10% of sub-grantee slot allotment
- Host agency agreements
- Memorandums of Understanding (MOUs) and Infrastructure Funding Agreements (IFA) for all one-stop sites.
- SCSEP Record Retention Policies
- SCSEP program Emergency Action Plans
- Workers compensation insurance policies

Note: When the monitoring is conducted on-site, paper documentation will be required from the sub-grantee during the site visit and not sent electronically.

After receipt of the PEQ and all requested documentation for remote monitoring, the PDA SCSEP program manager will review the answers to the PEQ, and utilizing the SCSEP program review workbook, determine if the sub-grantee is properly implementing procedures for:

- Grant administration; To determine if the sub-grantee has proper policies in place for disaster response, document retention, workers compensation insurance, and termination and grievance.
- Workforce Innovation and Opportunity Act (WIOA); To determine if the sub-grantee is operating in collaboration with the local one-stop centers and other agencies in accordance with WIOA
- Orientation; To determine if the sub-grantee is communicating effectively, orally and in writing, SCSEP regulations, goals, and requirements to host agencies and participants.
- Host Agencies/Community Service assignment; To determine if the sub-grantee is effectively recruiting and monitoring host agencies.
- Recruitment, Selection, and Eligibility of Participants; To determine if the sub-grantee is effectively recruiting and monitoring participants and properly applying eligibility criteria in participant selection.
- Fringe Benefits; To determine if the sub-grantee has required policies and procedures in place for workers compensation insurance, and for participants to make up time when the host agency is closed for a federal holiday or the participant is out sick and offering free physical exams at enrollment and annually thereafter.
- Participant Assessment and Individual Employment Plan (IEP) and Training; To determine if the sub-grantee has the required policies and procedures to ensure the participant is completing IEPs, assessments, and trainings in accordance with unsubsidized employment goals.
- Unsubsidized Placement/Job Development; To determine if the sub-grantee has required policies and procedures in place to ensure participants are completing job search activities and that the sub-grantee is assisting with participants gaining unsubsidized employment.
- Performance and Web-based Database Collection System (WDCS); Utilizing Quarterly Program Reports (QPRs) from SPARQ, determine if the sub-grantee is effectively meeting program goals, and if the subgrantee is utilizing SPARQ management reports to manage participant follow-ups, durational limits, and approved breaks.

- Durational Limits; To determine if the sub-grantee has required policies and procedures in place to ensure participants comply with durational limits, and that the sub-grantee sends participants required notifications of durational limits.

Any areas of concerns noted in the aforementioned topics will be identified for discussion during the monitoring call or on-site interview with sub-grantee staff. In addition, program invoices from the previous program year, and for all quarters from the current program year will be reviewed for discussion during the monitoring call or on-site interview with sub-grantee staff.

Day of monitoring

The PDA SCSEP program manager will conduct on-site or telephone interviews with host agency supervisor(s), participant(s), and sub-grantee staff to determine the sub-grantee's effectiveness. Case records will be reviewed for:

- Copies of Durational Limit (DL) letters sent at 12 months, 6 months and 30 days prior to the participant's DL exit along with their Participant Transition IEPs at 12 months and 6 months prior to exit.
- Completed and signed page 6 of the participant form for initial eligibility determination and signatures of participant and SCSEP staff, and the completed and signed recertification determination form (page 7 of participant form) for the first recertification.
- Completed I-9 and W-4 forms
- Completed initial assessment, IEP, and Training Description and the subsequent two reassessments, IEPs and Training Descriptions.
- Completed Safety Evaluations
- Documentation of offer of initial physical examination and offer of annual physical exams each year thereafter.

An exit interview will be conducted by telephone or on-site with the sub-grantee program manager to discuss areas of concern discovered during the monitoring and allow the sub-grantee time to provide additional verification or information.

After the monitoring

The PDA SCSEP Program Manager will issue a report of findings and areas of concern to the sub-grantee no more than five (5) business days from the date of the on-site or remote monitoring review. The report will include any findings found in the sub-grantee's program design and administration and provide a request for a Corrective Action Plan (CAP) from the sub-grantee to address all findings. The sub-grantee will be required to provide a diagnosis of the reason for the deficiency, their action plan to correct the deficiency, a follow up process to ensure the action plan is effectively correcting the deficiency, and verification, if appropriate, that the deficiency is corrected. (Attachment 3) The CAP must be submitted no later than 30 days from the submission of the PDA monitoring report, and a follow up of the CAP will be required of the sub-grantee no more than 90 days after implementation of the CAP. The sub-grantee will be required to submit review results after the CAP follow-up is complete.

All monitoring reviews and CAPs will be stored electronically for future reviews for the duration of the sub-grantee's contract with the PDA.

Fiscal Monitoring

Financial Representatives will conduct onsite financial monitoring of all subgrantees at least once in a three-year period, utilizing the attached monitoring tool (Attachment 4) to determine compliance. The Financial Representatives in the Bureau of Finance come to the PDA credentialed by their degrees/work experience and receive training from their peers and from other fiscal and program staff in the PDA. PDA will issue a financial monitoring report to the subgrantee no later than 30 days after the onsite visit has concluded. In addition to the financial monitoring conducted by the Financial Representatives, other PDA staff in the Bureau of Finance and the Bureau of Aging Services review monthly subgrantee financial reports/invoices and participant reports and conduct data validation on an annual basis. Staff from the Bureau of Finance and the Bureau of Aging Services review subgrantee financial reports/invoices monthly for AARP Foundation and each quarter for the Area Agency on Aging (AAA) sub-grantees to determine if a reasonable request of funds compared to the approved allocation is being made. Each January, Bureau of Aging Services staff determine if SCSEP subgrantee allocations should be reallocated based on current and projected expenditures of funds. Annually, PDA staff conduct a data validation review for a sample of participant records for all subgrantees. Participant timesheets are monitored during the data validation review to determine if the participant hours being entered into SPARQ each quarter match the hours on the timesheets for the respective quarter. The Bureau of Finance Contracting Division is tasked with reviewing subgrantees financial audits. They ensure award amounts are accurately reported and any noted audit findings are appropriately remediated. Audit findings are also forwarded to the Department's Financial Representatives who follow up on site to ensure corrective actions have been implemented.

