



# **Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan Modification**

*for the period of*  
July 1, 2024 through June 30, 2028

**DRAFT**

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*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.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- 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 upon the development of a strong, skilled workforce able to compete in today's global economy. Analyzing current labor market trends and understanding the obstacles confronting the workforce are essential steps the Commonwealth must undertake to inform and develop the policies, strategies, and goals vital to continued economic competitiveness.

Economic conditions within Pennsylvania over the past three years essentially tell a story of recovery from the brief but sharp downturn in early 2020, with slow improvements in the labor market and nonfarm jobs beginning immediately upon cessation of the 2020 recession and continuing throughout the remainder of 2020 and 2021. At the close of 2021, Pennsylvania's economy and labor market had recovered from losses experienced during the downturn in 2020. The fiscal stimulus measures implemented throughout 2020 and early 2021 contributed to this rapid recovery but also brought higher inflation. This, in turn, led to economic uncertainty regarding when, and by how much, the Federal Reserve would raise interest rates to fight rising inflation. While the Federal Reserve refrained from raising rates in 2021, it did reduce asset purchases which scaled back the stimulatory policy of quantitative easing. At year end, most indications were for continued improvement, but the risk was whether monetary policy could generate a "soft landing" and avoid a recession. The Federal Reserve lowered the federal funds target rate to 0.25 percent in March 2020, and kept it there until March 2022, when it was raised to 0.50 percent. This initial small increase of 25 basis points was the first of seven increases that the Federal Reserve implemented in 2022. This aggressive pace of increases moved the federal funds target rate to 4.50 percent at year end. Despite the Federal Reserve's attempts to stifle inflation by cooling the economy and labor market, most statistical measures on economic health remained sanguine throughout 2022.

The Federal Reserve's aggressive interest rate actions did decrease the monthly inflation rate but it still remained above the target level of 2.0 percent. Indeed, persistent high inflation appeared to be a challenge to the breadth and length of the ongoing recovery. Pennsylvania's labor market remained robust (as did the nation's) as employment was at a record high, the unemployment rate was the lowest in over two decades and nonfarm jobs were slightly below the record high set in February 2020. Since the Federal Reserve had not achieved its inflation goal, it was expected that more rate increases were coming. Given that monetary policy operates with a long (usually 6 to 9 months) and variable lag, prognosticators feared that instead of getting a "soft landing", the Fed might raise rates too far and trigger a recession, elevated unemployment, and broad economic pain. Even if the Federal Reserve is successful in the short term in taming inflation, though, Pennsylvania faces long-term challenges as well.

As of August 2023, total nonfarm jobs in the state were 76,600 above their February 2020 peak, and the unemployment rate was at an all-time low. The state's aging population and slow population growth will continue to be a long-term demographic challenge to its labor force and, as a result, may induce a persistent tight labor market regardless of economic conditions. The continuing large wave of retirements from the baby-boom generation will cause a loss of key skills that will not be replaced by fewer youth replacing them. Other long-term challenges include structural changes (such as the desire for teleworking and hybrid work schedules) and changes in the industry mix, from evolving consumer demands and from the continued evolution to an information economy. Technology, potential immigration, and global competition may adjust the demand for labor in certain industries, but many employers will likely still experience a shortage of workers. If the labor market does see long-term tightness, it will be challenged to create and maintain jobs with high and growing real wage rates in this new environment as a path towards stability.

Despite these new dynamics, Pennsylvania continues to nurture a diversified economy with numerous competitive industry clusters and strives to develop a skilled workforce that aligns worker career goals to employer needs, all while providing targeted services to those with barriers to employment. The state is an ideal location for families and businesses given its mix of urban, suburban, and rural areas; its geographic proximity to nearly one-half of the nation's population and overseas markets; robust postsecondary training systems and public and private institutions of higher education; and strong job markets. The Commonwealth's capacity to provide an educated workforce is evidenced by more than 300 postsecondary educational institutions which collectively enrolled more than 661,000 students in Fall 2021, according to the Integrated Postsecondary Education Data System (IPEDS) from the National Center for Education Statistics. While these characteristics of the state's labor market contribute to its solid economic foundation, 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 of labor market information and analysis or workforce trends will remain essential to the creation of effective workforce and economic development strategies and policies. Using the latest available information about the population, labor force, industry mix and employment outlook, the Commonwealth can strive to enhance its existing sector strategies and ensure they address current and evolving workforce 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, suburban, and rural labor markets (e.g., Philadelphia and Pittsburgh; or South-Central PA, the Lehigh Valley, and Erie; or Northern PA and the Appalachian region, respectively) is also critical in developing effective workforce and economic strategies.

As of December 2022, total nonfarm jobs in Pennsylvania rebounded to 6.1 million, or 99.7 percent of the previous high set in February 2020, only 16,900 below that record. Jobs increased by 184,800 (3.1 percent) over the year and were up 1.1 million (22.5 percent) since the most recent jobs low in April 2020. U.S. nonfarm jobs were at 154.5 million in December 2022, up 4.8 million jobs from one year prior or 3.2 percent. In Pennsylvania, despite a secular trend of decreasing government jobs, government jobs grew by 0.8 percent in 2022 from a year earlier, but still remained 4.0 percent below February 2020 levels. Government jobs also grew nationwide in 2022 but remained 2.4 percent below their February 2020 level. Private sector jobs increased in both Pennsylvania and the nation since February 2020 and over the year. Since February 2020, the performance of private and public sector jobs in the nation was superior to that in Pennsylvania. Since private sector jobs constitute a much higher percentage of total jobs than do public sector jobs, the performance of private jobs will disproportionately affect total jobs. Despite that, in Pennsylvania, the percentage decrease in government jobs was so much greater than the increase in private jobs, causing total jobs to decrease. In the nation, on the other hand, the percentage increase was close to the percentage decrease so that total jobs increased. Through August 2023, Pennsylvania has added an additional 76,600 total nonfarm jobs (seasonally adjusted, up 1.3 percent) above the recent February 2020 peak. The chart below compares Pennsylvania’s recent nonfarm jobs data (as of December 2022) with similar data at that peak.

	<b>PA Jobs in Dec. 2022</b>	<b>PA Volume Change in Jobs from Dec. 2021</b>	<b>PA Volume Change in Jobs from Feb. 2020</b>	<b>PA Percent Change in Jobs from Feb. 2020</b>	<b>U.S. Percent Change in Jobs from Feb. 2020</b>
Total Nonfarm Jobs	6,071,000	184,800	-16,900	-0.3%	1.4%
Total Private Jobs	5,389,700	179,400	11,300	0.2%	2.1%
Government	681,300	5,400	-28,200	-4.0%	-2.4%

Sources: Bureau of Labor Statistics, U.S. Dept. of Labor, Current Employment Statistics (CES) Program, seasonally adjusted data.

Pennsylvania’s goods-producing jobs at the end of 2022 were up 16,900 (2.0 percent) from one year prior, but were 10,300, or 1.2 percent, below the level of February 2020. The strength in job growth was widespread, as all goods-producing sectors and supersectors gained jobs in 2022. Manufacturing accounted for 74.0 percent of the volume gains while Mining & Logging had the largest percentage increase in jobs over the year (5.5 percent). Despite the one-year increase in goods-producing jobs, all sectors except for nondurable goods manufacturing had fewer jobs in December 2022 than they had in February 2020, when total jobs were at a record high. Goods-producing jobs since February 2020 increased in the nation by 1.8 percent, led by a 3.3 percent increase in Construction jobs, which accounted for 65.7 percent of the increase in that interval, while Mining & Logging was the only sector

in which jobs fell. Mining & Logging, the smallest sector, had the largest percentage increases over the year and the largest percentage decreases since February 2020, in both Pennsylvania and the nation. The disparity in goods-producing job performance between Pennsylvania and the nation may be partially due to Pennsylvania’s greater reliance on heavy industry.

In December 2022, Pennsylvania’s service-providing jobs were up 167,900 (3.3 percent) from one year prior, but 6,600 jobs or 0.1 percent lower since February 2020. Jobs in all the service-providing sectors rose in 2022 after most sectors had increases in the prior year. The largest increase in the volume of jobs over the year was in Education & Health Services, led by the Health Care & Social Assistance. The decrease in service-providing jobs in Pennsylvania since February 2020 was due to a large decrease in Government jobs, while private service-providing jobs increased by 0.5 percent over that interval. Service-providing jobs outperformed goods-producing jobs in Pennsylvania in 2022 and since February 2020, while the reverse was true in the nation. Pennsylvania’s best performing service-providing industry sectors (measured by percent increase) since February 2020 were Transportation, Warehousing & Utilities; Management of Companies & Enterprises; Professional & Technical Services; and Information. Of the service-providing sectors, Management of Companies & Enterprises and Real Estate & Rental & Leasing were the only two sectors to outperform their U.S. counterparts. Government jobs in both Pennsylvania and the nation decreased since February 2020, led by state government jobs which decreased the most in volume and in percentage terms, despite increasing in 2022. This reflects the long-term secular decline in government jobs. In Pennsylvania, the worst performing sector since February 2020 was Leisure & Hospitality. The growth in Transportation, Warehousing & Utilities jobs [which had the largest percentage increases in Pennsylvania (12.2 percent) and the nation (14.6 percent)] reflects a long-term trend away from brick-and-mortar retail toward on-line purchasing.

Within each industry sector, there are many different career opportunities. Many of the dominant occupations are found on Pennsylvania’s In-Demand Occupation List (PA IDOL), which highlights more than 230 occupations that have the greatest workforce needs for the state. Not all occupations with a lot of demand, however, are attractive targets for workforce development. Some high demand occupations experience high turnover, as opposed to employment growth, 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, both demographic change and technological advancement will be key factors in the continued evolution of Pennsylvania’s economy. Employment activity in all sectors stresses the dynamics of an aging population and its need for more health care; the transition of baby-boomers from worker to retiree; frequent, productive, yet also disruptive technological innovations; 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 26 percent 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 High Volumes of Older Workers	Sectors with Lower Volumes of Older Workers
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Wholesale Trade (30.9%)	Health Care & Social Assistance (26.3%)
Manufacturing (30.7%)	Management of Companies & Enterprises (26.1%)
Real Estate & Rental & Leasing (30.5%)	Retail Trade (25.4%)
Utilities (30.2%)	Construction (25.3%)
Public Administration (29.8%)	Admin & Waste Mgmt & Remediation Svcs (24.4%)
Other Services (29.0%)	Professional, Scientific & Technical Services (24.3%)
Agriculture, Forestry, Fishing & Hunting (29.0%)	Arts, Entertainment & Recreation (24.2%)
Transportation & Warehousing (28.2%)	Information (23.5%)
Educational Services (27.4%)	Mining, Quarrying & Oil & Gas Extraction (22.5%)
Finance & Insurance (26.6%)	Accommodation & Food Services (15.3%)

Source: U.S. Bureau of the Census, Local Employment Dynamics (LED) Partnership, 2022Q4; Note: Percentages based on unrounded data, of those aged 55 and over (1.5 million) out of the total employed aged 14-99 (5.8 million) in 2022, by industry sector.

The 2020-2030 employment projections estimate that Pennsylvania will see an overall growth rate of 7.6 percent. That is up from the 2018-2028 projections (5.0 percent) and slightly less than the U.S. rate (7.7 percent) for the 2020 to 2030 period. Typically, Pennsylvania tends to see growth rates for projections cycles around 5.0 to 5.5 percent. The higher growth projected this cycle mainly accounts for recovery from low employment in 2020 due to the brief but sharp economic downturn.

All industry groups are projected to see growth over the 10-year period. Growth is expected to be greatest in the Education & Health Services, Professional & Business Services, and Leisure & Hospitality sectors. With an increase of more than 154,000, Education & Health Services is projected to add the most employment through 2030. Employment levels in Professional & Business Services are expected to increase by slightly more than 70,500. Leisure & Hospitality employment is projected to add more than 108,000 by 2030, but this industry sector was hit extremely hard by the employment downturn and much of the growth expected here will be from the public resuming these activities and restoring the demand. Other Services— which includes establishments such as repair shops, hair salons, and religious organizations—had limited services at the start of the 2020 downturn, so they are also expected to see a high rate of growth as a result of recovery.

Four industry groups (Information, Financial Activities, Professional & Business Services and Education & Health Services) are all projected to see actual long-term structural growth that goes beyond recovery from a business cycle downturn. These are industries where additional workers will be needed, new opportunities will exist, and where training will be beneficial.

Switching focus from industries to occupations, seven of 12 occupational groupings were projected to have growth rates above the statewide overall growth rate of 7.6 percent. Protective, Food, Building & Personal Service Workers had the fastest growth rate of 15.9 percent (about 139,000 workers). Healthcare Practitioners, Technicians & Support (13.9 percent), Transportation & Material Moving (10.7 percent) and Computer, Engineering & Science (10.1 percent) groups are also seeing fast rates of growth, but also additional structural growth compared to Protective, Food, Building & Personal Service Workers (that were more impacted by the recent downturn). Office & Administrative Support is the only group projected to decline, due to the combined effect of both productivity improvement and automation occurring in offices.



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 more than 712,000 workers across all occupational groups. Only 6.3 percent of annual demand is due to economic growth. More than nine out of every 10 openings exist to replace workers who leave the occupation and/or retire. Some occupational groups with low growth rates 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 (85,100) greatly outpace the overall need for workers in other groups with strong growth, such as Computer, Engineering & Science (28,800) or Installation, Maintenance & Repair (24,600).

To fully understand Pennsylvania's emerging workforce needs, it is important to consider the information from various angles (see table). 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
Home Health/Personal Care Aides	Ushers & Lobby Attendants	Fast Food & Counter Workers
Fast Food & Counter Workers	Amusement/Recr'n Attendants	Home Health/Personal Care Aides
Cooks, Restaurant	Cooks, Restaurant	Cashiers
Laborers & Material Movers	Gaming Dealers	Laborers & Material Movers
Registered Nurses	Manicurists & Pedicurists	Retail Salespersons
Waiters & Waitresses	Fitness Trainers & Instructors	Stockers & Order Fillers
Stockers & Order Fillers	Massage Therapists	Office Clerks, General
Software Developers & QA Analysts	Statisticians	Waiters & Waitresses
Passenger Vehicle Drivers	Lifeguards/Ski/Protective Service	Customer Service Representatives
Hairdressers & Cosmetologists	Physical Therapist Assistants	Janitors & Cleaners

Source: Center for Workforce Information & Analysis, Long-Term Employment Projections (2020-2030)

*(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 nearly two decades, 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 and postsecondary education will become more important throughout the next decade, as will a shift to life-long learning along a career pathway. Educational requirements of most 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. In 2022, Pennsylvania was home to more than 300 postsecondary and higher education institutions, including 15 community colleges, 14 state-owned institutions, and four

state-related universities, so the Commonwealth continues to be well-resourced to evolve its postsecondary training offerings and respond effectively to 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 and distinct regional significance 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
- 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 approximately 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 using the latest available data (2021), 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 (2021)	National LQ (2021)	Wages (2021)
Advanced Manufacturing (AM)	415,915	1.01	\$66,907
AM - Chemicals, Rubber & Plastics (AM - CRP)	78,930	1.24	\$66,785
AM - Electronics (AM - E)	58,634	0.76	\$74,816
AM - Metals (AM - M)	120,938	1.45	\$70,171
AM - Vehicles & Vehicle Equipment (AM - VVE)	157,413	0.84	\$61,515
Agriculture & Food Productions (AFP)	181,014	0.86	\$52,730
Bio-Medical (BM)	92,524	1.24	\$127,912
Building & Construction (BC)	369,704	0.92	\$66,459
Business Services (BSV)	731,865	0.98	\$102,787
BSV - Media, Advertising & Marketing (BSV - MAM)	129,665	0.93	\$110,330
BSV - Operational Services (BSV - OPER)	220,032	0.95	\$63,323
BSV - Professional & Consulting Svcs (BSV - P&C)	382,168	1.02	\$122,949
Education (ED)	528,901	1.01	\$59,306
Energy (ENGY)	124,596	1.14	\$89,793

Health Care (HC)	1,061,571	1.22	\$62,752
Hospitality, Leisure & Entertainment (HLE)	515,899	0.84	\$25,366
Logistics & Transportation (LT)	280,569	1.14	\$56,197
Real Estate, Finance & Insurance (REFI)	306,007	0.94	\$103,232
Wood, Wood Products & Publishing (WWP)	88,843	1.22	\$61,355

Source: Center for Workforce Information & Analysis, Quarterly Census of Employment & Wages (QCEW) Program.

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 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. Pennsylvania continues to build on its IP work through the Pennsylvania 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.*

On an annual average basis, Pennsylvania’s labor force volume stood at 6.5 million in 2022, up 33,700 from 2021, or 0.5 percent. This was the first increase after two annual decreases in the labor force but was still below its peak level of 6.6 million in 2019. The increase in the number of employed over the year from 2021 exceeded the decrease in the number of the unemployed. This indicates that the labor market continued to improve as entrants or re-entrants to the labor force become employed. For comparison, the U.S. labor force was at a record high of 164.3 million in 2022, up 3.1 million from 2021, or 1.9 percent. Average employment for the state was 6.2 million 2022, an increase of 137,400, or 2.3 percent from its level in 2021; by comparison, average employment in the U.S. in 2022 was at a record high of 158.3 million, up 5.7 million or 3.7 percent from 2021. Despite the improvement in Pennsylvania labor markets, average employment was still 1.5 percent below the record high achieved in 2019. The average number of unemployed Pennsylvanians in 2022 decreased by 103,000 (down 26.7 percent), to 283,000. This was the second consecutive year for declines, after increasing in 2020; prior to that, the number of unemployed had decreased each year beginning with 2011. Unemployment volume at the end of 2022 was the lowest it had been since 2000, when it was 258,000. Pennsylvania’s average annual unemployment rate fell by 1.6 percentage points to 4.4 percent in 2022, after falling by 2.9 percentage points in 2021. The unemployment rate in 2022 was the lowest since 2000, when it was 4.2 percent.

The following table provides a summary of Pennsylvania’s labor force for 2022, 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)	6,442.7	328.7	299.6	1,624.5	685.9	442.5
PA Employed	6,178.6	291.5	290.5	1,570.9	635.4	412.1
PA Unemployed	264.1	37.2	9.1	53.6	50.6	30.4
PA Unemployment Rate (%)	4.1%	11.3%	3.0%	3.3%	7.4%	6.9%
PA LF Participation Rate (%)	61.7%	22.2%	42.6%	38.5%	58.3%	63.5%
U.S. Labor Force (LF)	164,287.0	7,528.0	8,807.0	38,357.0	75,887.0	30,601.0
U.S. Employed	158,291.0	6,956.0	8,557.0	37,335.0	71,477.0	29,299.0
U.S. Unemployed	5,996.0	572.0	250.0	1,022.0	4,411.0	1,302.0
U.S. Unemployment Rate (%)	3.6%	7.6%	2.8%	2.7%	5.8%	4.3%
U.S. LF Participation Rate (%)	62.2%	23.1%	47.9%	38.8%	64.8%	66.3%

Source: Current Population Survey (CPS); All volumes in thousands, based on the not-seasonally adjusted annual average; Pennsylvania data based on a 12-month moving average.

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 2022 decreased by 62.7 percent over the year (to 57,200) in Pennsylvania, and by 60.7 percent (to 1.3 million) in the nation. The ratio of those unemployed long term to the total unemployed in 2022 fell to 21.7 percent in Pennsylvania, and to 21.9 percent of the total unemployed in the nation. Over the past five years, the number of long-term unemployed Pennsylvanians fell by 17,500 (-23.4 percent). For the U.S., the number of long-term unemployed as a share of total unemployed declined by 376,600 since 2017, from 1.7 million (24.2 percent) to 1.3 million in 2022.

Of the 57,200 long-term unemployed in PA in 2022, roughly 49 percent were female while nearly 51 percent were male. Nearly 80 percent were White (77.8 percent), more than one-in-10 were Black (16.1 percent), with the remainder mainly of Hispanic ethnicity.

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 2022, Pennsylvania’s average employment-to-population ratio (as shown in the table below) was 59.1 percent, down somewhat as compared to five years earlier. Overall, the nation experienced an even smaller decrease in this ratio over this same period, falling by just 0.1 of a percentage point from 60.1 percent in 2017 to 60.0 percent in 2022. In Pennsylvania, the ratio increased for both the “Other non-Hispanic” and “Hispanic” cohorts over that period, while decreasing for the “White non-Hispanic” and “Black non-Hispanic” race/ethnic cohorts. By gender, losses were seen among “White non-Hispanic” males, and “Black non-Hispanic” and “Hispanic” females.

By educational attainment level, the ratio decreased for all educational categories except for those with less than a high school diploma (both genders) and was unchanged for females with a bachelor’s degree or higher level of education. The widespread declines in the ratio among almost all cohorts by educational attainment level (and to a much lesser extent by race/ethnicity cohort) was most likely due to the continuing impact of the large decreases in employment that were seen in 2020, and the complicated recovery since then—with increasing wage rates offered by employers perhaps encouraging job seekers to seek employment, even among typically hard-to-employ groups such as those with less than a high school degree.

	Total (2017)	Males (2017)	Females (2017)	Total (2022)	Males (2022)	Females (2022)
<b>Overall</b>	<b>59.4%</b>	<b>64.5%</b>	<b>54.6%</b>	<b>59.1%</b>	<b>63.7%</b>	<b>54.8%</b>
White non-Hispanic	59.8%	65.7%	54.2%	59.6%	63.9%	55.3%
Black non-Hispanic	55.5%	55.4%	55.6%	54.0%	57.5%	51.1%
Other non-Hispanic	59.0%	34.0%	25.4%	63.0%	34.0%	29.0%
Hispanic	58.1%	65.3%	50.5%	59.1%	67.6%	50.4%
Less than a HS diploma	34.1%	22.0%	18.6%	36.7%	23.7%	20.1%
HS graduate, no college	52.9%	34.1%	28.9%	51.1%	33.0%	28.0%
Some college or Associate degree	64.1%	41.3%	35.0%	59.7%	39.0%	32.7%
Bachelor's degree and higher	73.0%	47.1%	39.9%	72.9%	47.0%	39.9%

Source: Current Population Survey (CPS).

*(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 62,300 (0.5 percent) from 2022 to 2032. In comparison, the nation’s population growth is projected to be over 5.0 percent over the same period, and to continue growing through 2052 (due mainly to immigration outpacing natural increase). After a small initial decrease, Pennsylvania’s population is expected to grow slowly through 2036 and then decline at least through 2052. Its age distribution, however, is expected to change more dramatically.

With a median age of 40.9 years, Pennsylvania tied for the seventh highest ranking in the nation. The state’s percentage of those aged 65 and over (19.6 percent) is the ninth highest in the nation—Maine (22.6 percent), Florida (21.6 percent), Vermont (21.6 percent), West Virginia (21.2 percent), Hawaii (21.0 percent), Delaware (20.9 percent), New Hampshire (20.2 percent), and Montana (20.1 percent) are higher. The number of Pennsylvanians aged 65 and older was over 2.5 million in 2022 and the number and proportion of that age cohort are projected to increase at least through 2052. This is largely a by-product of the aging of those born during the baby-boom period after World War II (1946 to 1964). The oldest of the baby-boom generation turned 65 in 2011 (now age 76) and the youngest will turn 65 in 2029 (now age 58). Thus, a large wave of baby boomers will soon be leaving the workforce. Since the rate of births from the mid-1960s through the 1990s was lower than that during the baby-boom years, the natural increase in the workforce population (entrants) will be insufficient to replace those leaving it (separations). This will have profound effects on the future distribution of workers across industries and occupations.

As stated above, the modest overall population increase is expected to be accompanied by a greater proportion aged 65 and above and a declining volume of the traditional working age population (25 to 64). Through 2052, the total working age population is projected to decline annually, except for small increases from 2031 to 2038; over that same time period, the working age population is expected to decline by 3.6 percent. The labor force will increase rapidly through 2026 when it peaks, and then, except for increases in 2037 to 2039, decline through 2052, by 0.7 percent. Following expected national trends, the smaller decline in the labor force could be due to a substantial international in-migration of workers offsetting other factors such as the expected decline in the labor force participation rate. The overall labor force participation rate in Pennsylvania is expected to reach a peak in 2024 and decrease annually for the remainder of the period, except for small increases from 2037 to 2039.

Due to these long-term demographic trends (as retirees outpace new entrants), the workforce may lose key skills and knowledge that have supported industry growth and prosperity, with impact of these shortages varying across areas, industries, and occupations. Far fewer youth will be available to enter the labor market to replace those who will be leaving. While technology, potential in-migration, and global competition will help alleviate some of the need for workers, a shortage of workers is likely to remain, however, 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 2022, there were nearly 930,000 disabled adult Pennsylvanians of working age (18 to 64 years old), accounting for 12.0 percent of the state's working age population, compared to the 22.0 million disabled adults across the U.S. of that age group (that comprised 11.0 percent of the nationwide total working-age population).

638,000 veterans called Pennsylvania home in 2022, or 6.2 percent of the working age population. On average, about 21,200 adult TANF recipients received assistance each month in 2022. In 2022, Pennsylvania was home to nearly 339,000 individuals 18 years and older 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 2022, 34.3 percent of Pennsylvanians aged 65 to 69 were in the labor force (employed or unemployed), versus 33.7 percent of the comparable population for the United States. 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 2017-2021 period (the latest available for these data), Pennsylvania ranked 38th among states in the share of



adults (age 25 and up) with more than a high school diploma - 57.6 percent of such Pennsylvanians have participated in some level of postsecondary education. Another 33.8 percent are high school graduates with no postsecondary experience and 8.6 percent have less than a high school diploma. Strategies focused on these individuals are paramount to meeting the future demands of employers

When assessing jobs in PA, most employment was concentrated in occupations that were captured in the on-the-job training category (3.0 million), but that category will have one of the slowest expected growth rates through 2030 (6.9 percent). Conversely, occupations requiring an advanced degree had the highest projected growth rate (10.7 percent) but are only projected to employ about 314,000 individuals (less than 5.0 percent of the workforce). This growth is primarily driven by an increasing need for Physician Assistants, Health Specialties Teachers, Nurse Practitioners, and Statisticians.

All educational groups experienced higher growth rates from the previous set of projections. Occupations requiring an Associate Degree, some extended period of formal training, or on-the-job training are shown to have the most significant change from previous sets of projections (growth rates at least 1.5 percentage points higher). These occupations are more commonly found in industries that were heavily impacted by the recent 2020 downturn. Much of the expected growth here is attributed to recovery from low employment levels. As a result of lower-than-usual starting employment levels in these educational groups, an increase in jobs requiring a bachelor's degree or higher was observed. Occupations that tend to fall into these groups (managers, information technology and scientist) fared better at the start of the downturn. Roughly one out of every four jobs in the state will require a bachelor's degree or higher.

In summary, there is a lot of opportunity for those entering the job market with very little experience. But for those that have or wish to pursue further education, some of the largest growth rates continue to be seen for those jobs requiring an associate degree, and for those workers with advanced degrees.

*(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 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 various workforce development strategies outlined in this plan.

**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); Unemployment Insurance Programs (UI); the Senior Community Service Employment Program (SCSEP); the Community Services Block Grant (CSBG); the Reintegration of Ex-Offenders (REO) Program; and the Supplemental Nutrition Assistance Program (SNAP). Collectively, the fourteen 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 and caregivers 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 mathematics, reading, writing, English language, digital literacy, critical thinking, and self-management 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. Instruction, digital literacy activities, and workforce preparation activities support college and career readiness, including earning high school equivalency credential when needed. 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 (OVR): 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 OVR staff member who coordinates all program support. Support may include on-the-job training, as well as assistance in determining reasonable accommodations that could help increase the employment success of the individual with a disability.

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) (e.g., childcare, transportation, education level, overall employability, etc.). 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.

Supplemental Nutrition Assistance Program: This program supports SNAP recipients who are not also receiving TANF through a range of components designed to prepare participants for employment through education and training. Participation in the program is voluntary, and participants are placed in components based on an assessment of their individual needs. All components are designed to increase the skills and employability of SNAP recipients and participants receive a suite of supportive services while participating in the program, as well as for a retention period following placement in employment.

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.

Unemployment Insurance (UI): This program is a joint state-federal program that provides temporary financial assistance to qualifying unemployed workers while they seek work. The RESEA programs are designed to identify claimants who are most likely to exhaust unemployment compensation benefits and may need assistance to find a new job.

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): The Community Services Block Grant (CSBG) program is a federally-funded block grant that provides funds to eligible nonprofit community-based organizations or governmental entities that work to ameliorate the causes and conditions of poverty in disadvantaged and low-income communities across Pennsylvania. 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. The workforce services provided by these agencies varies among counties depending on the needs of the community. CAAs may also provide supportive services to assist participants in meeting needs that will increase the likelihood of success, including childcare, transportation, and/or employment specific 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 customer can access services associated with all WIOA-mandated Core Programs. 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, on May 11, 2022, the Pennsylvania Department of Labor & Industry published a policy document for the local MOU. The guidance underscores 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. You can find those documents here: <https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>

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 in their regional labor markets. 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 regions where it appears there was little or no engagement at the local level. The Commonwealth will continue to work with all 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, Pennsylvania Industry Partnerships 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. Recognizing parallels in methodology between the Career Pathways system and the Apprenticeship system, the intent is to directly align and integrate the Career Pathways System within the overall apprenticeship structure. The Commonwealth is strategically working on doing so through several initiatives including the PASmart grant funding opportunities focusing on aligning secondary and post-secondary institutions and the career pathway system.

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.

BSTs and other PA CareerLink® Staff will be provided information on how and why to connect jobseeker and employer clients to Registered Apprenticeship programs, how connecting job seekers with registered apprenticeships programs can help states and local areas meet their targets on the WIOA primary indicators, when to exit a WIOA client positively from the CWDS system even when still participating in a Registered Apprenticeship, and how to appropriately utilize workforce funding to support Registered Apprenticeship and Pre-apprenticeship programs.

*(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, 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.
- The Interagency Workgroup that is developing a series of asynchronous cross-training modules for workforce development system staff.
- A robust professional development system for adult education with resources available to all partners programs.
- Connecting early childhood education, k-12 education, Adult Basic 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.

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.
- Expanding cross-training opportunities 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.
- Increasing 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 & Industry.
- Incorporating regional partnerships to address shared challenges through collaborative solutions in common labor markets inclusive of multiple Local Workforce Development Areas.
- 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.

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.

Finally, the Pennsylvania Workforce Development Board hosts interagency meetings, on a monthly basis, attended by representatives from all Core and Partner programs. Individuals representing the core and partner programs also participate on the many standing committees of the Pennsylvania Workforce Development Board.

***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.*

Governor Shapiro has prioritized the continuous improvement of a thriving workforce system where workers have access to stable careers with family-sustaining wages and employers have the talent the need to establish new and continue growing existing businesses while supporting communities across the Commonwealth. Governor Shapiro sees the Commonwealth's workforce system—a teeming and dynamic ecosystem of employers, workers, educators from preK-12 to Career and Technical Education to postsecondary institutions to Adult and Basic Literacy educators, workforce trainers, government and non-profit service providers, economic development professionals, innovators, entrepreneurs, and students eager to learn about future careers—as a vital cog in the machinery that powers Pennsylvania's economy of tomorrow and empowers the real freedom all Pennsylvanians yearn for and deserve.

Through this vision, Pennsylvania's workforce development system continues to focus on more effectively and efficiently 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, regional approaches to shared challenges, 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 six broad goals for the workforce development system:

1. **Apprenticeship and Career & Technical Education:** Expand opportunities for individuals to enter into Registered Apprenticeship and Registered pre-Apprenticeship programs, assist employers in building Registered pre-Apprenticeship and Registered Apprenticeship programs, and increase the coordination with Career & Technical Education in these efforts.
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 PA CareerLink® System:** Identify and enact system changes and improvements that enhance the collaboration and partnership between agencies and partners in the workforce development system.
5. **Barrier Remediation:** Develop strategies to ensure the workforce development system is equipped to support individuals with barriers to employment in finding and maintaining self- and family-sustaining employment.
6. **Addressing Workforce Shortages in Critical Industries:** Prioritizing investment in industries that are critical to the economic prosperity of the Commonwealth.

The overarching theme throughout these six 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: Apprenticeship and Career & Technical Education** – The Commonwealth recognizes the critical importance of registered apprenticeships and pre-apprenticeships, and career and technical education centers, in empowering workers and potential workers to develop the knowledge, skills, and abilities that meet the needs of employers and an ever-evolving economy. Registered apprenticeships and pre-apprenticeships, and career and technical education programs are key parts of the career development strategy, allowing people the opportunity to learn career-sustaining skills on-the-job while also earning a paycheck.



**1.1 The Commonwealth will continue to increase the number of registered apprenticeship and pre-apprenticeship programs, including in non-traditional occupations and in new apprenticeship sectors, to ensure job-seekers have opportunities to earn while they learn.**

The Departments of Labor & Industry, Education, and Community and Economic Development will work collaboratively along with other partner agencies to assist employers, education and training providers and local workforce partners in developing new registered apprenticeship and pre-apprenticeship programs and in maintaining continued operations once programs are established. The state will measure progress on this goal by tracking the number of new registered apprenticeship and pre-apprenticeship programs established, as well as the total number of programs and types of occupations where registered apprenticeship and pre-apprenticeships are available.

**1.2 The Commonwealth will continue to increase recruitment efforts of registered apprenticeship and pre-apprenticeship programs, as well as career and technical education centers, to encourage greater numbers of participants from non-traditional populations and under-represented populations such as women, minorities, re-entrants, persons with disabilities, immigrants, and veterans, and to ensure opportunities are available to both eligible youth and adults.**

The Departments of Labor & Industry, Education, and Community and Economic Development will work together collaboratively along with other partner agencies to expand the opportunity for under-represented populations to participate in these programs. The state will measure progress by tracking the increase in number and percentage of non-traditional and under-represented populations participating in these programs, tracking recruitment efforts, and evaluating the effectiveness of the recruitment efforts.

**1.3 The Commonwealth will increase awareness about all career pathways for participants, including those seeking or better served by registered apprenticeships and pre-apprenticeships, and career and technical education programs.**

The Departments of Labor & Industry, Education, and Community and Economic Development will work together collaboratively along with other partner agencies and local workforce partners to increase awareness and exposure to these programs. They will also promote these programs as viable alternatives leading to career opportunities for some participants. The state will measure progress by tracking and evaluating the awareness and exposure efforts conducted, as applicable.

**1.4 The Commonwealth will continue to explore opportunities to expand offerings and participation in career and technical education programs for all populations.**

The Departments of Labor & Industry, Education, and Community and Economic Development will work together collaboratively along with other partner agencies and local workforce partners to explore ways to expand participation in career and technical education programs and what the programs offer to participants. The state will track and evaluate activities related to this goal.



**1.5 The Commonwealth will establish processes to enhance the alignment and coordination between registered pre-apprenticeship and career and technical education programs.**

The Departments of Labor & Industry, Education, and Community and Economic Development will work together collaboratively along with other partner agencies and local workforce partners to further define processes to coordinate programmatic elements, curricula and enhance participant outcomes more effectively. The state will track and evaluate activities related to this goal.

**1.6 The Commonwealth will continue to promote career and technical education programs' (CTE) inclusion of employer-desired skills in job application and resume building processes to better highlight that CTE participants have the skills employers want and that CTE programs are focused on developing those skills.**

The Departments of Labor & Industry, Education, and Community and Economic Development will work together collaboratively along with other partner agencies and local workforce partners to track efforts that promote alignment of program agreements and curriculum to measure progress for this goal.

**1.7 The Commonwealth will continue to ensure that core partners and career and technical education programs collaborate on identifying new workforce issues the Commonwealth faces and exploring potential solutions to those issues, and opportunities for continuous improvement.**

The Departments of Labor & Industry and Education, along with core partners and career and technical education programs, will collaborate on identifying workforce-related issues and potential solutions to issues as they develop in the Commonwealth. The state will track and evaluate activities related to this goal.

**1.8 The Pennsylvania Workforce Development Board will continue to maintain a standing Apprenticeship and CTE Committee, charged with facilitating interagency cooperation and coordination around apprenticeship programs and CTE, aligned to the related goals set forth in the WIOA combined state plan. The committee will update the full board on goal progress and execution.**

The Committee will meet regularly and update the Pennsylvania Workforce Development Board of its progress at the Board's 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 can 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 Industry Partnership 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 continue to promote Industry Partnerships by providing grant funding driven by business-identified priorities as well as job quality for employees, and promote post-grant period sustainability through local level and employer partner investment in the partnerships.**

The Pennsylvania Workforce Development Board, in coordination with the Department of Community and Economic Development, will continue to administer the grant for Pennsylvania's Industry Partnership program. For employees and job seekers who participate in the program, the state will measure the impact of this program by tracking increases in worker wages, numbers of credentials obtained, and retention period. For participating employers, the state will track the numbers of jobs created, and their economic impact. Through quarterly and annual reporting by the partnerships, the state will also track the participant career awareness activities, including number of events held and number of participants, and will measure the ability of the partnerships to braid and leverage resources, the number of employers participating in the partnerships, and the number of employers engaged in events.

**2.2 The Commonwealth will continue to enhance employer engagement and local coordination, to include opportunities for non-profit organizations, government employers (local/state) and other community anchor institutions in utilizing the workforce system in Pennsylvania.**

The Department of Labor & Industry will continue to support Business Service Teams in expanding their networks.

**2.3 The Commonwealth will increase engagement with employers in improving job quality.**

The Department of Labor & Industry will create a Job Quality Framework and will develop a plan as to how to implement it throughout the Commonwealth.

**2.4 The Commonwealth will work with employers to promote the importance of diversity, equity, inclusion, and accessibility in the workplace as well as the importance of hiring a diverse group of employees.**

The Department of Labor & Industry will specifically target services to help employers reduce their stigma around hiring individuals with barriers and will help employers diversify through programs such as the Work Opportunity Tax Credit and the Federal Bonding program.

**2.5 The Commonwealth will perform targeted outreach to disadvantaged businesses enterprises in order to help them succeed.**

The Office of Vocational Rehabilitation (OVR), and the Departments of Labor & Industry and Community and Economic Development will work together to form a collection of all resources currently available and formulate a plan on how to do outreach through the Business Service Teams.

**2.6 The Commonwealth will continue to increase engagement with employers on disability-related employment issues including emphasis on "Employment First", innovative job models,**

**accessibility standards, talent recruitment, ADA compliance, etiquette and the benefits of hiring individuals with disabilities and the importance of having an inclusive and accessible workplace.**

The Office of Vocational Rehabilitation (OVR), within the Department of Labor & Industry, in partnership with DCED will lead engagement with the business community and local workforce partners on this goal. The state will measure progress by tracking the numbers of Americans with Disabilities Act Accessibility Guidelines (ADAAG) consultations, reviews of employer workplace and public area accessibility, employer requests for OVR customers and disability etiquette trainings.

- 2.7 The Commonwealth will continue to increase collaboration and coordination between the OVR, state partners, employers, and local workforce development initiatives, to continue to expand and increase use of OJT training for persons with disabilities.**

OVR, within the Department of Labor & Industry, will lead efforts in collaboration with agency partners to advance this goal. The state will measure progress by tracking the number of OVR customers participating in on-the-job training.

- 2.8 The Commonwealth will promote employer engagement with the workforce development system and PA CareerLink®, to enhance employer recruitment of PA CareerLink® customers.**

The Departments of Labor & Industry, Education, Human Services, and Community and 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®.

- 2.9 The Commonwealth will communicate state grant opportunities more clearly, making it easier for all applicants to find and apply for state funding.**

The Departments of Labor & Industry, Education, and Community and Economic Development will work to synthesize a more uniform grant strategy. The Commonwealth will track this goal by the developmental activities around workforce grants between Departments.

- 2.10 The Pennsylvania Workforce Development Board will continue to maintain a standing Industry Partnership and Employer Engagement committee, charged with developing recommendations and facilitating interagency cooperation and coordination around Industry Partnership and Employer Engagement, and the related goals set forth in the WIOA combined state plan. The committee will update the full board on goal progress and execution.**

The 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 increase opportunities for youth to engage in registered apprenticeship (RA) and pre-apprenticeship (Pre-RA) programs, continue to establish new partnerships with secondary and post-secondary institutions.**

The Departments of Labor & Industry, Education, and Community and Economic Development will continue to collaborate on this goal, and will continue to measure progress and increases in the number of youth engaged in registered apprenticeship and pre-apprenticeship programs, their performance outcomes, and number of new registered programs at secondary and post-secondary schools, specifically CTCs.

**3.2 The Commonwealth will increase and ensure coordination and collaboration among service partners in co-enrollment of both in-school and out-of-school youth across programs to best leverage funds available for services.**

The Departments of Labor & Industry, Education, and Community and Economic Development will enhance the effectiveness of services for youth by increasing and ensuring coordination and collaboration among our service partners. All partner agencies will prioritize and collaborate on increased access to and participation in available programs by in school youth, out of school youth and opportunity youth. The state will develop performance targets and track the number of youth served, the number and types of services received, as well as the number of in school youth and opportunity youth co-enrolled in multiple programs.

**3.3 The Commonwealth will continue to develop and promote evidence-based quality summer programs and enhance the quality of services being delivered.**

The Department of Labor & Industry will work with the Department of Education to create a framework of what a quality summer program is and will work with all partner agencies to track, develop, and promote these programs.

**3.4 The Commonwealth will increase opportunities and access to services for justice-involved youth, and develop training programs that target justice-involved youth.**

The Department of Labor & Industry is committed to expanding opportunities and improving access to services for justice-involved youth, recognizing the significance of necessary support for societal reintegration. The state will evaluate current and past grants, utilizing the metrics/measures and data for justice-involved youth while continuing to assess outcomes to increase future opportunities.

**3.5 The Commonwealth will increase inclusive opportunities and access to services for youth with disabilities and develop training programs that target in-school and out-of-school youth with disabilities that allow for participation in an inclusive environment, being mutually accessible to them and others.**

The Commonwealth will measure progress by tracking youth with disabilities/students with disabilities that participate in services in the inclusive environment. To achieve this, we aim to increase competitive integrated employment placements and measure: postsecondary education and training, occupational skills training, unpaid and paid work-based learning experiences (summer and year-round employment, on-the-job training, internships, registered pre-apprenticeships, job shadowing) and entrepreneurial skills training.

**3.6 The Commonwealth will, via PennSERVE, continue to promote and encourage service opportunities with AmeriCorps and require WIOA regional and local plans to include AmeriCorps, when available, as a referral option, particularly for opportunity youth.**

In partnership with PennSERVE the Department of Labor & Industry will measure the increase in number of youth, particularly opportunity youth, enrolled in AmeriCorps state programs. We are dedicated to actively promoting and encouraging service opportunities with AmeriCorps, fostering a culture of service and community involvement. As such, the Department of Labor & Industry will ensure that 100% of plans include AmeriCorps as a referral option for youth when reviewing local and regional WIOA plans.

**3.7 The Commonwealth will continue to promote and encourage opportunities in programs such as YouthBuild, Job Corps, and Pennsylvania Outdoor Corps, and require WIOA regional and local plans to include these programs, when available.**

The Department of Labor & Industry will prioritize opportunities for these programs and measure the number of youth, particularly opportunity youth, enrolled in these programs. Additionally, we will strongly encourage WIOA regional and local plans to include these programs whenever available. We will measure this goal by increased referrals into these programs, increased participation rates, an increased employment outcomes by aligning our efforts with these programs.

**3.8 The Commonwealth will explore and promote opportunities for programs such as YouthBuild, Job Corps, Outdoor Corps and others to connect participants to employers who offer supports to workers who participated in those programs.**

The Departments of Labor & Industry, Conservation and Natural Resources, and other partner agencies will work to create a trackable program for this goal, as well as explore and promote opportunities for employers to value this experience in hiring, use these programs as pipelines for their future workforce, and support workers who participated in these programs.

**3.9 The Pennsylvania Workforce Development Board will continue to maintain a standing Youth committee, charged with developing recommendations and facilitating interagency cooperation and coordination around Youth in the Commonwealth, and the related goals set forth in the WIOA combined state plan. The committee will update the full board on goal progress and execution.**

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

**Goal 4: Continuous Improvement of the PA CareerLink®** – The One-Stop system, known in Pennsylvania as PA CareerLink®, is the primary touchpoint for the vast majority of customers, including job seekers, individuals looking to advance their careers, and employers. Ongoing progress in coordination among systems partners, identifying and implementing efficiencies, reducing duplication, and better customer service are all essential aspects of Continuous Improvement of PA CareerLink® service delivery.

**4.1 The Commonwealth will continue efforts to increase number of customers being served on-site at the physical PA CareerLink® centers/locations, i.e., “foot traffic”, and will promote shared-space opportunities with partner programs where appropriate to meet customer needs.**

The Department of Labor & Industry will work with all partner agencies and local partners to ensure awareness that on-site PA CareerLink® services are available and promote their use, and will encourage efficient use of available physical space to provide shared-space opportunities for partner programs. The state will track on-site customer traffic and percentage of customers connected to partner program services. The state will also measure customer satisfaction with the quality of on-site services received.

**4.2 The Commonwealth will continue to promote the availability of and access to virtual PA CareerLink® services.**

As the Commonwealth strengthens broadband access statewide, all partner agencies will collaborate to promote and expand virtual service opportunities where optimal and appropriate for customer needs. The state will track use of virtual services and measure customer satisfaction with the quality of virtual services. The state will also measure operational effectiveness and impacts on availability of other resources as a result of increased use of virtual services.

**4.3 The Commonwealth will expand availability and access to PA CareerLink® services to customers wherever they may be out in the community.**

The Department of Labor & Industry will work with all partner agencies and local partners to support statewide development of PA CareerLink® service delivery methods, that occur off-site from the physical PA CareerLink® site; i.e., out in the community. The state will track use of services off-site, and services received. The state will also measure customer satisfaction with the quality of the services received.

**4.4 The Commonwealth will increase use of PA CareerLink® services by “ex-offenders,” especially incarcerated and previously incarcerated individuals, by providing services where the individuals are located.**

The Department of Labor & Industry will coordinate with partner agencies to increase service use by this population, and will measure progress by tracking PA CareerLink® services used by ex-offenders and where services are obtained.

**4.5 The Commonwealth will promote greater access to PA CareerLink® services for immigrant, refugee and English Language Learner populations and other customers facing service access barriers related to literacy (digital included) and language accessibility.**

All partner agencies will coordinate to promote greater accessibility to and increased use of PA CareerLink® services by populations reflected in this goal. The state will measure progress by tracking numbers served and type of services received, customer and staff satisfaction with the quality and effectiveness of translation and improvements in alternate formats used, and customer referrals made.

**4.6 The Commonwealth will facilitate use of PA CareerLink® services by postsecondary students where they are located and access to postsecondary education for PA CareerLink® customers.**

The Department of Labor & Industry will coordinate with partner agencies to facilitate service use by this population, and will measure progress by tracking PA CareerLink® services used by the post-secondary students and where services are obtained.

**4.7 The Commonwealth will improve the quality of communication and information sharing with PA CareerLink® customers to better appeal to hard to engage populations such as re-entrants, immigrants, veterans, older individuals, and youth.**

All partner agencies will coordinate on tracking and reporting on relevant training and staff professional development activities, material and communications development, and staff, customer and employer feedback to determine progress toward this goal and where additional improvements would be valuable. Partner agencies will also explore opportunities to standardize customer satisfaction surveying materials and methods across programs.

**4.8 The Commonwealth will improve the perception of engaging government workforce development services among populations that have concerns or negative views.**

The Department of Labor & Industry and all partner agencies will collaborate on these efforts, and will measure progress by documenting and evaluating agency activities to improve customer perceptions about the workforce development system and receiving services.

**4.9 The Commonwealth will continue to enhance the interoperability of CWDS among agency partners' systems, including multi-direction referral systems (systems reciprocity) and offering coordinated access to the key demographic and performance data.**

All partner agencies will continue to collaborate on identifying opportunities and developing strategies to increase interoperability of data systems and promote better data sharing across workforce programs, including education and human services programs overseen by partner agencies.

**4.10 Business Service Teams will continue to collaborate with partner agencies and local partners to expand employer use of PA CareerLink® services, ensuring that engagement is coordinated across programs and focused on addressing employer barriers and related challenges in worker recruitment and retention.**

The Department of Labor & Industry will coordinate these activities in partnership with the Department of Community and Economic Development and other partners. The state will track

the number of business service events and employers involved, and measure increases in employer engagement with PA CareerLink® services.

**4.11 The Commonwealth will continue to improve the quality of fiscal stewardship and accountability by the state agencies and community partners for PA CareerLink® services.**

All partner agencies will continue to collaborate on these efforts and will measure progress by documenting and evaluating actions to ensure that service delivery improvements enhance the quality and efficiency of services, reflect sound fiscal stewardship, and are based on data and ongoing operational evaluation of efficiency and effectiveness.

**4.12 The Commonwealth will ensure coordination and alignment of WIOA and TANF outcomes as now applicable under federal law; as well as coordination and alignment of WIOA and SNAP outcomes.**

The Departments of Labor & Industry and Human Services and other partner agencies where appropriate, will measure progress by documenting coordination efforts and alignment of performance outcomes related to WIOA and TANF, as well as WIOA and SNAP, as applicable and where appropriate.

**4.13 The Commonwealth will ensure collaboration at the state and local workforce levels across PA, to explore informational campaigns that promote PA CareerLink® and educate the community at large about the tremendous opportunities PA CareerLink® provides for all customers, job seekers and employers.**

The Department of Labor & Industry will ensure state commitment to this goal and lead efforts with all state and local workforce partners. Progress will be measured by documenting exploration of opportunities to address policy and funding obstacles, and by developing a plan to enact public informational campaigns that achieve this goal.