(E) describe how the State will manage its providers and how it will transfer participants if new providers are selected to serve in the State.

All the PA Department of Aging SCSEP subgrantees are awarded 4-year contracts to operate a SCSEP program in their area. The contract stipulates that every year during the four years of the contract the sub-grantee can request to discontinue operation and hand the agreement back to the department or continue to operate the program for the program year. If a sub-grantee chooses to discontinue operation, an RFA will be published and a new sub-grantee will be chosen. The Area Agencies of Aging has the right of first refusal of SCSEP funds and currently 7 AAAs operate SCSEP programs along with The AARP Foundation. The AARP Foundation has agreed to transfer any participants to their program if a AAA has decided to cease operating a program to eliminate any hardship to participants while the sub-grantee selection is processed.

(2) Recruitment: describe how grantee will recruit and select of participants will be achieved. The eligibility of participants is described under 20 CFR 641.500 and 641.525.

The PA Department of Aging's SCSEP subgrantees have the responsibility of developing recruitment procedures that will allow them to enroll individuals in accordance with the service priority categories and which will help them to achieve the Most in Need performance goal. Subgrantee recruitment methods include, but are not limited, to the following:

- convening special meetings with community agencies to pool recruitment resources;

- coordinating with Workforce Innovation and Opportunity Act (WIOA) Programs, PA CareerLink® centers, County Assistance Offices, Vocational Rehabilitation Offices and other local service agencies;
- speaking engagements with civic organizations, business organizations, and other employer groups;
- having a public relations program that includes paid advertisements, employment and training "news" stories with photographs, public service announcements on radio and TV and PA Department of Aging employment brochures;
- dissemination of specially produced material (pamphlets, placards, brochures, and audio/visual presentations); and
- holding job fairs and local ceremonies to observe "National Employ Older Worker" week.

(3) Income Eligibility: describe how participant income will be recertified each year, including where eligibility records will be maintained.

Participant income, family size and employment status are recertified for all participants within 12 months of their last eligibility certification or recertification. It should be noted that local subgrantee staff inform participants to report any change in income, family size or employment status that could affect the participant's continued eligibility for SCSEP. If a participant reports any change in income, family size or employment status, the recertification will be conducted immediately. Eligibility records are securely stored at the offices of local subgrantees.

(4) Orientation: describe the orientation procedures for:

(A) Participants

Participants receive an overview of the program prior to enrollment and then after enrollment, there is a formal orientation for participants. The formal orientation informs participants of the SCSEP goals and policies, durational limits, allowable and unallowable political activities, grievance procedure, termination policy, etc. Participants sign an orientation form acknowledging that they have received and understand the orientation information that was provided to them.

(B) Host Agencies

During the host agency orientation, the host agency director and the participant's supervisor are provided with information related to their responsibility to supervise the participant in a safe and healthy environment; provide the participant with training and assistance in finding an unsubsidized job; maintenance of effort requirements, participant complaint procedures, etc. The Host Agency Director signs the host agency agreement acknowledging their responsibilities and requirements with training the participant in the SCSEP.

(5) Duration Limits: describe any policy for maximum duration of enrollment or maximum time in community service and provide a copy of the current Duration Limit policy.

As of November 1, 2011, participants are subject to a maximum of 48 months of SCSEP participation, excluding approved breaks in service, without the possibility of a waiver for an additional 12 months.

Any participant reaching his or her 48-month durational limit on or after November 1, 2011 will be exited from SCSEP. Sub-grantees shall send letters to individuals and their host agencies twelve months prior to their scheduled exit dates. Similar letters must again be sent to the affected participants and host agencies six months prior to their 48-month durational limit and again at 30 days prior to the effective date of their exit from SCSEP. The aforementioned 30-day letter shall serve as the participant's termination letter and it shall contain a copy of the sub-grantee's grievance procedures in the event the participant wishes to appeal the termination.

Sub-grantees shall develop Transition Individual Employment Plans (IEPs) at 12 months and 6 months prior to the participants' scheduled durational limit exit date. At twelve months prior to the participant's scheduled durational limit exit date, sub-grantees shall obtain an honest assessment of the participant's strengths and weaknesses from the host agency supervisor. For those participants with good employability potential, sub-grantees will start over with a redesigned IEP. A redesigned IEP is a process for helping each individual participant accomplish as much as possible while on the program, with an unsubsidized job and economic security as the end result. The redesigned IEP will keep sub-grantees and the participant focused and on task. The reassessment is critical for participants with multiple barriers to employment. The reassessment may trigger a completely new IEP, often with different goals and action plans. The IEP shall consider the jobs available in the local market that the participant could attain within the amount of time he or she has remaining in SCSEP. Host agency rotation will most likely be part of this process and is also a valuable tool for moving participants along. Sub-grantees shall also provide these individuals with specialized training or On-the-Job Experience (OJE) to increase their placement potential.

For those participants who are less apt to find unsubsidized employment, sub-grantees must complete the following tasks at twelve months prior to the participant's scheduled durational limit exit date. Obtain an honest assessment of the participants' strengths and weaknesses from the host agency supervisor and develop an exit transition IEP. To help with the exit transition IEP, sub-grantees will recruit host agencies able to provide a supportive environment for participants with personal barriers or growing frailties; ask such agencies for referrals to their colleagues in the same field; attend United Way meetings to learn of other agencies serving vulnerable populations; and make certain agencies maintain a safe environment and have the capacity to make adaptations to accommodate disabilities. Sub-grantees shall carefully review the local job market and qualifications for jobs to determine that the jobs are: suitable for the needs of this particular client group; with employers known for hiring older workers and persons with disabilities; and part-time, not physically strenuous, easily adaptable to accommodations. Sub-grantees shall also seek available training opportunities that lead to these identified job opportunities and that utilize appropriate adult education methodologies.

When all participants are 6 months away from reaching their durational limit exit date, sub-grantees shall refer them to appropriate programs that could provide further employment assistance such as the local CareerLinks, or stipend volunteer programs such as AmeriCorps and SeniorCorps which fund local RSVP, Senior Companions, Foster Grandparents, and other volunteer programs. Participants with disabilities shall be referred to the local Office of Vocational Rehabilitation. Sub-grantees shall also take the time to make certain that participants have a budget minus SCSEP wages which can be followed, and that the participant is signed up for all appropriate social service programs. Sub-grantees shall also determine if

these participants have a social support system and obtain the participants' permission to alert the support system to the participants' impending vulnerability and try to ensure a safety net throughout the transition.

It should be noted that the AARP Foundation and those AAAs that also receive funding from national SCSEP sponsors must adhere to the PDA's IDL policy for PDA funded participants if the national sponsor's IDL policy is different. Questions should be directed to David Miles at telephone number (717) 783-0178 or via e-mail at davimiles@pa.gov.

(6) Assessments: describe the procedures for assessing job aptitudes, job readiness, and job preferences of participants and their potential to transition into unsubsidized employment. Also describe how the assessment will be used to develop the participant's Individual Employment Plan (IEP).

The assessment is made in partnership with the participant. SCSEP subgrantee staff gathers information on the individual's work history, formal and informal education and training, skills, talents, physical capabilities, and need for supportive services. The PA Department of Aging's largest subgrantee uses a computerized assessment and career planning system called *JobReady* to complete the assessment and Individual Employment Plan (IEP). *JobReady* allows program staff and participants to: (1) identify job choices based on an assessment of the participants' interests, personal characteristics, skills and experience; (2) quickly test and assess participants' existing skill levels for their job choices while identifying skill gaps and other barriers; (3) create the IEP that starts with a host agency training assignment and guides the participants through the stated objectives and actions required to prepare for their job goals; (4) access online training programs to eliminate skill gaps; (5) earn Job Skill Certificates that show employers that participants have the required abilities for the job; and (6) link to job openings in the community. Participants are reassessed at least twice annually. The initial IEP is determined based on the participant's assessment. Subgrantee staff and the participant jointly develop the IEP to ensure that it is realistic and that it accurately reflects the participant's interests and needs.

(7) Community Service Assignments: describe how the participant will be assigned to community service including:

(A) the types of community service activity that will be emphasized and how they were chosen; methods used to match participants with community service training;

The SCSEP provides over 475,000 community service hours to public and non-profit agencies, allowing them to enhance and provide needed services. Local community leaders are in a better position to understand the unique needs of their communities. Therefore, the PA Department of Aging leaves the task of identifying the types of community services and the places where these services are needed at the local level. Locally, the types of community services needed are based on input from the partnerships developed in each county between the SCSEP subgrantees and County Human Service Agency Coalitions, the United Way and Aging Resource and Disability Links.

(B) the extent to which participants will be placed in the administration of the project itself;

Several PA Department of Aging SCSEP subgrantees use participants in administrative and job development capacities. Many participants that have worked in project administration at the subgrantee's office were subsequently hired by the subgrantee's agency.

(C) the types of host agencies used and the procedures and criteria for selecting the assignments; SCSEP subgrantees are aware of the local community needs from networking with community leaders. They are also aware of which agencies can qualify as a SCSEP host agency. They determine the quality of training that can be provided by the host agency and if the training is related to a High Priority Occupation. Local SCSEP subgrantees use the assessment and the IEP as the basis for developing an appropriate host agency assignment. They review the available host agencies to find the closest match with the participant's IEP goal and training objectives. When a participant has specific needs that cannot be met by the current host agencies, the local SCSEP subgrantee will seek out a new host agency.

(D) the average number of hours in a participant's training week;

SCSEP participants work an average of 20 hours per week and currently earn \$7.25 per hour.

(E) the fringe benefits offered (if any); and

SCSEP participants receive FICA, Workers Compensation and an annual physical exam. The offer of an initial physical examination and an annual physical examination thereafter is made to all participants. The participant is advised that the physical examination is a benefit and not a requirement for initial enrollment or continuing enrollment. If a participant declines to accept the offer of a physical examination, this will be documented.

(F) procedures for ensuring adequate supervision.

The agreements between the PA Department of Aging SCSEP subgrantees and the host agencies will state that a participant must receive at least the same amount and degree of supervision as permanent employees performing comparable job tasks. Subgrantees will conduct periodic host agency monitoring to assure appropriate supervision is being provided.