**4.14 The Pennsylvania Workforce Development Board will continue to maintain a standing committee charged with developing policy recommendations related to interagency collaboration and coordination around the PA CareerLink® or “One-Stop” system, and implementation of the related goals set forth in the WIOA combined state plan. The committee will ensure that all core and partner programs have the opportunity to share any proposed changes to program operations that could impact PA CareerLink® operations. The committee will update the Pennsylvania Workforce Development Board on goal progress.**

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

**Goal 5: Barrier Remediation** – Pennsylvania recognizes that certain groups of Pennsylvanians face disproportionate obstacles to securing and maintaining employment, and that they could be served more effectively if those barriers are considered and addressed strategically, with state-level coordination and support. Federal law ([29 USC § 3102\(24\)](#)), and the Pennsylvania Department of Labor & Industry’s [policy](#) on priority of service, identify an “individual with a barrier to employment” as a member of one or more of 14 populations, including low-income individuals, ex-offenders (also referred to as reentrants in state



policies), long-term unemployed individuals, English learners and individuals facing substantial cultural barriers, single parents, and individuals with disabilities. Local workforce development areas across Pennsylvania also may develop strategies to better serve additional populations in their own local area or region. This goal identifies factors that impact workforce participation for these identified groups. The subgoals address barriers that are widespread; seriously impede access to employment; that the workforce system can impact in the next four years; that co-exist; or that are already being remediated in some regions and localities and can be addressed more effectively through an aligned, statewide strategy. Accomplishing this goal will involve improving outreach to individuals who face barriers to employment, communicating effectively and accessibly with PA CareerLink® customers who face barriers to employment, and ensuring workforce development services are culturally competent and inclusive.

“Barrier remediation” does not only focus on getting individuals into jobs. The subgoals address factors that prevent individuals from entering or re-entering the workforce; remaining in the workforce; getting hired; maintaining a job; and working in a career that has good job quality, earns a family-sustaining wage (or leads to it through a career pathway), is safe, is sustainable, and suits their interests and skills. These factors are also barriers to employers’ ability to attract, hire, train, and maintain enough high-quality workers. The goal of “barrier remediation” focuses on the experience of jobseekers and workers, but it complements other goals in this plan that focus on meeting the workforce needs of Pennsylvania employers.

**5.1 Help implement and sustain statewide plans for equitable access to high-speed Internet and for digital equity, so that use of the Internet and its associated technology is not a barrier to employment opportunity for the working-age population in Pennsylvania.**

Commonwealth agencies, in particular the Department of Labor & Industry, Department of Community and Economic Development, and Department of Education, will work together to improve foundational digital literacy skills across Pennsylvania. Workforce development partners will assist in implementing statewide plans and strategies that address digital literacy, digital equity, access to digital devices, and access to high-speed Internet, include the Pennsylvania BEAD Plan and the Pennsylvania Digital Equity plan.

**5.2 Improve employment opportunity, workplace inclusion, and professional networking and mentoring opportunities for populations that experience stigma, bias, and discrimination. Expand on existing strategies and explore new approaches to reduce bias, from recruiting to hiring and employment.**

The Commonwealth will expand existing strategies that address the stigma sometimes associated with a lack of formal employment history or resume gaps. These strategies include employer education through business service teams and L&I’s efforts to encourage employers to hire individuals recovering from addiction. New strategies to explore may include public-sector paid internships or public-private partnerships that provide paid work experience to individuals who lack a formal or documented employment history, and innovative ways to conduct recruitment and hiring.

To measure progress on this subgoal, the Commonwealth will: track the number of PA CareerLink® customers across local workforce development areas provided with advising on how to navigate conversations with employers about resume gaps and other topics that can have a stigma

associated with them; track the extent to which employers use public policy incentives such as the Work Opportunity Tax Credit and the federal bonding program; and gather feedback from employers who participate in hiring incentive programs.

**5.3 Target outreach for training and education to individuals who face barriers to employment so that their knowledge and skills meet requirements for available, in-demand, and family-sustaining jobs.**

PA CareerLink® will aid in targeted outreach to customers. The workforce development system will target and tailor trainings to be accessible for populations that face barriers to employment, for example, ensuring that incarcerated individuals access training soon before reentry into the community. The Department of Labor & Industry and its partner agencies will find ways to increase the use of quality job training resources that have no cost to the participant, such as SkillUp™ PA, among populations that face barriers to employment.

**5.4 Work toward trauma-informed service delivery across the state, so that workforce development staff can better provide trauma-informed services and supports to PA CareerLink® customers, and the workforce development system can better work with employers on understanding and addressing trauma.**

The Commonwealth will address trauma as a barrier to pursuing, securing, maintaining, and advancing in employment for jobseekers and workers served by the workforce development system. The Commonwealth also will prioritize that workforce development system frontline staff's well-being is supported, recognizing the impact of secondary trauma on those who work in people-facing roles.

**5.5 Invest in regional and local strategies that address multiple, individual or community-wide barriers to employment, through applying supportive services funds, braiding funds, program cost-sharing, cross-training staff, and other means of coordination and collaboration across sectors and across state agencies.**

WIOA Core programs and partners will strengthen and maximize workforce supports and help individuals to access employment-related resources by leveraging funds and collaborating efforts across the workforce system and partner agencies, and by making the right referrals, to assist workers with critical employment-related supports and resources. Strategies may include individualized interventions such as leveraging supportive services funds for individuals to meet an immediate need that prevents them from accessing a job.

The Commonwealth will monitor progress on how well the workforce development system has increased the availability and accessibility of employment-related supports through the utilization of braided funds, program cost-sharing, and collaboration of resources. The Commonwealth will track the number of workers benefitting from employment-related supports such as childcare, transportation, food, housing or rent assistance, work clothes and tools, etc. through braided funds and program cost sharing.

**5.6 Better equip the workforce development system to address housing instability and support local and regional solutions.**

The Commonwealth will focus on partnership development across Pennsylvania. The Department of Labor & Industry will build relationships with other state agencies such as the Department of Community and Economic Development and the Housing Finance Agency to learn what supports are available to address housing instability, and to work together on holistic solutions at the state level. The Commonwealth will support the development of local and regional workforce development entities' partnerships with housing agencies, increase PA CareerLink® staffs' awareness of available resources from all sectors to support their customers' housing stability, increase the number of referrals from PA CareerLink® to appropriate agencies, and expand the use of helpful strategies (for example, vouchers) when working with individuals who have rent burden or need subsidized housing.

**5.7 Work with workforce development system partners to improve childcare and dependent care access, affordability, and availability in the needed places and at the needed times to enable full employment for individuals.**

The Department of Labor & Industry, the Department of Human Services, and the Department of Education will collaborate to address childcare and dependent care as a barrier to full employment. In addition to strengthening connections between state agencies, the Commonwealth will support the strengthening of connections between county agencies and local workforce development boards to support childcare and dependent care.

**5.8 Explore and implement ways to collaboratively support individuals for whom transportation is a barrier to employment.**

The Department of Labor & Industry will collaborate with PENNDOT and local transportation authorities to leverage existing programs that make transportation more affordable, available, and accessible. To measure progress, the Department will monitor the number of collaborations and agreements with groups that address transportation affordability and access, and the number of transportation vouchers provided to and used by individuals served by the PA CareerLink®.

**5.9 Coordinate across governmental agencies to facilitate obtaining official work and identity documentation for individuals who face barriers to employment, and to make obtaining those documents a timely and affordable process.**

The Commonwealth will address issues related to the cost and difficulty that jobseekers face when they need education and licensure, identity, and work authorization documentation. State agencies will collaborate to design documentation services in ways that are tailored to the populations they serve.

**5.10 Reduce barriers related to occupational licensing for transient, justice-involved, and military populations.**

The Department of State will collaborate with the Department of Labor & Industry and the Department of Human Services to improve license reciprocity for transient populations and to support ways for individuals who do not have U.S. citizenship or permanent resident status to

gain occupational licensures. The Department of State will collaborate with the Department of Labor & Industry, the Department of Corrections, and the Pennsylvania Commission on Crime and Delinquency to support ways for justice-involved individuals to gain occupational licensures.

**5.11 Develop ways to address other federal or legal barriers that prevent work opportunities or limit access to employment services for immigrants.**

The Commonwealth will leverage interagency workforce development workgroups to develop policies and strategies that make it easier for immigrants, refugees and asylum seekers, and migrant and seasonal farmworkers to thrive in the workforce. The Commonwealth will solicit input from employers and workers on priorities, such as the need to make it easier for these populations to gain credentials and certifications. The Commonwealth will monitor progress through the number of credentials earned, feedback from employers and workers, and the number of individuals in these populations who are referred to and participate in services under WIOA programs, including Title I and Title II.

**5.12 Support workforce development staff to recognize and address hidden barriers to employment for individuals served by WIOA core and partner programs.**

The Commonwealth will support workforce system staff in addressing factors that may present a barrier to employment, but which are not immediately apparent, and which may be associated with social stigma or societal expectations not to disclose, making them more difficult to identify and consider when helping an individual secure employment. Such factors could include generational poverty, trauma, and invisible disabilities such as chronic illness, mental illness, and addiction. The Commonwealth will develop and support ways for workforce system staff to address hidden barriers to employment and consider ways to design systems and processes to avoid system engagement as a barrier in itself, recognizing that individuals in these situations may be receiving multiple referrals and have to interact with multiple state systems to address multifaceted needs.

**5.13 Explore and expand ways that the workforce development system and its partners can help jobseekers and workers strengthen critical employability skills through evidence-based education, training, and professional development.**

The Commonwealth will build on existing strategies that teach “soft skills” and continue to support strategies that teach “career readiness” skills. The Commonwealth recognizes that certain skills, such as the “executive function” skills, which include planning, working memory, organization, and flexibility, are critical to obtaining and sustaining employment for all people and can be improved with intervention.

**5.14 Assist employers to retain employees, and help workers maintain full employment, through better job quality.**

The Commonwealth will develop ways to educate employers on characteristics of a quality job, such as child care and pay; help employers take advantage of existing programs that promote job quality, such as federal tax credits for offering childcare; develop model workplace policies with Workforce Development Board (WDB) members and WDB committees; and propose incentives

that the state can provide to employers for implementing job retention policies that remove barriers for WIOA-identified populations, such as family-friendly childcare and leave policies.

**5.15 Analyze the digital intake data from all PA CareerLink® centers to improve service for individuals who face barriers, especially those who face multiple barriers.**

The Commonwealth will leverage the statewide use of digital intake at the PA CareerLink® to disaggregate data by populations that WIOA and the Commonwealth recognize as those who face barriers to employment. The Department of Labor & Industry will analyze the digital intake data from all PA CareerLink® centers on variables that show engagement, services provided, and outcomes for individuals with barriers to employment.

**5.16 The Pennsylvania Workforce Development Board will maintain a standing committee, charged with facilitating interagency cooperation and coordination around barrier remediation and related goals set forth in the WIOA combined state plan. The committee will update the full board on goal progress and execution.**

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

**Goal 6: Addressing Worker Shortages in Critical Industries** – Pennsylvania is committed to addressing the pressing issue of worker shortages in critical industries, recognizing the pivotal role these industries play in the region’s economic growth and stability. Through comprehensive workforce development initiatives, we aim to promote employer engagement, enhance access to career-focused education and training programs, and establish robust partnerships between employers, educational institutions, and community organizations. Pennsylvania seeks to bridge the workforce gap and pave the way for individuals to embark on meaningful careers within critical industries.

**6.1 Improve workforce capacity and stability in agricultural industries by promoting on-the-job training (OJT) participation, pre-apprenticeships and apprenticeships, including but not limited to new migrant seasonal workers and individuals with visas, with a particular emphasis on expanding recruitment efforts to encompass a broader workforce demographic.**

The Department of Labor & Industry and Department of Agriculture will strengthen the workforce capacity and stability within agricultural industries through a multifaceted approach. The Commonwealth will work to expand pre-apprenticeships and apprenticeships opportunities, encouraging broader participation in OJT opportunities, establishing a comprehensive pathway to skill development. This strategy prioritizes both short-term training and long-term career advancement, thereby fortifying the agricultural sector’s workforce and sustainability. The state will measure the participation of those in on-the-job training, registered apprenticeships and pre-apprenticeships. The PENNSYLVANIA WORKFORCE DEVELOPMENT BOARD will maintain a committee focused on the agricultural industry workforce.

**6.2 Address worker shortages in healthcare and long-term care industries, focusing on direct care and community health sectors, by increasing the number of qualified healthcare and long-term care professionals.**

The Department of Labor & Industry will work to address worker shortages in critical healthcare and long-term care occupations, with specific strategies to increase direct care workers (e.g., nurse aides, home health aides, home care, and community health workers). This approach will encompass strengthening essential support services, ensuring accessibility to crucial resources such as childcare, transportation, food and housing. The PENNSYLVANIA WORKFORCE DEVELOPMENT BOARD will maintain a committee focused on the healthcare and direct care workforce.

**6.3 Increase the number of qualified educators in early childhood and K-12 education (including career and technical education), and school-based mental health professionals and support staff, through traditional and alternative pathways across all regions and particularly those experiencing chronic shortages.**

The Department of Labor & Industry and Department of Education will work to develop strategies to increase the number of individuals in these professions through both conventional and alternative pathways. The Commonwealth will work to increase the number of candidates within approved educator preparation programs, with a focus on recruiting candidates of color. The Commonwealth aims to reduce the educator vacancy percentage across distressed schools, rural schools, suburban schools, urban schools, early childhood providers and school libraries. The Pennsylvania Workforce Development Board will maintain a committee focused on the Education sector.

**6.4 Bolster the construction workforce and promote equitable access to high-quality jobs by increasing the number of individuals entering the construction industry.**

The Departments of Labor & Industry and Community and Economic Development will collaborate to increase the construction workforce and establish a foundation for equitable access to high-quality employment opportunities. This includes promoting long-term career growth and extending equal opportunities for all. The state will work to increase the number of construction registered pre-apprenticeship, registered apprenticeship, and skill development programs. The Pennsylvania Workforce Development Board will maintain a committee focused on the construction industry workforce.

**6.5 Strengthen the manufacturing workforce, promoting equitable access to high-quality jobs, attract youth, and cultivate interest through increased engagement in the manufacturing sector.**

The Departments of Labor & Industry and Community and Economic Development will collaborate on this goal. Reshaping perceptions of manufacturing careers through strategic “branding” and outreach efforts is a key component of these efforts. Targeted outreach efforts and supporting both registered pre-apprenticeship and registered apprenticeship programs will help to increase pathways into manufacturing careers. The Pennsylvania Workforce Development Board will maintain a committee focused on the manufacturing industry workforce.

**6.6 Strengthen the public safety workforce and promote equitable access to high-quality jobs in critical industries, including public service organizations through increased recruitment, retention, and partnerships with employers and businesses across the state.**

The Commonwealth will assist those pursuing careers in public safety by assisting with recruitment initiatives and offering career counseling and guidance within this industry. The goal aims to build a long-term capacity for skilled workers, particularly focusing on attracting, recruiting and employing veterans and underrepresented populations to public safety and public service-related careers.

**6.7 Leverage the existing Industry Partnership (IP) network to identify opportunities for investments in critical industries to address worker shortages.**

The Department of Labor & Industry will utilize existing IP network to increase employer engagement on issues facing critical industries and identify opportunities to scale successful initiatives across the Commonwealth.

**6.8 Increase youth awareness of opportunities in critical industries through programs that serve in- and out-of-school youth.**

The Commonwealth will offer career awareness and career education opportunities in critical industries, strengthen partnerships with critical industries through targeted outreach and engagement strategies, implement tailored educational programs and registered apprenticeships and pre-apprenticeships, that equip youth with the necessary skills and knowledge required in these industries.

**6.9 Address worker shortages in critical industries by promoting alternative pathways to certifications and credentialing.**

The Commonwealth will develop and promote alternative pathways, where possible, to employment within critical industries that offer quality jobs. By expanding opportunities beyond traditional education pathways, more individuals will be able to access and maintain employment in these careers.

*(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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	

Employment (Fourth Quarter after Exit)	7 Available Feb 2024		Available Feb 2024	
Median Earnings (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Credential Attainment Rate	Available Feb 2024		Available Feb 2024	
Measurable Skill Gains	Available Feb 2024		Available Feb 2024	

**Title I – Dislocated Worker**

	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Employment (Fourth Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Median Earnings (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Credential Attainment Rate	Available Feb 2024		Available Feb 2024	
Measurable Skill Gains	Available Feb 2024		Available Feb 2024	

**Title I - Youth**

	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Employment (Fourth Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Median Earnings (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	



Credential Attainment Rate	Available Feb 2024		Available Feb 2024	
Measurable Skill Gains	Available Feb 2024		Available Feb 2024	

**Title II – Adult Education and Family Literacy Act Program**

	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter after Exit)	47.5%		47.5%	
Employment (Fourth Quarter after Exit)	50%		50%	
Median Earnings (Second Quarter after Exit)	\$6,925.00		\$6950.00	
Credential Attainment Rate	37%		37%	
Measurable Skill Gains	37%		37%	

**Wagner-Peyser Act Employment Services Program**

	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Employment (Fourth Quarter after Exit)	Available Feb 2024		Available Feb 2024	
Median Earnings (Second Quarter after Exit)	Available Feb 2024		Available Feb 2024	
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 2024 Expecte d Level	PY 2024 Negotiated Level	PY 20253 Expected Level	PY 2025 Negotiated Level

Employment (Second Quarter after Exit)	53.0%	56.0%	55.0%	57.0%
Employment (Fourth Quarter after Exit)	47.0%	47.0%	58.0%	48.0%
Median Earnings (Second Quarter after Exit)	\$4,800.00	\$4,800.00	\$4,900.00	\$4,900.00
Credential Attainment Rate	2.0%	20.0%	2.5%	21.0%
Measurable Skill Gains	32.0%	39.0%	36.0%	40.0%

**All WIOA Core Programs**

	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

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 through multiple mechanisms: The Pennsylvania Workforce Development Board will continue to 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, the Pennsylvania Workforce Development Board and the interagency working group has been collaborating with Pennsylvania’s State Longitudinal Data System Office 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.

Finally, The Pennsylvania Workforce Development Board will continue to engage with each of the standing committees aligned to the broad goals for the workforce system. Through the review of these goals, the committees will continue to identify goals and make recommendations, when appropriate, on system changes and enhancements that will help ensure the achievement of these goals.

Through this, Pennsylvania will continue to 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 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 two ways. First, the Pennsylvania Workforce Development Board maintains a standing committee focused on Apprenticeship and Career and Technical Education. The primary 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 better supporting and formalizing the connection between registered pre-apprenticeships and apprenticeship programs and career and technical education providers. Secondly, the majority of Pennsylvania's discretionary grant funding, through both WIOA set aside and through state fiscal allocations, prioritizes

training that leads to credentials and certifications that support individuals entering, and remaining on, a career pathways that leads to self- and family sustaining employment.

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 twelve standing committees of the State Workforce Development Board aligned to one of more of the of the six broad goals identified in this plan. These committees include: (1) Apprenticeship and Career & Technical Education, (2) Industry Partnership & Employer Engagement, (3) Youth, (4) Continuous Improvement of the PA CareerLink® System, (5) Barrier Remediation, (6) Reentry, (7) Workforce Supports for Persons with Disabilities, and industry specific challenges around workforce for each of the following industries: (8) Education, (9) Agriculture, (10) Healthcare, (11) Construction, and (12) Manufacturing. 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 Development Board's committees and the interagency group as tools to address the identified weaknesses in section II(a)(2), including:

- The Continuous Improvement of the PA CareerLink® committee of the State Workforce Development Board is focused on addressing the level of customer service and customer options within the PA CareerLink® system and increasing employer engagement with the public workforce 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.
- In conjunction with improvements to the CWDS system, the Commonwealth has developed a common digital intake for use at all PA CareerLink® offices. This is helping to ensure that comprehensive information is collected on every customer and will help to enhance customer referrals to the proper programs and services.
- Pennsylvania is developing strategies to serve priority populations in a coordinated manner, by developing policies and programs collaboratively across agencies.

- An increased focus on regionalism as an approach to maximizing resources available to address economic and workforce challenges and to broaden the applicability of effective solutions.

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## 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—*

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### **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 Pennsylvania Workforce Development Board 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. The Center for Workforce Information & Analysis 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. Career Advisors in the PA CareerLink® help guide individuals to appropriate service 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 Temporary Assistance for Needy Families (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 Pennsylvania Industry 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, spouses of veterans, and eligible caregivers 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.

#### WIOA Title II - Adult Basic Education



WIOA Title II adult education funds provide instruction in mathematics, reading, and writing at educational levels from beginning literacy through high adult secondary, including high school equivalency test preparation. Funds also support English language acquisition for English language learners. Instruction, digital literacy activities, and workforce preparation activities support college and career readiness by developing participants' academic, digital literacy, critical thinking, and self-management skills. 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 co-enroll eligible Title I Adult, Dislocated Worker, and Youth participants 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. Workplace classes provide onsite instruction for incumbent workers to develop their skills to support employer capacity and success and for their own advancement.

WIOA Title II state leadership funds are used to support a robust professional development system for adult education program staff. The system includes a project that provides technical assistance and support to Title II programs to be effective partners in the workforce development system. The work focuses on aligning adult education and literacy activities with other core programs and one-stop partners to implement strategies in the State Plan; participation in the development of career pathways that provide access to employment and training for individuals in adult education programs; and understanding and fulfilling Title II's role as a one-stop partner to provide access to employment, education, and training services. A second project addresses State Plan strategies through alignment of adult education activities with the workforce system by supporting the development of content and models for integrated education and training and career pathways and promoting linkages with employers to promote workplace classes and integration of adult education and literacy activities into occupational training. Training for the administration of standardized basic skills assessments is also available to staff of the PA CareerLink one-stop centers. Staff from the professional development system lead an interagency working that is developing cross-training modules.

#### 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, quasi-governmental entities, community-based

organizations, faith-based organizations and other 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 (PDE), Human Services (DHS), Labor & Industry (L&I), Agriculture (PDA), Community and Economic Development (DCED), Military and Veterans Affairs (DMVA), State (DOS), and Corrections (DOC), 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 and 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 Pennsylvania Workforce Development Board created a committee dedicated to One-Stop Service delivery to promote greater connections between all agencies and partners providing services to Pennsylvania citizens. The committee has focused 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 Departments of Education, Human Services, and Labor & Industry, along with other Commonwealth agencies and executive office officials under the Governor's Cabinet for People with Disabilities, created a written plan that implements Employment First as the policy of all Commonwealth executive branch agencies; aligns funding, policy, and practice toward 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.

- Title II providers align services with WIOA Local Plans and coordinate with other available education, training, and social services to address community needs. Programs provide initial assessment of skill levels including literacy, numeracy, and English language proficiency, in support of local workforce activities to support dislocated workers.
- 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 In-Demand Occupation (IDOL) list and is designed to lead to credential attainment. Both credential attainment and IDOL alignment assist job seekers in securing employment with family-sustaining wages.
- All trade-impacted workers should be co-enrolled in the WIOA Dislocated Worker program through Title I to ensure that all individuals receive the full range of assistance available to Dislocated Workers. The Bureau of Workforce Partnership & Operations (BWPO) provided a Guidance Memo to all local areas encouraging co-enrollment.. Pennsylvania published a co-enrollment policy in May of 2022.
- L&I supports other state agencies in developing discretionary grant applications to ensure connections to the one-stop delivery system and to ensure system leverage. Additionally, when workforce applies for discretionary grants, we partner with multiple state agencies to develop application activities to ensure strategic delivery.
- 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 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 Division 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 DOC 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 Division 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.

- 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 2022.

- The Department of Community and Economic Development provides federal CSBG funding to the Department of Labor & Industry's Workforce Investment Areas (WIA) on behalf of the Community Action Agencies (CAA) in each WIA. The CAAs and the WIAs sign an MOU guaranteeing the CAAs a seat on the WIA board and assures that the CAAs will provide supportive services to the CareerLink customers either by having a physical presence in the CareerLink or via referral to assist participants in meeting needs that will increase the likelihood of success, including childcare, transportation, and/or employment specific needs.
- The Department of Labor & Industry's Bureau of Workforce Partnership and Operations through servicing the JVSG Grant can staff positions to develop veteran opportunities through employers. Local Veteran Employment Representatives (LVERs) promote the advantages of hiring veterans to employers, employer associations, and business groups. Where employer outreach is primarily accomplished by business services teams or like entities, LVERs are included as active members of those teams to advocate for veteran populations, including those that are ineligible for DVOP services. Per Veterans' Program Letter (VPL) 03-14, LVERs participate in a variety of outreach activities such as:
  - Planning and participation in job and career fairs
  - Conducting employer outreach to promote the advantages of hiring veterans
  - Conducting job searches and workshops for veterans in conjunction with employers
  - Coordination with unions, apprenticeship programs, and businesses to secure and promote employment and training programs for veterans
  - Providing information to federal contractors on the recruitment process for qualified veterans
  - Building capacity within the service delivery system to ensure easier access to services for job-seeking veterans
  - Educating staff on current veteran employment initiatives and programs
  - LVERs are also responsible for "facilitating employment, training, and placement services furnished to veterans in a State under the applicable State employment service delivery systems" (38 U.S.C. 4104(b)(2)).
- The Apprenticeship and Training Office (ATO), PA Department of Labor & Industry is working to embed a focus on apprenticeships within the State's workforce system and PA CareerLink® offices. In addition to regularly presenting Apprenticeship 101 webinars and providing additional resources to workforce staff, the ATO also supports the Registered Apprenticeship Navigator program, an apprenticeship program that trains professionals to develop and manage apprenticeship programs that has already trained nearly two dozen LWDB and PA CareerLink® staff. Other PAsmart Ambassador Network grantees are similarly required to partner with PA CareerLink® or One Stop Centers with a concentration on training or supporting Title One staff or other workforce development professionals who act as Ambassadors of Apprenticeship and grow this work. Starting in late 2022, the ATO hopes to offer strategic training for workforce development staff regarding serving clients through Registered Apprenticeship and Pre-Apprenticeship by launching a Desk Guide for those working in our PA CareerLink® on how to link jobseekers to apprenticeship and workforce funding.

- At select state correctional institutions, the PA Department of Conservation and Natural Resources (DCNR) in conjunction with Department of Corrections (DOC) runs a job training and environmental education program that prepares individuals for careers in the environmental services sector while equipping them with the knowledge and empowerment to improve the environmental conditions in the communities to which they return. The multi-week training leverages expertise from educational providers, employers, and professionals to provide participants with a diversity of perspectives and career pathways.
- The Pennsylvania Workforce Development Board, in partnership with all impacted agencies, have been working closely with both the Commonwealth Workforce Transformation Program (CWTP) and the Office of Transformation and Opportunity (OTO) to meet the needs of the federal investments made through the IIJA, IRA, and the CHIPS Act. The CWTP is specifically focused on developing on-the-job training opportunities for at employers working on IIJA and IRA funded projects. The OTO has been charged with fostering innovation, supporting transformational economic development, and creating real opportunity for businesses and workers alike in our Commonwealth, particularly in communities that have too often been left behind.
- Finally, the PA Workforce Development Board added two additional committees under the Board, focused on Construction and Manufacturing workforce challenges, that are keenly focused on meeting the needs of the critical investments made through the IIJA, IRA, and the CHIPS Act.

*(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 professional development system for adult education provides training on the administration of standardized basic skills assessments, which is available to PA CareerLink® staff.

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 In-Demand 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.

Local Veteran Employment Representatives (LVERs) are included as an active member of all applicable Business Services Teams (BST). LVERs attend all BST meetings and are including in BST outreach

activities. As an active member of the BST the LVERs advocate for all veterans served by the PA CareerLink® with businesses, industry, and other participating community-based organizations.

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 Pennsylvania Industry Partnership (IP) program has been successful at enlisting businesses participating in the same general economic sector to collaborate and cooperate.
- 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 In-Demand Occupations; 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 agribusiness 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®, Local Workforce Development Board offices, employer advocacy groups, including Chambers of Commerce, 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 and other Education and Training Providers. Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.*

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 In-Demand Occupations.

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.

In providing partner engagement and education to Trade Adjustment Assistance (TAA) providers, the Trade Grant Services (TGS) unit will provide continual grant services to institutions. These services include outreach to new schools, completion of TAA Master Agreement (TMA) and addenda when applicable with participating schools, provision of technical assistance to participating institutions, and monitoring of compliance with the Trade Act. These services may be contingent upon reauthorization of the Trade Act.

On May 11, 2022, Pennsylvania issued and updated Eligible Training List Provider policy 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: provide program information; assure compliance with nondiscrimination, equal opportunity, and ADA provisions; 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.

You can find the ETPL policy here: <https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>

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

The 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.

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 Shapiro's priority of investing in workers to build a stronger economy for everyone.

*(G) 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 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.

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 is working 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.
- **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 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.

- **Improving financial access to post-secondary education by leveraging available funding streams through the optimization of the use of federal financial aid.** The Pennsylvania Department of Labor & Industry provided training to approximately 1400 workforce staff across the Commonwealth on the use of the Free Application for Federal Student Aid (FAFSA) form. This training included the role of the FAFSA, the application process, how to use the financial aid report, the barriers to applying for, utilizing, and maintaining financial aid and the discussion of equity and access issues faced workforce system participants. This training was recorded and has been integrated as a part of regularly scheduled trainings provided across the one-stop delivery system. By increasing the understanding of the application process and how it impacts workforce participants will allow more of those participants to affordably obtain post-secondary credentials/degrees.
- **Building seamless secondary-postsecondary transitions:** In accordance with the federal Strengthening Career and Technical Education for the 21<sup>st</sup> 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. Postsecondary Institutions may exceed the minimum number of postsecondary credits awarded. The highest number of credits awarded is 21.
- **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 Credentials for Career and Technical Education Programs \(pa.gov\)](http://pa.gov) to identify industry-recognized credentials aligned to CTE programs in Pennsylvania’s career clusters.
- **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.
- **SkillUp** - Pennsylvania procured a virtual learning platform during the pandemic that can be used at no cost by all citizens of the state. The platform has over 7,000 courses, to include credential

tracks. The platform is being used by schools, jobseekers and employers to assess and upskill individuals across the Commonwealth.

- **Prioritizing High-Priority Occupation 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 in several industry sectors including Energy; Health; Advance Materials and Diversified Manufacturing; and Agricultural and Food Production.
- **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:** Pennsylvania invests in and promotes the expansion of Registered Apprenticeships and invests in postsecondary education and training in computer science and STEM fields. The Pennsylvania Industry 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. The Growing Registered Apprenticeships and Pre-Apprenticeships initiative seeks to expand Registered Apprenticeships in new industries and occupations and aims to advance individuals along career pathways with secondary and post-secondary schools. Additionally, this initiative is intended to reach underrepresented populations, including women, minorities, individuals with disabilities, veterans, socio-economic disadvantaged individuals, individuals who speak English as a second language, individuals who were previously incarcerated, or individuals experiencing multiple barriers to employment. Through the Growing Registered Apprenticeship and Pre-apprenticeships funding, the hope is to make funding available for intermediaries to support the statewide Apprenticeship Ambassador Network through creating new or supporting existing local and/or regional apprenticeship ambassador networks designed to grow Registered Apprenticeship and Pre-apprenticeship in local areas. It is a requirement of grantees to partner with PA CareerLink® or One Stop Centers with a concentration on training or supporting Title I staff or other workforce development professionals who act as Ambassadors of Apprenticeship and grow this work.
- **Pennsylvania-Specific Registered Apprenticeship and Pre-Apprenticeship Knowledge Product Creation:** The ATO is making substantial progress developing several knowledge products aimed at making it easier for potential sponsors to develop and register apprenticeship and pre-apprenticeship programs as well as see the benefits of the framework and speak to the Pennsylvania-specific guidelines and processes. Knowledge products completed include but are not limited to registration guides for apprenticeship and pre-apprenticeship aimed at helping potential sponsors gain an understanding of what is required to develop and register a program

as well as a quick reference flow chart. Templates and examples were created for Job Books and Work Processes, and a series of 1-pagers were developed to help employers and job seekers better understand the components and benefits of RA & Pre-RA, and how to build and fund new programs.

- **PA Apprenticeship and Training Office Webpage and Digital Footprint Enhancement:** Two new apprenticeship websites were launched making it easier for employers and jobseekers to access resources specific to building or entering Registered Apprenticeships. The main site, housed within the PA CareerLink® One-Stop portal, provides an overview of the ATO, and has different sections aimed at providing relevant information and resources to employers/sponsors, job-seekers, and workforce professionals interested in apprenticeship and pre-apprenticeship. All of the ATO's newly created registration paperwork and guides, informational 1-pagers, templates and examples can be downloaded from the site, accessible at: <https://www.pacareerlink.pa.gov/jponline/Common/Apprenticeships>. The ATO's 'homepage', housed within PA Labor & Industry's portal, includes information on the ATO, information on the PA Apprenticeship and Training Council (PATC) (including Meeting Agendas and Notes), and links to more information on the PA CareerLink® website. It can be accessed at: <https://www.dli.pa.gov/Individuals/Workforce-Development/apprenticeship/Pages/default.aspx>
- **Increased Apprenticeship and Training Office Partnership with Career and Technology Centers Statewide:** The ATO forged a relationship with the Pennsylvania Association of Career & Technical Administrators (PACTA) in hopes of encouraging more Career and Technology Education Centers (CTCs) to invest in the apprenticeship framework concentrating mainly on registering their existing vocational programs as Pre-Apprenticeships where and when appropriate. This push toward aligning CTE programming with the pre-apprenticeship to apprenticeship training model will allow for a direct pathway for participants into a Registered Apprenticeship, potentially allowing for priority consideration or advanced standing, thus fast tracking them through a Registered Apprenticeship program and ability to earn the completion credential as well as other potential industry recognized credentials at an advanced rate.

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.
- **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 can 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.



- **Supporting Business Education Partnership:** L&I provides Business Education Partnership grant opportunities for LWDBs to collaborate with school districts and local businesses and to educate students, parents and guardians about high-priority occupations and in-demand career pathways that are available to students as they enter the workforce. The project proposal will allow LWDBs to foster collaborations among school districts and businesses to create career programs with exposure to different workplace opportunities and knowledge of opportunities in the Commonwealth of Pennsylvania for the purpose of employing individuals in HPOs or PA In-Demand Occupations (PA IDOL) and meeting the workforce needs of businesses. Successful programs will:
  - Connect employers, students, parents, and guardians to share information about career pathways opportunities that lead to family sustaining wages in PA and teach career ready skills
  - Engage businesses to create opportunities for early career exposure and exploration, as well as the development of employability skills through work-based learning experiences, particularly through summer employment and STEM career pathways
  - Develop and implement outreach initiatives to under-represented students, parents, and guardians through innovative practices that promote equity
  - Develop career pathway programming that teaches students career ready skills for [HPOs](#) or [PA IDOL](#)
- **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 childcare 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) program, 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 technical assistance 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.

Engage! is Pennsylvania's Business Retention and Expansion initiative which began in 2018. Engage! prides itself on having experienced Economic Development and Workforce Development professionals listening to a CEO's challenges and opportunities and providing a customized Action Plan which outlines the forthcoming technical assistance. There are a wide variety of resource providers serving as the fiscal agents for the initiative across the Commonwealth.

PREP and Engage! partners continue to use ExecutivePulse, a cloud-based customer relationship management (CRM) software platform, to document and coordinate partner outreach with companies. The workforce development partners use a CRM platform called the Commonwealth Workforce Development System (CWDS). Working with the Department of Labor & Industry, an MOU was created (and continues to be in place) to allow users of both ExecutivePulse and CWDS to see company interactions across the state. This provides immediate information sharing and coordination among all partners and decreases employer fatigue (many partners wanting to meet with the same businesses and rehashing the same issues). The partners using both systems include the Business Services Teams, Office of Vocational Rehabilitation, economic development organizations, Small Business Development Centers (SBDC), Industrial Resource Centers (IRC) and various Chambers of Commerce involved with PREP and Engage!

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. All of the PREP regions have the workforce development partner and also WEDnet as their boots on the ground, sometimes attending joint visits to companies to tackle workforce and economic development opportunities at the same time.

In 2021, DCED changed the name of the Business Financing deputate to Business Financing and Workforce Development to reflect the importance of the departments many efforts to support and maintain a strong workforce in Pennsylvania. 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 Manufacturing PA Training-to-Career, Foundations in Industry Training (FIT), 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.

Foundations in Industry Training (FIT): The FIT 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 since 1999 and continues to provide qualified companies with incumbent work training. Since the inception of the program, DCED has invested more than \$283 million in training reaching 23,482 Pennsylvania businesses and 1,328,438 employees. During the 2022-23 fiscal year, the WEDnet program invested over \$10,000,000 in training, assisted 706 companies, and trained 23,842 employees. Fifty-seven percent of these companies were "small" (under 100 employees) and small companies received 37% of the total training dollars invested.

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 Pennsylvania Workforce Development Board (WDB), ensuring economic development strategies align with workforce development strategies. DCED serves on four goal groups for the State Combined Plan. Those goal groups include Apprenticeship and Career and Technical Education, Industry Partnership and Employer Engagement, Barrier Remediation, and Worker Shortages in Critical Industries. The department is also serving on the Manufacturing Sector Sub-Committee.

DCED continues to support the Industry Partnership Program, administered by the Department of Labor & Industry. DCED works collaboratively on the promotion and technical assistance to the industry partnerships across the Commonwealth, as well as participates on monthly community of practice calls. Some industries these partnerships represent are Manufacturing; Healthcare; Warehousing/Logistics; IT; Hospitality/Leisure; 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.

The Commonwealth Workforce Transformation Program (CWTP) was created by an executive order in July of 2023 to invest up to \$400 million to expand Pennsylvania's workforce, create opportunity, accelerate infrastructure projects, and grow the economy by providing on-the-job training to new employees, as it relates to the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction

Act (IRA). The IJA of 2021 and IRA of 2022, provide funding for states to train and build strong workforces in critical industries related to energy efficiency, infrastructure, and economic development. These initiatives have the goals of growing the economy, enhancing our competitiveness, creating good jobs accessible to all communities, and making our economy more sustainable, resilient, and just. The CWTP promotes workplace equity and economic development by encouraging new on-the-job training programs, supporting apprenticeship and other established programs, bolstering the workforce in IRA and IJA industries, promoting hiring from underserved communities including the unemployed and underemployed, the formerly incarcerated, and new entrants into the workforce, and rewarding those who maintain the highest workplace standards.

DCED administers the weatherization program for Pennsylvania and houses the Pennsylvania Broadband Development Authority (PBDA), both of which are impacted by the federal funding. PBDA has identified 12 high priority occupations that will be impacted by IJA funding. There have also been 12 occupations identified for the weatherization industry that are needed.

In conjunction with several different statewide strategies and plans being developed at the state level, DCED is currently assisting in the creation of a statewide economic development strategy. Workforce development will have a prominent role within the strategy and be a common theme throughout.

In July of 2023, Governor Josh Shapiro announced his plans for the Commonwealth Workforce Transformation Program (CWTP). CWTP intends to make available a total of up to approximately \$400,000 in grant funding, up to \$40,000 per participant per project, to Eligible Organizations that make investments in workforce development in critical industries in Pennsylvania. This grant opportunity was created to promote workplace equity and economic development by:

- Encouraging the creation and supporting the expansion of evidence-based on-the-job training (OJT) programs, such as pre-apprenticeship programs that matriculate to registered apprenticeship programs, registered apprenticeship programs, and sector-based labor management partnership training programs,
- Helping people facing systemic barriers to employment participate and thrive in training and employment by providing supportive services and direct cash assistance,
- Strengthening and expanding the workforce in Inflation Reduction Act (IRA) and Infrastructure Investment and Jobs Act (IJA) industries,
- Promoting the hiring of workers from underserved communities, including the unemployed and underemployed, the citizens returning from incarceration, single-parent households, residents of extreme-need and high-need communities, youth and young adults, and new entrants into the workforce, and
- Promoting high-road employment by rewarding Eligible Organizations that maintain the highest workplace standards, including in the areas of contractor integrity and responsibility, prevailing wage, wage payment, health and safety, equal employment opportunity, and other workplace laws and practices.

**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. (for example 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.

Pennsylvania continues to develop and expand functionality in CWDS. In addition to the Digital Intake effort, we have integrated Apprenticeship and Training Office activities into CWDS, Created a portal for local board monitoring that will give the Oversight Services and Fiscal units a better snapshot of Local Board compliance and fiscal stability. The new portal will streamline the monitoring process for local boards.

We have integrated TANF Youth programs into CWDS to better track expenditures and outcomes. Future enhancements include bringing pre-apprenticeship programs into the system to further solidify the collaboration and integration of Apprenticeship and Training Office activities and Title I Programs.

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.

The Commonwealth will implement a PA CareerLink® app that will allow customers to easily register, search for jobs and communicate with their career advisors.

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 - including TAA, RESEA, and Registered Apprenticeship Grant activity - 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 Center for Workforce Information and Analysis (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 (eCIS). eCIS 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. Co-enrollment 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;
- Local Workforce Delivery System - Memorandum of Understanding policy, which addresses how the local area one-stop delivery system is funded by partners;
- PA CareerLink® System Operator policy, which addresses the coordination of one-stop system services;
- Co-Enrollment policy, which addresses the need to enroll customers currently enrolled in a one-stop system program into a WIOA Title I program;
- Priority of Service policy, which establishes the implementation of priority of service for WIOA Title I Adult programs customers;
- 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 Pennsylvania, the state published a Policy on Policies (July 28, 2023) that brings 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.

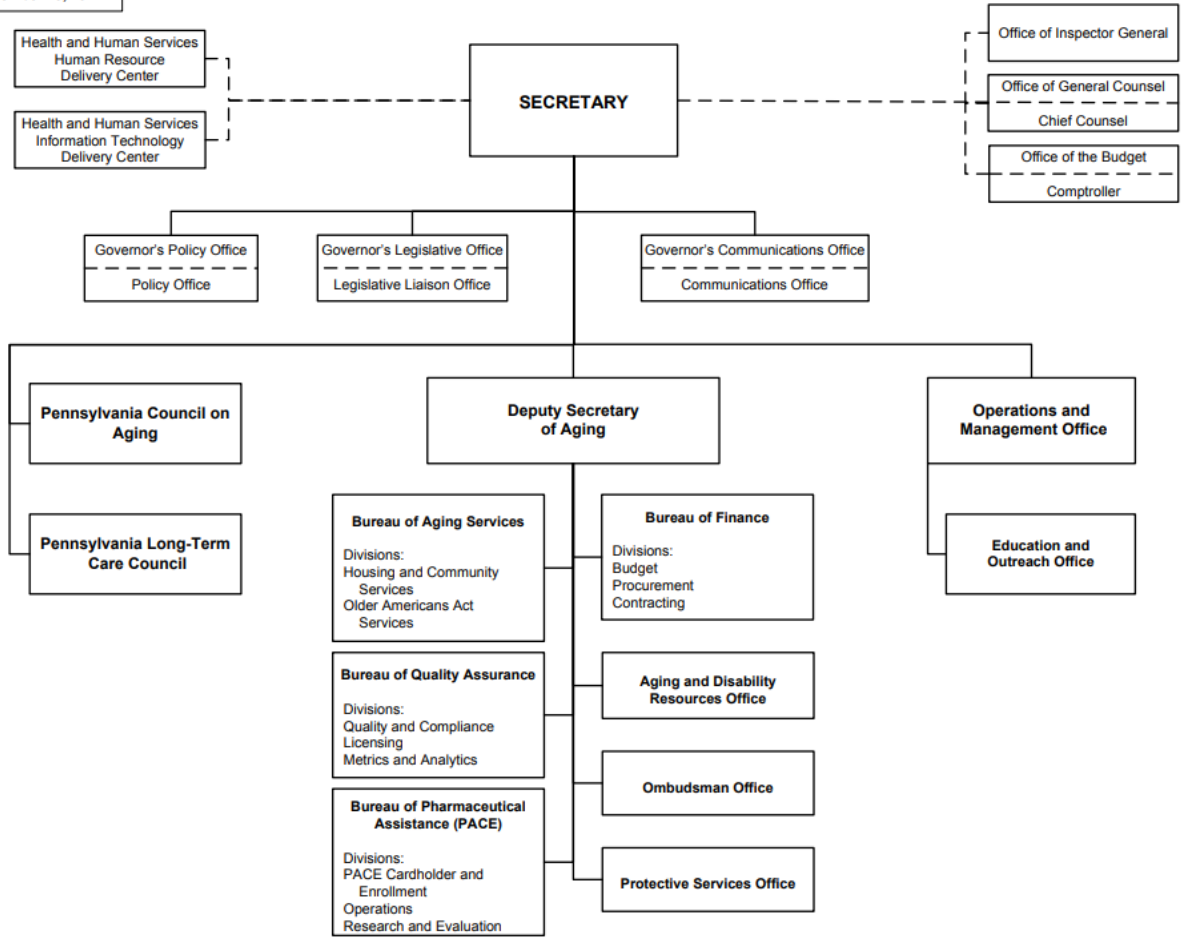
### *(3) State Program and State Board Overview.*

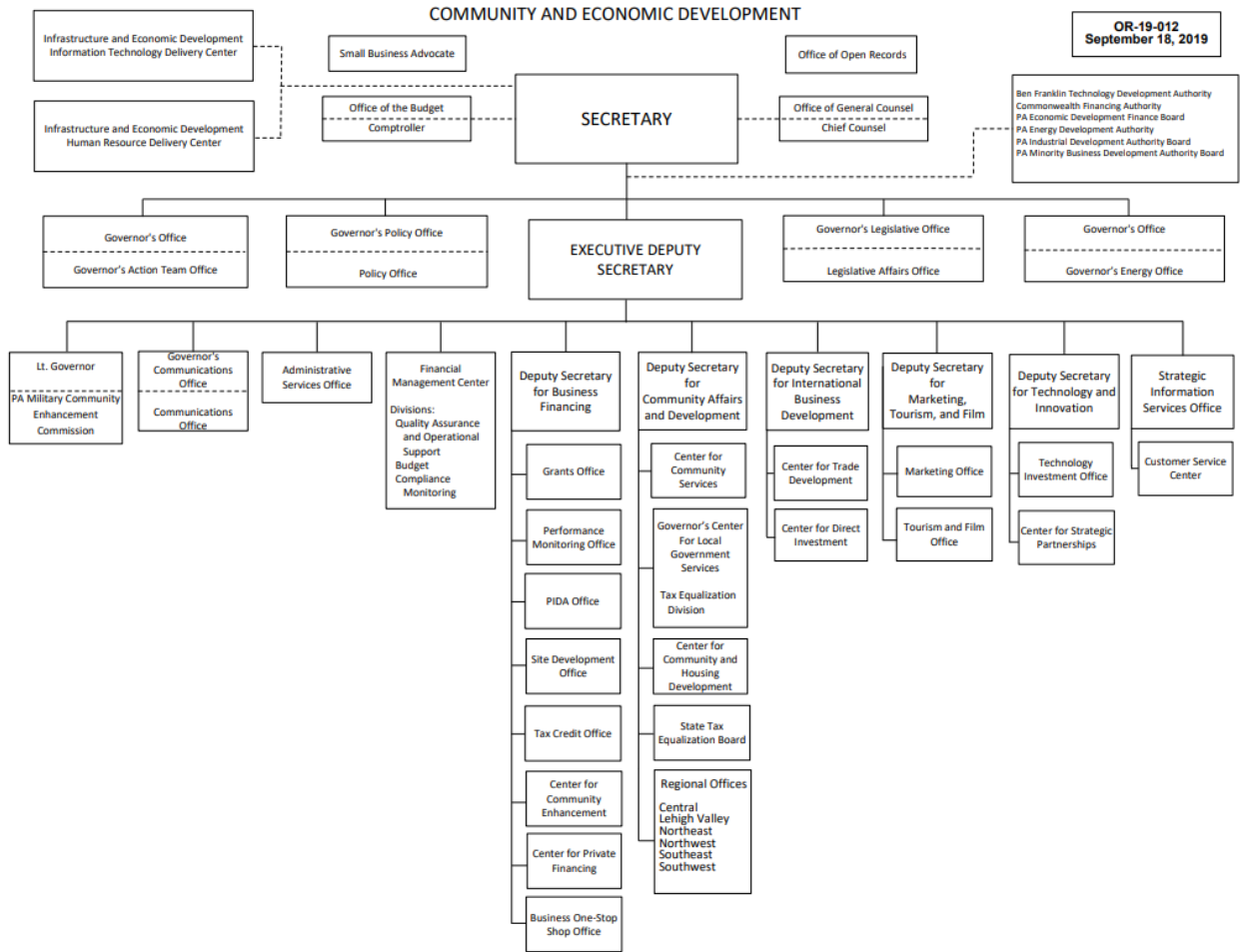
*(A) State Agency Organization. Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.*

The operation of the workforce development system is a shared responsibility among the Commonwealth, Local Workforce Development Boards, 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 and Economic Development, and Human Services. Organizational charts for each of these agencies are provided below.