(8) Training: describe the training that will be provided during community service assignments and any other types of training provided, including linkages with local one-stop centers, and Registered Apprenticeship.

The assessment and IEP are used to develop each participant's community service training assignment. Most SCSEP subgrantees offer computer training for participants. One subgrantee's host agency developed a two-week curriculum for computer classes, which took place at two PA CareerLink® centers, Pennsylvania's one-stop centers, in Southwestern Pennsylvania. The concept was to bring together older individuals and senior high school students into a collaborative process to foster relationships whereby older individuals could use their experiences to mentor students and students could provide computer training to older individuals. All 15 SCSEP enrollees participated in the training.

Organizations located at the PA CareerLink® provide training in areas such as literacy, self-esteem, basic computer entry, Internet job search, and interpersonal skills. There are currently no linkages between subgrantees and the Registered Apprenticeship Program but this is something that may be explored as a topic at a future SCSEP training.

(9) Supportive Services: describe the supportive services that will be offered to help participants obtain and retain an unsubsidized job, including transportation assistance (if applicable).

For any participant who finds unsubsidized employment, supportive services may be provided up to 12 months following the participant's exit provided that the services are necessary for the participant to remain employed. Subgrantees first seek to obtain supportive services for free from local agencies. For example, local Area Agencies on Aging provide support services that can help participants retain an unsubsidized job such as adult day care, meals on wheels, personal care services, transportation and home modifications. Local Adult Education programs partner with SCSEP subgrantees to provide Adult Basic Education and high school equivalency preparation services to participants, which will facilitate their job search. Individuals age 65 and older may ride for free at all times, any day of the week, on the fixed route services of local public transit systems throughout Pennsylvania. Also, on non-fixed route bus systems, the commonwealth's Shared-Ride Program allows individuals age 65 and older to ride at an 85 percent reduced fare with the local shared-ride transportation provider. When necessary, SCSEP funds are used mostly for the following supportive services: transportation for individuals under age 65, work shoes, uniforms, eyeglasses and tools.

(10) Termination: describe procedures for terminating a participant, including Individual Employment Plan(IEP) terminations. Please provide a copy of the current termination procedures.

There are six (6) reasons a participant may be involuntarily terminated from the SCSEP which are listed below along with an explanation. Sub-grantees must follow this Termination Policy fairly and equitably when involuntarily terminating participants. Participants will not be terminated based on age as there is no upper age limit for participation in the SCSEP. Except as noted below in the case of serious violations, participants will receive progressive discipline and an opportunity for corrective action before a formal termination notice is issued. In all cases, participants will receive a 30-day termination letter notifying them of the date of exit, the reason for the termination, and the right to appeal under PDA's grievance procedure, as described below. A copy of the grievance procedure will be attached to the termination letter. Participants will receive both a copy and a verbal explanation of the Involuntary Termination Policy during orientation. This policy is based on the Older Americans Act Amendments of 2006 and the SCSEP Final Rule, effective on October 1, 2010.

Types of Involuntary Terminations A participant can be involuntarily terminated from the SCSEP for six (6) reasons. The reasons are:

1. Knowingly providing false information in the eligibility process.
A participant may be terminated for fraudulent actions, such as intentionally providing inaccurate information to qualify for the SCSEP. If this occurs, the participant will be placed on Leave without Pay immediately, and a 30-day notification of termination will be sent to the participant.

2. Being incorrectly determined eligible at enrollment or annual recertification.
A participant will be terminated if found ineligible for participation in the SCSEP either after enrollment or after the annual recertification through no fault of the participant. A participant may be enrolled or deemed eligible for continued enrollment based on an error in determining program eligibility, e.g. income may be recorded or calculated inaccurately. When this occurs, the participant will be notified regarding the error and immediately sent a 30-day notification of termination letter. The participant will be able to continue participating in the program until the date of exit as noted in the letter.
3. Being determined no longer eligible at recertification.
A participant is recertified annually, or more frequently if there is a substantial change in circumstances, to determine if he or she continues to be eligible for participation. During the recertification, a participant may be determined no longer eligible due to a change in eligibility criteria such as income, family of one due to a change in disability status, employment status, and number of household members. The participant will be notified and immediately sent a 30-day notification of termination letter. The participant will be able to continue participating in the program until the date of exit as noted in the letter.
4. Reaching the maximum 48-months enrollment limit.
As of November 1, 2011, a participant will be terminated when he or she meets the 48-month maximum participation date. The participant will be sent a 30-day notification of termination letter 30 days before the 48-month maximum participation date. The participant will be able to continue participating in the program until the date of exit as noted in the letter.
5. Becoming employed during enrollment.
To qualify for enrollment in the SCSEP, a participant must be unemployed; all participants are informed that they may not be employed while participating in the program and that they must notify the program representative immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the program of the employment will be terminated from the program. If this occurs, the participant will be placed on Leave without Pay immediately, and a 30-day notification of termination will be sent to the participant.
6. For cause, including refusing to accept a reasonable number of job offers or referrals to unsubsidized employment based on the Individual Employment Plan (IEP) (with no extenuating circumstances hindering the participant from moving to unsubsidized employment).

There are several reasons to terminate a participant "for-cause." When warranted, a participant may be terminated for certain behaviors and/or conduct. The following are specific reasons; however, other similar reasons that demonstrate willful misconduct or an intentional disregard of program rules may cause involuntary termination:

IEP related reasons for Termination:

Refusing to accept a reasonable number of job offers or referrals to unsubsidized employment. A participant may be subject to disciplinary action up to and including termination when he or she refuses a total of three job offers and/or referrals to job openings.