OR-17-008  
December 19, 2017

### DEPARTMENT OF AGING



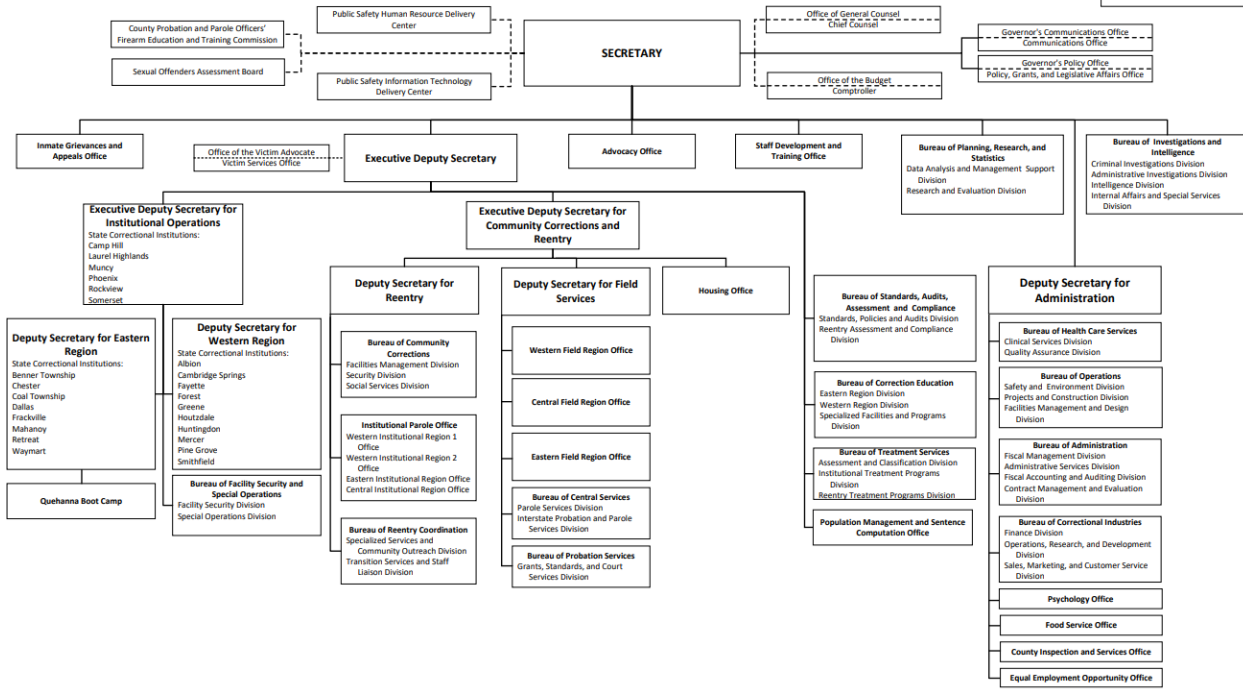


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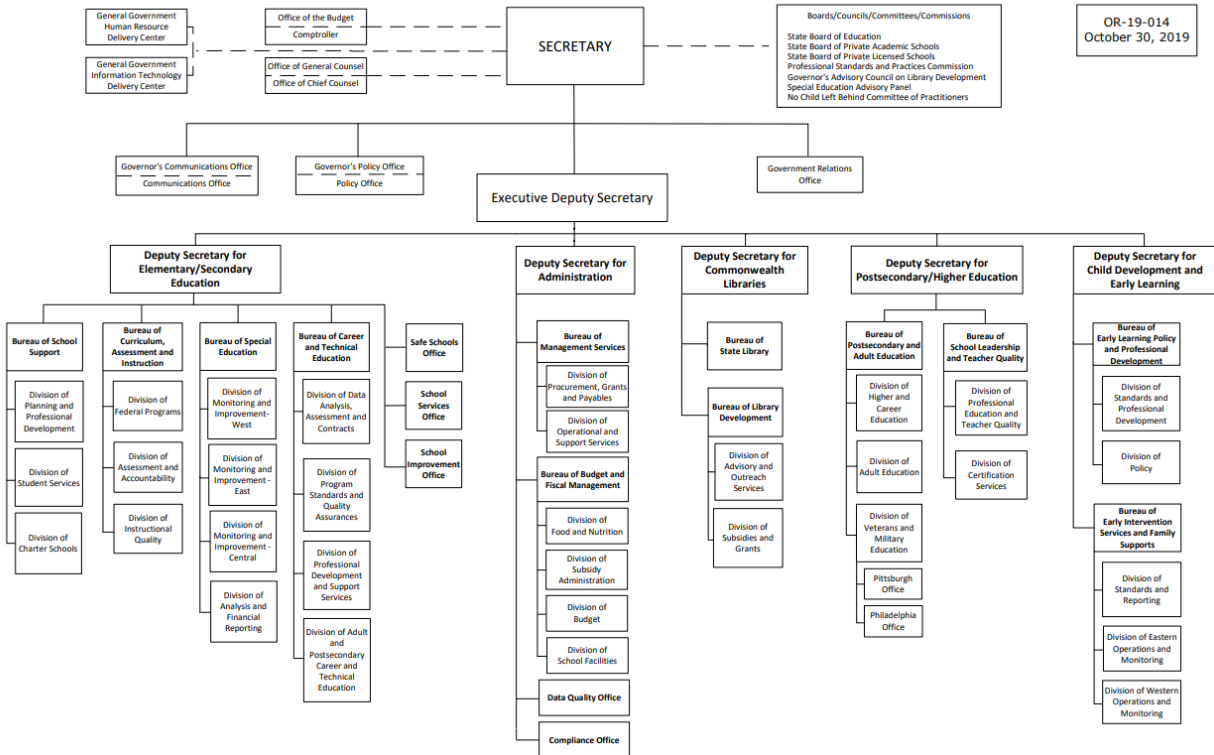
PENNSYLVANIA DEPARTMENT OF CORRECTIONS

OR-19-001  
February 5, 2019



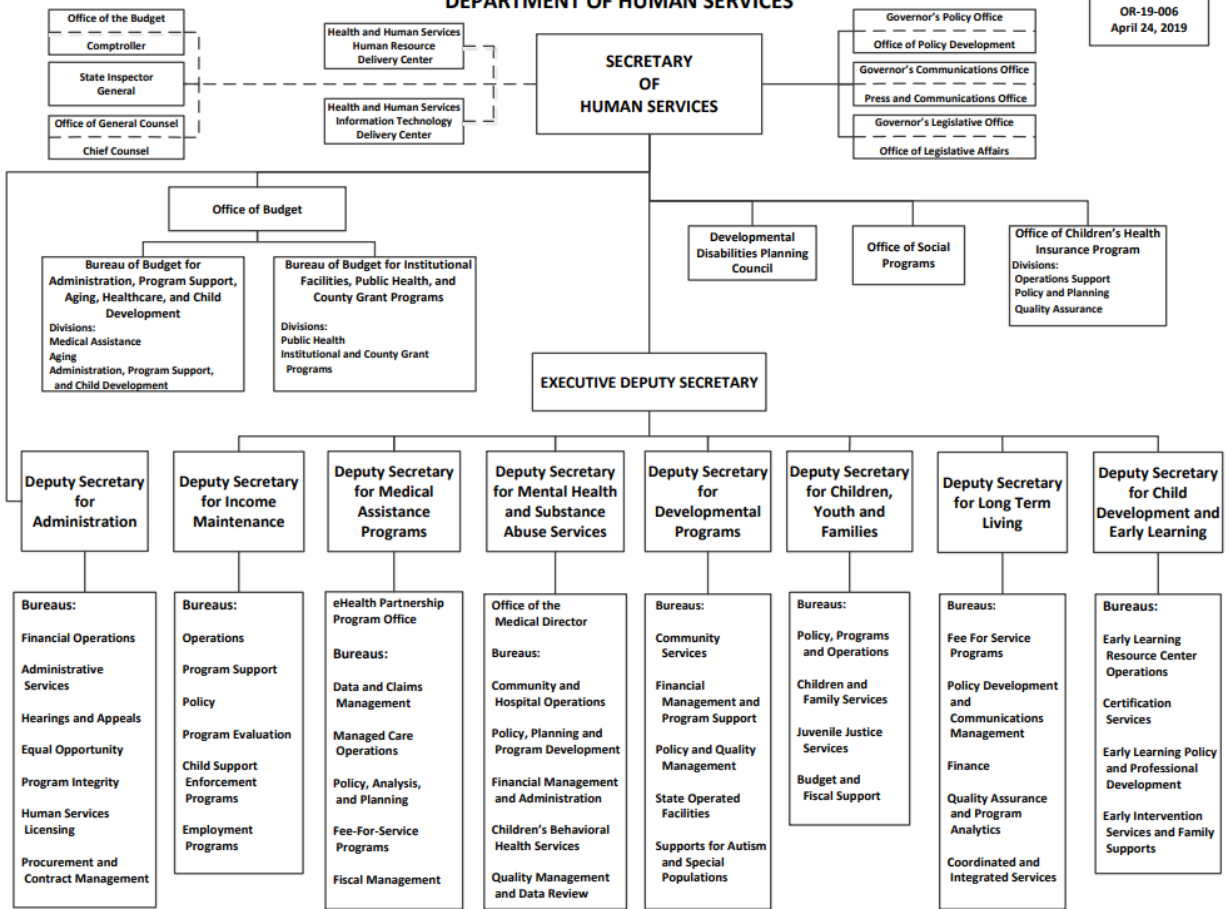
DEPARTMENT OF EDUCATION

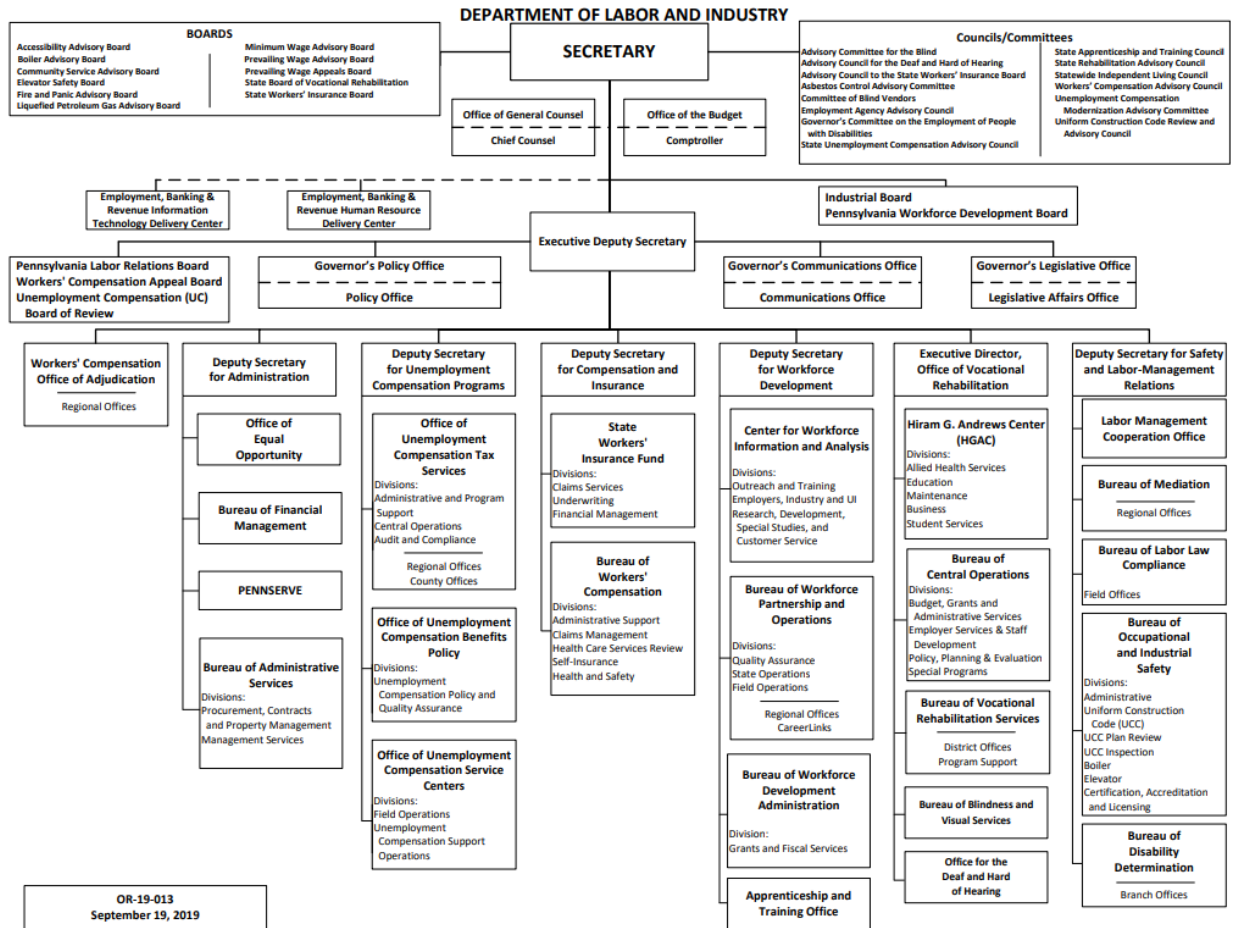
OR-19-014  
October 30, 2019



**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.

Name	Title	Organization	Membership Category
Terry Wiltrot, Chair	President; VP of Operations	Washington Health System Greene;	Terry Wiltrot, Chair
Josh Shapiro	Governor	Commonwealth of Pennsylvania	Governor
Valerie A. Arkoosh, MD, MPH	Secretary	Pennsylvania Department of Human Services	State Official
Robert S. Bair	President	Pennsylvania State Building Trades	Labor/CBO/Youth/Ed
Camera Bartolotta	Senator	Pennsylvania State Senate	General Assembly
Brian Campbell	Owner	Brian Campbell Farms	Business
Debra L. Caplan, MPA	Executive in Residence	The Forbes Funds	Business
Amanda M. Cappelletti	Senator	Pennsylvania State Senate	General Assembly
Morgan Cephas	Representative	Pennsylvania House of Representatives	General Assembly
Don Cunningham	President & CEO	Lehigh Valley Economic Development Corporation	Labor/CBO/Youth/Ed

Angela Ferritto	President	Pennsylvania AFL-CIO	Labor/CBO/Youth/Ed
Chekemma J. Fulmore-Townsend, MSW	President	Hamilton Family Charitable Trust	Labor/CBO/Youth/Ed
Brian Funkhouser	CEO	Buchart Horn Inc.	Business
Justin F. Genzlinger	CEO	Settlers Hospitality	Business
Kait Gillis	Owner	Nour Coffee Shop	Business
Nicholas Gilson	CEO	Gilson Snow, Inc.	Business
Bernie Hall	District 10 Director	United Steelworkers	Labor/CBO/Youth/Ed
James N. Harper, Jr.	Business Manager	Laborers' Local Union 413	Labor/CBO/Youth/Ed
Dr. Laurel R. Harry	Secretary	Pennsylvania Department of Corrections	State Official
Bob Harvie	County Commissioner	Bucks County	Local Elected Official
Akbar Hossain	Secretary of Policy and Planning	Office of Governor Josh Shapiro	State Official
Ryan Hyde	Executive Director	Office of Vocational Rehabilitation	State Official
Gerardo Interiano	VP of Government Relations and Public Affairs	Aurora	Business
Timothy James	Engineering Manager	Google	Business
Philip Jaurigue	Founder	Sabre Systems, Inc.	Business
Jason Kavulich	Secretary	Pennsylvania Department of Aging	State Official
Darrin Kelly	President	Allegheny-Fayette Labor Council	Labor/CBO/Youth/Ed
Carniesha Kwashie	Senior Manager, Workforce Development	PECO Energy Company	Business
Marguerite A. Kline, SHRM-CP, PHR	Human Resource Manager	County of Berks- Berks Heim Nursing and Rehabilitation	Business
Dan LaVallee	Senior Director	UPMC Center for Social Impact	Business
Andrea MacArthur	Vice President, Talent	Erie Insurance Group	Business
Ryan E. Mackenzie	Representative	Pennsylvania House of Representatives	General Assembly
Malik Majeed	President, CEO, and General Counsel	PRWT Services, Inc.	Business
Karen Masino	Master Electrician and Mentor Recruiter	Women in Nontraditional Careers	Labor/CBO/Youth/Ed
Dr. Khalid N. Mumin	Secretary	Pennsylvania Department of Education	State Official
Dennis J. Pagliotti	President & Business Manager	Bricklayers & Allied Craftworkers Local Union No. 1 PA/DE	Labor/CBO/Youth/Ed
Mark E. Pasquerilla	Chairman	Pasquerilla Enterprises	Business
Russell Redding	Secretary	Pennsylvania Department of Agriculture	State Official
Gregg Riefenstahl	Staffing Director - Operations	Penske Transportation Solutions	Business
Roy Rosin	Chief Innovation Officer	Penn Medicine	Business
Mike Shirk	CEO	The High Companies	Business
Rick Siger	Secretary	Pennsylvania Department of Community and Economic Development	State Official
John J.	"Ski" Sygielski President	HACC, Central Pennsylvania's Community College	Labor/CBO/Youth/Ed
Mark Thaler	CEO	The Organic Snack Company	Business
Vince Tutino	President	The Lindy Group Inc.	Business
Jennifer Wakeman, CECD	Executive Director	DRIVE	Labor/CBO/Youth/Ed
Nancy A. Walker	Secretary	Pennsylvania Department of Labor and Industry	State Official
Joseph P. Welsh, Esq.	Government Affairs	Rhoads Industries, Inc.	Business

F. Michael Wojewodka, Jr.	President	MRA Group	Business
Matthew W. Yarnell	President	SEIU Healthcare Pennsylvania	Labor/CBO/Youth/Ed
Shea Zwerver	Workforce Development & Public Affairs Manager	Flagger Force	Business

*(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 Shapiro’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 continue to have 12 standing committees focusing on the Governor’s goals. These committees include: (1) Apprenticeship and Career & Technical Education, (2) Industry Partnership & Employer Engagement, (3) Youth, (4) Continuous Improvement of the PA CareerLink® System, (5) Barrier Remediation, (6) Reentry, (7) Workforce Supports for Persons with Disabilities, and industry specific challenges around workforce for each of the following industries: (8) Education, (9) Agriculture, (10) Healthcare, (11) Construction, and (12) Manufacturing. 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.

*(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 PA Department of Labor & Industry 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 and III. Outcomes will be compared to negotiated levels of performance for each measure for the state and each LWDA to determine progress towards negotiated goals. Summary progress reports will be distributed to program areas, as well as local workforce development areas, to aid in program management. In addition, participant-specific reports that provide the pool of people included in the summary progress reports will be distributed to LWDA’s for the purpose of conducting independent analysis of the individual records. 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 Pennsylvania Workforce Development Board has established a standing committee to review recommendations for Performance and Accountability standards and measures.

The PA Department of Education (PDE) Division of Adult Education 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. 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 2021-2024 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 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 periodically 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.

Career Advisors within the 62 Pennsylvania CareerLink® offices provide services to job seekers through a variety of activities aimed at helping them find and/or retain employment leading to both family and life-

sustaining wages. Pennsylvania's assessment strategy rests on the premise that, in order to provide better service to our customers, we must invest in the professional development of our Career Advisors. The initial step of that process was to assess the skills of the Career Advisors employed by the Commonwealth. This examined the ability of 1,400 Career Advisors to respond to both the present and emerging needs of PA job seekers.

According to L&I staff, three conditions have become increasingly important in our current operations:

- Job seeker opportunities in some industries have been severely impacted by COVID 19; there is an increased need to upskill or reskill to enter or reenter the job market.
- The broad spectrum of the technological capability to utilize an increasingly digital marketplace are significant barriers.
- Post pandemic, many Pennsylvania jobseekers did not return to the workforce. L&I is working to uncover the reason that jobseekers have not reengaged in an effort to provide the proper supports to these individuals.

A vendor was chosen to identify what skills PA CareerLink(r) staff needed to serve our current customers. The report answered the following questions:

1. What Knowledge, Skills and Abilities do PA CareerLink® Career Advisors currently possess?
2. What core essential skills are needed for Career Advisors when considering the current context for the work environment, COVID-19, technology access, and racial, equity, and inclusion top of mind for most customers and employers?
3. What skills do Career Advisors, and their organizations as well, need to become known and seen as proactive?
4. What training will be needed to close the gaps or to reinforce strengths?

After receiving the final report, the Pennsylvania Department of Labor & Industry has been developing and implementing a training plan to address the recommendations contained in the report.

#### SkillUp™ PA

Pennsylvania procured a virtual learning platform during the pandemic that can be used at no cost by all citizens of the state. The platform has over 7,000 courses, to include credential tracks. The platform is being used by schools, jobseekers and employers to assess and upskill individuals across the Commonwealth.

L&I has incorporated the virtual courses into a Professional Development Day for agency staff members to upskill our staff and ensure our workforce has the knowledge, skills and abilities to successfully engage with jobseekers and employers through PA CareerLink(r).

#### CWDS Foundational Training

L&I procured a vendor to provide a comprehensive training for all WIOA title I and Title III staff to ensure all staff had the knowledge needed to properly record the programmatic and service information within the system of record for Pennsylvania. The training provided a live, virtual led training; a Journey Map for staff members working in certain portions of the system; web based trainings and Reference Guides.

L&I continues to work on it's plan to provide essential skills training to all PA CareerLink(r) staff to ensure all jobseekers and employers receive the services they require to be successful.



PDE's 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.

During the preceding two-year period, adult education and family literacy programs saw a 41 percent increase in participants from a low of 10,534 in 2020-21 to 14,893 in 2022-23. Measurable skill gains and employment outcomes were steady over that period. As the pandemic eased, many participants returned to in-person instruction and support services. However, while the number of participants participating in distance education decreased from 2020-21, it remained much higher than prior to 2020-21. To provide the flexibility necessary for participation in adult education activities, adult education and family literacy programs maintained orientation, intake, and assessment procedures to allow students to participate either remotely or in person and continued to provide instruction and student support services using a range of technology-enhanced and in-person activities.

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. In addition to desk monitoring, division staff completed in-depth multi-day monitoring reviews of a subset of the agencies; these reviews were conducted using a combination of virtual and in-person activities. Based on the information learned through these monitoring activities, the Division of Adult Education has implemented additional professional development and technical assistance opportunities for local program staff.

OVR, under Title IV, utilizes CWDS to capture information related to performance indicators for the VR program and to assess effectiveness of program activity on these indicators. The Systems and Evaluations Division within OVR regularly monitors this activity to compare expected levels of performance and negotiated levels of performance. All VR performance indicators have been trending upward over the past two-year period.

*(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 will evaluate the workforce system based on its strategic plan and for the purpose of evaluating the return on investment and best practices of its programs. Here are some examples of our current evaluations:



Digital Literacy Grant Round 1 - 3rd Party Evaluation: In the previous program year, the Department of Labor & Industry (L&I) had brought on a third-party vendor to evaluate the effectiveness, impact, return on investment, and overall success of the Digital Literacy and Workforce Development. The evaluator visited 31 grantee sites to examine each grantee's quality of curriculum, best practices, challenges, technical assistance needs, successes, and other information requested by Bureau of Workforce Development Administration. In early 2023, L&I received the evaluator's final report. We served 1,774 unique individuals across Pennsylvania under this initiative and provided 20,342 hours of digital literacy training for a total of 2,394 completed digital literacy trainings. The grant program had very high participant satisfaction: 97% of participants said they met their overall learning goals, 99% stated that their digital literacy skills improved as a result of training, 95% of participants said the content of the trainings were well organized and easy to follow, and 97% of participants reported that the digital literacy training met their expectations. We also asked sites to pick a focus demographic for the grant which included female or non-binary individuals, rural citizens, individuals without post-secondary diploma or GED, English language learners, Single parents/pregnant individuals, non-residents/immigrants, returning citizens, and veterans.

There were two main requests for improvement that the state will incorporate in future initiatives. The first is to include supportive services for participants, especially transportation and childcare, and to add an extra allowable training that would be individual- or site-specific.

Digital Literacy Grant Round 2 - 3rd Party Evaluation : L&I developed a statement of work (SOW) seeking services from a vendor with knowledge and experience in research and evaluation methodologies and WIOA workforce development systems to evaluate the efficacy and impact of the Digital Literacy and Workforce Development Grant. A vendor was selected in August 2022 and began working as the evaluator in September 2022. The evaluator began right away, by participating on the monthly calls with the grantees and utilizing 30-45 minutes each month to get to know the grantees and understand each of their projects and how it will fulfill the goals of the Digital Literacy Round 2 grant. The evaluator started collecting the data that was submitted to BWDA and began to compile it into a monthly report to update the grants' progress and to share with BWDA any challenges that the grantees may be encountering along the way. Site visits began in March 2023 and all 20 grantees were visited by the evaluator. Each site visit lasted anywhere from 2 to 4 hours, depending on the size of the organization and the evaluator met with all key employees from instructors to fiscal operations to project managers. A final report was presented to BWDA in September 2023 to share and discuss performance outcomes, challenges incurred and overall status of the grant utilization for each grantee. It was incredible to learn that this grant served 2,533 individuals. Collectively, the cohort served only 15 of Pennsylvania's 67 counties (22 percent), but these counties together represent close to half of the state's population (49 percent). The final report also contained recommendations for future Digital Literacy and Workforce Development Grants.

#### Grant Performance Evaluation

In collaboration with the Center for Workforce Information and Analysis (CWIA), the Apprenticeship Training Office (ATO), and the PA Workforce Development Board (WDB), the Grants Unit in BWDA contracted a vendor who will provide full-time staff to:

- Analyze existing grants and new Notices of Grant Availability (NGAs) and recommend improvements to performance monitoring strategies
- Create data collection tools and performance report dashboards

- Evaluate incoming grant performance data and produce summary documents, reports, dashboards, and infographics for department leadership and other stakeholders as requested

In addition, L&I has been working with the Harvard Kennedy School Government Performance Lab to build on efforts to improve grantmaking processes, including principles of Active Grant Management. This partnership has been extended through June 2024.

**RESEA.** Pennsylvania conducted its first programmatic evaluation to begin collecting data on the efficacy of the program. In the upcoming year, the program will be evaluated on its virtual and in person program to determine what changes may be required to most successfully prepare UI claimants to reenter the workforce.

**Business Services.** Pennsylvania conducted an evaluation of the delivery of services to the many employing in the Commonwealth's workforce delivery system.

Initiated by the Pennsylvania Keystone Command Center, L&I and the Department of Community and Economic Development (DCED) are evaluating whether the workforce and economic development (WED) system is effectively serving businesses and if the system infrastructure is sufficient to support service delivery. The evaluation concluded on March 30, 2023.

The evaluation included components for a research review of best and promising practices, qualitative study of business services in the Commonwealth, and a quantitative study of business services data that includes a five-year forecast of industry growth trends.

The evaluation identified small and medium employers as the prime target for engagement. It outlined the need for consistent statewide communication and training for employers, consistent engagement of all partners and community agents that interact with employers across the state. The Commonwealth is currently working on initiatives to move services to employers forward in all areas.

**Mobile Concepts.** Shortly after the implementation of WIOA, several LWDA's sought to make PA CareerLink® services more accessible, especially in rural areas where transportation to the established "brick and mortar" sites is unavailable. The Northwest LWDA was the first to pilot mobile service delivery. It posited that by implementing a mobile service delivery strategy, it could rely less on static sites and by doing so, save money allocated to building costs and put it back into service delivery. The LWDB also expected to serve more participants, leading to better performance.

To determine the effectiveness of this service strategy, in program year 2019, L&I's Bureau of Workforce Development Administration contracted with Jobs for the Future (JFF) to conduct an independent evaluation of the Northwest LWDA's service delivery system, including evaluating the difference in performance between its current mobile service delivery strategy versus its pre-mobile service performance. This evaluation was meant to determine both the successes and challenges Northwest encountered being the first to attempt the mobile service concept in the hope to share promising practices with the Commonwealth's other LWDA's.

The JFF evaluation was cut short because of the global pandemic; however, L&I staff used the results of the work that had been completed to develop a new evaluation of this area now that one-stop centers in this local area have reopened. This new evaluation will serve three (3) primary purposes: 1) determine both the successes and challenges Northwest encountered being the first to attempt the mobile service concept; 2) serve as a plan by which other local areas will be evaluated contemplating similar activities; and 3) share aspects of the effective methodologies used to support similar models in other areas.

*(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),*

*(ii) Adult and training activities in accordance with WIOA section 133(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 the methods and factors the eligible agency will use to distribute title II funds.*
- (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.*

The PDE Division of Adult Education conducts full and open competitions to distribute Title II funds. The competition for Section 243 funds is held separately from the competition for Section 231 and 225 funds. The next competition for Section 243 funds will be held in spring 2026. The next competition for Section 231 and 225 funds will be held in spring 2027.

For the competition for Section 231 and 225 funds, 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. Applicants for funds may request up to the maximum amount allocated for the proposed service area.

For the Section 243 grant competition, funds are not allocated to specific areas. Rather, applicants must provide evidence of the need and support for the proposed Section 243 program. Priority is given through the grant scoring process to applications that demonstrate a thorough and detailed plan for Section 243 activities that align with local needs, meet the minimum requirements established by PDE, and meet the purposes of Section 243.

Grants funds will be awarded through multi-year contracts with annual funding notifications contingent on the availability of federal 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 federal awards. When additional funds are available, the Division of Adult Education will award increased funds to grantees that have met enrollment and outcomes criteria and present evidence of increased need in the service area.

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 on the Division of Adult Education Grant Competitions webpage, which is accessible to the public. The division creates a grant competition information video with closed captions, which is available to the public on YouTube. Policies established by PDE's Communications Office ensure the accessibility of all grant-related documents that are posted to the website. The Division of Adult Education conducts its grant competitions through its eGrants system. Through this system all eligible providers have access to the same grant application for each project being competed. A PDF of the content of the grant, including the content of Help Buttons, is posted on the Division of Adult Education Grant Competitions webpage, so that all interested parties can review it prior to accessing eGrants.

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. For Section 231 and 225 funds, 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. For Section 243 grants, PDE will award funds to applications with a sufficient score from highest scoring to lowest scoring until all available funds are awarded or all acceptable applications are funded.

*(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 provides services to all types of people with disabilities.

#### *(6) Program Data*

*(A) Data Alignment and Integration. Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date. Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.*

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

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. The CWDS also tracks and record services, activities, and outcomes for the Trade, RESEA and JVSG programs. In addition, the CWDS is designed to integrate the recording of services for Titles I, III and Trade 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.

In an effort to integrate data across agencies, the Commonwealth has executed a 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 & Industry and Human Services have also executed a data sharing agreement that will allow for the identification of workforce program participants who have also received services available through the Pennsylvania Department of Human Services. The data sharing agreement is currently being operationalized and will result in a more efficient path to analyze the level of co-enrollment between the two departments.

The Pennsylvania Departments of Labor & 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 hired a project manager for and is in the process of building a Statewide Longitudinal Data system that will link data across systems of record in several areas including early learning, K-12 education, postsecondary education, and workforce development, and ideally to additional data sets and systems that provide detailed demographic data on individuals in these programs, and to wage record data. This system will allow for evaluation of program effectiveness at a level not previously achievable in Pennsylvania and will provide data to support policy development and funding decisions.

*(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 prioritized using technology to streamline intake and service delivery to WIOA program participants. Since then, the Commonwealth workforce partners (Workforce, Office of Vocational Rehabilitation, and Department of Human Services), the Commonwealth's Office of Equal Opportunity, and local boards have worked diligently in the development and implementation of the PA CareerLink® Digital Intake Form.

In addition to streamlining processes, the PA CareerLink® Digital Intake Form aims to provide a consistent, targeted way to gather pertinent customer demographic and employment barrier information for PA CareerLink® staff to utilize so that customers across the Commonwealth can have a more practical, productive, and uniform high-quality experience. It is anticipated that collecting and tracking this data will foster stronger relationships with our additional partners and lead to additional referrals. This initiative rolled out to pilot offices on June 12, 2023, with a phased rollout approach for subsequent offices that started on August 28 and is slated to be completed by December 22, 2023.

The Commonwealth is committed to the continuous improvement of our systems and services and as such, we will continue to collect information on potential enhancements to the form functionalities and workflow to ensure accessibility, efficiency, customer satisfaction, and high-value services.

*(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 (WDB) is focused on developing policy recommendations to assist the governor in aligning technology and data systems across one-stop partner programs. The Pennsylvania Workforce Development Board works closely with the Pennsylvania Longitudinal Data System office to link and analyze data across multiple systems and program areas to better evaluate program effectiveness at serving customers and participants.

The WDB continues to research 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 (CWIA) are responsible for coordinating production of the reports for Titles I and III, while staff from the Office of Vocational Rehabilitation (OVR) 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.

OVR is working closely with the Office of Administration, Office of Information Technology to correct ongoing issues with CWDS reporting to ensure that data is being captured correctly, thus reporting accurately the RSA-911. Progress is being reported in multiple data elements being tracked and OVR will continue to participate in ongoing quality assurance testing. Specific examples include the validation and removal of duplicate and/or inaccurate Unique Identifiers for Students with Disabilities receiving Pre-employment Transition Services. All inaccuracies are being investigated and prompt resolutions are being implemented.

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 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 the system and develop more robust postsecondary data.

PDE, Division of Adult Education conducts data matches to determine post-exit outcomes for participants, including employment, credential completion, and postsecondary enrollment outcomes. Data matches are conducted with L&I UC, National Student Clearinghouse, and HSE credential records.

As part of the key performance indicators PA OVR reviews data on the sustained employment outcomes of individuals with disabilities at two and four quarters after exit to determine if customers are remaining employed post exit. This information is shared with staff and reviewed statewide and on an individual office level to ensure that staff are providing services that will lead to sustained employment and closing cases appropriately. OVR has also been working with our data team to better understand post-secondary outcomes and align vocational goals with programs and schools that are producing in-demand employment opportunities and that lead to sustained careers for our customers.

The Commonwealth has hired a project manager and established a Governance Board to lead the transition to a true Statewide Longitudinal Data System (SLDS), linking the data elements outlined in the paragraph above into a secure environment, allowing assessment of educational and workforce initiatives over time. As additional data sets are identified over time, they will be incorporated into the SLDS to ensure continuous improvement of the system. Initial projects of the PA LDS include looking at workforce outcomes for Title II participants and evaluating outcomes for reentrants based on their participation status in public support programs such as SNAP and TANF.

*(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.

The eData system used by Title II is located within a web portal called MyPDESuite. MyPDESuite is a web portal that enables users to access various PDE data collection applications. To access MyPDESuite, users must register a Keystone Login username/password and use those credentials to login to MyPDESuite.- Users are granted access to applications within MyPDESuite by a security administrator at their education agency/institution. The security administrator is responsible for adding and removing users on behalf of their agency/institution. The website is SSL certified.

*(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."

In addition to normal priority of service the state also provides Individualized Career Services under the Jobs for Veteran State Grant (JVSG) to eligible veterans, veterans spouses, and caregivers as identified in VPL 03-14, VPL 03-14 Change 1, VPL 03-14 Change 2, and VPL 03-19. These populations include the following:

- A special disabled or disabled veteran, as defined at 38 USC 4211 (1) and (3); Special disabled and disabled veterans are those:
- who are entitled to compensation (or who but for the receipt of military retired pay would be

- entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
- were discharged or released from active duty because of a service-connected disability;
- A homeless veteran, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a));
- A recently separated service member, as defined at 38 USC 4211 (6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined in the Workforce Innovation & Opportunity Act (WIOA) Section 3(38), who is currently incarcerated or who has been released from incarceration;
- A veteran who lacks a high school diploma or equivalent certificate; or
- A low-income veteran, as defined in WIOA Section 3(36)(A)
- A Veteran aged 18-24
- A Vietnam-era Veteran as identified by 38 U.S.C. 4211
- An Eligible Transitioning Service Member, Spouse, or Caregiver as described in VPL 07-14
- Transitioning members of the Armed Forces who have been identified as in need of intensive services (now referred to as Individualized Career Services);
- Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities (MTF) or warrior transition units (WTU); and
- The spouses or other family caregivers of such wounded, ill, or injured members

“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 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 policy 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 individuals who deaf or hard of hearing; 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.

The L&I Office of Equal Opportunity (OEO) is the department’s Limited English Proficiency (LEP) Coordinator. OEO reviews each Local Workforce Development Area (LWDA) annually for compliance with WIOA 188 requirements regarding Limited English Proficiency plans as identified in 29 CFR Part § 38.4 §38.9, §38.40, §38.54. LWDAs must submit their current LEP plan to OEO for review, including documenting changes, updates and LWDB approval. OEO reviews documentation of the following:

- Common languages spoken in the LWDA service area and the availability of required translated documents
- Records including maintaining need for translators in individual files
- Including Babel notices in documents and electronic mediums (websites, applications, emails)
- Staff and provider training on LEP and access to language resources

OEO is a strong advocate for Diversity, Equity, Inclusion, and Accessibility (DEIA) and Affirmative Outreach efforts statewide and in local one-stop delivery systems. OEO staff provides coaching and training to state, local and community agencies on many aspects of these topic areas. This office also provides technical assistance and equal opportunity training that covers DEIA, Affirmative Outreach, and LEP requirements, including providing LEP Plan templates and guidance. The annual OEO LWDA compliance review collects documentation on Affirmative Outreach activities and recognizes best practices. Resources are provided to LWDAs in OEO’s quarterly newsletter and in between updates are distributed when necessary. For example, a recent newsletter included the White House DEIA Executive Order and suggestions for implementing DEIA plans at the local board.

## 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 and partner programs assisted in writing the Combined State Plan.

The Pennsylvania Workforce Development Board held three in-person and one virtual listening sessions during the summer of 2023 on the development of the WIOA Combined State Plan to gather input from stakeholders across the system. Additionally, each of the board's committees 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 and 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.

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 of 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 can be found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

*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 can be found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

*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 administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public;*

**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;*

The purpose of the Financial Management Policy is to provide operational guidance surrounding best fiscal practices to promote and increase fiscal accountability across Pennsylvania's workforce development system. The Financial Management Policy is found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

*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);*

The purpose of the Oversight and Monitoring Policy is to provide operational guidance outlining the procedures for monitoring of the workforce development system, including the Uniform Administrative Requirements. For more information regarding compliance with current federal and state laws, regulations, and guidance, the Financial Management Policy is found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

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

The four PA Management Directives below and the IT Accessibility Statement establish responsibilities for implementing provisions of Title II, Subtitle A of The Americans With Disabilities Act of 1990 (ADA), P.L. 101-336, which strictly prohibits discriminating against persons with disabilities.

- [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](#)

The Financial Management Policy is found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

[Financial Management Policy](#)

*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.*

The Fiscal Management Policy is found on the mail L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

*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;*

The Financial Management Policy is found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

*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);*

As required by the Workforce Innovation and Opportunity Act (WIOA), the purpose of this policy is to provide information regarding the Pennsylvania's one-stop delivery system. The Local Workforce Delivery System - PA CareerLink® Certification and Continuous Improvement policy is found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

*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 or any other criteria as identified by the Secretary of the US Department of Labor 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.*

When providing delivery of program services under WIOA, the central focus is to serve individuals with barriers to employment. The intent of the priority of service law is to ensure access for the most vulnerable populations. The priority of service for veterans and eligible spouses applies across all qualified employment and training programs. The full Workforce System Policy, Priority of Service is found on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

## 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, Chester 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 Local Area Designation Policy on May 11, 2022, 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, they appropriately expended funds and complied with acceptable standards of administration. If a local area has inappropriately expended funds due to willful disregard of the requirements of the provisions involved, gross negligence, or failed to comply with acceptable standards of administration, a formal determination will be generated that indicates this information.

The local area designation appeals process is found within the local area designation process policy and is available on the Pennsylvania Department of Labor & Industry website:

<https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>

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

The local area designation appeals process is found within the local area designation process policy and is available on the Pennsylvania Department of Labor & Industry website:

<https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>

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



Only after both the internal and external remediation processes are exhausted will the state funding mechanism, or SFM, be triggered. As described in 20 CFR Part 678.730, the SFM is only used when there is an impasse related to infrastructure cost funding. WIOA provides that a state mechanism allocation determination may only be appealed if the determination is inconsistent with the requirements of WIOA Sec. 121(h)(2)(E). Pursuant to 20 CFR 678.750 the permissible grounds for an appeal are that the state's determination is inconsistent with:

- the proportionate-share requirements in 20 CFR 678.735(a), or
- the cost-contribution limitations in 20 CFR 678.735(b), or
- the cost-contribution caps in 20 CFR 678.738.

A one-stop required partner shall appeal the SFM determination imposed upon it within twenty-one (21) calendar days, consistent with 20 CFR 678.750. The appeal must be a formal written correspondence and make specific reference to that portion of cash, non-cash, or third-party in-kind contributions which the mechanism requires the one-stop required partner to provide.

To be considered for state review, an appeal must:

- Be addressed to the attention of:  
Pennsylvania Department of Labor & Industry  
Deputy Secretary for Workforce Development  
651 Boas Street, 17th Floor  
Harrisburg, PA 17121
- Or the appellant may email the appeal to the attention of:  
The PA CareerLink® Finance & Budget unit at [RA-LI-PACL-FINOP@pa.gov](mailto:RA-LI-PACL-FINOP@pa.gov);
- Contain a subject line identifying the appellant and designating the letter or email as a formal appeal of the SFM determination;
- Identify the basis for the appeal to include full citations from WIOA or the WIOA Final Rules in Title 29 or Title 34 of the Code of Federal Regulations that support the appeal; and
- The letter or email must be signed and dated by the appellant.

Furthermore, including substantial information supporting the appeal basis within the formal correspondence is recommended.

The state will acknowledge receipt of the appeal within seven calendar days and will ensure all requirements for state review are met. L&I will then submit the appeal, on behalf of the appellant, to the Governor's Policy Office who will return a final determination within forty-five (45) calendar days of receiving the appeal from L&I. Typically, this timeframe will occur between May 16 until June 30; however, the state acknowledges that, in rare circumstances, this timeframe may not always be applicable. Adjustments to these dates may be made as necessary by the Commonwealth, but the forty-five (45) calendar-day determination period will be maintained.

Until the appeals process is completed, the appellant will remain liable for its contributions as originally determined in the SFM. If a one-stop partner's appeal to the state results in a change to the one-stop partner's infrastructure-cost contributions, then the MOU between the LWDB and applicable partner(s) *must* be updated to reflect the final one-stop partner infrastructure-cost contributions.

**Note:** The attached process is content from the Commonwealth's Local Workforce Delivery System - Memorandum of Understanding, or MOU, policy, guidance, and other supporting documents. The infrastructure funding agreement appeals process is found within the MOU guidance. You can find these documents here: <https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>

*(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.*

The Pennsylvania workforce system policies are on the main L&I policy page at [Workforce Policies and Forms \(pa.gov\)](#).

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 for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker and Youth Activities.*

Governor's set-aside funds will generally be used to promote Governor Shapiro's Workforce Expansion Plan with specific emphasis on the six 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 and other grantees/vendors 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 CFR 20 §§ 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. LWDBs 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.

*(C) Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.*

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.

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 proactive approach to planning for and managing economic transitions. At its best, Rapid Response assists 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 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 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 LWDBAs. 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 site tour. SEWN staff have 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 organized at the establishment to develop a preliminary service strategy. RRS 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, Pennsylvania Industry 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 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's Rapid Response Information Guide can be found here:

<https://www.dli.pa.gov/Individuals/Workforce-Development/warn/Pages/Resources.aspx>

*(D) 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 & 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's Rapid Response Information Guide can be found here:

<https://www.dli.pa.gov/Individuals/Workforce-Development/warn/Pages/Resources.aspx>

*(E) 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 (or a group of two workers or more) 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 RR 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 RR 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 RR 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 RR 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 RR 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 evaluate based on WIOA requirements and local priorities to identify what are the pressing training needs for employers. The Local Workforce Development Boards address their work-based training strategy in their local plans which are reviewed and approved by the state. 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 convening of industry partnerships or similar activities, 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.

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

The PA Apprenticeship and Training Office (ATO) works closely with LWDBs and PA CareerLink® offices from across the Commonwealth to build awareness and knowledge around apprenticeships. In addition to regularly presenting Apprenticeship 101 webinars and providing additional resources to workforce staff, the ATO also supports the Registered Apprenticeship Navigator program, an apprenticeship program that trains professionals to develop and manage apprenticeship programs. The program has already trained nearly two dozen LWDB and PA CareerLink® staff. Other PAsmart Ambassador Network grantees are similarly required to partner with PA CareerLink® or One Stop Centers with a concentration on training or supporting Title One staff or other workforce development professionals who act as Ambassadors of Apprenticeship and grow this work. As was seen with the Apprenticeship Building America (ABA) grant opportunities offered to local workforce development boards (LWDBs), the ATO will continue to look for funding opportunities to train and/or support Title One staff or other workforce development professionals who act as Ambassadors of Apprenticeship and support their respective efforts to expand apprenticeship and pre-apprenticeship opportunities among underrepresented populations in their respective regions.

In 2023, the ATO launched a Desk Guide for those working in our PA CareerLink® offices on how to link jobseekers to apprenticeship and workforce funding. The Guide provides PA CareerLink® Staff with the information on how and why to connect jobseeker and employer clients to Registered Apprenticeship, how connecting job seekers with registered apprenticeships programs can help states and local areas meet their targets on the WIOA primary indicators, when to exit a WIOA client positively from the CWDS system even when still participating in a Registered Apprenticeship, and has a section dedicated to business service teams. The document includes information on how you can potentially utilize WIOA and alternate workforce funding to support Registered Apprenticeship (subject to local policy and procedures) and procedures for using the Commonwealth Workforce Development System (CWDS) of record to indicate the use of WIOA dollars to support a client in a Registered Apprenticeship.

To further introduce and support the Desk Guide, the ATO has begun the process of cultivating close relationships with Local Workforce Development Board (LWDB) and PA CareerLink® as they build apprenticeship into their local efforts, plans, and professional development. In Summer of 2023, the ATO has rolled out a comprehensive training on registered apprenticeship and pre-apprenticeship, offered

through a full one-day, onsite, Professional Development Day (PDD). These PDDs are designed to educate workforce staff, including Workforce Development Boards, PA CareerLink® leadership and frontline staff, on strategies to best interact and engage with job seekers, employers and the ATO. The ATO provides guidance on introducing Apprenticeship and Pre-Apprenticeship to engage employers and jobs seekers as well as information on how apprenticeship is one of the most effective strategies for engaging employers and increasing performance outcomes for the public workforce system as apprenticeship programs can help states and local areas meet their targets on the WIOA primary indicators. In 2024, the ATO plans to expand on the introductory of Apprenticeship and Pre-Apprenticeship into the Workforce system by offering refresher Professional Development Days for new staff as well as honing in on specific topic related Apprenticeship and Pre-Apprenticeship information in mini information training session.

The ATO has made substantial progress developing knowledge products aimed at making it easier for workforce development staff to advocate for the apprenticeship model and for potential sponsors to develop and register apprenticeship and pre-apprenticeship programs as well as see the benefits of the framework and speak to the Pennsylvania-specific guidelines and processes. Notably helpful to business service staff, the ATO has developed an *Employer Needs Assessment* to assess an employer's workforce needs, including determining if apprenticeship is a good fit. The form is available on the PA CareerLink® apprenticeship website as well as accessing through the RA DeskGuide for PA CareerLink® Staff.

In addition to the pre-apprenticeship division of the ATO supporting the workforce development outreach, there have been significant strides made in strengthening the relationships between L&I and the Pennsylvania Department of Education (PDE). A long-standing ATO goal has been to further incorporate pre-apprenticeship within the Career & Technical Education (CTE) structure; the most recent initiative that just began is training educators across the Commonwealth as a support to the Career Ready PA Liaisons. Promoting registered apprenticeship and pre-apprenticeship as a valid pathway for students is crucial for educators, as they hold the keys to our future workforce. As the pre-apprenticeship division continues to expand, additional goals will be to further incorporate serving individuals through the pre-apprenticeship model by targeting TANF, SNAP and EARN populations in hopes of preparing them for registered apprenticeship.

In 2022, the Apprenticeship and Training Office (ATO) and L&I was one of 30 initial recipients nationwide who were awarded grant funding through the U.S. Department of Labor's 2022 Apprenticeship Building America (ABA) initiative. The grant, which ends in 2026, allowed the ATO to make \$2.75 million in funding available to build and modernize Pennsylvania's growing network of registered apprenticeship programs by supporting local workforce development boards (LWDBs) in their efforts to expand apprenticeship and pre-apprenticeship opportunities among underrepresented populations in their respective regions. Proposals were reviewed and 10 grants were awarded to LWDBs in late 2022, with program support activities beginning in early 2023. Collectively, the ATO's goal is to enroll at least 400 apprentices and provide support services to at least 400 pre-apprentices through these grants. As part of this grant, the ATO will also assist LWDBs in the development or enhancement of an actionable Apprenticeship Strategic Plan for their workforce development areas that will also inform their WIOA Local and Regional Plans. In addition, the ATO will help LWDBs engage Career and Technical Centers (CTCs) within their areas to develop plans for Pre-RA to RA pipelines.

Additionally, the ATO will ensure to offer all workforce development areas, regularly scheduled webinar 'Bootcamps' on RA and Pre-RA that cover topics such as: What is RA and Pre-RA; How to use WIOA and

other funds to support RA and Pre-RA; and How Business Services Teams can suggest RA as a strategic workforce development solution. Additional training topics will be developed with input from partners. The ATO remains committed to developing and implementing an I.T. upgrade to ensure WIPS reporting related to apprenticeship and apprentices funded by US Department of Labor grants (outside of WIOA). Work on the initial upgrade was finally completed near the end of 2022. The system is now an apprenticeship participant case management system that acts as a secondary system to supplement the data found in the Registered Apprenticeship Partners Information Database System (RAPIDS) as is required. The customization/upgrade of CWDS provides the conduit for the exchange of data between the PA Department of Labor & Industry and the US Department of Labor via WIPS for grant funded apprentices and programs. The system also allows for reporting of information on apprenticeship and apprentices being supported by alternate discretionary grants and state funding, including PAsmart, enabling the ATO to provide integral information related to outcomes of these initiatives. The ATO has begun the buildout of a similar functionality for pre-apprenticeship in late 2023 with aspirations to complete in 2024.

*(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).*

WIOA provides an opportunity for registered apprenticeship programs to be active partners in the public workforce system. These programs are a proven job-driven training mechanism that provides workers with career pathways and opportunities to earn while they learn. This effectively meets the needs of both jobseekers and employers.

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, this means that apprenticeship programs, registered with the PA Department of Labor & Industry's Apprenticeship and Training Office can be integrated onto the Commonwealth's statewide Eligible Training Provider List (ETPL). Registered Apprenticeship program sponsors that request to be eligible training providers are automatically eligible to be included on the Eligible Apprenticeship List housed within the ETP and will remain if the program is registered 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 jobseekers through the Commonwealth's PA CareerLink® locations.

Registered apprenticeship programs differ from other training providers in some other respects. Most notably, a participant's enrollment occurs only through an agreement between the participant, the registered apprenticeship program sponsor and/or an employer. Specifically, some apprenticeship programs work with a single employer, whereas others may operate through a joint labor-management organization where participants are selected for the apprenticeship but not immediately hired by a specific employer.

Registered Apprenticeship program sponsors 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](mailto:apprenticeship@pa.gov). The statewide ETPL, which can be electronically accessed at [www.pacareerlink.pa.gov](http://www.pacareerlink.pa.gov), will be modified no less than quarterly by L&I.