Refusing to comply with the Individual Employment Plan (IEP). If the participant fails, without good cause, to cooperate fully with PDA's sub-grantees to accomplish the goals of his or her IEP, an IEP- Related termination "for-cause" may be in order. Examples of lack of cooperation with PDA sub-grantees to accomplish IEP goals may include but are not limited to the following when provided for in the participant's IEP:

- Refusing to search for a job,
- Sabotaging a job interview. For example, a participant tells the interviewer that he or she is not interested in the job or tells the interviewer that he or she is not qualified,
- Refusing or not participating fully in training opportunities,
- Refusing to transfer to a new community service training assignment,
- Refusing to register at the local CareerLink,
- Refusing to take advantage of Workforce Innovation and Opportunity Act (WIOA) opportunities,
- Refusing to accept or lack of follow-through in obtaining supportive services that will enhance the participant's ability to participate in a community service assignment consistent with the IEP,
- Refusing to cooperate with other IEP-related referrals,
- Refusal to cooperate with the assessment or IEP process, e.g., refusing to participate in completing the assessment and IEP.

An IEP Related Termination would not be considered appropriate under the following extenuating circumstances:

- When occurrences are not within control of the participant, e.g. transportation is not available to training or an unsubsidized job,
- When situations such as the death of a closely related person or partner or a physical condition impact the training or work situation,
- When the training or unsubsidized job places undue hardship on the participant that exceed those of the community service assignment,
- When the proposed unsubsidized employment is costlier to the participant than the SCSEP position, and
- Other related reasons for an IEP Related Termination should be considered on a case-by-case basis.

Non-IEP related reasons for Termination:

Refusal to cooperate in recertifying eligibility, for example, refusing to provide required documents to determine continued eligibility or refusing to attend or be available for the recertification appointment.

- Failure or refusal to perform assigned duties, e.g., refusing without good cause to do assignments that are part of the IEP and required to increase skills and knowledge,

- Falsification of official records, such as timesheets, for example, intentionally signing the signature of the host agency supervisor on a timesheet or other official documents or including hours on a time sheet that are not accurate.
- Intentional disclosure of confidential or private information obtained from the host agency, sub-grantee, or grantee, for example, informing others of information that is supposed to be kept private or confidential.
- Frequent tardiness or unauthorized absences, including reporting to the assignment late or not reporting to the assignment and not informing the supervisor. Generally, three instances of absence without good cause or without proper notice may warrant termination.
- Insubordination, defined as intentionally refusing to carry out the direction or instructions of a host agency supervisor or PDA sub-grantee staff member, provided there were no extenuating circumstances and the directions or instructions were reasonable.
- Workplace harassment or discrimination based on sex, race, color, religion, national origin, age, marital status, or disability.
- Obscene, abusive, harassing, or threatening language or behavior.
- Physical violence or intentional destruction of property, for example, being violent and threatening to or carrying out threats that physically harm individuals or property.
- Theft, meaning illegal taking or withholding the property of another without permission.
- Causing an imminent threat to health or safety of self or others.
- Consuming, selling, purchasing, manufacturing, distributing, possessing or using any illegal or non-prescribed drug or from being under the influence of alcohol and or drugs while performing his or her host agency assignment or while carrying out objectives required by the IEP. Legally prescribed medications are excluded if they do not affect the participant's ability to perform his or her duties or protect the safety of the participant or others.
- Exceeding approved Leave without Pay by failing to return from an approved break by the required date without due notice or good cause.

(11) Complaints & Grievances: describe the procedures for addressing and resolving participant complaints and grievances related to program termination. Please provide a copy of the current complaint/grievance policies.

As per the language contained in Section 641.910 of the SCSEP Regulations, the following procedures describe the process for resolving complaints between Area Agencies on Aging (AAAs) SCSEP sub-grantees, non-AAA SCSEP sub-grantees and participants. AARP Foundation, which is currently the Department's only non-AAA SCSEP sub-grantee, will use their own internal procedures for resolving complaints. It should also be noted that any future non-AAA PDA SCSEP sub-grantee shall also use their own internal procedures for resolving complaints. The only difference between the AAA and non-AAA sub-grantees will be that non-AAA SCSEP sub-grantees shall allow their participants to appeal to the Department of Aging after they appeal to the non-AAA SCSEP sub-grantee's State Director. Non-AAA SCSEP sub-grantee participants shall not have the right to appeal to the President/CEO of the non-AAA SCSEP sub-grantee after they have appealed to the non-AAA SCSEP sub-grantee's State Director. All PDA non-AAA SCSEP sub-grantees shall provide the Department with their grievance procedures for applicants and participants as well as copies of all correspondence related to participant complaints.

All PDA SCSEP sub-grantees shall adhere to the following grievance procedures for applicants and participants. First, an informal process involving the person grieving and the local SCSEP AAA or non-AAA Project Director will be attempted. If this does not satisfactorily resolve the grievance, then a formal process will be initiated. The grievance will be prepared in writing by both parties and the AAA Director or the non-AAA SCSEP sub-grantee State Director will hear representatives from each side. A decision will be rendered by the AAA Director or the non-AAA SCSEP sub-grantee State Director within ten business days and a written copy of said decision shall be provided to the complainant and to the PDA. If this decision is believed to be unjustified by either party, they may appeal to:

PDA, Bureau of Aging Services,
555 Walnut Street, 5th Floor,
Harrisburg PA 17101-1919,
ATTN: SCSEP Program Manager

The appeal to PDA must be made within 30 days of the date of the AAA Director's letter or the non-AAA SCSEP sub-grantee's State Director letter. The PDA will render a written decision within ten business days after receiving the written grievance. The PDA will maintain the complaint and decision in its files after the completion of the grievance process. The PDA's decision will be final unless the complainant believes that a federal law, other than those alleging unlawful discrimination, was broken or if the complainant believes that the PDA's grievance procedures were not followed.

If the complainant believes that a federal law was broken or that PDA's grievance procedures were not followed, he or she can appeal the decision to the USDOL within 60 days of the date of the PDA written decision. Appeals to the USDOL shall be sent to:

Division Chief, Division of National Programs, Tools, & Technical Assistance
Employment & Training Administration, Office of Workforce Investment
United States Department of Labor
200 Constitution Ave. NW, Room C4510
Washington, DC 20210

Allegations determined to be substantial and credible will be investigated and addressed by the U.S. Department of Labor. All PDA SCSEP sub-grantees as well as the PDA shall document all grievances after receiving the grievance in writing. Written testimony and minutes must be kept on file as well as decision justifications. This procedure will be used as the process for adverse actions such as a denial of service, a reduction of service, or a termination of service. The PDA grievance policy shall be applied fairly and uniformly for all complainants. Questions about, or complaints alleging a violation of: the nondiscrimination requirements of title VI of the Civil Rights Act of 1964, S 504 of the Rehabilitation Act of 1973, S 188 of the Workforce Investment Act of 1998 (WIA), or their implementing regulations, may be directed or mailed to:

Director
Civil Rights Center, U.S.
Department of Labor

200 Constitution Avenue NW, Room N—4123
Washington, DC 20210.

A copy of the grievance procedure must be given to applicants during the initial intake interview and this must be documented. A copy of the grievance procedure must be provided to all involuntarily terminated participants, including participants who are terminated for cause, when the AAA issues a written termination to the participant 30 days prior to the termination date. For all involuntary terminations, including termination for cause, the AAA must write the terminated participant a letter which states that he or she will be terminated in 30 days and the reason(s) for the termination. The letter shall include a copy of the AAAs grievance policy. The official exit date will be 30 days after the last date of work if the participant does not grieve the termination. If the participant needs to be removed from the host agency because of the cause of the termination, then the participant shall be put on Leave without Pay or reassigned to another host agency for the 30 days, If the participant is placed on Leave without Pay, subgrantees must enter the beginning and ending dates of the 30 days in the approved break fields in the Community Service Assignment Form in SPARQ.

Questions should be directed to David Miles at telephone number (717) 783-0178 or via email at davimiles@pa.gov.

(12) Maximizing enrollment: describe procedures for fully enrolling all available slots, including over enrolling participants, and how over-enrollments will be balanced with equitable distribution requirements.

Over enrolling participants, based on the SCSEP subgrantee's historical exit rate, is a management tool that SCSEP subgrantees use to minimize adjusting participant training hours throughout the fiscal year. For those subgrantees with slots in more than one county, the Department Aging Services Specialist monitors the county's actual enrollment data against the county's equitable distribution amount in SCSEPED.org. Counties with slot imbalances are required to move towards equitable distribution through attrition.

(13) Performance: include a proposed level for each performance measure for each of the program years covered by the plan. While the plan is under review, the State will negotiate with the Employment and Training Administration to set the appropriate levels for the next year. The State may also negotiate performance levels in a subsequent modification. At a minimum, States must identify the performance indicators required under the SCSEP Final Rule published on September 1, 2010, and, for each indicator, the State must develop an objective and quantifiable performance goal for the next year. The performance measures include:

(A) entered employment,

48.5 percent

(B) employment retention,

39.6 percent

(C) average earnings,

\$2,841

(D) service level,

162.3 percent

(E) service to most-in-need, and

2.90

(F) community service

80 percent

(14) Administrative Costs: describe any request for an increase in administrative costs consistent with section 502(c)(3) of the Older Americans Act.

The PA Department of Aging has never requested an increase in administrative costs.

SCSEP Assurances

The State Plan must include assurances that:

- 1. Where SCSEP is included in the Combined Workforce Plan, the State established a written policy and procedure to obtain advice and recommendations on the State Plan from representatives of the State and area agencies on aging; State and local boards under WIOA; public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Social service organizations providing services to older individuals; Grantees under Title III of OAA, Affected Communities, Unemployed older individuals, Community-based organizations serving older individuals; business organizations; and labor organizations.*

Working in conjunction with the Pennsylvania Department of Aging, the commonwealth made all of the above entities aware of the posting of the Combined State Plan for public comment and of the procedures by which entities were able to submit public comment.

Community Services Block Grant (OMB Control Number: 0970-0382)

Note: Below is information about the employment and training activities carried out under the Community Services Block Grant (CSBG) (42 U.S.C. 9901 et seq.) that is included in the WIOA Combined State Plan. The

complete CSBG State Plan is submitted directly to the Federal agency that administers that program and is collected under OMB Control Number: 0970-0382.

Where CSBG is included in the Combined State Plan, the State CSBG Lead Agency (as designated by the chief executive of the State under the requirements of section 676(a) of the CSBG Act (42 U.S.C. 9908(a)) will coordinate plans for employment and training activities under CSBG as part of a larger antipoverty and workforce development strategy.