As noted in the PA WIOA Combined State Plan, an email will be sent annually to program sponsor main contacts, sharing Appendix A of the ETP policy, including the directions for the sponsor(s) to opt-in if they have not already done so. The following steps outline the process for Registered apprenticeship program sponsors seeking inclusion on (on-in) or exclusion from (opt-out) the statewide ETPL.

For Registered apprenticeship programs approved after March 2021, the sponsor's registration paperwork includes an explanation of the benefits of inclusion of the statewide ETPL and a question whereby the sponsor acknowledges they would like to be included on it.

**Step One.** Established Programs wishing to be included on the Eligible Apprenticeship List housed within the Statewide ETPL must notify L&I and submit the following information to L&I so they can verify registration with the state:

- Occupations included within the registered apprenticeship program; and
- The name, address and RAPIDS # of the registered apprenticeship program sponsor.

All notifications must be submitted to the following resource account: [apprenticeship@pa.gov](mailto:apprenticeship@pa.gov)

**Step Two.** Once the registration status has been verified, L&I will add the registered apprenticeship to the statewide ETPL. 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. 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 for funding 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.

### 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. Student course/program completion data must be entered based on the following reporting periods.

ETPL Applications Submitted	Reporting Period for Scheduled Exit Dates of Students
07/01/2023 - 09/30/2023	01/01/2021 - 12/31/2021
10/01/2023 - 12/31/2023	04/01/2021 - 03/31/2022
01/01/2024 - 03/31/2024	07/01/2021 - 06/30/2022
04/01/2024 - 06/30/2024	10/01/2021 - 09/30/2022
07/01/2024 - 09/30/2024	01/01/2022 - 12/31/2022

### 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:

**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;

**Registered Apprenticeships.** Apprenticeship Programs registered with the PA Department of Labor & Industry Apprenticeship and Training Office.

**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 of Labor & Industry.

### **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.

Local 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.

The current ETPL policy can be found here:

<https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>

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 credential;
- the quality of the program of training services including programs that lead to a recognized postsecondary credential; and
- 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, established precedence requirements based on a grading of priority, shall be provided by the Commonwealth LWDBs and PA CareerLink® offices for Title I Adult services. The Commonwealth has established measures to monitor the implementation and assess the effectiveness of priority of service for this program. The Commonwealth has established measures to monitor the implementation and assess the effectiveness of priority of service for this program.

Statutory priority groups established by WIOA, in relation to the Title I Adult program, are the categories of individuals who are eligible to receive priority of service. Those categories are:

- Recipients of public assistance;
- Low-income individual; and
- Individuals who are basic skills deficient.

Adult precedence is determined for the priority groups during eligibility and enrollment. Veterans and eligible spouses within these groups receive priority over non-veterans. The Commonwealth shall also allow a local area to identify a local discretionary priority group to include other categories of individuals with barriers to employment for the provision of individualized career services and training services funded through the Adult program.

The priority of service for veterans and eligible spouses applies across all qualified employment and

training programs. The priority of service for public assistance recipients, low-income individuals, and individuals who are basic skills deficient is a statutory priority that applies only to the receipt of individualized career services and training services in the WIOA title I Adult program. Priority of service for the WIOA title I Adult program must be applied in the following order:

1. Veterans and eligible spouses who meet the requirements of a statutory priority group and Adult program eligibility must receive the highest level of priority for services;
2. Other individuals (not veterans or eligible spouses) who meet the requirements of a statutory priority group and Adult program eligibility receive the second level of priority for services;
3. All other veterans and eligible spouses who do not meet the requirements of a statutory priority group but do meet Adult program eligibility, receive the third level of priority for services;
4. Other individuals (not veterans or eligible spouses) who do not meet the requirements of a statutory priority group but do meet a local area or Governor established discretionary priority and Adult program eligibility, receive the fourth level of priority for services; and
5. Other individuals (not veterans or eligible spouses) who do not meet the requirements of a statutory priority group and do not meet the local discretionary priority, but do meet Adult program eligibility, receive the fifth level of priority for services.

LWDBs and PA CareerLink® offices will be required to collect data for each of the three categories of priority of service that records the number of individuals who were served, and the levels of performance achieved. The Commonwealth will monitor data reported by LWDBs and PA CareerLink® offices to determine the percentage of those individuals in the three WIOA priority groups who are being served through the Adult program in comparison to all other individuals not receiving required WIOA priority who are being served through the Adult program. For this assessment, only individuals included in the three WIOA priority groups 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 50.1 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 50.1 percent requirement applies to all individuals who receive Adult services. Note that the 50.1 percent requirement does not equate with satisfaction of the priority of service requirements but rather is an indicator of whether affirmative outreach efforts are needed to ensure that those with priority of service are served.

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. LWDB’s will also identify the local area’s discretionary priority and any additional requirements, if a local discretionary priority group exists. In their WIOA plans, LWDBs must communicate the methods used to apply priority of service requirements and any local discretionary priority, including a description of the following:

- How data will be obtained for each of the three priority groups in their service area and the approximate number of individuals in each category.
- The outreach that will be completed to inform the public of Pennsylvania’s priority of service policy.

- How outreach will be targeted to best reach those potentially eligible for priority of service and any agencies that serve them.
- How individuals seeking access to WIOA services will be informed of their priority of service, such as through posters and prominent placement of other information.
- How individuals entitled to priority of service, when otherwise deemed eligible for program participation, will affirmatively be identified and informed of the full array of services available.
- The assessments that will be used to identify barriers to employment among those entitled to priority of service and the services needed to address them.
- The process by which Individual Employment Plans will be developed 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 the spectrum of persons entitled to priority of service will be served including those such as English language learners, who may require additional resources.
- How the needs of individuals with barriers to employment will be addressed in the delivery of services, such as ensuring 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 access to services will be ensured, such as interpreters and translated documents for English language learners, as well as for persons who are deaf or hard of hearing.
- How staff will be trained to understand which individuals are entitled to priority of service and how to be responsive to their needs.
- 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.

More information regarding WIOA Title I Adult program priority of service is provided in the Commonwealth's priority of service policy.

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

WIOA provides flexibility to LWDBs 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 related guidance, Financial Management Guide, chapter 5 *section: Transfer of funds*.

- 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.
- LWDBs 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 2023 WIOA Adult funds can only be transferred to the PY 2023 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. Local Areas will receive notification of any transfer request that is not approved.

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

On May 11, 2022 the Commonwealth published “Co-Enrollment of Participants in the Trade Adjustment Assistance Program and Workforce Innovation and Opportunity Act Dislocated Worker Program” on its website at [www.dli.pa.gov](http://www.dli.pa.gov), where it is persistently available for viewing and download. This policy informs the Pennsylvania local workforce development system of the co-enrollment mandate of Trade Adjustment Assistance (TAA) program participants with the Workforce Innovation Opportunity Act (WIOA) Dislocated Worker program. The policy applies to local workforce development boards and PA

CareerLink® WIOA provider program partners, and provides practitioners with detailed articulation of the co-enrollment mandate's background, requirements, and related processes.

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

Benefit Rights Interview (BRI) meetings are conducted by Rapid Response staff upon notice of certification of a TAA petition. All workers affected by a TAA petition certification are invited to BRI where available benefits and services are provided and discussed. Staff from local PA CareerLink® offices in the dislocation area also attend and explain their role in providing case management and reemployment services to assist eligible workers access these benefits and services.

The Trade Act Navigator unit provides additional outreach to affected worker groups as needed to ensure awareness of the available benefits and services.

The Trade Act Services unit provides technical assistance, guidance, and training to all internal and some external stakeholders of the TAA program and reviews and approves all applications for benefits.

TAA funds are the primary source of funding except for items that may not be covered by the program in which case the co-enrolled participants are referred to WIOA.

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

The Trade Act Services unit provides technical assistance, guidance, and training to internal stakeholders of the TAA program. This may occur in several ways including one on one conversations, email, or quarterly conference calls for all staff who work with TAA participants. This information sharing includes case management requirements as well as proper funding streams, with TAA as a primary source of funding for items allowed by law.

TAA program reference materials and case management tools are distributed to staff, housed in a shared location and are available upon demand to WIOA staff. In addition, the TAA desk guide is a comprehensive reference tool that is updated as necessary due to substantial changes in Federal TAA law. Federal TAA and state policies are the basis for all guidance and training content.

Through training and guidance, and in coordination with PA Bureau of Workforce Partnership and Operations (BWPO) leadership, Trade Act Services ensures a seamless approach to the provision of benefits to ensure that no services are duplicated and assists WIOA staff on TAA programmatic requirements including co-enrollment in the WIOA dislocated worker program. BWPO fosters open communication about TAA eligible participants to ensure receipt of all available benefits and services are utilized.

**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 LWDB 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;
- Recommending inclusive and diverse approaches to programming and organizational capacity to ensure diversity, equity and inclusion when serving diverse populations;
- 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 LWDBs 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 out-of-school youth, or 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 an impactful WIOA youth program is dependent on the competitive procurement of qualified providers of the youth workforce activities as outlined in WIOA Section 129, and active oversight of their performance in accordance with WIOA Section 116. Successful implementation of WIOA youth services begins with the incorporation of WIOA's youth program requirements into Requests for Proposals (RFPs), subsequent contracts, and existing youth provider contracts.

Such requirements include:

- The expenditure of a minimum of 75% of funding on services to OSY youth;
- The expenditure of 20% 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 that will lead to self or family sustaining wages and lifelong career opportunities;
- 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 providers with less experience in the provision of WIOA 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 targeted populations.

The Commonwealth will encourage LWDBs to assist with Pennsylvania Industry 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 OSY who are most in need, the Commonwealth will require providers to allow self-attestation for OSY under WIOA eligibility determination criteria, consistent with federal rulemaking. 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 OSY, signing and dating a form acknowledging this status, followed by verification conducted by workforce staff that such information meets WIOA eligibility criteria for OSY. 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 OSY expenditure rate increased from 30% to 75%. The increase in funds and other resources allowed a greater focus to be placed on serving our OSY population who faced the greatest challenges in attaining meaningful career pathways and employment. To assist with this paradigm shift, the Commonwealth developed several standing WIOA workgroups comprised of stakeholders from various levels of Pennsylvania's workforce system.

An overall goal of the WIOA Youth Service Workgroup, led by L&I TANF Youth Development Program staff, was to provide recommendations that would help build a workforce system to meet the demands of current and future customers and employers. Workgroup members consisted of



representatives from Pennsylvania's youth-serving organizations and were tasked with examining multiple strategies to deliver WIOA youth services that focused on intensive outreach and the engagement of disconnected youth and young adults. These efforts resulted in recommendations for 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 more robust 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 OSY through the TANF Youth Development Program, or YDP. This partnership encourages the network of state and local youth services providers, workforce development providers, and 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 WIOA programs, allowing individuals participating in TANF funded subsidized employment opportunities to benefit from additional services, such as occupational skills training and other relevant services. As TANF enrolled youth, the OSY can have access to the full complement of WIOA services. OSY who are found not eligible for WIOA programs are referred to the TANF YDP. All TANF YDP participants have access to a full complement of programs and services which include the 14 required program elements such as, Career Exploration, Entrepreneurial Skill Training, Adult Mentoring, Work Experience, Paid Internship Opportunities, Financial Literacy Education, and many more innovative programs.

In addition to the work being done at the state level, LWDBs are prioritizing 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 use of self-attestation.

*(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 at all of the PA CareerLink® One-Stop In-school-Youth (ISY) and 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, alternative secondary school services, skills training for in-demand occupations through Individual Training Accounts (ITAs), labor market-based guidance on local career pathways, tours of local businesses, financial literacy, entrepreneurial skills training, and other leadership development opportunities. Eligible youth in need are also offered comprehensive case management services 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 which include summer employment opportunities, internships, job shadowing, and On-the-Job (OJT) training opportunities. The PA ATO works closely with LWDBs and PA CareerLink® offices from across the State to build awareness and knowledge around apprenticeships. In addition to regularly presenting Apprenticeship 101 webinars and providing additional resources to workforce staff, the ATO also supports the Registered Apprenticeship Navigator program, an apprenticeship program that trains people to start and manage apprenticeship programs. Additionally, continues to support the growth of the statewide Apprenticeship Ambassador Network through creating new or supporting existing local and/or regional apprenticeship ambassador networks designed to grow Registered Apprenticeship and Pre-apprenticeship in local areas. This growth encouragement include emphasis on partnering with PA CareerLink® with a concentration on training or supporting Title One staff or other workforce development professionals who act as Ambassadors of Apprenticeship and grow this work.

Through the ATO's outreach efforts, it encourages the workforce system to use WIOA funding to support Registered Apprenticeship and/or Pre-apprenticeship in multiple ways concentrating heavily in serving youth through the following avenues:

- Individual Training Accounts (ITAs) – ITAs can be used to fund the related technical instruction component of the RA for eligible apprentices through the Eligible Apprenticeship List housed within the ETPL.
  - ITAs can also fund pre-apprenticeship training if the sponsor is on the ETPL. A pre-apprenticeship is not just a youth program strategy but may also be an effective strategy for participants in the WIOA adult programs.
- On-the-Job Training (OJT) – Typically up to 50% of the apprentices' wages may be reimbursed by WIOA funds. Local areas can contract with RA programs where participants may participate in OJTs with multiple employers who are signatories to the RA program. In certain circumstances, the local board may determine that a contract with a training provider is the most appropriate way to train a cohort of new apprentices for in-demand industry sectors or occupations.
- Customized Training – RA program sponsors and apprentices can be supported through customized training agreements for eligible instruction costs.
- Youth Occupational Skills Training and Work Experience – In the Title I Youth program, pre-apprenticeships are considered a type of work experience for youth ages 16-24. The work experience program element also emphasizes training that aligns with in-demand industry sectors and occupations, which is a key component of RA programs.
- Supportive Services – WIOA funds can support a variety of supportive services for apprentices, including annual dues, registration fees, books, supplies, childcare, transportation, tools, and uniforms.
- Trade Adjustment Assistance (TAA) – In appropriate circumstances, the Trade Adjustment Assistance Program (TAA) represents another funding vehicle to support apprenticeships. All TAA participants are covered under what is called a TAA certification. This certification confirms that the employment of a worker group was impacted or threatened due to trade-related

circumstances. Grants are provided to the states to provide services, which trade-affected workers access through the American Job Center Network. States also notify individuals of their eligibility.

Additionally, the ATO is taking steps to align the Career Pathways and Apprenticeship system more closely through forging strategic partnerships with Career & Technology Centers (CTC) statewide to see how their existing vocational programs can fit into the Registered Apprenticeship Ecosystem.

*(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, L&I facilitated discussions during the Spring of 2017, that included state representatives from WIOA program partner agencies to 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 LWDB and is articulated in each respective local board’s WIOA Local Plan.

**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;*

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;*

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

*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

*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 with chief elected officials in local areas throughout the State in determining the distributions;*

Pennsylvania has articulated the methods and factors of distribution in this plan Section (1)(B)(5)(A) which is reviewed and approved by the State Workforce Development Board which includes local area representation amongst its members.

*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;*

The state distributes adult and youth funds equitably according to the formula allocation outlined in this document and no local area suffers from significant shifts in funding from year-to-year, due to the hold harmless provisions.

*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);*

Pennsylvania monitors local area compliance with the *Uniform Guidance* annually in accordance with WIOA §184(a)(3) and the *Oversight and Monitoring Policy* and *Financial Management Policy*, the links to which can be found below. The monitoring is performed on-site at local board offices and through enhanced desk monitoring.

[Financial Management Policy](#)  
[Oversight and Monitoring Policy](#)

## **WAGNER-PEYSER ACT PROGRAM (Employment Services)**

### *(a) 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 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 LWDB 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. BWPO made significant progress this year in developing a foundational training on the PA CareerLink® system of record, the Commonwealth Workforce Development System (CWDS), to bring all CWDS users up to the same knowledge and skill level and provide access to the training and resources for all new users as they come on board.

- (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.

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

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.

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.

*(c) 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.

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

- (1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;*
- (2) Registration of UI Claimants with the State's employment service if required by State law*
- (3) Administration of the work test for the State unemployment compensation system, including eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and*
- (4) Provision of referrals to and application assistance for training and education programs and resources.*

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.

During the pandemic, the RESEA program launched a virtual module which walks the participants through the mandatory requirements of the program with one easy click. The participants can utilize a variety of technologies to include their phone to complete these requirements. Once they register for their personalized meeting, they may complete the additional components virtually or in person. This flexibility has allowed Pennsylvania to serve more participants and mitigate barriers of in person meetings such as transportation, lack of or cost, and childcare.



**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–

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

Migrant and seasonal farm workers represent a unique population that travels from location to location seeking employment. In Pennsylvania most of the MSFWs who come here for work travel in small groups. They travel in groups because in most cases they do not have their own transportation, and a majority of them have limited English skills, which makes them dependent on crew leaders, farm labor contractors, or third-party individuals who can facilitate their communication needs. The term “migrant stream” refers to the flow and backflow of MSFWs. In Pennsylvania we are part of the East-Coast migrant stream. Florida tends to be the home base of these workers. The term “home base” refers to where the farm workers’ families may reside year-round, and where the workers return to and continue working during the colder months when there is little and limited farm work here in Pennsylvania. The one overwhelming need of the majority of MSFWs who travel here in the East-Coast migrant stream is that they lack legal immigration status.

Workers who can take full advantage of our services do have unique needs. Many workers, as stated above, do not have their own transportation. From the very start, that limits their ability to take advantage of certain job opportunities that would otherwise avail themselves. Given that a worker has transportation or has transportation options, i.e., resides where public transportation is available, or has other means, then the job seeker may take full advantage of all the services we offer, and the services are equal to those of any non-MSFW, and employment opportunities may be accessed at any one of our one-stop centers or accessed electronically over the internet.

Another major need that MSFWs experience is housing. If the worker is planning on changing careers, then non-employer-provided housing will be necessary, and that is often a difficult transition. Most apartments require a deposit and a first month’s rent payment. This may also include deposits for utilities. Farm work generally includes free housing, and in many cases the only expense a farm worker ever incurs is food for sustenance. In most instances farm workers, at the very least, are able to save large portions of their pay in anticipation of a better future, and this includes transitioning into their own housing.

Training sometimes comes later for MSFWs. Once they have worked in non-agricultural employment for a time they become, by definition, non-MSFWs. By the time they take advantage of training opportunities they are not counted as farm workers. Still, there are circumstances where a farm worker may have a plan and take advantage of our training opportunities. Every one-stop has an available apprenticeship program or a partner, including the NFJP partner, who can assist in providing employment training to MSFWs.

Sometimes as a “bridge” to employment training there are community resources that provide free English as a Second Language (ESL) classes to anyone in need. English language skills not only expand the choice of employment training for MSFWs but also enhances their opportunities for employment.

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 principal departments, L&I and PDA, will encourage agricultural employers to create multi-employer workforce partnerships and apply for funding through the Next Generation Sector Partnership program

*(2) Provide 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.

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.

*(3) Provide 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.*

Farm workers have “unique needs,” but specifically their needs are generally common to them as a group. In Pennsylvania the overwhelming majority of farm workers, which represent a percentage in the upper 90s, are Hispanic, and within that group of workers the greatest percentage by far comes from Mexico. Other countries of origin within that group are Honduras, Guatemala, El Salvador, and Puerto Rico and the Caribbean. Outside this category, and representing combined single digit numbers, are workers from Jamaica, Haiti, Caribbean Island nations, the U.S. south, and occasionally workers from various Asian countries.

The most common language spoken by farm workers is Spanish, as Hispanic workers represent a large majority. Primarily the remaining groups of workers are so small in number that for them to obtain agricultural employment they must, and usually do, possess rudimentary English language skills at the very least. Besides Spanish, the next most commonly spoken language amongst farm workers is Haitian Creole.

During peak season it is estimated that the number of MSFWs (Currently H-2A workers are included as MSFWs in this number by regulation) in Pennsylvania are just under 10,000 in number. In the off-season, the low season, which is during the winter months, is under 1,000 workers statewide.

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.

Labor & Industry 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.

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

The Commonwealth projects just under 10,000 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 (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. SMAs no longer perform, by definition, any "outreach" activity, but do, however, perform "monitoring" of outreach activities.

The Commonwealth is not one of the 20 "significant" agricultural States and therefore has outreach coverage available year-round when needed, and full-time bilingual outreach staff during peak season, periods of the highest MSFW activity. Peak Season is variable, determined by the agriculture activities the farm workers perform, but generally it begins in September and runs through November. Some seasons may begin towards the end of August, and Pennsylvania has even had seasons where harvest extends into early December. The outreach "window" will be adjusted to open when harvest is in "full swing" and close when harvest activities diminish. Pennsylvania intends to perform MSFW Outreach four days per week. Fridays are not included in the outreach schedule as workers tend to receive their pay on that day, and at close of work they leave the farm to go shopping.

*(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 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 SMA. 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 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 MSFW outreach workers are merit staff and are trained individually and “as needed” by the SMA to thoroughly understand our mission and purpose of outreach, to understand the protocols of outreach, to be able to re-inspect labor camps, to identify any apparent violations, to have an on-going understanding of services available from the AJCs and from partner agencies, and to report any deficiencies, apparent violations, and complaints to the SMA for immediate follow-up/resolution. New outreach worker hires



are then given hands-on training by first observing MSFW outreach, and then observed while performing outreach until proficiency has been reached.

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 Agricultural Recruitment System (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.

PathStone's local offices may co-enroll MSFWs (migrant and seasonal farm workers) and provide NFJP services to adult and youth MSFW populations, as well as provide other enhanced benefits, which may include career and training options. Co-enrollment, i.e., enrollment in both PA CareerLink® and PathStone, may result in enhanced benefits, as both can provide OJTs (on-the-job-trainings), career planning and counseling, and job referrals. PathStone's local offices have bilingual staff and flexible, extended hours of service.

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.

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 considered as we proceed, and we expect to have more information in the near future.

**(5) Services provided to farmworkers and agricultural employers through the one-stop delivery system.**

*Describe the State agency's proposed strategies for:*

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

- i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;*
- ii. How the State serves agricultural employers and how it intends to improve such services.*

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:

- Assistance in performing a job search on our automated system, and individual support if needed.
- Referrals to any and all employment listings that the applicant expresses interest in and is qualified for
- Information on training and supportive services
- Referral to partner agencies that assist MSFWs
- Testing, counseling, and job development services and/or referral to NFJP partner
- An explanation of basic farm worker rights and the complaint system
- Referral to local office complaint specialist if necessary

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; 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 other outlets 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 (ARS) 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.

Although the Agriculture Recruitment System has been around for several decades it has hardly been used by growers to find workers, and its use, or lack thereof, is not unique to Pennsylvania. Growers frequently inquire about the ARS and about the H-2A program. In the end and invariably they choose the H-2A program over the ARS as it results in a guaranteed workforce. The SWA consistently purveys information about the Agricultural Recruitment System and willingly works with employers who express interest.

Regarding our AICs, agricultural employers rarely visit our offices. This may be due to the ease and availability to access our system electronically or to speak directly to one of our representatives by telephone. Also, since the previous year's pandemic, employers have become accustomed to accessing our counseling and placement system services remotely.

When local offices offer job fairs agricultural employers will be encouraged to participate.

More visibility may be given to the Agricultural Recruitment System on our website to apprise the public of its availability, and the SWA agrees to inform agricultural employers of the availability of the ARS, and will facilitate employers throughout the application process, which includes advertising and follow-up throughout on the referral process.

## **(6) Other Requirements**

*(A) Collaboration. Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).*

The National Farmworker Jobs Program (NFJP) and the SWA have an ongoing mutual relationship in which open lines of communication have been established and continue. There are activities that the NFJP partner performs that parallel those of the SWA, e.g. OJTs, and other activities where they intersect. When services to MSFWs intersect, i.e., both the SWA and the NFJP partner can provide distinct services that enhance services to MSFWs, there is a type of synergy that takes place. The same holds true for any other public agency that serves MSFWs. With diminished funding, it would best serve MSFWs if all agencies could coordinate their services.

With regard to MSFW outreach, the SWA has explored and continues to explore the possibilities of outside agency outreach performed by the NFJP partner, and with other partner agencies. With last year's outreach being suspended due to the pandemic, and this year's high rate of incidence of infection as determined by the PA Dept. of Health, any details of possible outreach performed by or in conjunction with the NFJP partner, PathStone, have not been finalized.

PathStone, the NFJP partner, also has an ongoing M.O.U. with the State Monitor Advocate. This M.O.U. specifies ongoing, open communication, and dialog on how to mutually enhance services to MSFWs.

The SWA has hired bi-lingual staff to conduct outreach to MSFWs at their place of work. This outreach will be available at any time of the year but will be full-time dedicated outreach during peak agricultural season.

The SWA collaborates with the Pennsylvania Department of Agriculture 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.

*(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 received the following comment from PathStone:

"I have had the opportunity to review the Agricultural Outreach Plan and while the plan lays out an accurate account of the outreach, recruitment and supportive services activities supported by the NFJP, I would be remiss if I did not offer comments on and an exception to the section that address the delivery of Career and Training services provided for Farmworkers as presented on pages 3, 14, 15 to name a few.

On page 3 of this year's combined state plan, both required and optional elements fails to cite NJFP. PA's Plan ensures that all Workforce Boards and One-Stop Career Centers serve all applicants, including MSFWs." While this may be true, the plan fails to include that Career and Training options are also available to eligible MSFW's and provided by Title I Section 167, the National Farmworker Jobs Program. MSFWs seeking these services should be made aware of this as a matter of customer choice.

The plan continues "Services including basic, individualized (training) and follow-up, will be provided as necessary. Individualized and training services, including co-enrollment options, will be provided through referral to on-site partner programs." Again, while NFJP is a WIOA mandated partner and in PA has a MOU with each of the local Workforce Development Boards, it operates outside the One Stop Career Centers. The plan as writing does not provide for, or discuss the enhanced benefits of co-enrollments with NFJP, a Title I resource designed and funded specifically for providing WIOA Career and Training services to both Adult and Farmworker Youth populations.

These omissions do not reflect the career services and training functions of NFJP nor our non-traditional approach to service delivery to the FW population which includes but is not limited to extended hours of operations, and employment of staff who are linguistically and culturally competent.

Pathstone Corporation would ask that consideration be given to expanding the present plan to incorporate the aforementioned information regarding PathStone's NFJP Title I service capacity."

In response to this comment, Pennsylvania updated the prompt responses for e.4.E and e.5.A. to reflect PathStone's request for additional content and context.

*(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.*

While the number of MSFWs has steadily decreased over the years, the numbers of services provided have remained proportionally the same, and all equity factors have been met. If there is a gray area in reporting it would be due to a waiver provided to the SWA by Region II going back a number of years, the SWA was exempt from capturing certain data by their data collection unit, and some of those numbers pertained to equity factors on the LEARS reporting system. This exemption was not unique to Pennsylvania. It had been agreed upon at the time that by using MSFW data from previous years' reports, patterns and trends in the data would emerge. The equity factors had always constantly been met over the years in Pennsylvania, and other MSFW data remained solid and stable. There had been no indication by the data that any trends would have changed over that time period.

The numbers of MSFWs had been steadily declining in the state. Then, due to Covid, and a shift of farm workers from migrant and seasonal to H-2A there has been a shift in the data. H-2A workers are on temporary work visas and cannot use the services of the AJCs. Also, during the last few years the numbers of MSFWs coming into the Commonwealth have plummeted. This shortage in workers made MSFWs a commodity. The workers no longer needed the job service to help them find work. They could practically show up at any farm and obtain employment on their own, and without assistance.

*(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.*

There were numerous goals in the prior AOP. Some of the goals depended on extenuating circumstances to be met. Outreach continues to be an issue. A fair number of our remote AJCs are in rural areas that have more diffuse populations in their service area. But these rural one-stops are in areas where the leading industries are agricultural. While some of these agricultural employers work in poultry, dairy, or have machine crops such as corn or soybeans, which do not employ MSFWs, there is always a number of farms that do hire MSFWs. For workers at a local AJC to be trained to perform MSFW outreach or field checks (in the case of H-2A) the workers must first be qualified to take on such responsibilities. Outreach workers must be bilingual. To apprise Spanish speaking farm workers of their rights and of our services, the outreach worker must be certified by our civil service commission as being proficient in Spanish. Second, it must be in the JS employee's pre-acceptance job description that MSFW outreach is one of the required job duties. Even a bilingual employee could not be required to perform outreach unless contractually it was originally part of the job description. For that reason, the solution to qualify local office staff as MSFW outreach workers is to replace, through attrition, local office employees with bilingual employees who accept the duties of performing MSFW outreach. To simply increase staffing at these local offices is not a viable solution because in many instances there would only be a few agricultural employers to visit. To take on another full-time employee to perform MSFW outreach to two or three labor camps cannot justify another full-time position at these locations.

Filling openings as they arise with qualified individuals who accept the responsibilities of MSFW outreach is an ongoing process. It represents a commitment that over time will put Pennsylvania back into full compliance with all Federal regulations with regard to outreach.

In the meantime, we are exploring other options such as third-party outreach and virtual outreach. Third-party outreach is actually not a strong alternative. Outreach is a term that tends to be interpreted as having a single, homogenous meaning. "Outreach" at Migrant Health, for example, consists of performing a perfunctory physical exam, and can even involve testing (for Covid) and administering flu and pandemic

vaccines. The only way that they, or any other third-party contractor, could perform outreach on our behalf would be for us to extensively train these workers to become proficient in what we do. Even our own AJC employees would need training to perform outreach, but our employees already have the background and understanding of how the AJC system works. Some third-party contractors, the NFJP partner Pathstone, for example, hires temporary outreach workers on a seasonal basis, and because of the nature of the circumstances of temporary employment there is a high annual turnover rate. That means that training for these workers would have to be repeated frequently. Also, accountability of any third-party outreach would be difficult. Under the best of circumstances few MSFWs ever take advantage of our services. If a third-party contractor performed substandard MSFW outreach on our behalf—or performed only spotty outreach, it might not become apparent for an extended period of time.

Other options that we are exploring may involve a large portion of creativity. The term “virtual” outreach is being used by other states with regard to MSFW outreach. We need to explore this as a possibility to determine its value and merits as a potential alternative. The possibility of running ads on local Spanish-speaking radio stations can have a valuable positive effect. If our services and opportunities of the local one-stops were presented in that audio format, and contact information was supplied, then an even far-wider audience could be reached. These ads could be run predominantly through the peak agricultural season for the MSFW target audience, and also presented randomly throughout the year to serve both MSFWs and other Spanish speaking customers. A campaign of this nature would reach a far wider audience than just the MSFWs. It would be beneficial to any Spanish-speaking community. We are taking everything into consideration and exploring every possibility to enhance services to MSFWs.

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.

*(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 consulted 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. SWA Officials:*

- 1) Initiate the discontinuation of services;*
- 2) Make the determination that services need to be discontinued;*
- 3) Make the determination to reinstate services after the services have been discontinued;*
- 4) Approve corrective action plans;*
- 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;*
- 6) Enter into agreements with State and Federal enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and*
- 7) Decide whether to consent to withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.*

Merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations.

*5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).*

The Pennsylvania Department of Labor & Industry, as the designated State Workforce Agency (SWA), affirms that a self-appraisal system for ES operation to determine success in reaching goals and to correct deficiencies in performance will be established and maintained. These appraisals will be performed as quarterly quantitative appraisals, will be documented and significant deficiencies will be identified. Corrective Action Plans will be implemented to correct any identified deficiencies. Annual qualitative appraisals will be conducted to evaluate the quality of service to applicants, employers and the community. These appraisals will be conducted in accordance with 20 CFR § 658.601 State Workforce Agency responsibility.



**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)).*

Pennsylvania's content standards for adult education are 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. In PY 2016-17, PDE Division of Adult Education began implementation of the *English Language Proficiency Standards* (ELPS) as a means to make the CCRS accessible to English language learners. The ELPS are integrated with and support the use of the CCRS.

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. In PY 2022-23 leadership funds were used to adapt an existing K-12 math curriculum for use in the adult education classroom by identifying lessons that were aligned to CCRS. The focus for PY 2024-25 through PY 2027-28 will be curriculum alignment using a process learned from a national training. Teams of instructors will be creating mini-curricula in content areas requested by the field.

**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.*

PDE Division of Adult Education held a full and open competition in spring 2022 for Section 231 Adult Basic Education Direct Service grants for a five-year grant cycle from July 1, 2022, to June 30, 2027. The division will conduct another full and open competition for a five-year grant cycle for Title II Section 231 funds in early 2027 for grants to be awarded July 1, 2027. The content of the section 231 grant applications will address the thirteen considerations and seven requirements established in Title II, as well as additional priorities determined by PDE. Eligible providers will be required to demonstrate clear alignment of proposed activities and services to the strategies and goals of the Local Plans for the areas to be served.

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: the number of individuals age 18 and over who are not enrolled in school and who do not have a high school diploma; the number of individuals age 16 and over who are in the labor force and are unemployed; the number of individuals age 18 and over with less than a ninth grade education; the number of people below poverty level; the number of OJT openings per year; and 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.

The competition will be open to all eligible providers. All applicants will be required to submit evidence of demonstrated effectiveness in order for their applications to be reviewed and considered for funding. To demonstrate effectiveness, applicants that have been funded under Title II AEFLA, as amended by WIOA, 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.

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, the *Request for Grant Applications Guidelines* and all other grant information are posted to the PDE website on the Division of Adult Education Grant Competitions webpage, which is accessible to the public. The division creates a grant competition information video with closed captions, which is available to the public on YouTube. Policies established by PDE's Communications Office ensure the accessibility of all grant-related documents that are posted to the website. The Division of Adult Education conducts its grant competitions through PDE's eGrants system. Through this system all eligible providers have access to the same grant application for each grant being competed. A PDF of the content of the grant, including the content of Help Buttons, is posted on the Division of Adult Education Grant Competitions webpage, so that all interested parties can review it prior to accessing eGrants.



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. For, PDE will award grants to the highest scoring applicant in each of the Local 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.

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 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.

Grants funds will be allocated to successful applicants through annual funding notifications contingent on the availability of federal 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 the federal award. All funds will be used in compliance with the supplement not supplant stipulation of the law. After grants have been awarded and during the grant contract review process, grantees will have the opportunity to negotiate administrative costs in excess of 5 percent using a process developed by the Division of Adult Education.

All adult education programs funded under Section 231 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 (IELCE) education activities where there is a need. Programs must provide supplemental computer-based distance learning opportunities to students participating in real-time, face-to-face, in-person or remote instruction. Programs must also prepare students for and support them in achieving successful transition to postsecondary education/training or employment. Programs will be allowed to provide workplace literacy activities and integrated education and training 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 digital literacy and digital resilience, promote critical thinking, and build self-management skills, such as utilizing resources and information, understanding systems, and working with others. Programs will have intake and orientation processes that help students and staff determine individuals' readiness for participation in the program. This includes activities to help individuals assess their schedule and potential barriers to successful participation in instruction. It also includes a discussion of the individuals' 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 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 student support coordinator who works with students to address barriers to participation and to plan and prepare for transition to employment or postsecondary education and/or training. Activities in support of transition will be offered in a variety of ways: integrated into instruction, stand-alone group activities, and one-on-one 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. Student support coordinators 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® and refer students to PA CareerLink® career services as appropriate. Program staff will also coordinate with staff from the other WIOA core programs and one-stop partner programs to support co-enrollment.

When and where appropriate, programs will be encouraged to develop integrated education and training that provides adult education and literacy activities, concurrently and contextually with both workforce preparation activities and workforce training for a specific occupation or occupational cluster, and that is for the purpose of educational and career advancement. Integrated education and training programs will support the needs of the local labor market and will be developed in consultation with Local Boards, employers, and training providers. The occupational training provided as part of an integrated education and training program will be taught by a qualified trainer, connected to realistic, existing employment opportunities in the local area and provide an "on ramp" to a career pathway for the participants. The division will require programs to submit an *Integrated Education and Training Proposal* to the division for approval. The integrated education and training program must be approved by the division prior to the start of class.

**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 Adult Basic Education Direct Service grants where there is a local need. All aspects of the grant competition as described above in the Title II Local Activities section 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, the *Request for Grant Applications Guidelines* and all other grant information is posted to the PDE website on the Division of Adult Education Grant Competitions webpage, which is accessible to the public. The division creates a grant competition information video with closed captions, which is available to the public on YouTube. 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 guidance to reviewers that applicants must prioritize corrections education services to individuals who are likely to leave the correctional institution within five years of participation in the program.

*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, as appropriate for the participants in the corrections education program, 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. PDE Division of Adult Education held its third full and open competition for Section 243 IELCE grants in early 2023 and awarded grants for July 1, 2023, to June 30, 2026. The division will conduct the next full and open competition in early 2026 for a three-year grant cycle beginning July 1, 2026. PDE will not determine specific grant amounts or allocate funds to specific areas. Applicants will propose funding amounts that they deem necessary to provide a compliant program to their proposed number of IELCE-activity participants and IET program participants.

The competition will be open to all eligible providers. As part of the grant application process, all applicants will submit evidence of demonstrated effectiveness in order for the application 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 have not been previously funded by the Division of Adult Education under Title II AEFLA, as amended by WIOA, will be required to provide performance data to show their past effectiveness in serving basic skills deficient eligible individuals, including evidence of success in achieving outcomes in comparable measures. For both groups, the measures included effectiveness in helping individuals develop their reading, math, or English language skills as demonstrated by level completion, achieve high school equivalency, and transition into employment and/or postsecondary education/training. PDE will give the greatest weight to the measures related to demonstrated effectiveness in improving English language skills of English language learners. PDE will also establish a threshold to ensure that applicants have experience working with English language learners by requiring them to have served a minimum number of individuals in ESL levels in each of the years for which they provide data.

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, the *Request for Grant Applications Guidelines* and all other grant information are posted to the PDE website on the Division of Adult Education Grant Competitions webpage, which is accessible to the public. The division creates a grant competition information video with closed captions, which is available to the public on YouTube. Policies established by PDE's Communications Office ensure the accessibility of all grant-related documents that are posted to the website. The Division of Adult Education conducts its grant competitions through PDE's eGrants system. Through this system all eligible providers have access to the same grant application for each grant being competed. A PDF of the content of the grant, including the content of Help Buttons, is posted on the Division of Adult Education Grant Competitions webpage, so that all interested parties can review it prior to accessing eGrants.

The content of the Section 243 Integrated English Literacy and Civics Education 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) program in the proposed service area. Such data include immigration trends, demographics of the English language learners in the proposed service area, educational attainment data for English language learners, and employment and labor market statistics showing sufficient employment opportunities for students who complete the program. Applicants will be required to provide evidence of partnerships that support the purpose of the program, including commitment from a training provider for the occupational training component of the IET. Applicants will be required 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 be required to provide evidence that the occupational training component of the proposed IET is in an in-demand industry, has the potential to lead to economic self-sufficiency, is part of a career pathway, and will be provided by qualified providers. They must identify specific employers they communicated with regarding related employment opportunities for individuals who complete the integrated education and training activity.

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, and will train review team members prior to their beginning the review and scoring of the 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 all available funds are awarded or until all applications with a sufficient score have been funded.

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 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.

During the post-award grant contract review and approval process, PDE staff will discuss the proposed grant amounts and participant numbers with the successful applicants to ensure that the final grant award amounts are appropriate. 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. During the annual grant review process, grantees will have the opportunity to negotiate administrative costs in excess of 5 percent using a process developed by the Division of Adult Education.

PDE requires grantees to use funds awarded under section 243 to provide a continuum of year-round, leveled, managed enrollment IELCE activities that assist English language learners, including professionals with degrees and credentials in their native countries, to acquire the reading, writing, listening, and speaking skills necessary to transition successfully to the integrated education and training activity (IET), other postsecondary education or training, or employment, and to earn a high school equivalency credential, if needed. In the context of the section 243 IELCE program, leveled classes means that classes include students in no more than two NRS levels per class. Programs must offer at least two levels of IELCE activity classes year round. Programs may serve beginning ESL level students as part of their IELCE activities or may elect to serve them with other funds. There must be a path into the section 243 IELCE program for beginning level students. Programs must also 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.

PDE requires programs to use the *Integrated English Literacy and Civics Education Content Guide* to ensure that the content of the IELCE activities meets the definition of instruction in the rights and responsibilities of citizenship and civic participation. Each section contains a list of student performance objectives around which IELCE programs must base the content of their IELCE lessons and instruction. Instruction must integrate this content with English language acquisition and literacy activities and should reinforce employability skills.

PDE requires all section 243 IELCE grantees to provide an IET as part of the program; they must hold at least one IET activity per program year. Grantees must use section 243 funds to provide the adult literacy and education activities and workplace preparation activities of the IET programs. Grantees also use section 243 funds for the ongoing planning and development activities necessary to ensure a high-quality impactful IET. PDE encourages grantees to use outside funding opportunities to cover the costs of the occupational training component of the IET; however, use of Section 243 funds for such training and associated necessary costs is allowable. PDE does not mandate a specific model for Section 243 programs. Successful applicants will propose models that ensure provision of all required components in compliance with WIOA regulations. In cases in which the grant recipient does not provide all components itself, it is responsible for ensuring full integration of all activities. Grantees must submit to and have approved by PDE an *Integrated Education and Training Planning Tool and Proposal* before they can conduct the IET.

Projects funded with state leadership funds (see the next section) provide technical assistance to IELCE grantees as they develop their curricula to ensure that IELCE activities prepare students to succeed in 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.

**State Leadership.** *Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.*

*Describe how the State will use the funds to carry out permissible State Leadership Activities under Section 223 of WIOA, if applicable.*

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 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 funds a project that provides technical assistance and support to Title II programs to be effective partners in the workforce development system. The work focuses on the required activities: align adult education and literacy activities with other core programs and with one-stop partners, as appropriate, to implement strategies in the State Plan; participation in the development of career pathways that provide access to employment and training for individuals in adult education programs; and understanding and fulfilling Title II's role as a one-stop partner to provide access to employment, education, and training services. Staff from this project will meet with each program administrator at the beginning of the year to identify gaps in their participation in the workforce development system and to plan for more engagement, such as attendance at local workforce development board (LWDB) meetings, meeting with potential partners, and identifying opportunities for integration. In addition, this project will support local programs by providing professional learning opportunities for staff through courses such as *New Administrator Training* and *Supporting Adult Learner Transition*. A second project further supports alignment of adult education and literacy activities with the workforce system by supporting the permissible activities of developing content and models for integrated education and training (IET) 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. This project will provide technical assistance in the development of IETs, customized to each local area's labor market.

PDE supports 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 funds a project that focuses on communication with the field, ensuring that this information is disseminated through an electronic newsletter and robust website. The website includes resources and on-demand modules that allow program staff to work independently to improve their practice. In addition, PDE supports a learning portal that contains facilitated courses delivered at a distance using virtual platforms.

PDE also funds 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. Project activities will include supporting programs in their use of PDE-approved supplemental distance learning resources, assisting programs in their use of learning management systems, and coaching instructors to create lessons that support student acquisition of digital literacy skills.

PDE funds 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. Professional development is offered in multiple modalities: courses, on-demand modules, coaching, and professional learning communities. Course offerings will include *Evidence-based Reading Strategies*, *Using Illustrative Math in the Adult Education Classroom*, *Improving Your Agency's Data Quality* and several others that address standards



implementation. Additionally, each program will have at least one practitioner-led professional learning community (PLC) that focuses on improving instruction. The PLCs will be led by the programs although consultants from the leadership projects will attend meetings several times per year and offer their expertise as needed.

PDE will ensure that procurement of both required and permissible state leadership activities complies 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 Friday 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 discusses program improvement/professional development plans with their advisor at the beginning of the year. The Division also holds an "all-PDS' meeting each year that includes all staff from all of the leadership projects where they evaluate the year's activities and use that information to plan future activities. 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 State Plan, PDE Division of Adult Education plans to contract for an outside evaluation of the implementation of professional learning communities to determine their efficacy and the extent to which professional development is program-based and practitioner led.

**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.

The Division of Adult Education will conduct formal ongoing monitoring, assessment, and evaluation of local programs through both desk monitoring and comprehensive monitoring reviews, which are conducted either in person or virtually. Division 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 monitoring reviews. Every year, the division will use a risk rubric to determine which agencies to monitor. Agencies with the highest scores will be selected for comprehensive monitoring reviews. These reviews will be conducted by teams of two, four, or six people. Each review will be guided by a monitoring tool to ensure standardization of the reviews. Monitoring reviews will include an initial meeting with the administrator of the adult education program; class observations; student focus groups; staff focus groups; a review of data and student records; program compliance review; fiscal review; and a meeting at the end of the review for the presentation of noteworthy practices, findings with required actions, and recommendations.

After the monitoring review, the division will send a written monitoring report to the agency explaining all of the noteworthy practices, 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 review 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 agreements 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, including 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.

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**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:

(a) State Rehabilitation Council

*All VR agencies, except for those that have an independent, consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, (select A or B):*

- (A) is an independent State commission.  
 (B) has established a State Rehabilitation Council.

*In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.*

<b>Council Representative</b>	<b>Current Term Number/ Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
Statewide Independent Living Council (SILC)	2 <sup>nd</sup> Term	07/12/2023
Parent Training & Information Center	1 <sup>st</sup> Term	10/11/2022
Client Assistance Program	2 <sup>nd</sup> Term	07/12/2022
Qualified VR Counselor (Ex-Officio if Employed by the VR Agency)	1 <sup>st</sup> Term	10/11/2022
Community Rehabilitation Program (CRP) Service Provider	1 <sup>st</sup> Term	09/21/2021
Business, Industry & Labor	1 <sup>st</sup> Term	4/10/2023
Business, Industry & Labor	2 <sup>nd</sup> Term	07/12/2022
Business, Industry & Labor	1 <sup>st</sup> Term	08/28/2023
Business, Industry & Labor	Vacant	
Disability Advocacy Groups (Physical Disabilities)	2 <sup>nd</sup> Term	07/12/2022

Disability Advocacy Groups (Sensory Disabilities)	1 <sup>st</sup> Term	9/21/2021
Disability Advocacy Groups (Mental Health)	2 <sup>nd</sup> Term	07/12/21
Disability Advocacy Groups (Sensory Disabilities)	2 <sup>nd</sup> Term	07/12/2021
Disability Advocacy Groups (Intellectual Disabilities)	1 <sup>st</sup> Term	07/21/2022
Current or Former Applicants for, or Recipients of, VR Services	2 <sup>nd</sup> Term	07/12/2023
Section 121 (AIVRS) Project Directors in the State (as applicable)	N/A	N/A
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2 <sup>nd</sup> Term	07/12/2023
State Workforce Development Board (WDB)	Vacant	
VR Agency Director (Ex Officio)	1 <sup>st</sup> Term	N/A

*If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.*

The PA Rehabilitation Council (PaRC) does not currently have a representative from the State Workforce Development Board (WDB); however, the Executive Director of the WDB is aware of the vacancy and supportive of filling it. He regularly reaches out to WDB members to encourage volunteers, as he is not able to serve due to the nature of his position with the Commonwealth. In the absence of an official member, the WDB Executive Director regularly assigns staff members from workforce-related Commonwealth agencies to attend PaRC committee meetings and share relevant information. OVR, PaRC and the WDB are in regular communication regarding the need to fill this position and will continue to pursue a representative. The PaRC is also actively seeking a fourth representative for Business, Industry & Labor.



*In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.*

The PaRC used the following sources to develop its recommendations to the PA Office of Vocational Rehabilitation (OVR):

- PaRC Annual Report (State Fiscal Year [FY] 2021-2022)
- OVR Customer Satisfaction Surveys
- Review of items in the 2022 State Plan Attachment (Description A)
- Comments received at 2022/2023 State Plan Meetings
- Comprehensive Statewide Needs Assessment (CSNA) Program Years (PY) 2019-2022 OVR/Institute on Disabilities at Temple University
- Local Citizen Advisory Committees (CAC) meetings and/or minutes
- Quarterly reports received from OVR at PaRC Full Council meetings

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

**Commendation:** The Council commends OVR for reopening the Order of Selection (OOS) and their work on the Financial Needs Test (FNT) and College Policy, thus providing many more opportunities for people across the Commonwealth to participate in VR and secure Competitive Integrated Employment (CIE).

**Recommendations:**

**Empower Individuals paid subminimum wages through 14(c) Waivers to obtain CIE.**

**Issue:** Many individuals who are paid subminimum wages through employers that hold certificates issued under section 14(c) of the Fair Labor Standards Act have stated a desire to receive the supports necessary to move into CIE. Potential barriers may include lack of contacts available outside of the workshops for families and individuals, communication between workshops and families, family resistance or decisions being made by families on behalf of individuals, individuals determined in-eligible for services, and a lack of benefits counseling during initial contact with providers.

**Recommendations/Measurable goals:**

Expedite the Integrated Vocational Engagement & Support Team (InVEST) Project to assist individuals with disabilities, families, and community businesses with CIE engagement, supports and services/resource coordination.

**OVR Response:** Year One is in progress to establish foundation according to the proposal submitted to RSA in preparation for Year Two when the InVEST Project will begin implementation.

Upon availability, OVR shares reports and data identifying the main cause of individuals remaining in 14(c) workshops.

**OVR Response:** Currently, there is no report as to why individuals choose to remain in 14(c) facilities; however, our Section 511 VR Specialists continue to conduct informational presentations to those individuals within the 14(c) facilities and complete applications for those interested in OVR services.

It is imperative that people with disabilities are: 1) included in the process of identifying how these barriers are removed, and; 2) provided creative solutions/presentations from people with full professional and lived experiences to ensure better outcomes for participants.

**OVR Response:** Our Section 511 VR Specialists will continue to provide information on how a person in a 14(c) facility can transition to CIE. They will also provide referrals to District Offices for any person

interested in CIE. Through the InVEST Project, OVR is running advisory committees and will use the feedback to implement further strategies to help Customers in 14(c) facilities exit to CIE.