As part of the Combined State Plan, the State CSBG Lead Agency must:

(a) Describe how the State and the eligible entities will coordinate the provision of employment and training activities through Statewide and local WIOA workforce development systems; and may

The PA Department of Community and Economic Development (DCED) is the commonwealth agency that represents the required one-stop (PA CareerLink® partner) representing employment and training activities carried out under the Community Services Block Grant Act (42. U.S.C. 9901 et seq.) at the state level. DCED will continue to contribute financial assistance to be applied to the infrastructure and other operating costs of the PA CareerLink® sites annually and to the extent funding exists through the Community Services Block Grant funds.

The mission of the Community Services Block grant (CSBG) is to provide a full range of services and activities having a measurable impact on the causes of poverty in a community or those areas of a community where poverty is a particularly acute problem. Only federally designated Community Action Agencies (CAA) receive funding, therefore in PA, there are 43 CAAs that cover all 67 PA counties. Ameliorating the causes and conditions of poverty take on a variety of community engagement activities and collaborative activism to remove obstacles that block the achievement of self-sufficiency; i.e. community stakeholder collaboration; literacy activities; employment and training resources; obtaining adequate housing; grassroots activities that provide intervention to the causes of poverty; addressing the needs of youth through programming or coordination; and increased engagement in community planning, development and improvement activities.

CSBG has been in existence since 1965, always with the same mission: to ameliorate the causes and conditions of poverty. Initiatives have included, but are not limited to: neighborhood linkages, leverage of community resources, conduction of Volunteer Income Tax Assistance sites, building housing capacity, provision of family self-sufficiency and case management, early childhood intervention and Head Start; facilitation of Results-Oriented Management and Accountability. In 2017, for every one dollar of CSBG funds, the PA network leveraged \$17.38 from other federal, state, local, and private sources, including the calculated value of volunteer hours.

DCED will participate in the local workforce service delivery system via the local CSBG agencies. In the initial years of the implementation of the WIOA State Plan, agreements were put into place between DCED and L&I to establish that CSBG agencies:

- Participate on local and regional planning groups;

- Engage in Business Service Teams activities;
- Have print materials available in the PA CareerLink® centers;
- Be linked to local workforce websites on computers;
- Potentially hold meetings at PA CareerLink® centers;
- Conduct joint employer outreach sessions as necessary; and
- Seek to leverage grant funding opportunities.

It is DCED's commitment that CSBG, as a required partner, will become part of the fabric of the public workforce system in a much more formalized way than in the previous years. To that end, DCED and L&I staff have actively collaborated to determine the status of the relationships between CSBG agencies and CareerLink® offices. These analyses have identified not only the historical relationships between the systems, but also the positive/innovative projects occurring and the areas that are lacking in coordination and collaboration.

(b) Provide examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy.

These projects were identified as positive projects by L&I, DCED and the CSBG and CareerLink agencies and shared with both networks and will serve as best practices for the weaker areas to consider in their development:

- Center for Community Action, Tableland Services, Inc. and the Southern Alleghenies workforce Development Board have redefined their approaches to target the multiple and complex barriers for individuals seeking employment. The CSBG agencies identified single contact persons who would be available for direct contact by their CareerLink offices and therefore would use current technology like Skype or Facetime to meet jointly with clients to address barriers such as housing or child care, for example. The CSBG agency is relied on for the navigation of helping services regardless of whether they provide the direct services or not since they can serve as the coordinator with knowledge of community helping practices.
- Schuylkill Community Action, Commission on Economic Opportunity and the Luzerne/Schuylkill Workforce Development Board maintains positive engagement regarding individuals' needs which are barriers to employment. The two community action agencies serve as the navigators and service providers or referral agents to address barriers. Staff members are identified as contact persons and board/committee members. Joint workshops are conducted as well.
- Montgomery County Community Action Development Commission and the Montgomery County Workforce Development Board take their collaboration very seriously with monthly support meetings to continuously analyze how the challenging barriers to work can be overcome. They engage in virtual workshops with individuals and want to move into the two-generation approach in working with families to address all barriers to employment. They have together created a six-week training for manufacturing jobs and continue to bring in other community

leaders to collaborate. In addition, the CSBG agency Executive Director has been, for many years, an active and engaged Workforce Development Board member.

Performance Indicator Appendix

All WIOA Core Programs

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Title I - Adult

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	73.0%	73.0%	73.0%	75.0%
Employment (Fourth Quarter after Exit)	70.0%	70.0%	70.0%	71.0%
Median Earnings (Second Quarter after Exit)	\$5,300	\$5,800.00	\$5,300	\$5,800.00
Credential Attainment Rate	55.0%	56.0%	55.0%	58.0%
Measurable Skill Gains	38.0%	38.0%	38.0%	38.0%

Title I – Dislocated Worker

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	75.0%	75.0%	75.0%	78.0%
Employment (Fourth Quarter after Exit)	76.0%	76.0%	76.0%	78.0%
Median Earnings (Second Quarter after Exit)	\$7,300	\$7,800.00	\$7,300	\$8,000.00

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Credential Attainment Rate	57.0%	58.0%	57.0%	59.0%
Measurable Skill Gains	30.0%	32.0%	30.0%	33.0%

Title I - Youth

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	65.0%	66.0%	65.0%	66.0%
Employment (Fourth Quarter after Exit)	58.0%	58.0%	58.0%	60.0%
Median Earnings (Second Quarter after Exit)	\$2,750	\$2,750	\$2,750	\$2,750
Credential Attainment Rate	72.0%	72.0%	72.0%	72.0%
Measurable Skill Gains	57.0%	57.0%	57.0%	57.0%

Title II – Adult Education and Family Literacy Act Program

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	50.0%		50.0%	
Employment (Fourth Quarter after Exit)	50.0%		50.0%	
Median Earnings (Second Quarter after Exit)	\$4,775		\$4,775	
Credential Attainment Rate	39.0%		39.0%	
Measurable Skill Gains	44.8%		45.4%	

Wagner-Peyser Act Employment Services Program

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	62.0%	64.0%	62.0%	65.0%
Employment (Fourth Quarter after Exit)	62.0%	64.0%	62.0%	66.0%

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Median Earnings (Second Quarter after Exit)	\$5,000	\$5,400	\$5,000	\$5,500
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Vocational Rehabilitation Program

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	15.0%		18.0%	

All WIOA Core Programs

	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Additional Indicators of Performance

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Additional Indicators of Performance
Pennsylvania has chosen not to identify any additional indicators of performance.

Reintegration of Ex-Offenders (REO) Program

Coordination of Services and Activities for Justice-Involved Individuals

Describe how the State and the REO grantee(s) will coordinate services and activities for justice involved individuals to successfully attain employment and transition into their communities with Statewide and local WIOA workforce development systems.

Increased collaboration amongst the education, training, workforce development, criminal justice and community-based systems to enhance reentry employment opportunities promotes an effective and efficient government that works. The alignment of reentry planning and service activities among stakeholders can likely improve the justice-involved individual's ability to attain and retain a job that pays family-sustaining wages and to be a productive tax-paying citizen.

Approximately 1 in 28 individuals in Pennsylvania are either incarcerated or under some form of parole/probation supervision. Over 81 percent of the individuals entering the DOC self-report as unskilled or possess no skills and reading levels are slightly below 8th and 9th grades for male and female offenders, respectively. Over 90 percent of the DOC population will ultimately be released and have reintegration needs including employment. Identified as an individual with barriers to employment, ex-offenders also characteristically are basic skills deficient and depict the sub-populations of individuals with disabilities, low-income individuals, individuals receiving public assistance such as SNAP, homeless, older, English language learners, single parents, long-term unemployed, and veterans.

Faith-based and community organizations, as well as local workforce development boards, local workforce service providers and criminal justice system providers that intend to apply to the REO Program solicitations can contact DOC for a letter of support or more formal agreements to support reentry program implementation. Additional information on requesting a letter of support can be found on the DOC website: <https://www.cor.pa.gov/About%20Us/Initiatives/Pages/Grants---Letters-of-Support.aspx>. The DOC values the applicant's ability to demonstrate an understanding of the criminally-involved population and the criminal justice system as well as the evidence-based practices that support an individual's reentry success and recidivism reduction. The PA Department of Corrections (DOC) will respond to requests for information from PA Department of Labor & Industry (L&I), including confirmation if we provided a letter of support.

The U.S. Department of Labor (U.S. DOL) REO Program awards are provided directly to the applicant and, in the instance a formal collaboration with the DOC has been established, DOC coordinates access to the state offender population and participates in REO programs as agreed upon.

Coordination of services and activities for justice involved individuals to attain and retain employment across the community, workforce and criminal justice systems is critical. However, since most applicants are direct recipients of the grant award, DOC does not partner with all applicants, and there is no formal mechanism established by U.S. DOL to indicate/communicate to DOC or L&I that an REO award is made in Pennsylvania. The DOC and L&I **may** participate in a workgroup if initiated by an REO grantee to support activities to include:

- Outreach and communicate to REO applicants (and potential applicants) on availability of solicitations.
- Establish a process to determine formal agreements of support by L&I and DOC for applications, including prioritization for programs/activities that a) align with the WIOA priorities outlined in the State Plan, b) incorporate workforce best practices that achieve successful employment outcomes and c) incorporate criminal justice best practices that achieve successful recidivism reduction outcomes.
- Monitor U.S. DOL REO awardee information for Pennsylvania recipients.
- Provide technical assistance, where possible and appropriate, to REO recipients in areas such as: designating staff contacts to guide interaction with the workforce and criminal justice systems, establish points of access and processes across the REO program and the workforce and criminal justice systems, identify opportunities to align common intake/referral, identify opportunities to support the identification and tracking of performance for ex-offenders, and other opportunities.

The State Board has also established a Re-entry Ad Hoc Committee that will identify strategies to support ex-offenders re-entering the workforce and encourage employers to hire ex-offenders. Committee members will include State Board members, Local Board members and staff, representatives from the PA Departments of Labor & Industry and Corrections, CareerLink® staff, training providers, employers, and ex-offenders.

Innovative Employment and Training Programs

Provide examples of innovative employment and training programs and activities conducted by faith based and community organizations (FBCOs), State reentry councils, and justice-organizations in coordination with education and training providers, one-stop centers and other supportive services, which improve employment outcomes for justice-involved individuals.

The Department of Corrections (DOC) created a Workforce Development Specialist position to promote workforce development for inmates and reentrants both within DOC and to external partners. The position works with the Bureau of Corrections Education, reentry staff within State Correctional Institutions, the Bureau of Community Corrections (BCC), Board of Probation and Parole (PBPP) Field Staff, and with outside organizations to implement meaningful learning opportunities for inmates and to establish community connections to create a continuity of support to ensure reentrants gain and sustain employment and reduce their chance of recidivism. The Specialist will collaborate with reentry partners to understand reentrants' barriers to employment; provide feedback to DOC staff on potential changes to policy that may assist reentrants. The Specialist is the single point of contact for outside employers, community colleges, training programs, and unions who wish to partner with DOC.