### **Leverage resources, heighten understanding, and provide additional staff trainings in OVR District Offices to better serve Customers with mental health needs**

**Issue:** According to the findings listed in the CSNA, people with mental health needs have been identified as one of the most underserved communities in the Commonwealth of Pennsylvania (PA) because, “many individuals with mental health needs do not recognize themselves as part of the disability community and understand that they can access VR services. This lack of understanding coupled with stigma results in individuals not getting access to necessary accommodations. There is also a lack of training and funding for providers to support individuals with mental health needs.”

#### **Recommendations/Measurable Goals:**

All OVR District Offices will collaborate with local mental health providers and obtain resources within their region to:

Provide necessary accommodations for people with mental health needs seeking VR services.

Perform community outreach and inform people with mental health needs about their rights to VR services.

Provide training, information, and resources to OVR counselors, staff, and VR providers to help identify behaviors that may exhibit the need for mental health services.

**OVR Response:** OVR will continue to provide outreach and onboard new providers to enhance services to those with mental health disorders. OVR will make training available to all staff through in-service trainings and outsource trainings as appropriate and collaborate with the PA Office and Mental Health & Substance Abuse Services (OMHSAS).

### **Recovery Efforts from the many impacts of COVID-19**

**Issue:** Since March 2020, when physical distancing protocols began in PA, issues with VR services have been exacerbated on all sides, including those who have experienced the lasting effects from COVID-19 or long-COVID, delayed VR services, disruptions to Pre-Employment Transition Services (Pre-ETS), and the lack of communication, interaction, and response for those seeking services.

#### **Recommendations/Measurable Goals:**

Expedite all VR services/cases that have been delayed since March 2020 due to the impacts of COVID-19.

**OVR Response:** Currently all cases on the waitlist have been served and those who were not able to participate in OVR services during the pandemic for health, personal, or other reasons, will be encouraged to apply. The OVR OOS is open to all three categories based on internal priority selection policies.

Provide a timeline for expedited services for those who have experienced delays with Pre-ETS due to the impacts of COVID-19.

**OVR Response:** Rapid Engagement initiatives have been put into place since October 2022 to expedite the referral, application, and eligibility processes. OVR’s referrals and Pre-ETS participation rates continue to increase steadily. OVR will continue to outreach to schools and other stakeholders to generate other referrals.

Within 30 days of the adoption of the State Plan, interact personally at least one time with individuals whose cases have been delayed or inactive since March 2020 either by phone, in-person meeting, or virtual meeting.

**OVR Response:** Through the months of April-June 2023, OVR conducted a Lean 5S Project requiring all staff to reach out to existing customers and ensure they are actively engaged. If they were not actively engaged, staff updated those cases to reflect current goals or closed cases when they were unable to connect with a customer. Customer engagement remains a central piece of OVR’s Rapid Engagement

strategy and staff will continue to make sure customers are continuously engaged with our system. Staff are also responsible for maintaining continued Rapid Engagement strategies to ensure cases progress timely, and office managers and supervisors have been tasked with developing monitoring and supervisory procedures to ensure compliance with federal service provision timeframes.

### **Strengthen Collaboration between Bureau of Vocational Rehabilitation Services (BVRs) and Bureau of Blindness and Visual Services (BBVS)**

**Issue:** VR services that provide job readiness, training, education, and a pathway to competitive employment are not fully accessible to all customers, particularly BBVS customers.

#### **Recommendations/Measurable goals:**

OVR will provide a heightened level of cross training and resources between BBVS and BVRs staff to meet the capabilities of all customers.

**OVR Response:** OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus.

OVR will increase BBVS and BVRs staff to focus on providing additional services, programs, and resources for students and customers.

**OVR Response:** OVR continues to submit employment postings supported by existing complement positions and works with the Governors' Office of Talent Acquisition to assist with talent recruitment.

OVR will consult with credible sources outside the Agency to provide training related to specific disabilities to enhance current training provided by OVR.

**OVR Response:** OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus. Within these topics, outside presenters are often included to ensure staff are aware of the most current information.

OVR will provide Innovation & Expansion grant opportunities to entities interested in providing specific blindness skills training to Pre-ETS and BBVS customers enrolled in VR services.

**OVR Response:** OVR will explore the need for Innovation & Expansion opportunities and will also continue to do community outreach to encourage additional providers to work with OVR and provide services to customers.

### **Promoting Competitive Integrated Employment Workplace Settings**

**Issue:** Organizations located within PA with the goal to hire a majority of employees with disabilities may be implementing hiring initiatives and policies detrimental to the continued development of competitive, integrated workplace settings, thus negatively impacting existing employment models.

#### **Recommendations/Measurable goals:**

WIOA defines CIE as work that is performed on a full-time or part-time basis for which an individual is: 1) compensated at or above minimum wage and comparable to the customary rate paid by the employer to employees without disabilities performing similar duties and with similar training and experience; 2) receiving the same level of benefits provided to other employees without disabilities in similar positions; 3) at a location where the employee interacts with other individuals without disabilities; and 4) presented opportunities for advancement similar to other employees without disabilities in similar positions. OVR will provide education and outreach to organizations that it partners with to help ensure PA's workplace settings align with the WIOA definition of CIE.

**OVR Response:** OVR's policy and review process is aligned with WIOA's definition of CIE and OVR's Business Services & Outreach Division (BSOD) will be providing information and education materials to new employers with whom they engage. When necessary, OVR goes conducts site visits with employers to ensure they are compliant with the CIE policy.

OVR will collect and analyze customer data such as wages, location/interaction, natural supports, advancement opportunities, and equal pay and benefits to measure the competitive environments and economic opportunities for people with disabilities.

**OVR Response:** OVR utilizes RSA's data when analyzing pay and areas of placement. OVR's Business Services staff work to ensure the placement of persons with disabilities meets the above requirements. OVR collects data in accordance with requirements of the RSA-911 file. OVR can use this information to analyze this type of information to ensure OVR customers are obtaining sustainable employment opportunities that provide a living wage and career advancement opportunities.

OVR will inform and educate their partner organizations on the importance of, and opportunities for, upward mobility, career advancement, best practices, location with interaction, collaboration within the workplace, natural supports, and equal pay and benefits to ensure the workplace is maintaining CIE.

**OVR Response:** Provider trainings and other regularly scheduled meetings are held on an ongoing basis. Local District Offices maintain contact with their partner organizations to ensure they are aware of the above measures.

### **Customer Satisfaction Surveys**

**Issue:** The PaRC reviews OVR Customer Satisfaction Surveys monthly to assist with developing the State Plan and evaluate and make recommendations regarding the effectiveness of PA's VR services; however, efforts to rectify concerns regarding low response rates and the lack of accessibility for customers to provide input on their experiences with VR services and programs remain insufficient.

#### **Recommendations/Measurable goals:**

OVR will increase Customer Satisfaction Survey accessibility and response rates by 10% each year.

**OVR Response:** OVR will continue to evaluate its Customer Satisfaction process and look for creative ways to increase the response rate.

To increase response rates, OVR will consider using Summer Interns to call customers and complete the surveys using the communication method which best meets the needs of the customer.

**OVR Response:** OVR currently has a devoted staff member who handles the above but will certainly consider additional resources to complete these tasks.

### **Identification of populations served by BVRS and BBVS.**

**Issue:** There is no discrimination between employment outcomes specifically defined for customers of BVRS and BBVS, or separate fiscal reports provided for each Bureau.

#### **Recommendations/Measurable Goals:**

OVR will provide separate lists of employers for each BVRS and BBVS Bureau.

**OVR Response:** OVR District Offices work with employers that provide career services for all Pennsylvanians with disabilities. Each placement is unique to the individual's strength and abilities.

OVR will provide a fiscal report for each BVRS and BBVS Bureau outlining the expenditures for customers in their respective VR programs.

**OVR Response:** OVR will provide a fiscal report regarding expenditures of services.

*(b) Comprehensive Statewide Needs Assessment (CSNA). Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:*

- (1) The VR services needs of individuals with disabilities residing within the State, including:
  - (A) Individuals with the most significant disabilities and their need for Supported Employment (SE).**

OVR contracted with the Institute on Disabilities at Temple University, PA’s University Center for Excellence in Developmental Disabilities, to conduct and interpret the CSNA required for PY 2019-2021. This is the most recently completed assessment. The purpose of the CSNA is to inform OVR and PaRC regarding issues and needs of the disability community in PA. 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.

OVR initiated a new CSNA project for PY 2022-2024, again with Temple University’s Institute on Disabilities. With the waning of the COVID-19 pandemic and more relaxed physical distancing protocols, this new project should mark a return to traditional in-person interviews, focus groups and site visits. The projected deadline will be for a final report expected in December 2025. This is also a collaborative effort with the PaRC, whose members received quarterly updates on the progress of the project, along with OVR leadership, and the OVR State Board members. Findings from this new CSNA project will be included in the development of the next VR Services Portion of the Combined State Plan expected to be drafted in 2027-2028.

### Comparison of Pennsylvania to National Population Statistics

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 PA and across the nation in 2017-2019.

### Comparison of Pennsylvania to National Population Statistics

Disability Identification across demographic variables	U.S. % Est (2017)	U.S. % Est (2018)	U.S. % Est (2019)	PA % Est (2017)	PA % Est (2018)	PA % Est (2019)
<b>Total civilian noninstitutionalized population</b>	12.7	12.6	12.7	14.1	14.1	14.0
<b>Population under 5 years</b>	0.7	0.7	0.7	0.9	0.9	0.5
<b>Population 5 to 17 years</b>	5.5	5.5	5.6	7.0	7.0	7.4
<b>Population 18 to 34 years</b>	6.4	6.4	6.7	7.0	7.6	7.9
<b>Population 35 to 64 years</b>	12.7	12.5	12.4	13.9	13.7	13.6
<b>Population 65 to 74 years</b>	25.0	24.4	24.1	24.0	23.3	22.6
<b>Population 75 years and older</b>	48.7	47.5	47.1	47.9	46.5	45.3
<b>Male</b>	12.6	12.5	12.6	13.8	13.6	13.7
<b>Female</b>	12.8	12.7	12.8	14.4	14.5	14.3
<b>White alone</b>	13.3	13.2	13.2	14.1	13.9	13.8
<b>Black or African American alone</b>	14.0	13.8	14.1	16.6	16.7	17.0

Disability Identification across demographic variables	U.S. % Est (2017)	U.S. % Est (2018)	U.S. % Est (2019)	PA % Est (2017)	PA % Est (2018)	PA % Est (2019)
American Indian and Alaska Native alone	17.3	16.9	17.2	20.8	24.0	20.6
Asian alone	7.1	6.9	7.2	7.0	7.3	6.9
Native Hawaiian and other Pacific Islander alone	10.3	11.1	10.6	N	8.6	16.1
Some other race alone	8.0	8.4	8.4	12.7	18.1	17.8
Two or more races	11.1	10.7	11.0	13.0	12.2	13.2
White alone, not Latinx	14.0	14.0	14.1	14.2	14.0	13.9
Latinx (of any race)	9.0	9.0	9.1	12.7	13.9	13.8

Source: 2018 and 2021 American Community Survey 1-Year Estimates

Compared to the estimated national rate of disability identification in 2017 (12.7%), 2018 (12.6%), and 2019 (12.7%), PA has a slightly higher rate of disability identification in its total civilian population (14.1% in 2017, 14.1% in 2018, and 14.0% in 2019). In 2017, PA civilians ages 18-34 and 35-64 years had a slightly higher than national average rate of disability identification (PA: 7.0% and 13.9% vs. U.S.: 6.4% and 12.7%). This trend continued in 2018, with PA civilians ages 18-34 years old (PA: 7.6% vs. US: 6.4%) and 35-64 years old (PA: 13.7% vs. U.S.: 12.5%) and in 2019 with, PA Civilians ages 18-34 years old (PA: 7.9% vs. US: 6.7%) and 35-64 years old (PA: 13.6% and US:12.4%).

The estimated national average of individuals identifying as having a disability who were employed was 24.0% in 2018 and 25.9% in 2021, and in PA, the estimated average was 24.1% in 2018 and 25.1% in 2021. The rate of unemployment for individuals with disabilities across the United States in 2018 was 2.8%, compared to 3.0% in PA in 2018, and in 2021 across the United States and in PA it was 3.8% (American Community Survey, 2018 and 2021). The Bureau of Labor Statistics, Census Bureau, and other relevant data sources calculate employment and unemployment rates based on those conceived as among the civilian labor force. Some people with disabilities may be perceived by themselves or others as not in the civilian labor force but may desire employment; this is sometimes referred to as joblessness rather than unemployment.

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 Individualized Plan for Employment (IPE) Initiated, and Transition Services for Youth and Students with Disabilities. 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. 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 (during Customer Satisfaction Committee meetings) to determine successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities.

*(B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program.*

Evaluation of the VR needs of individuals with disabilities who remain unserved or underserved was conducted via primary and secondary data collection and analysis. Secondary data included state and

federal agency reports and evidence-based research. Through the “Information about your Employment Services” mixed methods survey (August 2021), Community Rehabilitation Program (CRP) staff indicated that the most underserved communities in PA, in order of significance, were:

- People in rural areas
- People with mental health needs
- People who are blind or visually impaired
- People with Autism Spectrum Disorder
- People involved with the justice system (victims, defenders, or parolees)
- People who are deaf or hard of hearing
- Racially or ethnically marginalized people (Described in the survey as “racial or ethnic minorities”)
- People with intellectual disabilities
- Non-English speakers or English non-dominant speakers
- People with developmental disabilities
- People with physical disabilities
- People with neurological disabilities
- People with substance use disorder
- Seniors
- Transition-age students or youth
- Veterans.

In addition, the CSNA identified a few additional hidden communities, including state center residents, people with immigrant or non-citizenship status, parents with disabilities, people living with HIV/AIDS, children engaged in the foster care system, individuals experiencing homelessness, and people who require assistive technology (AT). It should be noted that people who are unserved or underserved by OVR may identify with multiple unserved or underserved communities and face compounding marginalization.

*(C) Individuals with disabilities served through other components of the workforce development system; and*

WIOA was built upon decades of workforce development legislation and reauthorized the workforce investment system. WIOA has mandated that 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 PA as PA CareerLink®), and Title IV, the public VR program as defined by the Rehabilitation Act of 1973, as amended, work together to improve alignment, coordination, cooperation and collaboration in services to businesses. This has led to a greater emphasis on student/youth career pathways, CIE for persons with disabilities, and increased business engagement. Consequently, the sections below detail the needs of the customers and constituents of these agencies as well as the efforts of these agencies to partner to best serve their mutual customers.

The PA Governor’s Policy Office established the Employment First Commission task force to include representatives of all agencies who administer workforce development programs. The group was tasked with increasing collaboration and communication across state agencies and with providing recommendations to the Governor’s Office to improve workforce development programs and activities in the Commonwealth.

The core workforce system partnership consists of:

- Department of Labor & Industry (DLI)
- CareerLink
- Office of Vocational Rehabilitation (OVR)
- Office for the Deaf & Hard of Hearing (ODHH)
- Bureau of Blindness & Visual Services (BBVS)
- Bureau of Disability Determination
- Department of Community and Economic Development
- Department of Education (DOE)
- Department of Human Services (DHS)
- Office of Children, Youth & Families
- Office of Developmental Programs (ODP)
- Office of Long-Term Living (OLTL)
- Office of Mental Health & Substance Abuse (OMHSAS)
- Department of Aging
- Other programs engaged in the statewide workforce investment system and interagency work group include:
  - Department of Agriculture
  - Department of Military & Veterans Affairs
  - Department of State
  - Department of Corrections
  - Governor's Office

The interagency workforce investment work group is coordinated by the Pennsylvania Workforce Development Board. In PA, workforce investment is managed across 23 regional Local Workforce Development Areas (LWDA), each of which has a WDB. WDBs are comprised of a board of governor-appointed workforce development stakeholders which develops locally responsive workforce policies and strategies and oversees their region's PA CareerLink® centers.

Interagency referrals greatly affect who learns about OVR and accesses services. While individuals may self-refer, many learn about OVR through county/administrative entities, supports coordination organizations and agencies, providers of employment-related services, high schools, universities and colleges, doctors and health agencies, and many other community organizations. Effective cross-agency collaboration requires that services are coordinated and unduplicated. PA ensures this through utilization of a statewide data system Commonwealth Workforce Development System (CWDS) and associated workgroup.

OVR also participates with many advisory committees that rely on the expertise of community leadership. OVR has continued to reach out to include the people and organizations that work for the VR community.

The following are just a few committees with whom OVR collaborates:

- Advisory Committee for the Blind
- Advisory Committee for the Deaf & Hard of Hearing
- Business Leadership Networks
- PA Chambers of Commerce
- PA Council on Independent Living
- PA Developmental Disabilities Council
- PA Initiative on Assistive Technology (PIAT)



- PA Rehabilitation Council (PaRC)
- Pennsylvania Assistive Technology Foundation (PATF)
- Pennsylvania Client Assistance Program (CAP)
- Pennsylvania Rehabilitation Association (PRA)
- Rehabilitation & Community Providers Association (RCPA)
- Society for Human Resource Management (SHRM)
- Statewide Independent Living Council (SILC)
- In the summer of 2021, the PA Workforce Coalition was established to address the needs of businesses and employment of people with disabilities. The PA Workforce Coalition is comprised of key PA state agencies and state business leadership including OVR:
- PA Association of People Supporting Employment First (APSE)
- PA Office of Developmental Programs (ODP)
- PA Office of Long-Term Living (OLTL)
- PA Office of Mental Health & Substance Abuse Services (OMHSAS)
- PA Department of Labor & Industry (DLI)
- PA Workforce Development Board (WDB)
- PA Chamber of Commerce
- PA Chamber of Black Owned Business
- PA Training & Technical Assistance Network (PaTTAN)
- PA Advocacy & Resources for Autism & Intellectual Disability (PAR)
- PA Rehabilitation & Community Providers Association (RCPA)

Survey data captured by the PA Workforce Coalition in September of 2021 revealed that:

- 50 of 77 (65%) employers are not tapped into the disability community for talent acquisition.
- 65 of 77 (84%) employers have not connected to OVR.
- 26 of 77 (34%) employers have not connected with a PA CareerLink®.
- Only 9 of 77 (12%) employers have a connection with a disability employment provider.

The leading needs of the individuals with disabilities served by the agencies/programs engaged in the statewide workforce investment system and interagency work group is provided below.

#### **Needs of Individuals Served by the Department of Labor & Industry (DLI)**

- The needs of individuals with disabilities served by DLI include:
- Information about high demand employment opportunities that match their career interests.
- Employment resources from *PA CareerLink®* and OVR to be made accessible to them in more coordinated ways by these offices.
- Clear pathways to apprenticeships through direct support from trained professionals within OVR and/or DLI's Apprenticeship & Training Office (ATO).
- More apprenticeship opportunities to be made available to them through organizations that work with their communities.

#### **Needs of Individuals Served by the Department of Human Services (DHS)**

The needs of individuals with disabilities served by the Department of Human Services (DHS) include:

- Increased opportunities for competitive employment.
- Training and continued education throughout their careers.
- Screening mental health and substance use disorders as part of employment services .

- Mental health and substance use disorder treatment offered alongside employment services.
- Assistance navigating the joint services offered through Experience the Employment Connection (EEC).

### **Needs of Individuals Served by the Department of Community and Economic Development**

The needs of individuals with disabilities served by the Department of Community and Economic Development include:

- Access to employers who have been trained in strategies to hire and retain individuals with disabilities.
- Increased awareness and action from PA businesses on issues related to the Americans with Disabilities Amendments Act (ADAA) and employment.
- Access to employment services, job training, and other related supports throughout their career.
- Focused efforts to serve those individuals who are unemployed for 27 weeks or longer.

### **Needs of Individuals Served by the PA Department of Education (PDE)**

The needs of individuals with disabilities served by the PA Department of Education (PDE) include:

- Increased post-secondary education opportunities that provide accommodations for individuals with disabilities.
- Greater opportunities for continuing education throughout careers and employment.
- Outreach to local business and organizations through the Department of Community and Economic Development to increase apprenticeship, internship, training, and other employment opportunities.
- Access to affordable post-secondary education.
- Targeted outreach and support of those individuals with less than a high school degree and those who have completed only some post-secondary education.

### **Needs of Individuals Served by the Department of Aging**

The needs of Seniors 65 and older with and without a disability served by the Department of Aging include:

- Affordable prescription medications.
- Access to in-home care and services.
- Available and affordable housing options.
- Available and affordable transportation.
- Dementia-capable and dementia-friendly communities.
- Access to mental health services.
- Expanded employment opportunities.
- Person-centered planning that fosters independence and self-sufficiency.
- Support (health care, paid employment, affordable transportation, and affordable housing) when released from Department of Corrections.

### **Needs of Individuals Served by the Department Of Agriculture**

The needs of individuals with disabilities served by the Department of Agriculture include:

- Improved transportation infrastructure.
- Access to affordable and reliable transportation.
- Outreach about employment and career opportunities in the agricultural industry.
- Increased representation in the department of agriculture reporting and planning.

### **Needs of Individuals Served by the Department of Military & Veterans Affairs**

The needs of individuals with disabilities served by the Department of Military & Veterans Affairs include:

- Direct support to navigate access affordable housing to avoid experiencing homelessness.
- Pathways out of homelessness and into stable housing situations.
- Coordinated resources between the OVR and the Veterans Administration (VA) to reduce overlap, wait time, and miscommunications about services.
- Services for mental health diagnoses and substance use disorder diagnoses that are offered and coordinated along with their employment services.

### **Needs of Individuals Served by the Department of Corrections**

Needs of individuals with disabilities served by Corrections include:

- Employment services that mitigate and work past the prejudices held by employers against individuals with criminal justice records.
- Available and affordable housing, transportation, and health care.
- A reduction of the length of time a minimal infraction remains on their criminal background check.
- Services for mental health diagnoses and substance use disorder diagnoses that are offered and coordinated along with their employment services.

*(D) Youth with disabilities, including students with disabilities and their need for Pre-ETS. Include an assessment of the needs of individuals with disabilities for transition career services and Pre-ETS, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA).*

As part of the 2019-2021 CSNA, Temple University's Institute on Disabilities researchers used surveys and interviews with workforce professionals to identify barriers to and strategies for increasing services and support opportunities for students and youth with disabilities. The primary needs identified for Pre-ETS are:

- Summer programming to prepare for workforce and further education.
- More collaboration with employers on "soft skill" training.
- Increased expectations among family members for the future of their students and youth.
- Access to affordable and reliable transportation.
- Access to digital resources and technology needed for employment and education.
- Increased OVR presence at schools.

*(2) Identify the need to establish, develop, or improve CRPs within the State.*

According to CRP staff surveyed for the CSNA in 2021, the primary obstacles facing CRPs in their provision of employment services, in order of significance, are:

- Transportation issues.
- Staff turnover or being short-staffed.
- Loss of benefits or concern thereof.
- Inadequate ongoing/long-term supports or funding.
- Lack of cross-agency collaboration/coordination (e.g., referral process).
- Employer perceptions.

Transportation was identified as the most significant barrier to service provision and employment of people with disabilities in the 2021 CRP survey, the 2014-2016 PA CSNA, and became a Target Goal of the 2016-2018 CSNA. Lack of accessible transportation impact rural communities in particular.

Individuals with disabilities need:

- Flexibility with scheduling and planning for paratransit services.
- Reliable and consistent paratransit services.
- Transportation workers with cultural competency and disability awareness.
- The general assumption that people with disabilities are interested in employment or being active.
- Institutional or societal investment in transportation for people with disabilities.

Specific strategies and best practices for reducing transportation barriers to employment for people with disabilities include:

- Developing transportation alternatives and support networks specific for people with disabilities who want to be or are currently employed.
- Training people with disabilities to interact with transportation workers in effective ways to receive the information and services they need.
- Expanding community involvement in transportation initiatives.

As mentioned above, the lack of reliable transportation continues to be identified as the most significant barrier to both employment and employment services. To combat the barrier of transportation, some CRPs provide transportation, secure alternative transportation including natural supports when possible, and partner with the transit system. These efforts make a difference at the individual level. However, more work can be done at the community level and system-wide level to assure individuals with disabilities have access to reliable transportation. This work must be done with individuals with disabilities in order to be successful. Per the 2016-2018 CSNA report, the most successful transportation and employment initiatives included:

- Involvement of people with disabilities in the committee work being done within transportation authorities throughout PA.
- Inclusion of people with disabilities in the development of current transportation initiatives.

The Statewide Provider Partnership (SPP) has described changes to supported employment and Pre-ETS policies as “unsustainable” for CRPs. The situation has been exacerbated by the COVID-19 pandemic. CRPs feel unable or ill-equipped to provide services as required by OVR (consequent of WIOA, Employment First, etc.) due to procedural, temporal, and financial constraints. Providers cited several challenges related to the Performance-Based SE (PBSE) payment model. Rather than establish additional CRPs, it is recommended that OVR focus on retaining existing CRPs. According to the SPP, retention would require OVR to follow up and act on the issues discussed during the productive convenings held between providers and OVR on January 13, 2020.

Many providers are interested in receiving more referrals and recommend more regular communication with OVR. 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 CRPs.

A majority of CRPs surveyed advised that intake and service provision could be significantly improved if providers received more information about the potential customer in the initial report (such as reports or records from other VR services, employment goals, etc.). Providers would benefit from a more standardized approach to the types and time frames of relevant documents attached to the referral.

Similarly, providers stated that more timely transition from a Community Based Work Assessment (CBWA) and waitlists for services would have a positive impact on placing individuals in employment. Providers noted that virtual meetings have helped speed the intake process. A majority advised that intake and service provision could be significantly improved if the customer received greater explanation of potential services in plain language.

The Hiram G. Andrews Center (HGAC) is the State-owned and operated comprehensive rehabilitation center in PA, a CRP providing necessary VR services to individuals with disabilities. HGAC provides a comprehensive program of services including the integration of Pre-ETS, education on campus at the Commonwealth Technical Institute (CTI), vocational counseling, vocational evaluation, and physical restoration in a barrier free environment for individuals with disabilities leading to CIE. The PA DLI's Center for Workforce Information & Analysis lists welders, cutters, solderers and brazers as High Priority Occupations (HPOs) for PA's industry-driven approach to workforce development. The purpose of the HPO lists is to align workforce training and education investments with occupations that are in demand by employers, have higher skill needs and are most likely to provide family sustaining wages. HGAC's expansion of services, involving expanding the welding program, will help prepare workforce needs in HPOs such as welding services and opportunities for welding employment in the State. In order to keep the Center operational and ensure continuity of service provision, at times it is necessary for the State to repair or replace systems and equipment within the center, including, but not limited to: electrical, plumbing and hot water, fire prevention, ventilation, sewage, etc., that go beyond ordinary repairs and maintenance. The State will submit requests for prior approval to RSA for related costs that exceed the capital expenditure threshold used by the State.

*(c) Goals, Priorities, and Strategies. Sections 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and SE programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act. VR agencies must—*

*(1) Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and*

The state goals and priorities for the VR Services Portion of the PA Combined State Plan were initially developed jointly with OVR Executive Staff and the PaRC Policy & State Plan Committee during a teleconference meeting exchange on March 20, 2023. Any projections, program continuations, etc. in this description are subject to the availability of funding in the plan year.

*(2) Identify measurable goals and priorities in carrying out the VR and SE programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—*

*(A) Support innovation and expansion activities;*

*(B) Overcome barriers to accessing VR and SE services;*

*(C) Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and Pre-ETS); and*

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

**Goal 1: Increase Competitive Integrated Employment (CIE) Opportunities for Individuals with Disabilities**

- Explore the utilization of alternative transportation services, not limited to Lyft or Uber, for job placement services.
- Conduct outreach to all transportation services within PA to identify interested vendors, targeting rural areas.
- Develop a provider agreement that offers a competitive rate to potential vendors.
- Enroll vendors into case management system.
- Increase VR services and outcomes for the blind/visually impaired.
- Conduct staff training to ensure all OVR program information is provided to this population (individuals who are blind/visually impaired).
- Increase awareness of OVR programming for customers who are blind/visually impaired via outreach events targeted for this population.
- Monitor District Offices that serve individuals who are blind/visually impaired to ensure this population has equal access to all services.
- Promote accessibility and technology based upon universal design principles.
- Conduct outreach to AT vendors within PA to identify interested vendors.
- Conduct staff training on AT and universal design principles.
- Utilize all existing resources within PA to ensure staff are equipped with the necessary tools to provide education to all customers.
- Expand training for CRPs and increase services for customers with mental health disabilities.
- Identify the most up to date evidence-based practices for individuals with mental health disabilities seeking employment.
- Expand partnerships with community agencies to increase awareness and effectiveness of service provision to people with mental health disabilities.
- Monitor efficacy of and outcomes for customers with mental health disabilities.

**Goal 2: Increase Transition Services for Students with Disabilities**

- Develop and expand summer, during, and after school Pre-ETS programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
- Continue to expand upon already established successful programming to include all populations served by OVR in order to prepare students with disabilities for a seamless transition from secondary school to CIE.
- Conduct research to identify evidence-based practices for during and after school curriculum and programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
- Implement and monitor programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
- Increase statewide collaboration with the Bureau of Special Education (BSE) and the Office of Developmental Programs (ODP) to expand Pre-ETS across Departments.

- Continue to build upon already established Memorandum of Understanding (MOU) with BSE to enhance and expand Pre-ETS across Departments.
- Continue to build upon the already established MOU with ODP to enhance and expand Pre-ETS across Departments.
- Establish consistent and regular communication with BSE and ODP to identify the potential for new pre-ETS programming.
- Implement and monitor programming to prepare Students with Disabilities for a seamless transition from secondary school to CIE.
- Identify School Districts and/or Charter Schools with low Pre-ETS outcomes and assist to increase positive outcomes during transition.
- OVR will evaluate the data available within CWDS to determine what school systems are not actively participating in Pre-ETS activities.
- Based on the available data, OVR will develop specific outreach activities for those schools.

**Goal 3: Increase Community Education and Outreach**

- Increase outreach to Department of Corrections to establish contact with reentrants and reduce recidivism.
- Identify a single point of contact (SPOC) for all State Correctional Institutions to begin collaboration on re-entry programming.
- Provide training to all OVR staff on re-entry initiatives.
- Increase social media and alternative outreach methods.
- Increase social media postings in order to highlight OVR success stories and positive outcomes of all OVR programming.
- Utilize additional media outlets to provide community outreach and education on OVR services.

**Goal 4: Initiate and Complete Capital Improvement Projects at HGAC**

- Increase opportunities for students through capital projects, including improvement of student training areas and development of new classrooms and other updated campus features.
- Through the enhancement of student training areas, begin outreach to attract new students.
- Through the enhancement of technology and infrastructure, begin outreach to populations traditionally underserved by HGAC.
- Through the enhancement of campus features, improve the collegiate experience for current and potential students.
- Promote accessibility and technology through capital improvements based on universal design principles.
- Remodel outdated accessibility in restrooms, classrooms, and dormitories due to age of facility.
- Evaluate current technology available on campus and update as needed.
- Conduct staff training on AT and universal design principles.
- Phased renovation of the dormitories at HGAC.
- Work with design team to optimize available space, increase accessibility to current standards, and add modern features.
- Coordinate current and incoming enrollment with construction schedule to maximize facility utilization during renovation phases.

**Goal 5: Increase Usage Opportunities At HGAC/CTI.**

- Expand outreach to non-traditional referral sources including increase of online presence.
- Strategize marketing events and efforts to target non-traditional referral sources.

- Strategize use of social media, website, virtual tour and other on-line marketing tools.
- Continue to improve application and payment options for non-traditional students.
- Expand opportunities for individuals who are blind/visually impaired.
- Continue to partner with BBVS to evaluate/update current technology and program accessibility.
- Conduct staff training to improve HGAC/CTI service delivery to this population of customers.
- Continue to evaluate satisfaction surveys and feedback from stakeholders.
- Expand the availability of services and education offered, including virtual learning opportunities.
- Continue to conduct feasibility studies and evaluate labor market trends for new training programs and credentials.
- Continue to research and develop virtual services specific to driver education, vocational assessment, and career preparation.

#### **Goal 6: Increase SE/VR Outcomes**

- Expand training for CRPs.
- Identify the most up to date evidence-based practices for SE.
- Expand partnerships with community agencies to increase awareness and effectiveness of service provision to people with mental health disabilities.
- Monitor efficacy of and outcomes for customers with mental health disabilities.
- Expand training for VR staff.
- Provide staff with training on evidence based best practices for supporting customers in obtaining CIE.
- Support staff through ongoing workshops and in-service trainings to ensure all OVR programming is being discussed with all populations served.
- Monitor efficacy and outcomes of trainings to identify knowledge gaps.
- Conduct outreach to employers to increase CIE.
- Provide employers with disability related work incentives/tax credits/employment supports.
- Educate employers on OVR employer specific services.
- Conduct disability etiquette training, ADAA evaluations, and on-going support during the onboarding process to enhance the relationship between the employer and OVR.

*(d) Evaluation and Reports of Progress: VR and Supported Employment Goals. For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—*

*(1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs.*

#### **Goal 1: Increase CIE Opportunities for Individuals with Disabilities**

Expand the availability of apprenticeships, internships, and On-the-Job Training (OJT) for individuals with disabilities.

Apprenticeship achievement:

During PY 2022, two OVR field staff began a one-year Registered Apprenticeship Navigator course provided through Keystone Development Partnership (KDP) where they physically participate in an apprenticeship geared towards the development of registered apprenticeships. The knowledge gathered



from this course will be used to assist OVR in employing new strategies to developing future apprenticeship opportunities.

During PY 2022, OVR continued to partner with the PA DLI's Apprenticeship & Training Office (ATO) to increase apprenticeship opportunities. An example of this strategy was with PeopleShare. PeopleShare is a staffing service that employs individuals in temporary to permanent, contracted, and temporary positions. With the assistance of the OVR Apprenticeship Navigators, PeopleShare developed the Sourcing Recruiter Registered Apprenticeship Program. OVR's BSOD Specialists refer OVR customers to the apprenticeships and other open job positions with PeopleShare.

OVR's BSOD staff continued to support CTI/HGAC to explore eligibility of current certification programs and certificate skill trainings to become registered Apprenticeships or Pre-Apprenticeships.

Internship achievement: OVR's State Employment Internship Program highlights the importance of state VR agencies partnering with other state entities to promote employment opportunities for individuals with disabilities. In PY 2022, in collaboration with the PA Office of Administration (OA), 30 OVR customers completed a 10-week paid summer internship in various state agencies in the Pittsburgh, Harrisburg, and Philadelphia regions. This experience afforded college students with disabilities the opportunity to experience state employment while at the same time gaining real-life work experience in addition to their college studies.

OVR also partnered with eight different Centers for Independent Living (CIL) to provide internships during the summer of 2022. These internships were aimed at OVR college students pursuing degrees related to social services. A total of six OVR customers completed the CIL internships with great successes reported, including one intern participating in his first ever work experience.

OJT achievement: In program year 2022, approximately 292 customers participated in OJT wage reimbursement employment opportunities that included permanent, temporary, summer, and seasonal time-limited employment in retail establishments, amusement parks, health care, municipal maintenance, customer service, clerical positions, and more.

Strategies related to the achievement of Part 1 of Goal 1:

- Demonstrating OJT value to businesses and for those not interested in wage reimbursement, OVR offered other services such as supported employment, customized employment (CE), ADAA consultation, etc.
- Not applying an FNT to the provision of OJT as a placement service affords all customers the benefit of OJT wage reimbursement services to an employer regardless of their financial status.
- Demonstrating the value of internships to both employers and customers through statewide, regional, and local means using the Single Point of Contact (SPOC) model and business service connections.
- Establishing a SPOC model for statewide hiring initiatives to serve the needs of both our employers and our customers.
- Partner with the Bureau of Workforce Partnership & Operations (BWPO) and individual local CareerLink administration bodies to ensure programmatic and physical accessibility of the PA CareerLink centers for equal access for individuals with disabilities.

A strategy related to achieving this goal in PY 2022 consisted of the virtual participation of OVR staff in WDB meetings both at a statewide and local level.

OVR continued to partner with workforce development partners by conducting comprehensive ADA accessibility reviews of the One-Stop Service system's primary PA CareerLink centers across PA. Reviews are intended to help partners ensure programmatic and physical accessibility of the centers for equal access for individuals with disabilities. This required OVR Business Services staff across the state to visit the primary PA CareerLink centers, take necessary measurements, document AT available, compile evaluation reports, and share with center administrators. Evaluation information has already been used by many centers to begin making modifications to physical buildings, parking spaces, offices, cubicles, etc. along with the procurement of AT to be fully ADA accessible. During this program year, OVR completed 60 reviews of PA CareerLink centers across PA. Private businesses have utilized OVR to provide ADA Accessibility reviews, including the Junior Achievement Center in western PA and MobilityWorks in Allegheny County.

BSOD staff continue to promote programmatic accessibility, through delivery of a comprehensive disability awareness and etiquette training to interested PA CareerLink partners and businesses. OVR has also made available to all PA 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 ADA to include strategies and modules for training businesses and customers on the Act. Increase SE and Customized Employment (CE) outcomes; evaluate and monitor OVR's SE policy implementation.

Implementation is monitored and evaluated through the formal VR case review process along with routine reports of information reviewed by Central Office Specialists in BSOD. This includes the use of performance "report cards" generated through the case management system and other custom reporting measures to evaluate outcomes.

Under the umbrella of OVR's current SE policy service options, an increase of 851 participants received services. Specifically, 566 more participants received supported employment services (as it is defined in WIOA) in PY 2022.

Despite more customers receiving SE services, successful SE and CE outcomes decreased in PY 2022 by 440 participants. OVR is reviewing the efficacy of the current policy and has been working on a draft revision in light of decreased outcomes.

## **Goal 2: Increase Transition Services for Students with Disabilities**

Develop summer and after school Pre-ETS programming to prepare students with disabilities for a seamless transition from secondary school to CIE.

### *JJS/PACTT Collaboration*

OVR and the Bureau of Juvenile Justice (BJJS) began a partnership in 2017. This collaboration has grown over the years, and enables us to provide work experiences, summer programming, and post-secondary training counseling to students from a variety of backgrounds. In the last SFY, OVR spent \$1,071,929 Pre-ETS dollars on services or staff time in developing and implementing Pre-ETS programs for PACTT Affiliates and PACTT Affiliated students. As of last quarter, OVR had interacted with 979 BJJS-affiliated students documented, 79 of them having a VR case open.

### *Early Reach Programming*

Early Reach assists youth with disabilities in becoming better prepared for the transition from high school to the world of work and independence. Early Reach is intended to promote successful employment outcomes for youth with disabilities, beginning at age 14, by increasing awareness of OVR services and the benefits of early career planning. The Early Reach initiative employs a team of Early Reach Coordinators (ERCs) to provide group and individual outreach, education, and consultation services to youth with disabilities and their parents, local schools and agencies that serve them. ERCs provide creative and engaging group workshops and presentations to help students build essential work and life skills in the areas of self-advocacy, workplace readiness, independent living, job exploration and post-secondary options. In the 2022-2023 State Fiscal Year, OVR's ERCs provided a combined total of 7,587 Outreach Events and Pre-ETS to 21,068 students with disabilities. 2,335 of those services were IEP meetings. ERCs most frequently provided Workplace Readiness Training, Instruction in Self-Advocacy, and Independent Living Skills Training.

### *Mobile Fab Lab*

OVR was excited to reignite the partnership with Carnegie Science Center to offer Fab Lab to students across the state. During a Fab Lab session, students use 3D printers and laser cutting to create digital design projects. OVR District Offices have taken the opportunity to offer these engaging services to students across PA, and the Carnegie Science Center has been offering sessions regularly.

### *BBVS*

Our BBVS offices are continuing to build Pre-ETS programming for our students who are blind or have a visual impairment. Summer programs, specifically for students who have a visual impairment, offer the unique chance for many students to be in a group with peers who face similar barriers when it comes to accessing their community and finding employment.

While we had several BBVS students participate in summer employment last year, we now have every BBVS office with a student applying to participate in a MY Work summer employment program. Each BBVS office has students participating in the BBVS Summer Program being held at Penn State Main Campus. This is in addition to the summer programs students are participating in throughout the state (i.e., IDEAL, Overbrook, EnVision, etc.).

### *DHSA*

The Deaf & Hard of Hearing Summer Academy was held from July 16-26, 2023, at Penn State University. Seventeen students from across PA participated in programming on vocational development, counseling and exploration on post-secondary options and resources, and self-advocacy instruction. OVR staff from Allentown, Johnstown, Pittsburgh, New Castle, Pittsburgh, and OVR's Central Office volunteered to provide onsite support.

Increase opportunities for students to gain workplace skills and community-integrated work experiences.

### *Professional Connections Experience (PCE)*

The Professional Connections Experience (PCE) is an OVR program available to students with disabilities as early as age 14, that begins to prepare them for community employment. It includes a combination of group instruction on workplace readiness and job exploration, along with community experiences such as job shadows, mock interviews, workplace tours, and/or assistance in obtaining prerequisite work

documents such as photo ID or work permits. Sixteen out of OVR's 21 District Offices have PCE programs and several District Offices offer multiple programs.

#### *Professional Connections Foundation (PCF)*

The Professional Connections Foundation (PCF) was rolled out for the 2022-2023 school year. PCF is similar to PCE, but is more flexible to allow students to participate during the school year. A PCF is a 30-hour program, where students receive 15 hours of group instruction on workplace readiness and job exploration and 15 hours of employer interaction in the areas of job shadowing, informational and mock interviews, tours, and assistance with work documents. Students are eligible for a stipend upon completion of the program. There are currently 20 provider agencies who offer this service across the state.

#### *Project SEARCH*

Project SEARCH is an internationally recognized model of a combined training and work experience for youth and adults with significant intellectual and developmental disabilities. It prepares students and young adults for CIE through internships hosted at employers like UPMC Hospitals and the Bucks County Government Center.

OVR currently collaborates on 21 Project SEARCH sites across the state and will be opening four new sites for the 2023-2024 school year:

- LIFE Lawrence (adult site) with New Castle BVRs
- Wind Creek (student site) with Allentown BVRs
- Aramark (student site) with Philadelphia BVRs
- Lehigh Valley Health Network – Pottsville (student site) with Reading BVRs
- The following sites achieved a 70-90% employment outcome for the 2021-2022 program year and earned an Excellent Outcome Award:
  - County of Bucks Government Center, Doylestown
  - Cumberland Perry County Government, Carlisle
  - Drexel University, Philadelphia
  - Lehigh Valley Hospital – Cedar Crest, Allentown
  - Lehigh Valley Hospital – Muhlenberg, Bethlehem
  - Penn State Health St. Joseph's, Reading
  - Phoenixville Hospital, Phoenixville
  - UPMC Mercy, Pittsburgh
  - WellSpan Health- York Hospital, York
- The National Project SEARCH conference was held July 10-14, 2023, in Milwaukee, WI.
- The PA Statewide Coordinator along with 19 additional OVR staff attended.

At the Opening Ceremony, the following PA sites earned a 100% Outcome Award for the 2021-2022 program year:

- Penn State Health Milton S. Hershey Medical Center, Hershey
- UPMC Hamot, Erie
- WellSpan Health Gettysburg Hospital, Gettysburg
- The following breakout sessions were offered at the conference that involved PA sites/partners/past intern and OVR staff:
  - Employment Planning Meetings (Bucks County Government site)

- Ryan’s Journey: Early Intervention, Education, Transition, Project SEARCH, Employment, Adulthood, Independence (UPMC Hamot)
- A Perfect Fit: Implementing the Project SEARCH Model in a Hospitality Setting (Kalahari Resorts and Conventions)
- Technology Supports for Success (Drexel University and School District of Philadelphia at 440)

#### *Youth Ambassador (YA)*

Our first Youth Ambassador (YA) was employed starting in June 2022 and completed his duties at the end of February 2023. Some specific YA duties have included job shadowing and informational interviewing with Intermediate Unit (IU) staff; observing/assisting with the IU6 Summer Program classrooms including the Multiple Disabilities, Life Skills and Autism Support classes; exploration through the PA Secondary Transition website curriculum including topics of disability awareness training, soft skills and executive functioning skills training, self-advocacy training, and decision making skills/informed choices training; coordinating transportation; maintaining a daily journal; and developing a professional portfolio.

Because of staffing shortages in schools, we have made the program requirements more flexible, to include expanding the qualifications to students attending post-secondary education in addition to being in their last two years of high school. The provider requirements have also been expanded to include public and private schools and private/non-profit agencies, in addition to IUs, special education professional development/technical assistance programs, and local education agencies (LEAs). Ongoing marketing efforts have been in place targeting IUs, school districts, and private organizations to recruit upcoming YAs.

For the 2023-24 school year, there will be at least 11 YA positions available across the state at a variety of agencies and locations. District Offices are currently working with providers to recruit students to fill the positions.

Enhance collaborative relationships with the PA DHS, PDE, higher education institutions, the PA Employment First Oversight Commission, and CRPs.

#### *N-TACT C Capacity Building Institute*

Members of the Transition Division attended the N-TACT: C Capacity Building Institute from May 16-18, 2023, in Charlotte, NC. Representatives from 49 states and territories attended the Capacity Building Institute. This provided the OVR Transition Division with the opportunity to work as a team with PA stakeholders as well as network with representatives from other state VR programs on best practices to better serve PA students with disabilities.

The PA Team had 20 stakeholders in attendance who attended breakout sessions on evidenced based practices for Transition Services for students with disability. Members of OVR’s Transition Division alongside representatives from PaTTAN, IU staff, PA college and university partners, parents, Parent Education & Advocacy Leadership (PEAL) Center representatives, PA Youth Leadership Network (PYLN), and the PA Office of Long-Term Living (OLTL) spent three days reviewing survey results from Transition Discoveries, data, and input from the PA Community of Practice on Transition and coming to a consensus on goals and action steps for the PA team. This work will be developed into a state plan to direct the collaborative efforts to serve students with disabilities and advance rates of CIE.

#### *PA Career Technical Education Special Populations (PACTESP)*

Specialists from the OVR Transition Division BSOD presented the PA Association of Career & Technical Education Special Populations (PACTESP) conference in Spring 2023 in Harrisburg, PA. General OVR Pre-ETS information and summer programming options were shared with various stakeholders in Career & Technical Education (CTE). Future work with CTE programs is planned with the PA Community of Practice.

#### *Connecting 4 Employment (C4E)*

Connecting 4 Employment (C4E) is a partnership between OVR, BSE and ODP. The goal of C4E is to ensure a seamless human services delivery system that can be effortlessly entered and navigated by individuals with disabilities and their families, should they choose to seek formal supports and maintain CIE. Leadership from OVR, BSE, ODP, and PaTTAN continue to meet weekly to further this initiative. From this regular collaboration, regional teams based on IUs were developed and have been meeting regularly, assessing resources, and building relationships.

Three regional trainings (West, Central & East) were conducted in October 2022 and March 2023 to help keep the momentum going among OVR, ODP, BSE and the IUs. At the 2023 PA Community of Practice on Transition Conference, a pre-conference was held collaboratively between OVR, ODP, and BSE. The pre-conference was an in-person networking opportunity that included presentations on collaboration and celebrated the teams' accomplishments.

#### *Disability Innovation Fund Pathways to Partnership Grant Application*

OVR has submitted and received the Disability Innovation Fund (DIF) Pathways to Partnership grant in collaboration with federally funded CILs, ODP, LEAs, and PDE/PaTTAN for a total amount of \$9,990,688. This is a five-year grant that will run from October 2023-September 2028.

**Grant Abstract:** The Pennsylvania Transition Partners: Pathways to Partnership Demonstration Model is an innovative three-component model of transition services that will be implemented with support and engagement across all partners to provide both intensive training and program development support. **Pathways to Partnerships—Professional Development, Capacity Building and Training** will provide all partners with shared trainings in Charting the LifeCourse from the PA Office of Developmental Program and the Transition Discoveries framework, an evidenced based transition planning program and will also train and provide employers with Inclusive Model Employer Credential. **Pathways to Partnership—Transition Discoveries** implements a “trainer the trainer” model at the IU and LEA level to support dissemination of Transition Discoveries to increase student outcomes through individualized transition planning. **Pathways to Partnership—Work Based Learning Experience** supports development and implementation of work-based learning programming at the LEA level. Formative and summative program evaluation informs project implementation, refinement, and upscaling within additional sites in Pennsylvania. Planned comparisons to prior outcomes within targeted regions for the intervention, as well as matched regions within the state, will provide for the evaluation of the project relative to control regions. Fidelity of implementation, project outcomes measures, and psychometrically valid measures will provide for a thorough evaluation of the impact of the project toward dissemination and replication to other agencies. Strategies and interventions, implementation considerations, evaluation metrics, and related information will form the basis of a toolkit to promote high fidelity of application of the Pathways to Partnership programs across the Commonwealth, sustainability of those efforts, and replication by other state vocational rehabilitation agencies.

### **Goal 3: Increase Community Education and Outreach**

Work with PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.

OVR conducts monthly outreach to customers to understand their experience of services from OVR. The current Customer Satisfaction Surveys were developed prior to 2022 with PaRC input and guidance. The basic method of outreach is through CWDS case record customer e-mail addresses. The surveys go to all customers of BVRS and BBVS based on their case services progress to status 26, employed. This includes those entering status 26 for one, six, and twelve months. A similar process is conducted for all customers who exit OVR in status 28. All customers in status 28 are only surveyed once during the month they appear in CWDS case records. Personally identifying information is redacted. This information is then shared with PaRC, and OVR Bureau Directors and managers. Customers who have requested follow-up are contacted on a case-by-case basis by OVR Central Office staff assigned to the surveys. Customers who request a follow-up by their VRC are shared with the Bureau District Office Administrator and VRC. To date, OVR averages approximately a 3% return on an average of one thousand surveys sent each month.

Lastly, all students in either transition status or Pre-ETS status are surveyed on their experiences with OVR. To date, OVR has had no responses to these surveys.

OVR has surveyed other state DSU survey models and results to look for ways to improve the survey process. This information has been shared with the OVR Executive Team and PaRC. PaRC has a committee that is exploring with OVR Central Office staff strategies and future improvements to improve the response rates.

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.

The Administrative Officer 3 for HR, Recruitment & Diversity has worked to create a Hiring Manager Resource Folder. This folder contains a variety of resources related to HR, Recruitment, and Diversity, Equity, Inclusion and Accessibility (DEIA). This folder and subfolders are designed for clerical assistants and managers (Executive Director, Bureau Directors, Bureau Managers, Division Chiefs, District Administrators, Assistant District Administrators, etc.). The resource folder provides informational fact sheets and statistics related to unserved/underserved populations, communication guidance and support, and information on our foreign language line (Propio). Some examples of these resources include articles, documents on person-first language, etiquette for working with individuals with disabilities, EEO information, saying basic phrases in other languages, and information related to other topics including: accessibility and awareness. OVR hopes to foster an environment of inclusivity and belonging and continues to reflect upon programs and resources to support our staff and customers from cultural and ethnic minorities.

Promote accessibility and technology based upon universal design principles.

Within OVR, we continue to promote accessibility by ensuring all documents and communication are usable and accessible for all. 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. Within OVR, staff has access to virtual accessibility trainings that provide instruction on document accessibility. To extend information beyond just OVR, OVR staff assist the PA Office of Administration with creating a usable and accessible website which staff accesses to complete mandatory trainings. Revisions and collaboration

have been ongoing, enhancing the accessibility of WBT training products. OVR is an active participant in ensuring the accessibility-based reviews continue on an ongoing basis for all Commonwealth web-based trainings. 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. 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 AT 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 DLI forms identified as inaccessible. Raising awareness of document accessibility is an ongoing need that is being addressed by ensuring new staff learn how to develop and disseminate accessible content. OVR actively participates in opportunities to enhance individual knowledge and understanding of the critical need for accessibility for all.

#### **Goal 4: Initiate and Complete Capital Improvement Projects at HGAC**

Invest in the replacement and repair of end-of-life systems and structure within HGAC, including but not limited to, building automation replacement, security cameras replacement and upgrade, phone system upgrade, campus-wide public restroom remodel, roof repairs, air handlers and cooling tower replacement and the repair to a failing ADA ramp/egress.

The agency has completed the replacement of some end-of life systems, but not all outlined in the State Plan. This is due in large part to continued delays in supply chains for large systems related to infrastructure and technology. The agency was able to complete the repairs to the failing ADA egress, roof repairs and phone system upgrade. Substantial work has been completed on the air handler and cooling tower replacements, with programming and linking to the existing then new building automation system still slated to occur in spring 2024. Planning, mobilization, and installation/networking work continues with the building automation replacement, security cameras replacement and system upgrade, and public restroom remodel.

Increase opportunities for students through capital projects, including new classrooms, upgrades to existing classrooms and updated campus features.

Planning continues for new classrooms, with Childcare Development Associate being the next program slated to open. Technology has been upgraded in all classrooms where life cycles allowed, and we continue to implement industry standards in the classrooms as recommended by the PAC committees. Campus upgrades place opportunities for our students at the forefront, with improvements made in the Dining Hall, dormitories, shared recreational and study spaces, and classrooms.

Promote accessibility and technology through capital improvements based on universal design principles. The agency continues to explore and move to procure systems, classroom and student life technology based on universal design. An internal navigation application for campus available on Android and Apple devices is currently moving through the Commonwealth procurement process. Every capital project design is assessed by architects fluent in universal design.

Expand the availability of services and education offered through HGAC.

The agency has been and continues expanding both on-campus and community programming for customers of the Commonwealth. The Center for Assistive and Rehabilitative Technology (CART) has



expanded services and serves a greater number of customers off-campus in their community and residences. A deal was brokered between HGAC and the local public transportation agency to offer every customer receiving services a bus pass for the entirety of their campus stay with the agency. Future plans, currently in varying stages of program development, Commonwealth procurement, or MOU enactment, include virtual classroom driver's education services with in-community behind-the-wheel drivers training, transportation contract for students, virtual vocational assessments, virtual career services, and a driver evaluation program in conjunction with the PDE.

Phased renovation of the dormitories at HGAC.

HGAC has implemented and been approved to proceed with a project through PA's Department of General Services to renovate each dormitory on campus, which will be seven total with two being done at a time. It is anticipated each two-dormitory remodel will take approximately eight months. Administration has been presented with and reviewed several renderings for dormitory renovations and made alterations to plans to best serve the student body in function, form, and accessibility. Plans were solidified and final drawings have been developed. Renovations will begin in Bedford and Cambria Halls, with work taking place at the same time to maximize contractor time and to ensure materials are available and uniform. Due to other capital projects, start time for the renovations is unknown, however it is expected to begin late 2023/early 2024.

*(2) Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and*

OVR's performance indicators for Program Year 2022 are as follows:

- Employment Q2 After Exit – 61.8% (RSA's goal as established in the State Plan is 56%)
- Employment Q4 After Exit – 56.8% (RSA's goal as established in the State Plan is 47%)
- Credential Attainment (CA) – 19% (RSA's goal as established in the State Plan is 20%)
- Measurable Skill Gains (MSG) – 36.5% (RSA's goal as established in the State Plan is 39%)

Of note is that PA OVR started Q1 off at 1.8%, climbed to 10.8% in Q2, 16.7% in Q3, and reached 36.5% in Q4, so although we fell just short of the goal for MSG, we were able to climb 34.7% in a 12-month period. The key now will be sustaining that momentum as the activities related to both CA and MSG tracking are an administrative burden on staff.

*(3) The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).*

No funds were used to purchase *RSA-defined* I&E activities during PY 2022 according to sections 101(a)(18) and 101(a)(23). However, OVR will evaluate the necessity of reserving I&E funds related to the provision of direct services to customers based on needs identified in the CSNA.

*(e) Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.*

*(1) Acceptance of title VI funds:*

(A)  VR agency requests to receive title VI funds.

(B)  VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

*(2) If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the SE program.*

Title VI funds will be used to provide SE services under the WIOA definition to eligible participants of the VR program. At least 50% of these funds will be used to provide SE to youth with disabilities; however, it is OVR's intention to devote up to 100% for this purpose if there are sufficient numbers of appropriate youth participants. Adults with disabilities will be served with any remaining funds available after youth have been served using these funds. All services provided using title VI funds will operate under the same guidelines as SE services provided under title I.

*(3) SE services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe the quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities; and the timing of transition to extended services.*

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**

OVR completely overhauled its SE policy and procedures from 2016-18. Changes were brought about by recommendations of an SE workgroup and new regulations stemming from WIOA, and included a revision of the milestone payment approach that was in place to a fee structure corresponding to a customer's job stability, a move from Letters of Understanding (LOU) with CRPs to an SE Provider Agreement, the inclusion of Discovery/CE in the 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. As of October 2023, there are 173 approved SE providers (an 11% increase from August 2021), with 30 providers approved to render Discovery/CE services (17% increase).

## **Quality Standards**

OVR utilizes a broader case review process to ensure that counselors are providing services in accordance with policy and procedure. This covers the general oversight of providing SE services.

OVR's electronic case management system has business rules in place to ensure that all reporting and documentation related to the provision of SE services are being conducted according to policy, thus helping to ensure quality standards.

Current OVR SE policy requires that CRP staff have minimum credentials including Certified Employment Support Professional (CESP), Association of Community Rehabilitation Coordinators (ACRE), and CRC, in order to provide SE services to ensure quality service provision.

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, video conferences and conference calls.

### **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 include 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 PA, 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 Medicaid 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 that can be used for extended service funding are natural supports, SSA work incentives, and private foundations.

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 has a joint agreement that dictates when the case can move to ODP-funded extended services and documentation requirements.

*(4) Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide SE services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(C)(19)(v).*

As mentioned above, OVR has coordinated with other State offices such as ODP and OLTL. Preliminary meetings were held with OMHSAS to discuss a coordinated approach to bringing the Individual Placement and Support (IPS) and other entities to provide SE services and extended 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 offices to provide quality SE services and provide referrals and information regarding mutual customers. OVR will provide current information and training to state offices and other entities to ensure the provision of services and extended services.

OVR will continue to support the provision of quality SE services by adequately trained and properly credentialed staff either directly, through other state and local government agencies, or private service agencies, as appropriate.

*Annual Estimates. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:*

*(1) Estimates for next Federal fiscal year—  
(A) VR Program; and*

Priority Category (if applicable)	No. of Individuals Eligible For Services (Statistical Estimation of open cases in PY from past performance {2018-2022} and PY22 category composition)	No. of Eligible Individuals Expected to Receive Services under VR Program	Total Career and Training Services Expenditures (from PY22 ETA-9369 per capita amounts)	No. of Eligible Individuals Not Receiving Services (if applicable)
Most Significant Disability	34,000	34,000	\$140,000,000	N/A
Significant Disability	1,000	1,000	\$5,000,000	N/A
Non-Significant Disability	125	125	\$600,000	N/A

*(B) Supported Employment Program.*

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	No. Receiving Services x Actual Per Customer Costs for SE From 7/1/22 to Present	No. of Eligible Individuals Not Receiving Services (if applicable)

Most Significant Disability	8,300	8,300	\$20,100,00	N/A
Significant Disability	450	450	\$1,100,100	N/A
Non-Significant Disability	35	35	\$85,000	N/A

*(g) Order of Selection.*

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

The VR agency is implementing an order of selection with one or more categories closed.

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

Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

*(1) For VR agencies that have defined priority categories describe—  
(A) The justification for the order;*

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. The OOS in PA gives priority first to individuals with Most Significant Disability; second to individuals with Significant Disability; and third to individuals with Non-Significant Disability.

On July 1, 2019, with approval from RSA, OVR closed priority categories Most Significant Disability, Significant Disability, and Non-Significant Disability. The OOS was subsequently opened on August 8, 2022, and as of February 22, 2023, all eligible customers on the wait list were able to be removed from the list. OVR will continue to evaluate the fiscal outlook quarterly and resume the OOS and re-develop the wait list only if fiscally found necessary.

*(B) The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and*

**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.

*(C) The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.*

OVR is not implementing an OOS and all eligible individuals will be served.

OVR's outcome and service goals are projected as follows for **FFY 2024**:

- For the Most Significant Disability category, the number eligible is expected to be approximately 34,000, with all expected to be served.
- For the Significant Disability category, the number eligible is expected to be approximately 1,000, with all expected to be served.
- For the Non-Significant Disability category, the number eligible is expected to be approximately 125, with all expected to be served.

*(2) Has the VR agency elected to serve eligible individuals outside the OOS who require specific services or equipment to maintain employment?*

- Yes  
 No

*(h) Waiver of Statewideness. The State Plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the RSA (Commissioner) may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."*

OVR requests a continuation of its waiver of statewideness for its Intergovernmental Agreement (IGA) with the School District of Lancaster (SDoL). Through this program, transition age students with disabilities are provided with enhanced activities and services that lead to employment or career-related postsecondary education or training.

An 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 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.

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:

- Program Coordinator (Professional)
- Vocational Special Education Teacher (Professional)
- Job Trainer (Paraprofessional)

These two programs provide two separate paths for Pre-ETS. Pathway One is identified as "Employability and Career Readiness," and Pathway Two is identified as "College and Career Readiness."

### **Pathway One – Employability and Career Readiness**

A minimum of 120 OVR eligible and potentially eligible students with disabilities received employability skills, career readiness training and transition services.

Increased Employability and Career Instruction - Teachers are using the Life Centered Education Curriculum from CEC. Additional resources and curriculums were added.

Increased work simulations opportunities and projects in the classroom and building setting with a minimum of 10 new simulations and across students of multiple programs and level of need.

Continue to connect students to agency and transition services.

A minimum 45 OVR eligible students with disabilities will participate in at least one form of paid work experience. The following locations provide opportunities for paid work experiences.

- School District of Lancaster - Student Employee Program was successful
- Thaddeus Stevens
- Marriott/Lancaster County Convention Center

A minimum of three employee partnerships to provide small group training and a minimum of three employee partnerships for individual high need student cases. An employee partnership is an agreement between the SDoL and/or agency providers such as OVR, along with a community employer to provide students various levels of employment experience/opportunities such as OJT.

20 students with disabilities received job readiness and employment skills support. Eight students obtained post-graduation competitive employment.

In the school setting with limited community opportunity;

15 OVR eligible students with disabilities shall be placed in CIE consistent with their IEP.

### **Pathway Two - College/Career Readiness Transition**



This pathway includes classroom-based instruction related to college/career readiness skills and participation in a part-time college campus experience. Daily instruction and coaching is provided on a college campus for two hours per day through the duration of one college semester with the use of a vocational special education teacher. A minimum of 10 eligible students with disabilities receive college/career readiness training and services annually.

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 PDE and DHS more effectively. OVR, as the designated State unit, approved each proposed service before it was put into effect, as demonstrated by a fully executed IGA between the parties and following guidance in the OVR Fiscal Procedures Policy. Based upon 34 CFR §361.50 and 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 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.

*(i) Comprehensive System of Personnel Development. In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency’s comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:*

*(1) Analysis of current personnel and projected personnel needs including—*

*(A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;*

*(B) The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and*

*(C) Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in five years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.*

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
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VRC (includes VR Counselors for Deaf & Hard of Hearing)	315	380	65
Vision Rehabilitation Therapist	20	21	2
Orientation & Mobility Specialists	10	15	5

*(D) Ratio of qualified VR counselors to clients:*

The ratio of qualified VRCs to clients with an active rehabilitation plan as of October 2023 was 1:111.88.

*(E) Projected number of individuals to be served in five years:*

OVR projects that in the next five years, approximately 50 VRCs will become eligible to retire. This will be an average of 10 VRCs retiring per year, in addition to an unknown number of VRCs who leave as part of general turnover. Additional numbers of new VRCs may be needed due to promotions into management positions. If the number of customers seeking VR services remains the same, or slightly increases or decreases, OVR projects that an average of 15-20 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.

*(2) Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:*

*(A) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Pennsylvania State University	Clinical Mental Health and Clinical Rehabilitation	54	19
The University of Pittsburgh	Clinical Mental Health and Clinical Rehabilitation	60 (30 in Year 1, 30 in Year 2) but hoping to add Clinical RC back Fall 2024	20
Penn West University (Edinboro University of PA)	Clinical Rehabilitation Counseling	*School did not yet respond	*School did not yet respond

The University of Scranton	Clinical Rehabilitation *They also have other master's counseling programs	15 current Clinical RC students, plus 4 working on advanced studies credits towards licensure 62 Mental Health Counseling students 19 School Counseling students	8 Clinical Rehabilitation 20 Clinical Mental Health Counseling 7 School Counseling
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*(B) The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.*

### OVR Counselor Recruitment

As a direct result of the COVID-19 pandemic, all PA Commonwealth agencies (including OVR) were placed under a hiring freeze in March 2020. Since this directive was initiated by former PA Governor Tom Wolf for a significant period of time, OVR was unable to hire VRC Interns and new VRCs starting in March 2020. Hiring has since resumed and has been inclusive of all job classifications, including internships. The Administrative Officer 3 for HR, Recruitment, and Diversity responsible for recruitment and retention of employees has been working diligently with Commonwealth Human Resources and the Office of Administration in developing and implementing a strategic plan for recruitment.

In July 2022, after ongoing collaboration and coordination with the Office of Administration – HR, an expansion of the Minimum Experience and Training Requirements (METs) for the VRC, VRC-Deaf & Hard of Hearing, and VR Supervisor positions was approved. This expansion now permits individuals with master's degrees in the following fields to apply for the VRC, VRC-Deaf and Hard of Hearing, and VR Supervisor positions: VR, mental health, special education, social work, human services, psychology, business administration, human resources, public administration, and closely related fields. This change has significantly increased the eligible talent pool for recruitment in these job classifications. Additionally, in September 2022, the Administrative Officer 3 worked closely with PDE to provide outreach to over 300 colleges and universities within PA to encourage applicants for all job classifications. This effort was also to again highlight the new expanded METs for the VRC, VRC-Deaf & Hard of Hearing, and VR Supervisor positions.

In addition to the available students graduating from in-state programs, OVR's Administrative Officer 3 for HR, Recruitment & Diversity continues to recruit students from CORE/CACREP-approved universities that offer a master's degree in Rehabilitation Counseling/Clinical Rehabilitation Counseling nationwide. PA residency requirements are waived under the State Civil Service commission for the VR Counselor Internship position and other VR Counselor classifications in OVR. This waiver provides OVR with an opportunity to recruit students nationwide and offer paid VR Counselor 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 will have a master's degree in the field of

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 from a broader recruitment pool and can include more 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 PA. 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. This includes campus visits, onsite presentations, use of telecommunication technology, and one-on-one meetings with students for targeted recruitment. OVR has established relationships with the following HBCU's nationwide: Alabama State University, Coppin State University, University of the District of Columbia, Fort Valley State University, Langston University, University of Maryland Eastern Shore, North Carolina A&T State University, North Carolina Central University, South Carolina State University, Southern University and A&M College, and Winston-Salem State University. OVR will also continue to build relationships with program coordinators at graduate training programs in Puerto Rico who offer rehabilitation counseling disciplines including Bayamon Central University, Pontifical Catholic University of Puerto Rico, and the University of Puerto Rico.

Maintaining membership on Rehabilitation Counseling Program Advisory Boards, including George Washington University, Penn West University (formerly Edinboro University), Rutgers University, The University of Scranton, and West Virginia University. OVR will also maintain a commitment to other related partnership meetings, including Assumption University, Auburn University, Florida International University, and The University of South Carolina.

Maintaining active membership with professional organizations and visiting colleges/universities, and appropriate job fairs in conjunction with the Office of Equal Employment Opportunity, to recruit potential job applicants who are from diverse cultural backgrounds and applicants with disabilities.

#### *VRC Updates*

OVR is currently exploring additional options to expand the qualified talent pool for VRCs. This exploration involves consideration of varying levels of VRCs with the possibility of bachelor's level positions. This option was discussed at a previous State Board meeting and members were in favor of this option.

### *VRC – Deaf and Hard of Hearing*

OVR's Administrative Officer 3 for HR, Recruitment & Diversity 3 also has partnered with colleges and universities nationwide specific to VRC – Deaf & Hard of Hearing positions. Entry-level requirements for the VRC – Deaf & Hard of Hearing includes the METs for the VRC as well as passing a sign language proficiency evaluation at the intermediate level. Recruitment spans to students and alumni who receive training at universities nationwide. Students and alumni from these programs reside both inside and outside of PA. Some of these collegiate partners include Emporia State University, Gallaudet University, Troy University, Western Oregon University, and Winston-Salem State University. OVR will continue ongoing outreach and partnership with these colleges and universities.

### *Orientation & Mobility Specialists and Vision Rehabilitation Therapists*

OVR's Administrative Officer 3 for HR, Recruitment & Diversity recruits from accredited university programs in PA that train Orientation & Mobility (O&M) Specialists and/or Vision Rehabilitation Therapists (VRTs), including Salus University, the University of Pittsburgh's Vision Studies Program, and Kutztown University. Graduates of these approved university programs are eligible for certification in VRT or O&M from the Academy for the Certification of Vision Rehabilitation & Education Professionals (ACVREP). 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 PA. Additional collegiate partners that OVR's Administrative Officer 3 has worked with in this area include the following O&M Programs: California State University – Los Angeles, Florida State University, North Carolina Central University, San Francisco State University, Texas Tech University, Stephen F. Austin State University, University of Arkansas at Little Rock, Umass – Boston, O&M and VRT Programs: Northern Illinois University, West Michigan University, and VRT Programs: The University of Arizona.

OVR 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.

*(C) Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:*

- i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under Section 4 of the Assistive Technology Act of 1998; and*
- ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by WIOA.*

OVR employs a Training Specialist who monitors trends in both training and rehabilitation, including participation in a Community of Practice under the Center for Innovative Training in VR (CIT-VR), sharing various training opportunities from other partnerships.

In addition, 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's internal subject matter experts receive guidance from various technical assistance centers including the National Technical Assistance Center on Transition: The Collaborative (NTACT:C) and the VR Technical Assistance Center for Quality Management (VRTAC-QM).

OVR supports various training opportunities and coordinates efforts with various professional associations such as the PA Workforce Development Association, PA Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, PA Rehabilitation Association and the Association for Education & Rehabilitation of the Blind & Visually Impaired to train and retain qualified personnel. These external organizations frequently focus on evidence-based practices and current trends in their areas of subject matter expertise.

*(3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—*

*(A) Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and*

*(B) The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21<sup>st</sup> century understanding of the evolving labor force and the needs of individuals with disabilities.*

Section 101(a)(7) of the Rehabilitation Act as amended, 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 (CRCs). 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 PA Civil Service Announcement for VRC positions became effective on October 4, 2002.

On July 1, 2017, all CORE programs merged under CACREP. The intent of this merger was 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 VR. While a benefit to

the student, there is concern of 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. As mentioned above, in July 2022, OVR expanded the METs for the entry level VRC as it relates to the CACREP standards.

As a result of the CORE/CACREP merger, PA Office of Administration approved the proposed MET expansion. Within this redesign, and following RSA standard (34 CFR §361.18©(2)(A)(1), OVR has observed documented increases in the VRC candidate pool which has allowed us to decrease our vacancies in addition to increasing our visibility amongst all CORE/CACREP programs nationwide. The approved job classifications for the expansion included: VRC, VRC-Deaf & Hard of Hearing, and VR Supervisors. The expanded degree areas included: VR, mental health, special education, social work, human services, psychology, business administration, human resources, public administration, and closely related fields. All efforts are mission critical to support our District Offices and give the ability to maintain work-life balance for our employees.

OVR continues to provide the following recruitment incentives for VRCs:

A designated Administrative Officer who actively recruits qualified VRCs, including those with disabilities, individuals from diverse cultural backgrounds, and underrepresented groups, and from all CORE/CACREP programs nationwide. The Administrative Officer 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 & Hard of Hearing and Counselors for the Blind & Visually Impaired.

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.

OVR ensures that personnel have a 21<sup>st</sup> century understanding of the evolving labor force and the needs of individuals with disabilities through staff training, professional development, and continuing education on Labor Management Information (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 the 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

CIE 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-ETS.

*(4) Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.*

Most OVR District Offices have at least one Rehabilitation Counselor for the Deaf & Hard of Hearing population. Entry-level requirements for these counselors require that candidates pass a sign language proficiency evaluation at the intermediate level. OVR District Offices in geographic areas where there are large numbers of individuals who speak Spanish, recruit and hire VRCs 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. In addition, OVR has a VR Specialist assigned to coordinate the Deaf, Hard of Hearing & Deaf-Blind Program in OVR. This Specialist assists with outreach to these populations to attract qualified OVR candidates for employment.

Additionally, OVR has incorporated 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.

*(5) As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act (IDEA).*

VRCs focused on Transition and Early Reach Coordinators (ERCs) within OVR work regularly with educators in local school districts who are working under IDEA. Training on OVR's *School to Work 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.

## **COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)**

*(j) Coordination with Education Officials. In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—*

*(1) Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of VR services, including Pre-ETS.*

The *School to Work Transition Policy* was updated on March 11, 2021. The policy details OVR staff responsibilities regarding Pre-ETS, transition services, outreach, collaboration, and financial responsibility. Regarding coordination with education, OVR will collaborate with LEAs to improve the successful movement from school to work for students and youth with disabilities. OVR representatives will work with LEAs to develop strong, consistent relationships with LEAs so the OVR representative's knowledge and expertise can be of benefit to students and youth with disabilities, even before students/youth are formally referred to OVR.

Transition services, including Pre-ETS, offered by OVR will supplement, but not replace, IDEA transition services delivered through a secondary school or any other entity charged with the delivery of transition services in accordance with IDEA. The LEA is responsible for providing and paying for transition services that are also considered special education or related services and that are necessary for ensuring a free, appropriate public education to children with disabilities. Nothing under Title I of the Rehabilitation Act shall be construed as reducing an LEA's obligation to provide the above-described services under IDEA (see section 101(c) of the Rehabilitation Act and §361.22(c) of the VR regulations).

VR transition services facilitate the transition from school to post-secondary life, such as achievement of an employment outcome in CIE. Pre-ETS are part of the continuum of services that VR can provide to students with disabilities.

OVR will also designate a liaison to PDE and provide statewide coordination and technical assistance for transition from school to work. An OVR representative maintains contact as needed with personnel in area schools, alternative educational sites and community resources to ensure early identification of students and youth who may require VR services. These students and youth may or may not be receiving special education services.

*(2) Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:*

*(A) Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist*



*educational agencies in planning for the transition of students with disabilities from school to post-school activities, including Pre-ETS and other VR services;*

OVR and the PDE-BSE have signed an MOU. The MOU was approved by all parties in October 2020. A training series that overviewed the MOU agreement was provided to OVR, BSE, LEAs, youth and families. The trainings were offered on April 8, 2021 (*Unpacking the MOU*), April 21, 2021 (*Engaging Stakeholders*) and May 13, 2021 (*Strategies for Aligning Efforts*).

In addition, OVR has collaborated with PDE-BSE on launching a new PA Secondary Transition website with the intent to provide a “one-stop shop” for professionals and which provides general information about transition, practices, and resources. The website also includes an inter-agency shared events calendar and a place to share current announcements and information. The website is closely aligned with the Transition Discoveries website that contains resources for youth and families.

In the MOU with the PDE-BSE, 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.
- Inform and collaborate with LEAs 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.
- Create a consistent communication plan to develop policies and procedures.
- Along with BSE, collaborate on the provision of ongoing joint staff training, such as development and implementation of IEPs, Pre-ETS, 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-ETS information is made available to all LEAs. 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.

*(B) Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their IEPs under section 614(d) of IDEA;*

OVR can assist the students and youth with a disability transition from school to CIE, or from school to post-secondary training/education that leads to CIE. The transition goal of the student with a disability should always remain the priority of the IEP process. It is OVR’s role to provide appropriate and necessary information to the student and parent/advocate to ensure the IEP is developed with effective transition foremost in mind.

LEAs will send timely invitations to OVR counselors for participation in IEP meetings, when appropriate. When possible, OVR staff will attend IEP meetings in person or by alternative means, such as videoconferences and conference calls, when invited by the LEA. If they cannot participate in the IEP

meeting, OVR staff can provide information, vocational planning and guidance, and transition-specific materials to the IEP team.

In addition to the MOU and WIOA, the PA 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 that students with disabilities have Pre-ETS included in IEPs when appropriate and that OVR reports on IEP meeting attendance.

*(C) The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and Pre-ETS;*

The MOU outlines the roles and responsibilities of each agency:

OVR Responsibilities:

- Provide students with Pre-ETS 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-ETS, and students or youth with disabilities interested in applying for VR services.
- Determine eligibility for individual VR services and develop an 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 SPOC for each LEA 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-ETS 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.
- Conduct outreach to businesses and 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.
- 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 SE services to a student in their final six months of high school to secure permanent CIE if it is an identified service in their IPE.

#### BSE Responsibilities:

- Ensure the provision of a Free Appropriate Public Education (FAPE), including transition services.
- IDEA [34 CFR §300.43 (Authority: 20 U.S.C. 1401(34))]
- 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-ETS.
- Ensure that LEAs collaborate with OVR in determining the student's needed Pre-ETS 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-ETS.
- 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 PaRC 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-ETS 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-ETS 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 provide relevant training and technical assistance to 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 (ODP)
- Pennsylvania Rehabilitation Council (PaRC)
- State Board of Vocational Rehabilitation
- Right to Education State Task Force and Local Task Forces
- Client Assistance Program (CAP)
- 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-ETS 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). For financial responsibilities, OVR and BSE will identify a method for defining the financial responsibility of OVR and LEAs for the provision of VR services and will identify procedures under which OVR may initiate proceedings to secure reimbursement for VR services from LEAs and vice versa. 34 C.F.R. §§ 300.154 & 361.53(d)(3)(i) and (iii).

Disagreements about which entity is financially responsible for payment for services may occur, and decisions about whether the service is related to an employment outcome or educational attainment, or whether the service is considered a special education or related service, as well as whether the service is one customarily provided under IDEA or the Rehabilitation Act, will be made at the State level by BSE and OVR.

LEAs should continue to provide some of the transition services typically provided under IDEA rather than cease providing the services with a referral to the VR program. If any of the five required Pre-ETS are needed by a student with a disability, and are not customary services provided by LEAs, OVR will collaborate and coordinate with the LEA regarding the provision of such services.

When similar or identical service needs are identified as education-related in the IEP established by the LEA and employment-related in the IPE established by OVR, it is understood that disputes will be resolved between OVR and LEAs at the local level. The process for dispute resolution is as follows:

If the service is special education or a related service and included in the student's IEP, the LEA may provide the service either directly or through other sources, or request OVR provide the service. If OVR determines the service does not violate the comparable benefits policy (unless such a determination would interrupt or delay the progress of the individual) and is identified as a service on the individual's IPE, OVR may assume the costs for the service. If OVR determines that the purpose of the service is more for educational attainment than achievement of CIE, then the LEA would pay for the service, as they would for services under IDEA.

OVR's funding for assessment for eligibility and vocational needs, counseling and referral services, job placement services, rehabilitation technology and auxiliary aids and services are exempt from comparable benefit and the FNT.

When AT goods or services are needed for educational purposes, it will be the financial responsibility of the LEA. However, prior to exit from high school, OVR will determine needs and comparable benefits for AT for post-secondary education and employment purposes for the individual as needed for employment and identified on the individual's IPE.

Nothing in the MOU shall be construed to reduce the obligation under IDEA for the LEAs to provide/pay for transition services that are required to ensure FAPE.

*(D) Procedures for outreach to and identification of students with disabilities who need transition services and Pre-ETS. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;*

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. OVR outreach activities focus on providing information about VR to school staff, students, families, community professionals, and others interested in Pre-ETS and transition services, including students and families of diverse backgrounds. 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
- Pre-ETS that may be provided to potentially eligible or eligible students.
- OVR will provide information to BSE and LEAs regarding OVR services that will be disseminated to students and their families. BSE will ensure that LEAs highlight the information and outreach activities provided by OVR and make such information and activities available to all students with disabilities and families of students with disabilities.

OVR staff may conduct outreach in the following manner such as:

- Providing VR brochures and business cards to the school.
- Presenting at the first open house, family information nights, or orientation held at the school.
- Conducting regularly scheduled school visits.
- Participating in transition and job fairs at the school.
- Attending IEP meetings, when invited.
- Speaking about Pre-ETS and VR services at school staff meetings, teacher in-service trainings, student/family group meetings, or interagency meetings.

OVR will work with LEAs to ensure referrals of students with disabilities to the VR program at the beginning of the school year. Referral for Pre-ETS should begin at age 14 for all students with disabilities who may need them.

While outreach typically occurs in the LEA environment, OVR will work with PDE to identify students and youth with disabilities who may not be served in public schools under an IEP or 504 Plan. Outreach will be conducted to identify students and youth with disabilities who are underserved through other community partners, such as, but not limited to:

- Intermediate Units (IUs)
- Career and Technology Centers
- Approved Private Schools
- Charter and Cyber Schools
- Home School Organizations
- Student Assistance Programs
- Summer CIE programs
- Workforce Development Boards (WDBs)

- Parent-Teacher Associations, etc.
- Juvenile Justice System
- Foster Youth Organizations
- Homeless shelters/programs
- Medical facilities.

*(E) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and*

As part of the MOU between OVR and the PDE-BSE, for students with disabilities who are seeking subminimum wage employment after high school exit, BSE will ensure that LEAs provide OVR documentation of completion of appropriate transition services under IDEA. The MOU includes the following section:

Limitations on Subminimum Wage and Documentation Requirements under Section 511

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:

- a. Pre-ETS or transition services under the IDEA; and
- b. 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 CIE 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.
- 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).
- 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.

*(F) Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the LEA will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.*

As part of the MOU between OVR and the PDE-BSE, BSE will assure 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.

The MOU states:

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.

OVR and BSE are committed to supporting the Employment First Act.

*(k) Coordination with Employers*

In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify CIE and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including Pre-ETS for students with disabilities.

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, PA CareerLinks, economic development partners, CRPs, DHS Offices of ODP, OMHSAS, and OLTL, and other DLI BWPO multi-employer workforce partnerships.

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.

OVR will work with each business to target career ladders and pathways for quality CIE in career pathways matched to each VR consumer customer's financial needs, unique aspirations, capacities and the talent succession plans of an employer.

VR 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 seeks VR talent across several states and PA workforce regions.

The following are OVR employer outreach and networking strategies to work with employers to increase CIE and career exploration opportunities:

- 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;
- Employer outreach by OVR BSOD Specialists through in-person and/or virtual/telephonic meetings, regional and statewide RSA-allowable Chamber of Commerce membership, networking, and Society of Human Resource Manager statewide and local organization involvement;
- Outreach to employers to recruit and hire people with disabilities through local District Offices and HGAC. HGAC business services staff will identify and coordinate with the referring district VRCs and business services staff 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 District Office business service teams will actively coordinate employer recruitment, work-based learning experiences, internships, apprenticeships and pre-apprenticeships, OJT and other on-boarding supports for OVR customers. District Office business services staff, in consultation with VRCs, will monitor successful job performance and follow-up with the OVR customer and employer to ensure job retention;
- 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 TransCen, ADA Leadership models from Cornell University and a BSOD specialist trained on the use of the Misericordia University, Comprehensive Accessibility Kit, and the ADA Architectural Guidelines standards, will provide non-legal, best practice disability etiquette training, and on-site accessibility compliance reviews;
- BSOD specialists will provide no-cost compliance consultations to CRPs of 14(c) Federal Ability One, or State operated set aside vendors, to ensure work settings are fully integrated before federal VR funds are used in placement supports or on-boarding;
- OVR's BSOD Specialists will conduct employer/business satisfaction surveys to measure effectiveness in business engagement; and

- 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.

OVR will work to establish regular employment hiring events to serve employers both at local/regional and statewide levels. These events may be conducted both in-person and through virtual means. In-person events are anticipated to incur costs for venue, supplies, marketing, and other materials to ensure the success and participation of employers, service providers, human service resources, and participants with disabilities. Virtual hiring events may require the purchase of a web access platform to accommodate an interactive and accessible virtual venue.

BSOD staff will assess and market available resources and services offered by OVR to employers through a proposed Business Portfolio tool. This tool will be offered to employers both in printed and electronic formats and will be designed to showcase the value of business partnerships with OVR and its constituents.

#### Partnering with Workforce Agencies to Align with Regional Employment Sectors

OVR BSOD staff and District Office business services teams will participate in regional planning processes in partnership with local WDBs.

OVR and Workforce partners will review and 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 Information (LMI) published monthly from the PA DLI's Center for Workforce Information and Analysis (CWIA) with their District Office VRCs 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 PA.

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 CIE. 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-ETS to prepare students for CIE. Project SEARCH is one example of this type of collaboration.

The OVR Early Reach Program is to assist youth with disabilities in becoming better prepared for the transition from high school to the world of work and independence. Early Reach is intended to promote successful employment outcomes for youth with disabilities, beginning at age 14, by increasing awareness of OVR services and the benefits of early career planning.

An Early Reach Coordinator (ERC) is an OVR employee with an extensive background in the social work profession. ERCs have specific training and skills in delivering services to a variety of populations. ERCs also have a great deal of experience in the service systems that students with disabilities encounter throughout their lives.

ERCs primary role is to develop and provide dynamic and engaging presentations and events that focus on the five required Pre-ETS categories. Coordinators also provide informational presentations and consultation to school personnel, community agencies, youth with disabilities and families to outline the services offered by OVR. Additionally, ERCs can assist youth with disabilities in planning and applying for OVR services and can provide consultation and links to resources that will help youth with disabilities pursue both independence and participation in the workforce.

*(I) Interagency Cooperation with Other Agencies. In accordance with the requirements in section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:*

*(1) State programs (designate lead agency[ies]) and implementing entity[ies]) carried out under section 4 of the Assistive Technology Act of 1998;*

OVR utilizes the following agreements to address the AT needs of customers seeking employment services:

PA's Initiative on Assistive Technology ("PIAT") – The Assistive Technology Lending Library (ATLL) is a program facilitated through the Institute on Disabilities at Temple University, "TechOWL." PIAT is a regional center for southeast PA and is also the main organization for TechOWL. PIAT facilitates the activities of all of the other regional centers and reports to the state and federal agencies that fund our work. ATLL is PA's statewide program under Section 4 of the Assistive Technology Act. Activities that are provided by ATLL are: device demonstrations; device lending; device reuse; public awareness activities; and trainings to raise awareness and knowledge of AT topics. Any of these activities are available to Pennsylvanians with disabilities which includes OVR staff and clients, often at no charge.

OVR utilizes additional AT providers through whom services and/or devices can be purchased to address the specific needs of customers. OVR has executed LOUs or Administrative Memoranda (AM) agreements for expanded services to customers.

*(2) 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. In 2017, two new fees were added to the LOU to include reimbursement for travel and professional fees. Currently both agencies are working together to develop an IGA. The AgrAbility Project is a statewide project whose staff provides direct services for OVR customers who are farmers with a disability 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.

*(3) Non-educational agencies serving out-of-school youth;*

An MOU has been developed between OVR and the Bureau of Juvenile Justice Services (BJJS) to coordinate their work to support students and youth with disabilities receiving services through a PA Academic, Career and Technical Training (PACTT) Affiliate. BJJS provides state funds to OVR to serve students and youth. OVR will meet with PACTT Affiliates to determine need for services, will provide and/or set-up services to students and youth, and will assist interested PACTT Affiliates in becoming Pre-ETS providers.

*(4) State use contracting programs;*

OVR uses a number of statewide contracts through the PA Department of General Services (DGS), the agency responsible for the majority of Commonwealth contracting programs.

OVR and ODP have developed a Training Services Invitation to Qualify (ITQ) through DGS for Specialized Professional Skills Development Training. This ITQ pre-qualifies contractors to provide Supportive Employment Certification Trainings for OVR and/or ODP CRP agencies, who support individuals with the most significant disabilities, and who provide supportive employment services. When a training is needed, a Request for Quote (RFQ) is developed and sent to the qualified contractors. An ITQ qualified contractor will be awarded a contract to provide necessary services based on the best value, meaning the best service. Contractors will provide training for CRP agencies for the following two certifications: The Association of Community Rehabilitation Coordinators' (ACRE) Certificate Training Program; or the Association of People Supporting Employment First (APSE) Certified Employment Support Professional (CESP) Certification.

DGS has executed multiple contracts with various service providers across PA 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 these contracts to secure interpreter services for daily business proceedings, meetings, workshops, public presentations, and conventions.

DGS has developed an ITQ for Information Technology (IT) hardware providers for Commonwealth agencies to purchase IT hardware. OVR then issues a Request for Proposal to qualified providers to purchase computers, monitors and peripherals for staff.

DGS developed a statewide Services ITQ to qualify contractors to address IT service requirements of Commonwealth 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.

*(5) State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);*

In PA, the State agency responsible for providing services for individuals with developmental disabilities is DHS/ODP. One of the ways OVR collaborates with DHS/ODP is 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 CIE.

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 CIE; increasing awareness of OVR services; and providing information about other agencies that can help them to achieve their goals for personal growth and independence.

*(6) State agency responsible for providing services for individuals with developmental disabilities;*

An MOU has been developed between OVR and PA ODP to fund, implement, and manage key services within the InVEST Project Model, a five-year model demonstration grant funded by the Disability Innovation Fund. The MOU will fund the following: 1) ODP Grant Liaison, a contracted position that will manage services funded through the grant via ODP contracts as well as assist with data collection, project monitoring and evaluation; 2) Training & Technical Assistance from the University of Missouri - Kansas City on Charting the LifeCourse™ Framework to integrate supported decision making throughout the InVEST Project; and 3) Services from PA Family Network for six positions dedicated to engaging adults with ID/DD/Autism who are earning subminimum wage and their families to consider the benefits of CIE. Representatives from ODP assisted with the development of the Subminimum Wage to Competitive Integrated Employment (SWTCIE) Grant proposal and have been OVR's primary partners in the development of the project. Both OVR and ODP representatives attend biweekly project team meetings. A relationship with the UMKC- CtLC™ Framework team has been established via ODP and initial OVR staff training is being developed for delivery in May/June 2023. Weekly meetings are conducted with the PA Family Network, funded through ODP's contract with the Columbus Organization to discuss project development and to identify preliminary opportunities for education about the InVEST Project.

*(7) State agency responsible for providing mental health services;*

The existing MOU between OVR and OMHSAS ended on June 30, 2022. A new MOU is to be developed. The MOU will explore a transfer of funds from DHS to OVR, which would support opportunities for customers with serious mental health conditions to participate in various Certified Peer Specialist (CPS) training opportunities to achieve CIE. Certified Recovery Specialist (CRS) trainings and employment supports for customers with mental health diagnoses will also be explored.

*(8) Other Federal, State, and local agencies and programs outside the workforce development system; and*

OVR is participating in Brain Injury REACH, a research study conducted by the Icahn School of Medicine at Mount Sinai in collaboration with the Brain Injury Association of Pennsylvania (BIAPA) and funded by a federal grant from the National Institute of Justice. The study aims to evaluate NeuroResource Facilitation (NRF) intervention in adult male re-entrants with brain injury who are returning to Philadelphia, Bucks, Chester, Delaware, and Montgomery counties. The goal of NRF is to increase recidivism and improve community participation upon re-entry. VR has been identified as a key component of NRF. This project is being conducted in four State Correctional Institutions (SCIs) across PA (Chester, Frackville, Mahanoy, & Phoenix) over an initial five-year period (2021-2024) with plans for extension in place. The Reading and

Norristown BVR District Offices have collaborated with the NRFs in processing referrals and determining eligibility prior to case transfer to the District Office of residence.

*(9) Other private nonprofit organizations.*

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 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 PA.

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.

## **VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES**

### **CERTIFICATIONS**

#### **States must provide written and signed certifications that:**

1.	The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA, <sup>1</sup> and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency or the designated State unit when the designated State agency has a designated State unit) <sup>2</sup> agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services

<sup>1</sup> Public Law 113-128.

<sup>2</sup> All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

	portion of the Unified or Combined State Plan <sup>3</sup> , the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations <sup>4</sup> , policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan <sup>5</sup> , the Rehabilitation Act, and all applicable regulations <sup>6</sup> , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4.	The designated State unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The Executive Director of the Office of Vocational Rehabilitation 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;

<sup>3</sup> No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

<sup>4</sup> Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 CFR part 361.

<sup>5</sup> No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

<sup>6</sup> Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

8.	The Executive Director of the Office of Vocational Rehabilitation has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

## ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

### The State Plan must provide assurances that:

1.	<b>Public Comment on Policies and Procedures:</b> The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2.	<b>Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:</b> The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.
3.	<b>Administration of the VR services portion of the Unified or Combined State Plan:</b> The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. 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. 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). as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.



	<p>as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.</p> <p>statewide and waivers of statewide requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.</p> <p>the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.</p> <p>all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.</p> <p>the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.</p> <p>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.</p> <p>the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).</p> <p>the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.</p>
<p>4.</p>	<p><b>Administration of the Provision of VR Services:</b> The designated State agency, or designated State unit, as appropriate, assures that it will:</p> <p>comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.</p> <p>impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.</p> <p>provide the full range of services listed in section 103(a) of the Rehabilitation Act, as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.</p> <p>determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.</p> <p>comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.</p> <p>comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.</p> <p>provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.</p> <p>comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.</p> <p>(i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.</p> <p>(j) with respect to students with disabilities, the State:</p> <p>(i) has developed and will implement,</p> <p>(A) strategies to address the needs identified in the assessments; and</p>

	<p>(B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and</p> <p>(ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15),101(a)(25), and 113).</p> <p>(iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.</p>
5.	<p><b>Program Administration for the Supported Employment Title VI Supplement to the State plan:</b></p> <p>The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.</p> <p>The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.</p>
6.	<p><b>Financial Administration of the Supported Employment Program (Title VI):</b></p> <p>The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.</p> <p>The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.</p>
7.	<p><b>Provision of Supported Employment Services:</b></p> <p>The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</p> <p>The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.</p>

**Certification Signature**

Signatory information	
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Name of Signatory	Ryan Hyde
Title of Signatory	Executive Director
Date Signed	

**Appendix 1: Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

	Vocational Rehabilitation Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	58%	TBD	59%	TBD
Employment (Fourth Quarter after Exit)	49%	TBD	50%	TBD
Median Earnings (Second Quarter after Exit)	\$5,000	TBD	\$5,100	TBD
Credential Attainment Rate	22%	TBD	23%	TBD
Measurable Skill Gains	41%	TBD	42%	TBD
Effectiveness in Serving Employers <sup>7</sup>	Not Applicable	Not Applicable	Not Applicable	Not Applicable

**Additional Indicators of Performance**

<sup>7</sup> The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

1. Pennsylvania has chosen not to identify any additional indicators of performance.
2.
3.
4.

DRAFT

## 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.*

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					
	Business/Community	Postsecondary Education	Secondary Education	Education Partners	PDE	Total
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.)*

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 & 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 Pennsylvania Industry 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 12<sup>th</sup> 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 & 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 & 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.)*

*D. 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](#)<sup>8</sup>.

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 grid<sup>9</sup> 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

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<sup>8</sup> [Development of Pennsylvania POS Framework](#)

<sup>9</sup> [Pennsylvania Program of Study Competency Task Grids](#)

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, 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](http://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:*

- 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).*

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.<sup>10</sup> The Department will look for alignment to local workforce needs and representation

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<sup>10</sup> Program Approval – Section 339.4 (22 Pa. Code § 339.4)

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.

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 & 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
<b>Total Secondary Enrollment (9-12<sup>th</sup> Grade)</b>	546,617	541,921	538,117	-1.6%
<b>Secondary CTE Enrollment</b>	67,648	67,294	67,248	-0.6%
<b>Percent Enrolled in CTE</b>	12.4%	12.4%	12.5%	1.0%
<b>CTE Participants (At least 10% of the program earned)</b>	64,166	63,847	63,601	-0.9%
<b>Female</b>	26,714	26,574	26,562	-0.6%
<b>Male</b>	37,452	37,273	37,039	-1.1%
<b>Race/Ethnicity</b>				
<b>American Indian/Alaskan Native</b>	147	163	165	12.2%
<b>Asian</b>	820	872	884	7.8%
<b>Black or African American</b>	8,304	8,439	8,071	-2.8%
<b>Hispanic</b>	6,868	7,247	7,366	7.3%
<b>Multi-Racial</b>	1,089	1,114	1,230	12.9%
<b>Native Hawaiian or Other Pacific Islander</b>	34	38	48	41.2%
<b>White</b>	46,904	45,974	45,837	-2.3%
<b>Disabilities Status</b>	17,825	17,899	17,975	0.8%
<b>Economically Disadvantaged</b>	31,849	33,644	33,640	5.6%
<b>Single Parents</b>	302	231	213	-29.5%
<b>Displaced Homemakers</b>				N/A
<b>Limited English Proficient</b>	1,192	1,301	1,651	38.5%
<b>Migrant Status</b>	30	37	31	3.3%
<b>Nontraditional Enrollees</b>	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

<b>Postsecondary CTE Enrollment</b>	75,563	72,804	70,627	-6.5%
<b>CTE Participants (At least one credit of the program earned)</b>	70,247	67,088	65,656	-6.5%
<b>Female</b>	40,697	37,375	38,024	-6.6%
<b>Male</b>	29,550	29,713	27,632	-6.5%
<b>Race/Ethnicity</b>				
<b>American Indian / Alaskan Native</b>	214	195	193	-9.8%
<b>Asian</b>	1,821	1,814	2,265	24.4%
<b>Black or African American</b>	12,248	10,719	12,150	-0.8%
<b>Hispanic</b>	5,803	5,938	6,760	16.5%
<b>Multi-Racial</b>	1,320	1,451	1,643	24.5%
<b>Native Hawaiian or Other Pacific Islander</b>	92	81	79	-14.1%
<b>White</b>	41,715	40,140	37,344	-10.5%
<b>Unknown</b>	7,034	6,750	5,222	-25.8%
<b>Disabilities Status</b>	3,521	3,495	3,511	-0.3%
<b>Economically Disadvantaged</b>	32,382	30,087	31,279	-3.4%
<b>Single Parents</b>	5,865	5,391	5,695	-2.9%
<b>Displaced Homemakers</b>	618	614	452	-26.9%
<b>Limited English Proficient</b>	1,400	1,606	1,552	10.9%
<b>Migrant Status</b>				N/A
<b>Nontraditional Enrollees</b>	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<sup>11</sup>](#)
- 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](#)

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<sup>11</sup> [POS Articulation](#)

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](#)<sup>12</sup> 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.

[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 2008, 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

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<sup>12</sup> [Counselor Resources](#)

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 recommended 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 12<sup>th</sup> 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)*

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 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.  $70\% \text{ allocation} = \text{poverty percentage} \times (\text{allocation amount} \times 0.7)$
- d.  $30\% \text{ allocation} = \text{individual population percentage} \times (\text{allocation amount} \times 0.3)$
- e.  $\text{Total allocation} = 70\% \text{ allocation} + 30\% \text{ allocation}$

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.

<b>Fiscal Agent</b>	<b>Tentative Allocation 2019-2020</b>
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
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

<b>Fiscal Agent</b>	<b>Tentative Allocation 2019-2020</b>
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
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

<b>Fiscal Agent</b>	<b>Tentative Allocation 2019-2020</b>
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
<b>TOTAL</b>	<b>\$27,862,822</b>

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

<b>Fiscal Agent</b>	<b>Tentative Allocation 2019-2020</b>
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



<b>Fiscal Agent</b>	<b>Tentative Allocation 2019-2020</b>
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
Thaddeus Stevens Coll of Tech	\$189,546
Westmoreland County CC	\$522,945
Wilkes-Barre Area CTC	\$93,419
<b>TOTAL</b>	<b>\$11,921,447</b>

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.

*(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),<sup>26</sup> 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<sup>[2]</sup> 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 \(SF LLL\) \(OMB Control No. 4040-0013\)](#).<sup>[3]</sup>
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 SDLPs 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)<sup>13</sup>, 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:

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<sup>13</sup> See page 11 of the [Committee Report](#).

1. It made the State plan publicly available for public comment<sup>14</sup> 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.)

#### 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).<sup>15</sup>
3. [Certification Regarding Lobbying \(ED 80-0013 Form\)](#).
4. [General Education Provisions Act \(GEPA\) 427 Form \(OMB Control No. 1894-0005\)](#).

<sup>14</sup> 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.

<sup>15</sup> [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)

## 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.
  - 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.

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Budget Form

State Name: Pennsylvania

Fiscal Year (FY): 2020-2021

Line Number	Budget Item	Percent of Funds	Amount of Funds
1	<b>Total Perkins V Allocation</b>	<b>Not applicable</b>	\$45,114,979
2	<b>State Administration</b>	5%	\$2,255,749
3	<b>State Leadership</b>	10%	\$4,511,498
4	Individuals in State Institutions	0.9%	\$406,035
4a	Correctional Institutions	<b>Not required</b>	\$406,035
4b	Juvenile Justice Facilities	<b>Not required</b>	\$0
4c	Institutions that Serve Individuals with Disabilities	<b>Not required</b>	\$0
5	Non-traditional Training and Employment	<b>Not applicable</b>	\$150,000
6	Special Populations Recruitment	0.1%	\$4,511
7	<b>Local Formula Distribution</b>	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	<b>State Match (from non-federal funds)</b>	<b>Not applicable</b>	\$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
<b>Secondary Level</b>		
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
<b>Secondary Level (continued)</b>		
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
<b>Postsecondary Level</b>		
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. <sup>16</sup>	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. <sup>17</sup>	3P1	Non-traditional Program Concentration

State Determined Performance Levels (SDPL) Form

<sup>16</sup> 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.

<sup>17</sup> 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
<b>Secondary Indicators</b>					
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 <sup>18</sup> Technical Skill Attainment	84.27	84.99	85.71	86.43	87.15
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
Indicators		Performance Levels			

<sup>18</sup> 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.

	Baseline Level	FY 2020	FY 2021	FY 2022	FY 2023
<b>Postsecondary Indicators</b>					
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

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## 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.

DRAFT

## **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)

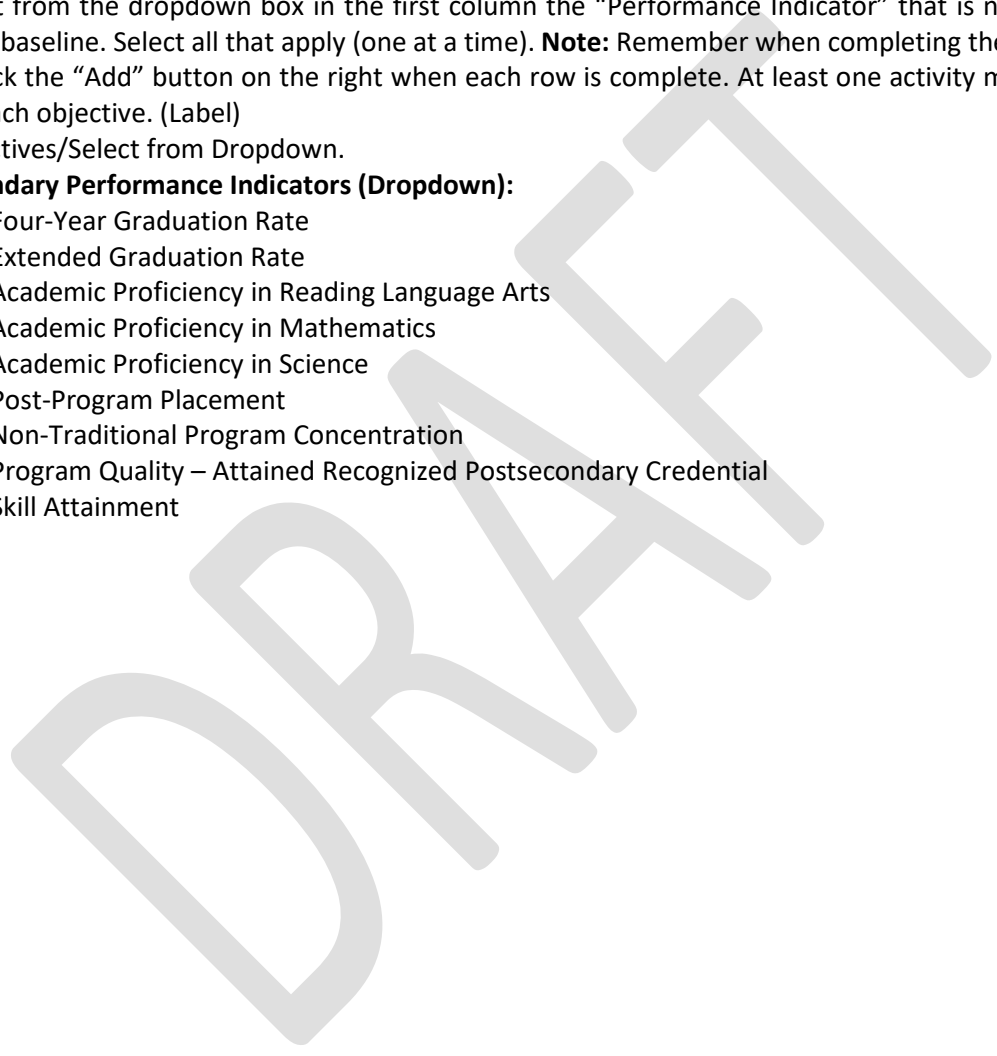
**Action Plan**

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)
			<b>Total Amount:</b>	
			<b>Grant Total:</b>	

**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)

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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)
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**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)
			<b>Total Amount:</b>	
			<b>Grant Total:</b>	

**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 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			

<p>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> <ul style="list-style-type: none"> <li>(a) One secondary technical course per year is offered (definition of a courses is 240 technical instructional hours);</li> <li>(b) At minimum, 50% of the postsecondary credit meets the definition of career and technical education:</li> <li>(c) Secondary and postsecondary academic and technical content are aligned, leading to a sequence of courses that lead to a nonduplicative program offering;</li> <li>(d) Is inclusive of work-based learning; and</li> <li>(e) A credit transfer articulation agreement exists between the secondary CTE program and the corresponding postsecondary CTE program.</li> </ul>			

<p><b>QUALITY</b> 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:</p> <p>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 Department of Education/State Board for Vocational Education.</p>			
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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, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals	Teachers			
	Counselors			
	Principals/Admin			
	Support Personnel			
	Paraprofessionals			
(2) Representatives of career and technical	Postsecondary Faculty			
	Postsecondary Admin			

education programs at postsecondary educational institutions, including faculty and administrators				
(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 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)	Out of School Youth Reps			
	Homeless Youth 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.

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## **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 11<sup>th</sup> grade Keystone results have been federally approved for ESSA accountability reporting. The best of 11<sup>th</sup> 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 11<sup>th</sup> 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.”

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**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.

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## **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 of Human Services (DHS), 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:

- Each adult applicant and recipient required to sign the Application for Benefits.
- 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.

##### **Work Expense Deduction**

Effective September 26, 2020, each working individual in all TANF families with earned income may be eligible for \$200 a month deduction 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. Act 2018-125 was passed on October 24, 2018 and provided new rules for the purpose of determining a recipient's eligibility for cash assistance. Individual lottery winnings of \$600 or more shall be considered an available resource. The lottery winnings shall be calculated on a prorated basis over a 12-month period following receipt of the winnings.

Lottery winnings are to be reported within 10 days of receipt. Individual lottery winnings greater than \$600 is divided evenly over the 12 months following receipt. The divided amount counts as a resource for comparison to the resource limits for the 12-month period of time.

Lump sum lottery winnings of \$599.99 or less are counted as income in the month received, and as a resource thereafter if money is still available.

### **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 six 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's approach provides the client with a range of services to build necessary skills and a work history. 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 Certificate of General Equivalence
- Providing child care services to an individual who is participating in a Community Service Program
- Enrolled in a Keystone Education Yields Success (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 (HPO) as defined by the Department of Labor & 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 an 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
- Single 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 work or participate in a work activity when the condition ceases.

A single parent/caretaker specified relative who is exempt for unavailability of child care for a child under the age of six is required to work or participate in a work activity as soon as child care is available. Child care unavailability includes the following; unavailability of appropriate child care within a reasonable

distance from the individual's home or work site, unavailable or unsuitable informal child care by a relative or other arrangements, and unavailability of appropriate and affordable formal child care arrangements.

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 of 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 a 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.

### *SPALs for Supportive Services 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 may 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 high school equivalency, English as a Second Language, 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 that clients can gain employment that can move them successful in finding employment and are now seeking career advancement in order to move 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 high priority occupations 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.

### *Non-compliance 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 October 1, 2019 through September 30, 2021. 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 ensures 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 Federal Poverty Income Guidelines (FPIG) 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.

In order 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 child care 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 resource and referral service that educates participants on the importance of quality early

education and child care services. ELRC agencies also educate parents/caretakers on how to secure high-quality child care in their area.

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)(1)(A)(iii) of the Social Security Act. The CAO will assist all individuals who are required to work to find opportunities through the Employment, Advancement and Retention Network (EARN) program and the PA CareerLink® system. Both services can be accessed locally 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 received less than 60 months of TANF and are not enrolled in community college will be referred to the EARN program, which assists with barrier remediation, job placement, and job training opportunities. 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 have received 60 or more months of TANF, are not enrolled in community college, and have demonstrated a state defined hardship barrier to employment such as literacy, executive function 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 facilitate a job search program when the individual 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:

- 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 the Department with the name of the recipient and states that the recipient is fleeing to avoid prosecution, 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 the Department 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 individual has requested and the services will advance the individual's welfare and the individual has authorized the Department 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 Philadelphia, Delaware, Allegheny, Beaver, Berks, Dauphin, Fayette, Lackawanna, Lycoming, Lehigh, and Venango 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.

- 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 partial hospitalization or outpatient mental health facilities, licensed psychiatric residential treatment facilities, licensed residential substance abuse treatment 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 prevention curriculum. Training is provided to staff at implementation sites on lesbian, gay, bisexual, transgender, and questioning (LGBTQ) cultural competency. The Department currently funds eight PREP Grantees.
- Through grant agreements with Pennsylvania's four regional family planning councils, comprehensive reproductive health services are provided to sexually active adolescents 21 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 receives funding through the Title V State Sexual Risk Avoidance Education (SRAE) Grant Program. The purpose of the SRAE program is to fund states and territories to teach youth personal responsibility, self-regulation, goal setting, healthy decision making, to focus on the future, and to avoid risky behaviors. The Department selected the Wyman Center's Teen Outreach Program (TOP) for implementation to youth statewide. TOP is an evidence-based, positive youth development program that promotes the healthy development of youth in grades 6-12 through a combination of weekly peer group meetings, an engaging curriculum, and Community Service Learning. The program is facilitated by trained facilitators who build strong, supportive relationships with youth. The program is being implemented in Allegheny, Fayette, Mercer, Lawrence, and Philadelphia Counties.

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 2019, there were 131,952 births in Pennsylvania, of which 54,393 or 41.2 percent were out-of-wedlock. Of the out-of-wedlock births, 4,986 or 9.2 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 2019. This is the most recent data as of June 2021.

Year	Births	Out-of-Wedlock	Out-of-Wedlock - 19 years of age or younger
2019	131,952	54,393 (41.2 percent)	4,986 (9.2 percent)
2018	133,270	54,842 (41.2 percent)	5,303 (9.7 percent)
2017	135,306	55,984 (41.3 percent)	5,581 (9.9 percent)
2016	137,191	56,179 (40.9 percent)	6,005 (10.7 percent)
2015	140,165	57,626 (41.1 percent)	6,790 (11.8 percent)
2014	140,979	58,070 (41.2 percent)	7,460 (12.8 percent)
2013	139,606	58,129 (41.6 percent)	8,180 (14 percent)
2012	140,146	58,744 (41.9 percent)	9,514 (16.1 percent)
2011	141,300	58,879 (41.7 percent)	10,292 (17.5 percent)
2010	141,681	58,727 (41.5 percent)	11,355 (19.3 percent)
2009	144,627	59,194 (40.9 percent)	12,037 (20.3 percent)
2008	148,166	60,269 (40.7 percent)	12,905 (21.4 percent)
2007	149,717	59,466 (39.7 percent)	12,966 (21.8 percent)
2006	148,706	56,749 (38.3 percent)	12,683 (22.4 percent)
2005	145,033	52,849 (36.5 percent)	12,036 (22.8 percent)
2004	144,494	50,487 (35.2 percent)	11,772 (23.4 percent)
2003	145,485	48,985 (33.9 percent)	11,833 (24.2 percent)
2002	142,380	47,519 (33.5 percent)	11,879 (25 percent)

*(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 Act 44/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 our websites to provide information about healthy relationships and sexual violence awareness and prevention, in addition to providing resources for teens to seek help. During FY 2019-2020, the PCAR website ([www.pcar.org](http://www.pcar.org)) had 318,407 page views. PCAR has a Facebook page which it updates daily and uses Twitter (@PCARORG) to communicate upcoming events. As of June 30, 2020, the Facebook page had 3,913 likes and PCAR has 7,900 followers on Twitter. Social media activity continues to be a growth area.
2. Sexual Assault Awareness Month: The 2020 theme for Sexual Assault Awareness Month (SAAM) was "I Ask", a campaign which focused on consent. The Communications team worked with PCAR's Prevention & Resource Coordinator to develop promotional items for use by PA centers. These items included materials such as balloons, pins, palm cards, coffee sleeves, a poster, sticker sheets and window clings. Due to the pandemic, many local events were canceled including the Day of Action at the Harrisburg Capitol Building PCAR planned on April 6, 2020 with key legislators and members of our centers. Like so many plans, local rape crisis centers had to host events, PCAR's event transitioned to an online video campaign. PCAR also developed a webinar for PA Centers regarding how to conduct SAAM activities from home.
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 2019-2020. Because of the pandemic, many of the resources developed during FY 2019-2020 were in an on-line format rather than print.

On-line Resources:

- The Safe Secure Kids educational program created by a partnership between PCAR and d'Vinci Interactive was officially launched in October 2019 at the d'Vinci offices in Harrisburg. Safe Secure Kids provides resources to make it easier for adults to communicate with the children in their lives about respect and consent, with the ultimate goal of preventing sexual abuse and harassment. For additional information visit <https://www.safesecurekids.org/>.
- The Communications Team created/updated a COVID-19 page on PCAR's website to keep the general public up to date on the services offered at sexual assault centers throughout the Commonwealth.
- PCAR developed podcasts highlighting PCAR's work to end sexual harassment, abuse, and assault. You can listen to our podcast on Apple and Android, or [via the PCAR website \(www.pcar.org\)](http://www.pcar.org).

Factsheets:

- Sexual Extortion

Brochures:

- LGBTQ (Redesign and content update)
- Elder Abuse (Redesign and content update)
- Prevention (Redesign and content update)
- Human Trafficking (Redesign and content update)

Guides:

- Title IX (new guidance from the U.S. Department of Education)
- Responding to Older Adults and People with IDD Who Are Survivors of Sexual Violence

Technical Assistance Bulletins:

- Cultural Responsiveness
- Victim Rights for Persons with Limited English Proficiency
- Strategies for Supporting Bicultural and Bilingual Staff

Talking points:

- Statute of Limitation Reform (Redesign and content update)
- Harvey Weinstein verdict
- Hazing incident involving Penn State's football team
- Sexual Assault Awareness Month

4. Training/Resources to Increase the Capacity of Rape Crisis Center's to Outreach in Their Communities:

PCAR provided a number of trainings to local rape crisis centers during FY 2019-2020. Some of the topics included:

- Let's Talk Racism in Terms of Sexual Violence
- Intersections of Sexual Violence and Mental Illness
- Training Skills Development
- Focus, Framing & Facts: Effective Messaging for Our Work
- Skills of Advocacy (online course)
- Language Access for Incarcerated and Detained Survivors
- Victimology and Trauma
- Navigating Vicarious Trauma
- Foundational Counseling Skills
- Evaluation Practices

*(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 semi-monthly cash payments delivered primarily through the Electronic Benefits Transfer (EBT) system. See section (h) which describes the plan to ensure recipients have adequate access to their cash assistance.

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 Commission mandated third party processors to block 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 AMR, 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 Commonwealth of Pennsylvania Access to Social Services (COMPASS) application process. The Prohibitions and Penalties page of Pennsylvania’s Common Application and Benefits Review forms also warns that misuse of the EBT card 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.

- In order 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 any one of the prohibited locations. Since 2014, DHS has sent 192 letters to individuals found to have used their EBT card at one of these 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 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 (POS) devices to electronically deliver cash assistance and Supplemental Nutrition Assistance Program (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.connectebt.com/paebtclient/>.
- When the recipient creates his or her unique EBT PIN at the CAO.
- On the Pennsylvania Department of Human Service website <https://www.dhs.pa.gov/Services/Assistance/Pages/EBT.aspx>.
- 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 of 1996 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 CAO 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 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. Pennsylvania requires contracted providers to create or identify credentialing programs for TANF participants to receive training in many high-priority occupations 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. 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. Our system relies heavily on family caregivers who provide unpaid care to their loved ones in the home. As of April 20, 2017, more than 1.6 million family caregivers across Pennsylvania became eligible to 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).*

**Pennsylvania provides the following MOE-funded services:**

*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 GED, 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 (NFP)*

This initiative is funded with commingled funds.



Effective October 1999, NFP provides evidence-based home visiting services to eligible low-income, first-time mothers only. The home visitors are registered 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 nutrition, 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.

There are 15 NFP Network Partners from nine states participating in wave one of the NFP Pilot Project to serve Multiparous Women (women who are having their second or subsequent babies). Two of these Network Partners are in Pennsylvania. NFP Network Partners in wave one began enrolling clients in September of 2017. There are an additional 13 agencies from six states participating in wave two of the pilot. Seven of these NFP Network Partners are in Pennsylvania for a total of nine Pennsylvania NFP programs in total. The purpose of the pilot is to determine the feasibility of enrolling and serving multiparous women in NFP and the additional supports, materials, education, etc., that nurse home visitors might need to serve this population.

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 41 grantees and 7,790 children served. Programs can serve children either as new enrollments or extending the day for existing children. 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 Benefits 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.

### **TANF Catastrophic Emergency Contingency Plan**

TANF eligibility procedures during a catastrophic emergency due to a public health emergency or natural disaster may be modified while maintaining compliance with existing federal TANF requirements. Procedural modifications may be required to provide access to and avoid loss of eligibility for benefits during an emergency crisis that places limits or restrictions on an individual's ability to interact with the Department. The Department's response to the 2020 coronavirus public health pandemic identified several areas within our procedural processes that become barriers to establishing and maintaining

eligibility. The Department may implement some or all the measures below in the event of a public health emergency or natural disaster.

Interview procedures may be modified allowing applicants and recipients to participate in a phone or online interview instead of in person at the CAO.

Verification procedures leveraging acceptance of client's statement when verification is dependent on a third party, i.e., employers, court authorities, etc., that is not available to the individual or the Department to secure documented evidence. The Department will continue utilizing electronic state data exchanges when possible.

Cooperation with support requirements will be met through an electronic referral to Domestic Relations for impacted counties that require a personal appearance prior to authorization.

The completion of the SAR form at six months between eligibility reviews may be extended through good cause for up to six months if the individual's ability to complete the process is impacted by the nature of the emergency.

The completions of the annual eligibility reviews will continue to follow the timeliness standards whenever possible but flexibilities in timeliness may be utilized when the ability to complete the process is impacted by the nature of the emergency.

Clients who are mandatory to participate in RESET may be granted good cause from participation in work or work activities. When determining good cause, the Department will consider all the facts, circumstances, and availability of alternative methods of participation to include on-line work support activities.

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. This initiative is funded with 100 percent former unobligated funds.

### **Emergency Assistance Program (EAP)**

This initiative provides temporary financial relief to families with children in response to a specific emergency disaster declaration.

To be eligible for EAP the applicant family must meet income/resource requirements and definitive conditions (minor child, specified relative, and deprivation) for receipt of TANF.

The EAP initiative can be activated at the Governor's or Secretary's discretion when a declaration of disaster or emergency has been declared and impacts TANF families. EAP provides a one-time non-assistance payment to eligible families during a specific crisis situation or episode. The EAP payment is an amount determined by the Secretary and approved by the Governor's office depending upon a family's need in relation to the type of emergency being addressed. EAP benefits will not exceed four months in duration.

Examples of disasters which could result in an emergency disaster declaration include:

- Natural disasters such as tornadoes, hurricanes, and floods

- Medical pandemics such as COVID-19
- Armed conflicts
- Civil disorders

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. This initiative is funded with 100 percent former unobligated 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 & 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.
- Lottery winnings through the Pennsylvania State Lottery.

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 eligible 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.

### *Coordination with Child Welfare*

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.

### *Identifying Domestic Violence*

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 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 their 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 restrooms for discreet access. Two different domestic violence awareness posters are also available for posting in the CAOs. In addition, the Pennsylvania Application for Benefits form includes a tear-out sheet explaining domestic violence, provides domestic violence hotline telephone numbers, explains 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.

#### *Link with Medical Assistance*

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 qualify for Medical Assistance benefits.

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.

#### *Supplemental Nutrition Assistance Program (SNAP) Outreach*

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 either Pennsylvania or the community- and faith-based organization, to 12 organizations for SNAP outreach. This project is known as Supplemental Nutrition Assistance Program Participation Project (SNAP PP).

The organizations use a variety of methods to reach out to households who may be eligible for SNAP, complete and submit SNAP applications on behalf of interested households 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 2019-2020 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 lifetime. 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, DHS intends to provide funding included in the FY 2019-2020 budget for the Transitional Cash Assistance grant. Benefits received for this temporary supplemental grant period may be received up to three months.

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.

Effective 2015, this program is funded with 100 percent state commingled 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**

1 <sup>st</sup> Quarter	2 <sup>nd</sup> Quarter	3 <sup>rd</sup> Quarter	4 <sup>th</sup> Quarter
25 percent	25 percent	25 percent	25 percent

**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)(8) 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

*(iv) provide information to victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking to ensure that applicants and potential applicants for assistance under the State program funded under this part are notified of assistance made available by the State. Ensure that case workers and other agency personnel responsible for administering the harassment and domestic violence, sexual assault, and stalking; State standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking; and methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking; and ensure that the screening for, and identification of, domestic violence, sexual assault, or stalking provides information about the options under this part to current and potential beneficiaries; and case workers and other agency personnel responsible for administering the State program funded under this part are provided with training regarding State standards and procedures*

**Assurance(s) or Attachment(s):** Yes

DRAFT

**Supplemental Nutrition Assistance Program, Employment and Training (SNAP E&T) and Work Programs Authorized Under Sections (6)(d)(4) and 6 6(o) of the Food and Nutrition Act of 2008 (OMB Control Number: 0584-0083)**

*(a) General Requirements: The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:*

*(1) The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed;*

Supervised Job Search (SJS)	Answer the question in the space below
<p><b>Summary of the State guidelines implementing supervised job search.</b> This summary of the State guidelines, at a minimum, must describe: The criteria used by the State agency to approve locations for supervised job search, an explanation of why those criteria were chosen, and how the supervised job search component meets the requirements to directly supervise the activities of participants and track the timing and activities of participants.</p>	<p>Supervised job search component serves job-ready participants engaged in job-seeking activities, either individually or as a group at state-approved locations. Case managers validate client’s job search activities through discussions and guidance at minimum once per month. Job-seeking activities may include counseling, provision of local labor market information, and instruction in job-seeking skills, and a minimum effort of 12 hours per month. Job Search can be conducted at state-approved locations including American Job Centers, online via CWDS/Job Gateway, or at facilities operated by a contracted E&amp;T service provider included in this Plan. Locations were selected based on alignment with PA’s workforce development system, and to ensure E&amp;T participants may utilize the job search component in a space similar to the one in which they engage in other components. Online or internet-based job applications will be tracked by the case manager, who will provide continuous advice to participants as the component progresses.</p>
<p><b>Direct link.</b> Explain how the State agency will ensure that supervised job search activities will have a direct link to increasing the</p>	<p>PA DHS has ensured a direct link for Supervised Job Search in each contracted program. SNAP EARN is required to provide employability assessment and case management to all participants not only by regulation, but also by</p>

Supervised Job Search (SJS)	Answer the question in the space below
<p>employment opportunities of individuals engaged in the activity (i.e. how the State agency will screen to ensure individuals referred to SJS have the skills to be successful in SJS and how the SJS program is tailored to employment opportunities in the community).</p>	<p>program design through their contract. They complete a service plan and have access to Job Search Training services to assist. SNAP EARNs are contracted with the Workforce Development Boards, are able to leverage local resources and employer partnerships, and uniquely suited to providing the Supervised Job Search component.</p> <p>SNAP 50/50s are designed so that Supervised Job Search is only offered following completion of vocational education or work experience components, when participants are ready to put their new skills into action. As part of the onboarding process for each new SNAP 50/50 third party partner, PA DHS reviews the partner’s ties to employers in the community as well as the job coaching and placement services.</p>
<p><b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.</p>	<p>This component is open to any E&amp;T participant who meets criteria for participation and wishes to volunteer</p>
<p><b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</b></p>	<p>Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.</p> <p>Typically, individuals are encouraged to enroll in a supervised job search period following successful completion of another SNAP E&amp;T component.</p>
<p><b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.)</p>	<p>Statewide</p>

<b>Supervised Job Search (SJS)</b>	<b>Answer the question in the space below</b>
<b>E&amp;T Providers.</b> Identify all entities that will provide the service.	SNAP EARN and SNAP 50-50 contractor groups  Note: Graduates of the SNAP KEYS program are referred to SNAP EARN after graduation for assistance with job placement.
<b>Projected Annual Participation.</b> Project the number of unduplicated individuals.	600
<b>Estimated Annual Component Costs.</b> Project only administrative costs.	\$1,414,423

<b>Job Search Training (JST)</b>	<b>Answer the question in the space below</b>
<b>Description of the component.</b> <b>Provide a brief description of the activities and services.</b>	Job Search Training component prepares individuals for the workplace by teaching interviewing techniques, preparation of resumes, employer expectations, and basic life skills.
<b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer
<b>Criteria for Participation.</b> What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)	Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.
<b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas	Statewide

Job Search Training (JST)	Answer the question in the space below
covered by the American Job Centers, etc.)	
<b>E&amp;T Providers.</b> Identify all entities that will provide the service.	All contracted groups
<b>Projected Annual Participation.</b> Project the number of unduplicated individuals.	840
<b>Estimated Annual Component Costs.</b> Project only administrative costs.	\$2,234,485

Job Retention (JR)	Answer the question in the space below
<b>Description of the component. Provide a summary of the activities and services. Include a description of how the State will ensure services are provided for no less 30 days and no more than 90 days.</b>	<p>Includes services designed to assist individuals to successfully transition into the workplace and retain employment. This component includes financial literacy planning, job coaching, and workplace literacy services. This component is offered to each participant for a minimum of 30 days and a maximum of 90 days.</p> <p>Consistent with federal rules, this component is offered for the full period of up to 90 days notwithstanding a participant’s loss of eligibility for SNAP benefits.</p>
<b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer
<b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor</b>	Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component. The only prerequisite that PA DHS places on enrollment in this

<b>Job Retention (JR)</b>	<b>Answer the question in the space below</b>
<b>market attachment, computer literacy etc.)</b>	component is that the participant must have started a new job while participating in another SNAP E&T component.
<b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, area covered by the American Job Centers, etc.).	Statewide
<b>E&amp;T Providers.</b> Identify all entities that will provide the service.	All contracted groups
<b>Projected Annual Participation.</b> Project the number of unduplicated individuals.	540
<b>Estimated Annual Component Costs.</b> Project only administrative costs.	\$1,391,988

<b>E&amp;T Workfare (W)</b>	<b>Answer the question in the space below</b>
<b>Description of the component. Provide a summary of the activities and services</b>	<p>Workfare is an unpaid work activity used to provide opportunities for ABAWDs to serve in a community service capacity in the federal, state or local government or nonprofit sector. Workfare enhances an individual's employability by helping to develop effective work habits and basic job skills, including organization skills, problem solving, and basic math skills or to brush up existing skills needed for the work environment, through unpaid employment. The maximum number of hours is determined by the CAO, which calculates this figure by dividing the household's benefit level by the federal minimum wage. Participants perform workfare for the number of hours calculated by the CAO and listed on the EDP.</p> <p>The maximum number of hours worked in community service, combined with any hours worked during the week by a</p>

E&T Workfare (W)	Answer the question in the space below
	<p>participant for compensation (in cash or in kind) in any other capacity must not exceed 30 hours per week.</p> <p>The CAO is required to ensure all ABAWDs participating in E&amp;T, including ABAWDs participating in community service, continue to meet the work requirement. E&amp;T contracted programs open an activity code in CWDS immediately upon referral to indicate that the participant has secured a community service position. The E&amp;T contracted program then uses a state-issued form, the PA 1938, to establish a non-financial agreement with the community service provider, in which the provider certifies the proposed schedule of service and agrees to report any change in the individual's participation in community service within 10 days from the date the change occurred.</p> <p>E&amp;T contracted programs follow up by entering the hours served in the position by the 15<sup>th</sup> day of the calendar month following the month in which participation occurred. E&amp;T contracted programs are instructed to terminate the participant in CWDS if they do not meet the hours listed on the EDP. Participation hours entered into CWDS by the E&amp;T contracted programs can be viewed by the CAO in eCIS the day following data entry. CWDS terminations are likewise automatically communicated to the CAO the following day.</p> <p>By reviewing the activity codes opened, the monthly data-entry of hours, and the receipt of E&amp;T termination notifications, the CAO is able to take action to discontinue benefits to ABAWDs who are no longer meeting the work requirement through participation in E&amp;T, pursuant to 7 CFR §273.7(m)(9)(ii).</p>



<b>E&amp;T Workfare (W)</b>	<b>Answer the question in the space below</b>
<p><b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.</p>	<p>ABAWDs</p>
<p><b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</b></p>	<p>Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.</p>
<p><b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).</p>	<p>Statewide</p>
<p><b>E&amp;T Providers.</b> Identify all entities that will provide the service.</p>	<p>SNAP EARN and SNAP KEYS</p>
<p><b>Projected Annual Participation.</b> Project the number of unduplicated individuals.</p>	<p>180</p>
<p><b>Estimated Annual Component Costs.</b> Project only administrative costs.</p>	<p>\$338,939</p>

**I. Educational Programs**

<b>Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)</b>	<b>Answer the question in the space below</b>
<b>Description of the component. Provide a summary of the activities and services</b>	This component is designed to increase employability of participants through an appropriate course of literacy, numeracy, and basic skills education equivalent to successful completion of the 8 <sup>th</sup> grade. For individuals who successfully attain this level of proficiency, or who already demonstrated it upon placement into the component, this component will also prepare a participant to qualify for a high school general equivalency diploma or equivalent certification.
<b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer
<b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</b>	For GED/high school equivalency services only, an individual must be functioning at the 8 <sup>th</sup> grade level or above to enroll.
<b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).	Statewide
<b>E&amp;T Providers.</b> Identify all entities that will provide the service.	SNAP EARN
<b>Projected Annual Participation.</b> Project the number of unduplicated individuals.	120

<b>Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)</b>	<b>Answer the question in the space below</b>
<b>Estimated Annual Component Costs.</b> Project only administrative costs.	\$420,039
<b>Not supplanting.</b> Federal E&T funds used for activities within the education component must not supplant non-Federal funds for existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&T program are not supplanting funds used for other existing education programs.	SNAP EARN contractors are provided with guidance prohibiting the use of funds to supplant existing state entitlements. Generally, if a service is available from a reputable provider in the community at no charge, SNAP EARN programs are expected to refer the participant to the no-charge provider and bill DHS only for the cost of providing case management, supportive services, and supplemental activities that are provided to the SNAP participant, but not available to the general public.
<b>Cost Parity.</b> If any of the educational services or activities are available to persons other than E&T participants, provide evidence that the costs charged to E&T do not exceed the costs charged for non-E&T participants (e.g. comparable tuition).	Contractors are advised of the requirement that costs charged to the E&T grant may not exceed costs charged to or for non-E&T participants.

<b>Career/Technical Education Programs or other Vocational Training (EPC)</b>	<b>Answer the question in the space below</b>
<b>Description of the component. Provide a summary of the activities and services</b>	<p>This component provides occupational skills training that lead certifications, industry-recognized credentials, and in-demand jobs. Only educational activities that directly enhance the employability of the participant are allowed.</p> <p>This component also includes credit-bearing certificate programs and career-specific degrees that enhance participants' employability. Program partners include but are</p>

Career/Technical Education Programs or other Vocational Training (EPC)	Answer the question in the space below
	<p>not limited to: Pennsylvania’s community colleges and state-owned universities.</p> <p>ABAWDs are advised that they may appropriately combine this component with up to 10 hours/week of job search and/or job search training to meet the work requirement.</p>
<p><b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.</p>	<p>This component is open to any E&amp;T participant who meets criteria for participation and wishes to volunteer.</p>
<p><b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</b></p>	<p>Most contracted partners have specific criteria for admission into their program that align with labor market demand. For example, completion of high school; verification of literacy or numeracy levels; or, in limited instances, criminal history requirements.</p>
<p><b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, area covered by the American Job Centers, etc.).</p>	<p>Statewide</p>
<p><b>E&amp;T Providers.</b> Identify all entities that will provide the service.</p>	<p>Both contracted partners and the SNAP agency</p>

Career/Technical Education Programs or other Vocational Training (EPC)	Answer the question in the space below
<p><b>Projected Annual Participation.</b> Project the number of unduplicated individuals.</p>	<p>3,720</p>
<p><b>Estimated Annual Component Costs.</b> Project only administrative costs.</p>	<p>\$9,877,555</p>
<p><b>Not supplanting.</b> Federal E&amp;T funds used for activities within the education component must not supplant non-Federal funds for existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&amp;T program are not supplanting funds used for other existing education programs.</p>	<p>Contractors are provided with guidance prohibiting the use of funds to supplant existing state entitlements. Generally, if a service is available from a reputable provider in the community at no charge, contractors are expected to refer the participant to the no-charge provider and bill DHS only for the cost of providing case management, supportive services, and supplemental activities that are provided to the SNAP participant, but not available to the general public.</p>
<p><b>Cost Parity.</b> If any of the educational services or activities are available to persons other than E&amp;T participants, provide evidence that the costs charged to E&amp;T do not exceed the costs charged for non-E&amp;T participants (e.g. comparable tuition).</p>	<p>In the SNAP KEYS program, tuition is generally not paid for with SNAP E&amp;T funds, and KEYS coordinators are expected to refer students to free resources available on campus to all students. KEYS contractors then use funds to pay for case management, supportive services, and additional activities and enhanced services (not available to non-E&amp;T participants) that address the unique needs of the E&amp;T participant population.</p> <p>SNAP 50/50 third-party partners, which are community-based organizations, are required to bill DHS for SNAP E&amp;T participants consistently with the amount charged per non-E&amp;T student to their other charitable donations or grants.</p>

English Language Acquisition (EPEL)	Answer the question in the space below
<p><b>Description of the component.</b> Provide a summary of the activities and services.</p>	<p>Formal education training specifically designed to improve an individual’s proficiency in English needed to compete in the current job market.</p>
<p><b>Target Population.</b> Identify the population that will be targeted for participation in the component. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.</p>	<p>This component is open to any E&amp;T participant who meets criteria for participation and wishes to volunteer.</p>
<p><b>Criteria for Participation.</b> What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</p>	<p>The participant has expressed that English is not their first language.</p>
<p><b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).</p>	<p>Statewide</p>
<p><b>E&amp;T Providers.</b> Identify all entities that will provide the service.</p>	<p>Both contracted partners and the SNAP agency.</p>
<p><b>Projected Annual Participation.</b> Project the number of unduplicated individuals.</p>	<p>120</p>
<p><b>Estimated Annual Component Costs.</b> Project only administrative costs.</p>	<p>\$293,413</p>
<p><b>Not supplanting.</b> Federal E&amp;T funds used for activities within the education component must not supplant non-Federal funds for</p>	<p>Contractors are provided with guidance prohibiting the use of funds to supplant existing state entitlements. Generally, if a service is available from a reputable provider in the community at no charge, contractors are expected to refer</p>

English Language Acquisition (EPEL)	Answer the question in the space below
existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&T program are not supplanting funds used for other existing education programs.	the participant to the no-charge provider and bill DHS only for the cost of providing case management, supportive services, and supplemental activities that are provided to the SNAP participant, but not available to the general public.
<b>Cost Parity.</b> If any of the educational services or activities are available to persons other than E&T participants, provide evidence that the costs charged to E&T do not exceed the costs charged for non-E&T participants (e.g. comparable tuition).	Contractors are advised of the requirement that costs charged to the E&T grant may not exceed costs charged to or for non-E&T participants.

## II. Work Experience

Work experience is divided into two subcomponents per 7 CFR 273.7(e)(2)(iv): Work activity (WA) and Work-based learning (WBL). WBL activities like internships, apprenticeships, and on-the-job training, among others, may provide wages subsidized by the E&T program. In order to capture information about WBL activities that may be subsidized or unsubsidized by E&T, there are two sets of tables below for each kind of WBL activity – one table for activities not subsidized by E&T (e.g. Work-based learning – Internships) and another for activities subsidized by E&T (e.g. Work-based learning – Subsidized by E&T). Note that subsidized means programs where E&T funding is used to subsidize wages of participants. Subsidized in this context does not mean programs where participants receive a subsidized wage from another source.

Internship (WBLI)	Answer the question in the space below
<b>Description of the component.</b> <b>Provide a summary of the activities and services.</b>	Short-term entry-level work experience with an employer in an industry associated with the participant’s course of study and supervised or case managed by the E&T provider. The participant may or may not be paid by the employer, however wages will not be subsidized with E&T dollars.
<b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens,	Community College students

Internship (WBLI)	Answer the question in the space below
Homeless, Older Disconnected Youth, etc.	
<b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</b>	This component is open to E&T participants who are simultaneously enrolled in or recently were enrolled in the career/technical education programs or other vocational training component.
<b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).	Statewide, including areas covered by Pennsylvania’s 14 community colleges
<b>E&amp;T Providers.</b> Identify all entities that will provide the service.	SNAP KEYS
<b>Projected Annual Participation.</b> Project the number of unduplicated individuals.	60
<b>Estimated Annual Component Costs.</b> Project only administrative costs.	\$94,595

Pre-Apprenticeship/ Apprenticeship (WBLPA)	Answer the question in the space below
<b>Description of the component. Provide a summary of the activities and services to be offered.</b>	Registered pre-apprenticeships (RPAs) that expand participants’ career pathway opportunities with industry-based training and classroom instruction, preparing individuals to enter and succeed in registered apprenticeships (RAs) or other unsubsidized employment. RPAs are typically conducted in a classroom setting, with participants also experiencing simulated job environments to gain relevant hands-on experience.



Pre-Apprenticeship/ Apprenticeship (WBLPA)	Answer the question in the space below
	<p>ABAWDs are advised that they may appropriately combine this component with up to 10 hours/week of job search and/or job search training to meet the work requirement.</p>
<p><b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.</p>	<p>This component is open to any E&amp;T participant who meets criteria for participation and wishes to volunteer.</p> <p>Berks Connection Pretrial services focuses on serving Returning Citizens.</p>
<p><b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</b></p>	<p>Each contracted partner has specific criteria for admission into their program that align with labor market demand. For example, completion of high school; verification of literacy or numeracy levels; or, in limited instances, criminal history requirements.</p>
<p><b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).</p>	<p>Philadelphia, Allegheny, and Berks Counties</p>
<p><b>E&amp;T Providers.</b> Identify all entities that will provide the service.</p>	<p>SNAP 50/50 (Samuel Staten Sr. Pre-Apprenticeship Program, New Century Careers, and Berks Connection Pretrial Services)</p>
<p><b>Projected Annual Participation.</b> Project the number of unduplicated individuals.</p>	<p>312</p>
<p><b>Estimated Annual Component Costs.</b> Project only administrative costs.</p>	<p>\$1,611,371</p>

Transitional Jobs (WBLTJ)	Answer the question in the space below
<p><b>Description of the component.</b> Provide a summary of the activities and services.</p>	<p>Transitional Job activities provide time-limited work experiences that are wage-paid, but not subsidized, and are in the public, private, non-profit sectors for those individuals with barriers to employment who are chronically unemployed and have inconsistent work history. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment. Training objectives include enhanced coaching designed to build non-cognitive (soft) skills, as well as job skills specific to the participant’s specific TJ placement, which can be in industries such as distribution/supply chain, food processing and manufacturing, hospitality, printing/imaging, and restoration/large loss.</p>
<p><b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.</p>	<p>Returning citizens, homeless, chronically unemployed.</p>
<p><b>Criteria for Participation.</b> What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.)</p>	<p>This component is open to any E&amp;T participant who meets criteria for participation and wishes to volunteer. Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.</p>
<p><b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).</p>	<p>Philadelphia, Bucks, and surrounding counties</p>
<p><b>E&amp;T Providers.</b> Identify all entities that will provide the service.</p>	<p>SNAP 50/50 (First Step Staffing)</p>

Transitional Jobs (WBLTJ)	Answer the question in the space below
<b>Projected Annual Participation.</b> Project the number of unduplicated individuals.	125
<b>Estimated Annual Component Costs.</b> Project only administrative costs.	\$548,073

Transitional Jobs – Subsidized by E&T (WBLTJ - SUB)	Answer the question in the space below
<b>Description of the component. Provide a summary of the activities and services. Include the training objectives for each subsidized activity and how the State agency will ensure that the subsidized activity serves as a training to move participants into unsubsidized employment.</b>	Transitional Job activities provide time-limited work experiences that are wage-paid, with wages 50% reimbursed with E&T dollars. Placements are in the public, private, non-profit sectors for those individuals with barriers to employment who are chronically unemployed and have inconsistent work history. Placements are limited to no longer than 75 working days, which may be consecutive or non-consecutive. Participants receive wages at the end of each working day. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment. Training objectives include non-cognitive (soft) skills, as well as job skills specific to the participant’s specific TJ placement, which can be in industries such as landscaping/land reclamation, building renovation, and litter abatement.
<b>Target Population.</b> Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.	Returning citizens
<b>Criteria for Participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor</b>	Participation is limited to individuals who have been released from state incarceration and are under state supervision/parole. In some instances, individuals released from county incarceration and under county supervision/probation may also be eligible.

<b>Transitional Jobs – Subsidized by E&amp;T (WBLTJ - SUB)</b>	<b>Answer the question in the space below</b>
<b>market attachment, computer literacy etc.)</b>	
<b>Geographic Area.</b> Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).	Philadelphia, Allegheny, Dauphin and surrounding counties.
<b>E&amp;T Providers.</b> Identify all entities that will provide the service.	SNAP 50/50 (Center for Employment Opportunities)
<b>Projected Annual Participation.</b> Project the number of unduplicated individuals.	247
<b>Estimated Annual Component Costs.</b> Project only administrative costs.	\$2,836,814

*(2) An operating budget for the Federal fiscal year with an estimate of the cost of operation for each Federal fiscal year covered by the Combined Plan. Any State agency that requests 50 percent Federal reimbursement for State agency E&T administrative costs, other than for participant reimbursements, must include in its plan, or amendments to its plan, an itemized list of all activities and costs for which those Federal funds will be claimed, including the costs for case management and casework to facilitate the transition from economic dependency to self-sufficiency through work. Costs in excess of the Federal grant will be allowed only with the prior approval of FNS and must be adequately documented to assure that they are necessary, reasonable and properly allocated. A State must submit a plan amendment to request budget adjustments at least 30 days prior to planned implementation;*

**Section B - Operating Budget**

*Instructions for completion: Complete all cells, as applicable that are shown in gray. The cells that are blue are either being prepopulated from contracts or partnerships table or will automatically calculate and populate some of the cells that are included in the Funding Sources table. the Non-Federal Share will include any State/local funds or funds being provided through third-party partnerships. Federal share will include the 100 percent Federal E&T funds and the federal share of the 50/50 funds.*

Expense Category	Non-Federal Share	Federal Share	Total
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<b>I. Direct Program and Admin Costs</b>			
Salary/Wages (State agency only)	\$ 449,672.00	\$ 1,281,322.00	\$ 1,730,994.00
Fringe Benefits - provide approved fringe benefit rate percentage in line 8 below. Or provide total fringe benefits in line 9 if multiple rates are used by the State agency			
<b>87.80%</b>	\$ 394,812.00	\$ 1,125,001.00	\$ 1,519,813.00
<b>Fringe Benefits -</b>			\$ -
Non-capital equipment		\$ 161,376.00	\$ 161,376.00
Materials		\$ -	\$ -
Travel	\$ -	\$ 2,137.00	\$ 2,137.00
Building Space	\$ -	\$ 164,359.00	\$ 164,359.00
Equipment and other capital expenditures	\$ -	\$ -	\$ -
<i>Subtotal - State agency costs only</i>	\$ 844,484.00	\$ 2,734,195.00	\$ 3,578,679.00
Contractual Costs: <i>Is prepopulating from Contract-Partnerships Table, must not include Participant reimbursements.</i>	\$ 6,745,729.50	\$ 10,737,286.50	\$ 17,483,016.00
County Administered Program Admin Cost, if applicable: <i>Is prepopulating from County Admin Budget.</i>	\$ -	\$ -	\$ -
<b>Total Direct Program and Admin Costs</b>	\$ 7,590,213.50	\$ 13,471,481.50	\$ 21,061,695.00
<b>II. Indirect Costs:</b> <i>Indirect costs are only calculated on the subtotal of State agency costs only.</i>			
Indirect Costs - provide approved indirect cost rate percentage in line 23 below.			
	\$ -	\$ -	\$ -
<b>III. In-kind contribution</b>			

State in-kind contribution	\$ -	\$ -	\$ -
<b>Total Administrative Costs</b>	\$ 7,590,213.50	\$ 13,471,481.50	\$ 21,061,695.00
<b>IV. Participant Reimbursements</b>			
Dependent Care (including costs from contracts/partners and county administered programs)	\$ 1,600,000.00	\$ 1,600,000.00	\$ 3,200,000.00
Transportation & Other costs (including costs from contracts/partners and county administered programs)	\$ 1,310,000.00	\$ 1,310,000.00	\$ 2,620,000.00
State Agency Cost for Dependent Care	\$ -		\$ -
<b>Total Participant Reimbursements</b>	\$ 2,910,000.00	\$ 2,910,000.00	\$ 5,820,000.00
<b>V. Total Costs</b>	\$ 10,500,213.50	\$ 16,381,481.50	\$ 26,881,695.00

*(3) The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions;*

#### SNAP E&T Projected Participation

A) Anticipated number of work registrants in the State during the Federal FY. This is an unduplicated count. Take into consideration the expected number of work registrants in the State on October 1 <sup>st</sup> as well as the number of new work registrants expected throughout the Federal Fiscal Year.	516,189
B) List State exemptions from E&T and the number of work registrants expected to be exempted under each category. A State operating a voluntary program would show that all work registrants are exempt. Alternatively, a State may exempt only certain populations from SNAP E&T participation, such as individuals experiencing homelessness.	516,189 <i>1. All Work Registrants</i>

C) Total estimated number of work registrants exempt from mandatory E&T (sum of State exemptions in B above).	516,189
D) Percent of all work registrants exempt from E&T (line C /line A * 100).	100%
E) Anticipated number of ABAWDs in the State during the FY.	340,068
F) Anticipated number of ABAWDs in waived areas of the State.	340,068
G) Anticipated number of ABAWDs to be exempted under the State's ABAWD discretionary exemption allowance.	0
H) Number of potential at-risk ABAWDs expected in the State during the FY (line E – (lines F +G)).	0

*(4) The characteristics of the population the State agency intends to place in E&T;*

Pennsylvania will continue to offer a voluntary SNAP E&T program in Federal FY 2022. Individuals who choose to participate in the program may do so through any of the allowable components.

*(5) The estimated number of volunteers the State agency expects to place in E&T;*

**Mandatory, Voluntary, and ADAWD Projected Participation**

A) How many total mandatory participants do you expect to serve in E&T during the FY?	0
B) How many total voluntary participants do you expect to serve in E&T during the FY?	4,962
C) How many ABAWDs do you expect to serve in E&T during the FY?	0

*(6) The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered;*

Pennsylvania offers a choice of eight components so that E&T participants may pursue an appropriate activity applicable to their local labor market conditions through one of three SNAP E&T contractor

groups: 1) SNAP KEYS, 2) SNAP EARN, or 3) SNAP 50/50. While not all counties have SNAP KEYS or SNAP 50/50 contractors, each of Pennsylvania's 67 counties is served by at least one SNAP EARN program.

The eight SNAP E&T components offered in Pennsylvania are:

1. Supervised Job Search
2. Job Search Training
3. Job Retention
4. E&T Workfare
5. Basic/Foundational Skills Instruction (includes High School Equivalency Programs)
6. Career/Technical Education Programs or other Vocational Training
7. English Language Acquisition
8. Work Experience

*(7) The method the State agency uses to count all work registrants as of the first day of the new fiscal year;*

The IMCW in the local CAO determines work registrant status at application, renewal, provider determination, and as other changes become known to DHS. IMCWs encourage SNAP recipients to volunteer to participate in the SNAP E&T program at certification and renewal without regard to their work registrant or ABAWD status.

Work registrant status is entered into eCIS by an IMCW using a series of two-digit numerical identifiers called ETP codes. These ETP codes correspond to each federal exemption from general work registration requirements.

**Income Maintenance Caseworkers input ETP codes during eligibility determination which indicate work registrant or exempt status. To count work registrants for the FNS-583, DHS uses those codes in the Data Warehouse to identify all SNAP recipients who meet a federal exemption from work requirements, then subtracts the number of such recipients from the total number of all SNAP recipients to arrive at who is a work registrant as of October 1<sup>st</sup>.**

*(8) The method the State agency uses to report work registrant information on the quarterly Form FNS-583;*

**See response to item (7) above**

*(9) The method the State agency uses to prevent work registrants from being counted twice within a Federal fiscal year. If the State agency universally work registers all SNAP applicants, this method must specify how the State agency excludes those exempt from work registration under 7 C.F.R. §273.7(b)(1). If the State agency work registers nonexempt participants whenever a new application is submitted, this method must also specify how the State agency excludes those participants who may have already been registered within the past 12 months as specified under 7 C.F.R. §273.7(a)(1)(i);*

**Each SNAP recipient is identified in eCIS with a unique "individual number". The SQL code used to identify work registrants utilizes the "distinct" function to ensure that each individual number is counted only once in the reported number of work registrants.**



*(10) The organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the Statewide workforce development system, if available. FNS is specifically concerned that the lines of communication be efficient and that noncompliance by the participant be reported to the certification unit within 10 working days after the noncompliance occurs;*

On the state level, the Bureau of Employment Programs (BEP), in the Office of Income Maintenance (OIM), is responsible for administering the RESET (TANF E&T) and SNAP E&T programs which includes program oversight, policy guidance, and technical assistance to local CAO and contracted program staff.

On the local level, each CAO has IMCWs that enroll voluntary or ABAWD participants in SNAP E&T. A basic intake assessment is conducted by the IMCW to determine which SNAP E&T contractor is most appropriate. An EDP is created to identify participant needs and goals as they move toward obtaining employment. As those needs change, and at a minimum of every 12 months, the plan is updated. The EDP is supplemented by a more comprehensive assessment – sometimes called a service plan or IEP – which is completed by the SNAP E&T contractor.

Delivery of E&T services is available through contracted program providers, supplemented by referrals to resources available in local communities at no cost. CWDS includes digital interfaces for E&T contractors, participants, and employers and acts as the system of record. SNAP E&T requires contractors use CWDS to track participation in all components, as well as case management. CWDS's participant-facing interface, known as Job Gateway, includes built-in resume development and job search tools, and is one method DHS uses to deliver supervised job search and job search training components to participants.

Each CAO has a E&T Ombudsman who the contracted programs in that county may reach out to at any time for technical assistance with local issues. In addition, CAOs have regular Direct Service Team meetings with each E&T contracted program and Local Management Committee meetings with a panel of several area E&T contracted programs and supportive service providers.

Additionally, eCIS, the eligibility management information system, is linked to CWDS via an overnight batch process, allowing the CAOs and contracted providers to share updates concerning participants. In addition, at least one staff person at each CAO is authorized to directly access CWDS to review cases and case notes entered by contracted programs.

CAO staff directly refer eligible SNAP applicants to E&T program staff through eCIS, which is transmitted to CWDS via an overnight batch process.

Further, E&T program staff are encouraged to submit reverse referrals. When submitting a reverse referral, E&T program staff enter relevant information into CWDS to perform a preliminary screening. CWDS interfaces with eCIS to determine if the individual is receiving SNAP and returns a response. E&T program staff must then follow up with the CAO to definitively establish the individual's eligibility for a referral. If the CAO determines that an individual is eligible for a reverse referral, the CAO sends an electronic referral through eCIS which is transmitted to CWDS via an overnight batch process. Participants are only considered enrolled in E&T if an electronic referral is sent by the CAO and accepted by the E&T program. Participants who are preliminary screened, but who are never electronically referred by the CAO, are not considered enrolled in E&T.

*(11) The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the Statewide workforce development system, if available. Copies of contracts must be available for inspection;*

DHS partners with a wide variety of local and regional organizations in communities across the state, including: third party training providers through SNAP 50/50, community colleges through SNAP KEYS, and Local Workforce Development boards through SNAP EARN. Contracted programs provide unique perspectives and enjoy strong relationships with a broad array of community employers to ensure placement of graduates in in-demand jobs in the local job market.

*(12) The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the Statewide workforce development system, if available. Copies of contracts must be available for inspection; The State agency must document how it consulted with the State workforce development board. If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, it must document this consultation and explain the determination that doing so was more effective or efficient. The State agency must include in its E&T State plan a description of any outcomes from the consultation with the State workforce development board or private employers or employer organizations. The State agency must also address in the E&T State plan the extent to which E&T activities will be carried out in coordination with the activities under title I of WIOA;*

DHS collaborates with third party entities who offer PA Department of Labor & Industry-approved Registered Pre-Apprenticeship programs in the fields of machining and construction. DHS collaborates with the 14 Pennsylvania community colleges, 14 state universities, and numerous career or technical schools certified by the Pennsylvania Department of Education through the SNAP KEYS program established by state legislation ([Act 92 of 2015](#)).

Department of Labor & Industry (L&I): DHS regularly engages its sister agency, L&I, to provide information and updates regarding DHS E&T programs. These conversations have included specific details on Pennsylvania's SNAP E&T program design, including efforts to expand 50/50 partnerships so that trainings in in-demand fields are offered at even more locations throughout the Commonwealth, access to data through an MOU for purposes of enhancing service delivery, and compiling the Annual SNAP E&T Reporting Measures.

State Workforce Development Board: The Acting Secretary of DHS, Meg Snead, is a member of the PA Workforce Development Board. During a quarterly meeting of the board, the previous Secretary of DHS, Teresa Miller, presented information regarding the SNAP state plan's E&T activities; this was provided in writing for the board members' briefing books, as well. Board members were invited to share input, questions, and concerns on the SNAP E&T activities described.

Keystone Economic Development and Workforce Command Center: Governor Tom Wolf created this Command Center, which meets weekly and is led by the Secretaries of Labor & Industry, the Department of Community and Economic Development, and the Department of State, in addition to the President of the PA Chamber of Commerce and the President of the AFL-CIO. DHS also participates on the Command Center and provided a presentation on SNAP E&T programming. DHS's goal and method of implementing SNAP 50/50 has been discussed multiple times at the Command Center.

The PA Chamber of Commerce: DHS invited the President of the PA Chamber of Commerce to visit a SNAP 50/50 program to further understand the model and advance discussions around training programs to meet employer needs, as well as employer investments in these programs.

Interagency Workforce Collaboration Meetings: DHS holds monthly interagency meetings focused on workforce development. Plans for SNAP E&T programming, particularly around the 50/50 model, have been discussed in these meetings with the L&I Deputy Secretary of Workforce Development and multiple bureau directors and staff.

L&I Bureau of Workforce Development Administration and Center for Workforce Information and Analysis: DHS collaborated with L&I regarding the state's goals and developing access to data through an MOU for purposes of enhancing service delivery and compiling the Annual SNAP E&T Reporting Measures.

DHS coordinates with L&I and local workforce development boards through American Job Centers. This relationship ensures that dual eligible SNAP/WIOA clients can receive access to high quality services under both programs while avoiding duplication. SNAP EARN contractors work with local workforce development boards to refer SNAP participants to appropriate Title I services and reverse refer SNAP-eligible Title I recipients into SNAP E&T. The SNAP EARN contractor is then able to track hours and supports across both programs, and report these accurately to the SNAP certification office to ensure compliance with ABAWD work requirements when necessary.

Since approval by FNS in 2006, Pennsylvania continues to operate a Mini-Simplified SNAP Program (mini-SNAP) for households that receive SNAP and TANF (Title IV-A) benefits concurrently. DHS understands that no federal SNAP E&T funds may be used to serve SNAP recipients who also receive Title IV-A assistance.

Pennsylvania plans to implement policy changes and system enhancements to allow recipients of TANF "non-assistance", such as Diversion, to receive SNAP E&T services, while continuing to ensure that SNAP E&T funds will not be used to serve individuals who are receiving Title IV-A assistance.

As part of mini-SNAP, joint TANF/SNAP households are subject to the TANF work requirement and are served by DHS's TANF E&T program, RESET. The RESET program and the SNAP E&T program are integrated on the state and local levels. On the state level, the Bureau of Employment Programs within the Office of Income Maintenance is responsible for administering both the RESET and the SNAP E&T programs, which includes program oversight, policy guidance, and technical assistance to local CAO and to contracted program staff. On the local level, each CAO has IMCWs that enroll participants in both RESET and SNAP E&T.

As the administrator of both the RESET and SNAP E&T programs, DHS ensures that all participants in RESET who lose eligibility for TANF assistance, and thus the ability to participate in RESET, are given the opportunity to enroll in SNAP E&T programs if appropriate.

One of our SNAP 50/50 contracted programs, the Center for Employment Opportunities (CEO), works exclusively with returning citizens. CEO serves three of Pennsylvania's largest cities — Pittsburgh, Harrisburg, and Philadelphia — and has an MOU with the Pennsylvania Department of Corrections (DOC). CEO participants are dual clients of both DHS and DOC.

*(13) The availability, if appropriate, of E&T programs for Indians living on reservations after the State agency has consulted in good faith with appropriate tribal organizations;*

N/A

*(14) If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period;*

N/A

*(15) The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.*

DHS works closely with the Office of Childhood Development and Early Learning (OCDEL), the CCDBG state agency in Pennsylvania which is housed jointly under DHS and the Pennsylvania Department of Education. SNAP E&T participants with a need for childcare are referred to OCDEL's local Early Learning Resource Center (ELRC) offices. At the ELRC, the participant is directly connected with a childcare provider approved by the ELRC; the childcare provider is directly paid by the ELRC based on the established payment rates that ELRC uses for both CCDBG and SNAP E&T clients.

*(16) The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.*

PA DHS issues participant reimbursements for the actual cost of transportation or other expenses, however these reimbursements are limited to the annual and lifetime caps noted in the table below.

*(17) Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and comment on the proposed reimbursements before they are implemented.*

<b>Allowable Participant Reimbursements</b>	<b>Participant Reimbursement Caps (optional)</b>	<b>Who provides the participant reimbursement?</b>	<b>Method of disbursement</b>
Transportation (may include public transportation, mileage, car repair, taxi, carpool)	\$1,500 per participant per year combined expenses in entire category (SPAL)	DHS directly (SPAL), Traveler's Aid/SEPTA, or via select contracted programs	Actual amount, in advance via EBT card or restricted endorsement check; direct issuance of needed item or service through third-party vendors

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
	Mileage limited to 20¢ per mile		
Clothing	\$150 per participant per year (SPAL)	DHS directly (SPAL) or via select contracted programs	Actual amount in advance via EBT card; direct issuance of needed item or service through third-party vendors
Dependent Care	Established rate for dependent care costs unless SNAP regulations are revised to increase the federal ceiling or match.	DHS directly via referral to the local ELRC	DHS directly pays the provider the actual cost of care (up to the cap) in the calendar month following the month services are provided.
Other work, education, and training-related expenses (may include tools, equipment, books, supplies, and certain fees)	\$1,000 lifetime limit per participant combined expenses in entire category (SPAL)	DHS directly (SPAL) or via select contracted programs	Actual amount in advance via EBT card; direct issuance of needed item or service through third-party vendors

(18) For each component that is expected to include 100 or more participants, reporting measures that the State will collect and include in the annual report in paragraph (c)(17) of this section. Such measures may include:

- (a) The percentage and number of program participants who received E&T services and are in unsubsidized employment subsequent to the receipt of those services;
- (b) The percentage and number of participants who obtain a recognized credential, a registered apprenticeship, or a regular secondary school diploma (or its recognized equivalent), while participating in, or within 1 year after receiving E&T services;
- (c) The percentage and number of participants who are in an education or training program that is intended to lead to a recognized credential, a registered apprenticeship an on-the-job training program, a regular secondary school diploma (or its recognized equivalent), or unsubsidized employment;
- (d) Measures developed to assess the skills acquisition of E&T program participants that reflect the goals of the specific components including the percentage and number of participants who are meeting program requirements or are gaining skills likely to lead to employment; and
- (e) Other indicators approved by FNS in the E&T State plan.

<b>Component</b>	<b>Outcome Measure</b>	<b>Methodology including timeframes being reported (e.g. denominator and numerator)</b>
<b>Supervised Job Search (SJS)</b>	Number and Percentage of participants employed during or upon completion	<p>Numerator will include those participants who were employed or during or upon completion of the component during the period of 10/1/2021 and 9/30/2022</p> <p>Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022</p>
<b>Job Search Training (JST)</b>	Number and Percentage of participants employed during or upon completion	<p>Numerator will include those participants who were employed or during or upon completion of the component during the period of 10/1/2021 and 9/30/2022</p> <p>Denominator will include those participants who are currently participating in the component and those who have completed the activity during the period of 10/1/2021 and 9/30/2022</p>
<b>Job Retention (JR)</b>	Number and Percentage of participants employed	Numerator will include those participants who were employed at the 90-day completion of the

	during or upon 90-day completion	<p>component during the period of 10/1/2021 and 9/30/2022</p> <p>Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022</p>
<b>E&amp;T Workfare (W)</b>	Number and Percentage of participants gaining skills likely to lead to employment	<p>Numerator will include those participants who are enrolled in the component during the period of 10/1/2021 and 9/30/2022</p> <p>Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022</p>
<b>E&amp;T Workfare (W)</b>	Number and Percentage of participants employed during or upon completion	<p>Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2021 and 9/30/2022</p> <p>Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022</p>
<b>Basic/Foundational Skills Instruction (includes High School Equivalency Program (EPB))</b>	Number and Percentage of participants gaining skills likely to lead to employment	<p>Numerator will include those participants who are enrolled in the component during the period of 10/1/2021 and 9/30/2022</p> <p>Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022</p>
<b>Basic/Foundational Skills Instruction (includes High</b>	Number and Percentage of participants employed	<p>Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2021 and 9/30/2022</p>

<b>School Equivalency Program (EPB)</b>	during or upon completion	Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022
<b>Basic/Foundational Skills Instruction (includes High School Equivalency Program (EPB))</b>	Number and Percentage of participants who earned a High School Equivalency Degree	Numerator will include those participants who obtained a High School Equivalency Degree during the period of 10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/22
<b>Basic/Foundational Skills Instruction (includes High School Equivalency Program (EPB))</b>	Number and Percentage of participants who successfully complete as determined by the provider	Numerator will include those participants who successfully completed the component as determined by the provider during the period between 10/1/2021 and 9/30/22  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022
<b>Career/Technical Education Programs or other Vocational Training (EPC)</b>	Number and Percentage of participants gaining skills likely to lead to employment	Numerator will include those participants who are enrolled in the component during the period of 10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022
<b>Career/Technical Education Programs or other Vocational Training (EPC)</b>	Number and Percentage of participants employed during or upon completion	Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022
<b>Career/Technical Education Programs</b>	Number and Percentage of	Numerator will include those participants who obtained a Credential during the period of



<b>or other Vocational Training (EPC)</b>	participants who earned a Credential	10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/22
<b>English Language Acquisition (EPEL)</b>	Number and Percentage of participants gaining skills likely to lead to employment	Numerator will include those participants who are enrolled in the component during the period of 10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022
<b>English Language Acquisition (EPEL)</b>	Number and Percentage of participants employed during or upon completion	Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022
<b>Work Experience (WE)</b>	Number and Percentage of participants gaining skills likely to lead to employment	Numerator will include those participants who are enrolled in the component during the period of 10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022
<b>Work Experience (WE)</b>	Number and Percentage of participants employed during or upon completion	Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2021 and 9/30/2022  Denominator will include those participants who are currently participating in the component and those who have completed the component during the period of 10/1/2021 and 9/30/2022

*(b) Able-bodied Adults without Dependents (ABAWD)28: A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs) subject to the 3- month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA:*

*(1) Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;*

N/A

*(2) Estimated costs of fulfilling its pledge;*

N/A

*(3) A description of management controls in place to meet pledge requirements;*

N/A

*(4) A discussion of its capacity and ability to serve at-risk ABAWDs; Information about the size and special needs of its ABAWD population;*

N/A

*(5) Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement.*

N/A

*(6) Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement.*

N/A

## **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.*

Pennsylvania has incorporated TAA in its responses to the common planning elements in sections II, III, IV, and V.

DRAFT

## **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 work with other PA CareerLink® staff on a common strategy for identifying veterans in their offices during the initial assessment. 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. Regulatory limitations prevent DVOPs from providing services directly to any non-veterans or veterans without mandated SBEs. DVOPs still assist other PA CareerLink staff serving as subject matter experts on issues facing veterans and the resources available to veterans in their local area.

Alongside their peers at PA CareerLink®, DVOPs are responsible for implementing and maintaining services related to programs required by WIOA, specifically Wagner-Peyser and other legislation as needed by veterans with significant barriers to employment. It is critical that DVOPs establish and maintain professional relationships with local organizations and partner staff that serve veterans for referrals, to ensure each veteran receives all services they require.

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.

LVERs initiate and collaborate with PA CareerLink® partners to hold career fairs; and represent PA Careerink® offices as job and career fairs. They provide promotional and informational services to employers, employer associations, business groups, and PA CareerLink® staff concerning the benefits of hiring veterans and eligible persons. LVERs advocate for veterans' employment and training opportunities with business, industry, labor organizations, educational institutions, and community-based organizations through contact with Veterans' community, governmental organizations and service providers.

*(d) The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;*

Public Law 107-288, the Jobs for Veterans Act, requires the Commonwealth to administer performance incentive awards for quality employment training and placement services to veterans. However, Commonwealth collective bargaining agreements prohibit employee monetary bonuses as proscribed in the JVSG Act. Previously Pennsylvania did not accept or use JVSG incentive funds. As an alternative going forward, the Commonwealth will recognize and reward PA CareerLink® (American Job Center) offices that display outstanding dedication and services to our veteran populations. The incentive awards to these offices will be limited in use to funding continuing services to veterans and eligible spouses and caregivers.

*(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;*

During the reception process, a series of questions are used to identify veteran or eligibility status. Qualified veterans and/or qualified spouses are provided services prior to other customers and an initial assessment is completed by the first available PA CareerLink® staff member. If during the initial assessment it is determined that the veteran has a SBE or is a member of another special category, the veteran is immediately referred to a DVOP specialist.

The Commonwealth provides priority of service in accordance with TEGl 05–03. When a veteran is identified as having barriers to employment, they are fast tracked to ensure that those barriers are resolved as expeditiously as possible.

The Commonwealth monitors programs and offices to ensure that veterans are given priority of service. Periodic trainings and technical assistance are provided to PA CareerLink® staff on priority of service and its implementation. JVSG program managers plan to periodically conduct site checks to ensure all required priority of service signs are present and properly displayed, and that One Stop Center staff understand both the requirement of priority of service and its proper implementation. During these site visits, monitors will pay particular attention to the implementation of priority of service beyond core services, particularly in the allocation of training funds.

*(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;*

The Commonwealth uses reports from the Center for Workforce Information & Analysis (CWIA) to monitor services provided and results. Reports are generated monthly and quarterly. Reports are sorted by Region and Local Offices. The Commonwealth also can view and track services entered by individual DVOPs and LVERs. Plans are in place for the JVSG program coordinator to conduct reviews and analysis monthly in which the raw number of veterans provided intensive services and the percentage of Veterans provided intensive services in comparison to the total number of veterans served is reviewed. The Commonwealth will also monitor and report to USDOL VETS on a quarterly basis veteran’s Individualized Career Services numbers, Training Services numbers, and Total Current Period numbers from the ETA-9173 form. The Commonwealth also takes and analyzes, from the ETA-9173 form, performance indicators including Employment Rate – 2<sup>nd</sup> Quarter After Exit, Employment Rate – 4<sup>th</sup> Quarter After Exit, and Median Earnings – 2<sup>nd</sup> Quarter After Exit.

The Commonwealth is dedicated to continuously improve the way in which we provide and measure job and job training individualized career services, employment placement services, and job-driven training and subsequent placement service program for eligible veterans and eligible persons.

*(h) The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and,*

**Disabled Veterans Outreach Program Specialists**

Last Name	First Name	Start Date	Mandatory Training Date
Barton	John	04/03/2023	08/25/2023
Colian	Matthew	03/05/2023	
Conyer	Sunshine	02/14/2022	08/12/2022
Cooper	Elizabeth	05/17/2020	03/12/2021
Crowe	Anthony	10/05/2020	03/12/2021
Curtis	Vicki	04/15/2002	06/06/2008
Enos	Pamela	11/28/2022	04/28/2023
Evans	Roy	01/03/2015	05/15/2015



Fallon	William	07/04/2015	12/18/2015
Getz	William	07/15/2019	07/24/2020
Giocondo	Crystal	07/3/2021	
Gourn	Patrick	12/27/2022	09/15/2017
Groll	Michael	11/14/2022	
Haefner	Robert	10/27/2014	05/08/2015
Koppenhofer	Scott	04/21/2019	01/27/2020
Nancy	Labat	06/26/2023	
Langer Williamson	Andrew	05/01/2023	
Lee	Christopher	12/12/2022	
Lucas	John	05/01/2023	
Mynczywor	Stanley	10/27/2018	02/07/2020
Paglia	Ryan	12/03/2007	12/2/2008
Peaden	Porter	07/22/1993	10/18/1999
Rockne	Erik	02/04/2023	
Root	Branden	12/05/2022	04/08/2023
Silva	Sha-Wana	02/13/2023	
Torres	Rafael	09/23/2019	08/14/2020
Vano	Jeffrey	01/23/2023	06/09/2023
White	Clifford	01/14/2008	10/28/2008
Wilkins-Harvey	Dartanyun	03/21/2022	05/05/2023

#### Local Veterans Employment Representatives

Last Name	First Name	Start Date	Mandatory Training Date
Anderson	Trent	09/07/2021	03/10/2023
Bell	Joanne	04/18/2009	06/16/2009
Bodnar	Joseph	03/20/2021	05/13/2022
Broadwell	David	11/28/2022	03/31/2023
Casamassima	William	03/16/2019	10/18/2019
Crouch	Alexander	10/05/2019	07/24/2021
Dukes	Stacy	07/15/2019	08/14/2020
Duvall	Thomas	06/29/2023	
French	Timothy	03/25/2017	05/27/2017
Gardner	John	03/25/2017	06/13/2017
Hollenbach	Randal	03/09/2019	07/04/2020
Jocuns	Samuel	02/11/2019	05/06/2011
Jones	Vincent	10/18/2010	05/27/2011
Kuhn	Fae	08/21/2017	01/29/2019
Magliocca	Norman	08/19/2017	01/29/2019

McCullough	Hugh	09/24/2005	10/30/2006
Montalbano	Charles	01/16/2004	11/16/1999
Silman	Sean	08/21/2023	
Sulderits	Heidi	01/14/2023	
Warholic	George	08/11/2018	01/29/2019
Zelinsky	Francis	05/21/2016	08/15/2019

*(i) Such additional information as the Secretary may require.*

N/A

DRAFT

## **Unemployment Insurance Programs (Programs Authorized Under State Unemployment Compensation Laws In Accordance With Applicable Federal Law)**

*The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.*

### **Pennsylvania State Quality Service Plan – Federal Fiscal Year 2024**

#### **A. OVERVIEW**

Pennsylvania's economy has improved steadily since the height of the COVID-19 pandemic when, in 2020, the annual average unemployment rate reached 9.1 percent. Since then, Pennsylvania's annual average unemployment rate declined to 6.3 percent in 2021 and 4.4 percent in 2022. Pennsylvania's June unemployment rate dropped to a record low 3.8 percent.

Despite having a Trust Fund balance of over \$3.2 billion at the end of February 2020, the unprecedented surge in unemployment benefits from the COVID-19 crisis led to the depletion of the Trust Fund by September 2020 at which time Pennsylvania began accruing Title XII federal loans. Pennsylvania's federal loan balance peaked at \$1,559,422,237 in April 2021. With improving economic conditions, Pennsylvania was able to repay its federal loan balance in May 2022, as well as another short-term loan in April 2023 (repaid in May 2023). As of August 7, 2023, the Trust Fund balance stands at \$1,258,813,242.

#### **Recent Initiatives**

##### **UC Benefits Modernization Project**

As of June 8, 2022, we completed our first year with our new system. We continue to work on addressing issues as they are discovered, making improvements as we spot the need and implementing our post go-live initiatives. We have been meeting with other GSI states to learn their best practices that we can consider implementing.

##### **Tiger Team Initiatives**

In December 2022, Pennsylvania was approved for an initial **\$1,478,848.25** Tiger Team grant for the following four projects:

### **Internal Communications Development (Robohelp)**

The department stores its guidelines on unemployment insurance (UI) policy in a digital directory comprised of multiple PDF documents called the Manual of Operations and Procedures (MOP). Service center staff navigate these large and frequently updated documents to reference and review complex and changing UC policies and procedures. Staff reference these documents while they are directly communicating with claimants and need a more nimble method to find relevant documents. This need has grown due to the learning curve associated with using PA UC's new modernized system (Ben Mod). Policy descriptions, policy changes, and Ben Mod's issue codes have added to the many details service center staff must be aware of while interacting with claimants and employers. This project would build on an existing wiki effort to create such a system that includes search, tagging, and linking features, as well as version control to meet the needs of service center staff.

### **Investigative Case Management Solution (CMS)**

L&I's new Fraud Case Management System (CMS) is made up two main parts, the UC Fraud Reporting Tool, and the UC Fraud Reporting Tool Dashboard. The CMS was designed to assist staff in the process of a tracking hijacked or ID theft claims and what necessary actions are needed to rectify the situation. Staff gather the required information from victims/claimants by phone who had their personal information compromised. Staff enter the information via the UC Fraud Reporting Tool. The forms are submitted through the case management system to the Internal Audits Division (IAD) dashboard for investigation. Once reviewed by an IAD investigator, the investigator will enter a case note on the form or in the case as to what actions need to be completed by Benefit Integrity (BI) staff. The IAD investigator will then submit the case to Benefit Integrity (BI) or close the case if no action is needed (Phase 2). The first phase and second phases are active.

The CMS Phase 1 - UC Fraud Reporting Tool Dashboard has four functions: (1) Home page which consists of the total pending count in the queue to be assigned; (2) My Dashboard where IAD/BI staff locate their assigned cases; (3) Search function by First name, Last name, Submitted Date, Status, Assigned to, and User ID; and (4) ADMIN section where supervisory staff control permissions to the dashboard. IAD/BI staff go to their personal dashboard to review the case assignments and notes submitted from L&I's frontline staff and then take the appropriate action.

The CMS Phase 2 - The second phase consists of three areas of reports. The first report consists of how many CMS tickets are entered each day, who enters the ticket with the claimant's ID number attached, and a summary of each person's productivity. Second, a report will be run by pending Date Range, Status, Assigned to BI, Assigned to IAD, Completed, Submitted to BI, Submitted to IAD, and Closed No Issue. The third report identifies who sent the case, who it's assigned and who closed the case. The capability to search claimant ID number for spot checking, search by particular user, and query all the cases staff have assigned or completed will be an asset for accuracy and quality performance. The programming should have the ability to be exported to Excel.

The CMS Phase 3 – The third phase will allow the public citizens to enter their fraud concerns whether it be for them or someone they know or to report someone they think committed fraud. Employers will

also have access to this tool to report any fraud they are seeing. Increased reporting with the system will be a big advantage.

### **Data Collection for LEP**

The department plans to hire a vendor to address data collection issues. We already collect some Equity and User Experience (EUX) data points. However, there are EUX Key Performance Indicators (KPIs) that are not currently captured. The following challenges will be addressed:

- Data is not collected at the correct point/only collected at the intake of the UC claimant life cycle.
- Data is not collected/used at critical junctures along the claimant's UC life cycle.
- The department does not have a formalized process for monitoring and interpreting equability and accessibility.

With this project we plan to incorporate the following key data points:

- Primary language spoken
- Level of English proficiency
- Technology access
- LGBTQIA+ identification

The goal will be to further enhance our ability to conduct equity and accessibility analysis to determine whether and which populations face disproportionate barriers to accessing UC. EUX KPIs will allow us to better understand where access gaps for different populations exist and determine ways to address them. Additionally, we hope for greater transparency and improved trust from the public.

### **Translation Improvement**

The Translation Improvement grant project will improve translation services for claimants speaking languages other than English. The goal is to reduce the need for ad hoc translation services by providing materials in the correct languages. We will review the practicality of utilizing human and technology-assisted translation services across all claimant resources that can translate the online environment and print materials. The online environment includes, but is not limited to, the PA UC website, videos, social media content, and downloadable content. The print materials include, but are not limited to, educational materials and correspondences delivered to claimants. The PA UC Handbook is already translated in Spanish but will be sent to a vendor for additional translation when updates to the handbook are required. Additionally, we will create an info graphic for claimants that outlines how and where LEP claimants can access UC processes and resources. Finally, as part of this project, the department will improve reports to collect the number of claimants leveraging both online and offline translation services and the language they are requesting.

On September 15, 2023, Pennsylvania was awarded an additional Tiger Team grant of \$2,994,702.00. We plan to apply for a total of six projects under this additional grant:

### **Robohelp Modification Request**

Pennsylvania is seeking a budget modification for the Tiger Team grant for Internal Communications (RoboHelp) Development. This project was determined to be Pennsylvania's #1 Tiger Team grant priority. The current team funded by this grant consists of:

- 1 Robohelp Developer

- 1 Robohelp QA

The budget modification will increase the funding to request the following additional contractual resources:

- 2 additional Adobe RoboHelp developers
- 1 RoboHelp QA
- Total Cost = \$522,780.00

### **Operations Mailroom Configuration**

This project will result in a reconfigured mailroom space to both simplify and speed up mail processing for the Unemployment Compensation Operations group. Improved flow of the mail processing and scanning functions will enable the staff to access scanned documents in a timely manner and support a reduction in response time to claimants and employers. The reconfigured space will include incoming and outgoing mail stations, a mail processing area, mail bins for sorted document storage, and six high-capacity scanning workstations located in a central location. The finished space will include updated signage and instructions to promote an efficient workflow and minimize unnecessary backlogs. The design of the reconfigured space has been completed and updated quotes are being processed. Materials will be ordered in November 2023, with renovation activities taking place in early 2024. Updated signage and process improvements will be finalized upon completion of the new layout.

### **Simplified Language Initiative**

As the department creates new documents/content and revises old, we are revising the language to ensure it is understood by our audience – both internal and external customers. This will apply to our determinations, web content, general correspondence, trainings and policies. We are also planning to work with NASWA on various projects to evaluate our verbiage. We also utilize our Strategic Operations (SO) team to assist us in our efforts. The SO team provided plain language training to the Office of UC Benefits Policy to instill the concept of simplified and plain language to the staff that originate the content and helped identify our most impactful documents to begin with, such as our Unemployment Handbook which all claimants receive and has already been updated with new content meeting the simplified language concept.

### **RPA (Needs to combine with OCR)**

We are currently working with a vendor, Guidehouse, to determine the most effective use of RPA in Pennsylvania. We have not yet selected an area to focus our efforts.

### **OUCBP Staff Orientation and Training**

The Pennsylvania Department of Labor & Industry (DL&I) has two bureaus which deal with unemployment benefits. The Office of UC Service Centers (OUCSC) has over a thousand employees who process claims and provide customer service. Their work is made possible by the Office of UC Benefits Policy (OUCBP), a team of 60+ individuals who create their procedures, create all internal and public-facing communications, handle the system issues and troubleshooting, handle audits, provide quality control, create and provide internal and public training, and more. These are the primary jobs for the classifications of Unemployment Specialists 1, 2, & 3, and also Unemployment Compensation Executive 1 (Division chiefs), which account for a total of 40 staff in the bureau. Training for new staff in OUCBP has always

been done one-on-one with a supervisor in an on-the-job format. This means every unit and every supervisor provides unique training. Although every specialist is assigned different subject matter regarding the unemployment program, the basic functions of the specialists are all the same. To ensure the staff are doing their jobs in a consistent, proactive manner, a standard training and guide on being successful in these positions is needed. These 40 individuals need consistent training and job aids among them, with the majority of the content geared toward Specialist 1s and 2s (representing all the basic functions and services the bureau provides), with additional modules for supervisors (Specialist 3s) and Division chiefs so they understand their own roles in addition to understanding their staff's roles. As these staff are the ones who have a heavy influence on the entire unemployment program, their success in their positions means success for Pennsylvania. This project will incorporate a third-party vendor who can remain an objective expert in creating this training.

### **Promoting Electronic Employer Access**

The Promoting Electronic Employer Access grant project is still in early phases of development. The problem we are experiencing is that most of PA employers are not taking advantage of the online self-service options we offer. They rely on postal mail and phone calls instead of the self-help, real-time service that our online system offers.

We plan to hire a vendor that will do outreach with employers to find out why they aren't using the system, and help us devise strategies to increase employer's online use for all aspects of UC business.

### **Overpayment Blanket Waivers**

On December 20, 2022, Pennsylvania was approved for an additional blanket waiver scenario for overpayments that were a result of a vendor technical error. This technical error caused 30,575 claimants to receive duplicate PUA and FPUC benefits for payments originally issued on June 22, 2020. The claimants were clearly without fault so those overpayments will be waived, in addition to the other blanket waiver scenarios in UIPL 20-21 that apply to Pennsylvania.

## **B. FOCUS ON FY 2024 NATIONAL PRIORITIES**

Fiscal year's 2023 national priorities include combatting fraud, reducing the UI improper payment rate, and improving prevention, detection, and recovery of improper and fraudulent overpayments. Pennsylvania plans to address these priorities in several ways.

- 1) PA will continue utilizing the Integrity Data Hub's Fraud Alert System to find fraudulent and/or suspicious claims. These searches are conducted either manually or by submitting requests to our IT department for larger alerts.
- 2) Pennsylvania requires everyone who files an additional claim, initial claim, new claim on an existing account, or reopened claim to verify their identity with ID.me before receiving any federal or state UC benefits. Claimants who need password resets also go through this process.
- 3) When the information is returned from ID.me with a valid identity match, the UC system creates a user account and sends the claimant through Multi-Factor Authentication (MFA).
- 4) The commonwealth will continue to block claims with international IP addresses.
- 5) The department will continue using NASWA training materials to conduct virtual in-house fraud, improper payments, and overpayment recovery training. If staff can become experts

- at identifying fraud, they can stop it before payments occur or reduce the number of improper payments.
- 6) The Case Management System (CMS) (as described above) enables IAD and BI staff to track hijacked or ID theft claims and review necessary actions to rectify fraudulent claims or improper payments.
  - 7) Staff utilize the efficiencies created by the new UC system and provide suggestions for enhancements to eliminate the excessive workload created by the Covid-19 pandemic.
    - Some of those efficiencies allow Pennsylvania to review claims for certain fraud measures automatically and stop payments to any claims meeting the Commonwealth’s fraud criteria until a manual review can be accomplished.
    - Those fraud measures can be adjusted easily as staff review claims and notice patterns of behavior.
    - Pennsylvania has been careful about not making information about its fraud prevention measures public in hopes of staying one step ahead of the fraudsters.
  - 8) PA has taken advantage of the suggestions of the “Tiger Team” and will be pursuing some of the recommended actions.
  - 9) The Commonwealth will use these suggestions to effectively minimize improper payments caused by separations and lack of staffing.
  - 10) Improving the Payeezy portal for credit and debit card payments plus implementing the new website link for requesting lien payoffs will improve overpayment recovery.

**Rebuilding and improving program performance by addressing the significant impact that the workload created by the Coronavirus Disease 2019 (COVID-19) pandemic continues to have on the UI system**

Pennsylvania’s Governor made a promise to improve the UC system in Pennsylvania and clear the backlogs by September 2023. We used the following steps to tackle our pandemic backlog.

- We continued to hire additional interviewer staff, and promote others to examiner positions. We currently have over 600 full time interviewers and 210 examiners. We are in the process of hiring more examiners.
- We further researched and tested our new benefits system to find ways to reduce unnecessary workload items.
- In addition, our new Deputy Secretary held the system vendor accountable to meet deadlines on system improvements, in order to make our system more efficient.
- We were able to find ways to use the new system to expedite processing of certain work items.
- We have developed work lists to aid staff in focusing on backlogged issues that needed to be resolved.
- We utilized overtime for staff to concentrate on the backlog items.
- We have been conducting training to expand our staff’s knowledge of the UC system, address any identified issues and make staff more efficient in the work they do.

As of noon on August 31, 2023, we officially completed all cases from our pandemic backlog, which included all claims which were filed between March 2020 and November 2021.

**Focusing on improving the timely delivery of benefit payments and the reduction of the UI adjudication and appeals backlogs**



UC Service center management staff are investigating methods to increase the production of individual examiners. Key staff have also been meeting with Nebraska (who also uses GSI's unemployment product) to view their adjudication tools and work together to suggest potential changes to improve the efficiency of the system's adjudication process. Examiners have started reviewing adjudication cases on an Excel spreadsheet to reduce the amount of clicking and waiting on each individual case. They are also utilizing mass adjudication and automation to address cases, as permissible. We will continue to look for ways to improve and increase productivity.

Recent implementation of the GSI Adjudication queue is currently being used by our examiners. This is help management and supervisors closely monitor staff work in real-time while also focusing on the oldest cases.

Staff are continually being hired, with a focus on getting new interviewer staff in place. Once that classification is amply staffed, some interviewers can begin being promoted into examiner positions.

The Office of UC Service Centers and the UC Board of Review (UCBR) worked together to develop appeal processing efficiencies on assembling the proper documents for appeal case files and also developed a streamlined method of processing certain appeals which do not require a hearing. UCBR has also increased its staffing to handle the additional incoming appeals and to reduce backlogs. Prior to the pandemic, the UCBR had 46 permanent appeals referees and 10 annuitant referees. UCBR now has a total of 56 permanent appeal referees, as well as nine annuitant referees. UCBR legal division has, among other steps, added several permanent attorney decision writers and has temporarily assigned attorneys from the Workers Compensation Appeal Board legal division to assist with drafting second level appeal decisions. UCBR also added a high-level program analyst to assist with report development. Previously, one position supervised the Capital Sector referee offices and assisted the Administrator. In June, an Assistant Administrator was hired to help management focus on higher authority appeals and system upgrades. UCBR has been working to address appeals that are improperly listed as pending when they were improperly converted from the legacy system, both at lower and higher level. UCBR has principally identified the lower level appeals that were improperly converted and is shifting its focus to address such appeals at the higher authority. The new assistant administrator has been helping identify these appeals and revise higher level administrative processing. UCBR is also engaging in other operational efficiencies to streamline processing for both first and second level appeals. Higher level staff have been cross trained on various processes to ensure that staff can assist where most needed. Annuitant staff have also participated in this training and have begun to assist the higher authority with a wide variety of tasks.

UCBR has been able to reallocate permanent, annuitant and TWOC staff formerly assigned to work on PUA appeals to work on regular UC appeals. UCBR placed 12 referees on a PUA team to work exclusively on PUA appeals and subsequently added 13 additional referees and also clerical support to work overtime to assist with PUA appeals. As a result of these initiatives and the declining incoming PUA appeals, UCBR reduced the PUA appeal backlog and has been able to shift most of these referees and clerical assistants to work on UC, EB and PEUC appeals. As lower level PUA appeals have continued to dwindle, UCBR reassigned nearly all of the staff working on PUA appeals to UC, EB, and PEUC appeals. A group of referees and clerical assistants from the PUA team were reallocated to work as a team to assist offices with the highest backlogs of appeals. Additionally, UCBR hired more TWOC and annuitant clerical assistants to organize case files and identify the issues of law involved in each appeal to allow regular clerical staff from these offices more time to schedule hearings.

## Staffing

In an effort to maintain quality and handle increased workload resulting from the COVID-19 pandemic, the UCBR increased staffing in the appeals referee position by hiring eight permanent appeals referees in 2021 and adding nine TWOC referees. UCBR also hired 10 additional TWOC referees in 2022. From October 2022 through September 2023, UCBR has hired 28 clerical assistants and 9 referees. However, turnover has remained high. During the same period, 21 clerical assistants and 5 referees have left. We are currently in the process of filling an additional 12 clerical assistant and 1 referee positions. UCBR continues to the filling of all available first and second level appeal positions on its complement to handle the increased workload. UCBR is also utilizing annuitant clerical assistants to assist with the increased workload for first and second level appeals.

### Training

UCBR's quality initiatives include developing and providing training programs, updating FAQ's on a regular basis, and developing an updated handbook for all first and second level appeal clerks and for all UC Appeals Referees on the use of the UC system in an effort to improve the quality as well as quantity of work. UCBR scheduled its first referee conference since 2019 and several training programs will be delivered at the event. In addition to training on the new UC system for all staff, the UCBR legal division deputy chief counsel and a senior attorney developed and provided CARES Act and ARPA training to all permanent and TWOC referees. UCBR legal also delivered additional training classes on updates to case law. New training programs have been developed for all incoming new permanent and temporary appeals referees and clerical assistants. Lastly, all permanent referees participate in training through the PA Bar Institute on state UC Law and recent case law.

UCBR is addressing efficiency with workflow and operational improvements and monitoring results with reports:

UCBR has engaged the Department's Center for Workforce Information and Analysis (CWIA), the UC system vendor (GSI) and hired a new permanent Program Analyst to reconstruct previous legacy system reports in the UC system as well as develop new reports from the additional data sources available in the new UC claims system. These reports have helped to validate pending appeals data, including data converted from the legacy system to the new UC Claims system. UCBR continues to meet quarterly with CWIA and the legal division to review reports and identify areas for improvement. The UC system has had recent issues with reports including the duplication of work items, and UCBR is working with GSI to address the inconsistencies and errors. As the reports are developed to track outstanding pending appeals, UCBR is focusing on the oldest first and second level appeals to expedite processing and issuing decisions. Reviewing these new reports has also allowed UCBR to identify appeals which did not convert into the new UC system. Use of similar reports is now being used to address conversion issues at the higher authority. UCBR has used new reporting tools to identify appeals that were lingering and assist staff in addressing the oldest cases. The implementation of the new UC system has provided an opportunity for UCBR to re-examine workflow, which has led to process improvements.

### **Ensuring Equitable Access to UI Programs**

#### ***Equity Grant***

In March of 2022, the department was awarded a \$6.8 million dollar Equity grant. This grant is designed specifically to promote equitable access to UC programs and remove barriers some populations face in securing services. Pennsylvania decided to promote equitable access by providing in-person UC services. In-person services for UC claimants were available, by appointment, at all PA CareerLink® centers

throughout the Commonwealth. In total, 58 PA CareerLink® centers were accepting appointments to assist claimants with their cases. The federally funded grant project ran from March 2022 until June 30, 2023, at which time the grant funding was exhausted. During this time, L&I used the grant funding to serve and assist more than 45,800 UC claimants across Pennsylvania.

In-person services for UC claimants are designed to assist individuals who do not have proper technology, equipment, or technical skills, individuals without access to home Internet or broadband, and individuals with limited-English proficiency.

Additionally, the department presented 74 workshops to over 500 claimants. The workshops were designed to reach larger groups and meet the needs of those wanting to learn about the self-help features we offer, but don't need one-on-one assistance.

Due to the success of this program, the department will continue to offer this service on a permanent basis. Funding will no longer be provided from the Equity Grant and the program has been renamed UC Connect Services.

### ***Use of Identity Verification does not create barriers***

Pennsylvania contracts with security vendor ID.me to provide additional identity verification. According to ID.me system reports, there is no statistical difference in identify verification success across any groups, such as race or economic levels. In addition, for any claimant having difficulty in navigating the online identify verification, we offer in person assistance in CareerLink offices through our UC Connect program. This online identity verification is not required to file for UC benefits in Pennsylvania. It simply offers verified claimants the full access of our online services. If claimants prefer not to participate in ID.me, they may file their claim via telephone without being verified.

### ***Simplify communications***

In March 2023, the UC program was part of a commonwealth-wide initiative to make our communication materials more customer-service focused. Training was provided to the UC staff who develop external communications to our customers, as well as procedures for the field staff. The training provided details about the agency's plain language objectives, tips for simplifying language for internal and external users, the benefits for users/customers and the agency, and examples for how to make these types of changes moving forward. Since that time, staff have used what they learned to ensure that all new communications are written in plain and simple language. This will assist our customers in understanding the UC process.

### ***Engaging Claimant-Focused Community Organizations***

In June of 2022, the department was awarded a \$3 million dollar Navigator grant. Pennsylvania's Department of Labor & Industry (L&I) is using the funds to confront disparities in access to the Commonwealth's UC system by partnering with community-based organizations that work with underserved Pennsylvanians.

Through these community partnerships, the UC Navigator grant is designed to improve UC access for all Pennsylvania workers, but especially the following groups:

Immigrants and refugees in Pennsylvania's biggest urban centers – Philadelphia and Pittsburgh  
Individuals in low-income communities with limited access or familiarity with technology  
Individuals with disabilities

After soliciting applications from community-based organizations (CBOs) and awarding funds to seven different groups, we worked to formalize agreements. Finally, in March 2023, all seven CBOs had signed contracts in place.

Funds awarded to these community organizations are being used for outreach and education (classes, workshops, seminars), educational equipment, staffing, training, and vendor costs (translation services, print/mail). CBOs continue to report about grant activities quarterly and submit invoices for reimbursement monthly.

Since finalizing all agreements in March 2023, we have completed a kickoff meeting, held several trainings for Navigators and continue to host bi-weekly meetings where we discuss various topics including system improvements and communication enhancements.

Additionally, the department created a new unit, staffed with experienced customer service representatives. These staff members' priority is working with individual Navigators to assist with any claimant issues that arise from the Navigators' clients.

### **Supporting the re-employment of UC claimants through Reemployment Services and Eligibility Assessment (RESEA), Short-Time Compensation (STC), robust work search activities, and other targeted initiatives**

#### ***Reemployment Services and Eligibility Assessment (RESEA)***

In Pennsylvania, claimants, including Unemployment Compensation for Ex-Servicemembers (UCX) claimants, who are most likely to exhaust UC benefits are referred to the RESEA program. The systemic process of identifying prospective RESEA participants automatically compares a claimant's employment characteristics to a statistical model at the time the claimant becomes financially eligible. The comparison produces a score that rates a claimant's likelihood of exhausting UC benefits. Once the claimant is notified that they are selected for RESEA, participation is mandatory. Claimants who have a recall date, obtain work through a union hiring hall, or are involved in a labor dispute should be screened out of RESEA.

Data elements needed for profiling purposes are collected from claimants during the initial claims process. The UC system is used to profile claimants. Necessary labor market information data is also gathered during the initial claim process.

Claimants who have been issued a first payment are then profiled using a three-step approach: (1) UCX claimants (2) claimants who are on recall or who use a union hiring hall are first excluded, and (3) the remaining claimants are either assigned a probability of dislocation through a statistical model process or additional characteristic screens are used to identify the appropriate claimants.

RESEA participants are selected by the fifth week of filing an application for benefits. If there is a delay in filing due to financial or nonmonetary eligibility issues, then the claimant may be selected during the first week they claim benefits after being determined eligible for benefits.

Claimants are required to complete the questionnaire online prior to the self-scheduled RESEA session as instructed on the PA CareerLink® self-scheduling letter (WDP-13 RESEA Self Scheduling Letter). The WDP-13 is sent to each claimant who is selected to participate in the RESEA program. The letter explains the

intent of the program and gives a brief explanation of the claimant's responsibilities to fulfill the requirements of the program. The reverse side of the WDP-13 contains various eligibility questions that the claimant must complete prior to the scheduled RESEA session. These questions are designed to identify a possible eligibility issue(s) that help prevent improper payments. PA CareerLink® staff will email the designated UCSC indicating a potential issue was detected, on a weekly basis. PA CareerLink® staff may also make notes on the claimant's profile if a claimant provides information that may raise an eligibility issue. Designated staff are responsible for reviewing the questionnaires to identify potential eligibility issues.

### ***Short-Time Compensation***

Shared-Work applications and UC claims are handled through the modernized UC system. Weekly benefit processing is now a batch process per employer plan, rather than by individuals in each plan, saving time and improving accuracy. Employers are not yet able to submit weekly claims directly into the system. The department facilitates the batch processing from data provided by the employer on a weekly basis. The department continues to work with the UC vendor to improve staff and employer functionality. Currently, the department has 92 active plans involving 10 employers and 434 claimants.

### ***Work Search***

For Pennsylvania's state work search requirements claimants must apply for suitable work, as defined by law. If they are, or become partially employed and continue filing, they still must search for work. They must search for at least two positions per week and participate in at least one work search related activity per week. They must maintain a record of their work search activities for two years and must furnish them upon the request of the department for audit purposes. The claimant is provided a form to record the searches, Form UC-304, but the claimant may adopt whatever method they wish, as long as all of the criteria on the form are properly documented. Claimants are asked if they completed their work search activities as required when certifying their weekly claim for benefits. One formal warning is provided, in writing, to any claimant who fails to adequately satisfy the weekly work search requirement. Failure to satisfy the weekly work search, after the warning is received, results in a determination rendering the claimant ineligible for the week(s) at issue.

Some of the challenges with work search improper payments have been when a claimant states that they are going back to work with their employer. However, they cannot furnish an expected date of recall. Claimants do not always keep track of their work searches, despite our requirement to do so for up to two years.

With the new UC system, we have put in place various systems to improve work search compliance, reduce work search errors and strengthen reemployment. In our new system, at the end of the initial claim process, the claimant will be presented with a statement instructing them that they must actively search for work for each week they file for. The claimant must select a checkbox before proceeding to finalize their initial application which indicates that they have read and understand the requirement before they continue. After they have filed their initial claim, they are presented with an Acknowledgement statement, "You MUST actively search for work beginning with the third week of your benefit year by applying for two jobs and participating in one work search activity each week. You should keep a list of your work searches, including employers' names, addresses (mailing, web, or email), phone numbers, dates of contact, person contacted, how you contacted the employer, and results." After the Acknowledgement statement section, the claimant is directed to the Work Registration and Work Search

Requirements section. Within this section the Work Search requirements are displayed. They are encouraged to select a hyperlink for PA CareerLink® as a tool to complete work search activities. This same section includes a hyperlink to a state-provided work search log (Form UC-304) to help them keep track of their work search activities. In our new system, if a claimant indicates during their weekly certification that they did not conduct work searches, they will automatically receive a work search warning letter without any staff intervention for the first failed action. The letter serves as a warning that the claimant must meet the law's active search for work requirements to be eligible to receive benefits for any future week(s) claimed. Denials will be issued for any subsequent failed actions.

## **Ensuring UI program integrity by assessing and Evaluating fraud risks, implementing and maintaining sufficient controls to effectively mitigate the likelihood and impact of fraud, and reducing improper payments**

### ***Identity Verification***

The Pennsylvania Department of Labor & Industry contracted with security vendor ID.me to provide additional identity verification after the surge of fraudulent Pandemic Unemployment Assistance (PUA) claims and to help prevent hijacked claims. ID.me provides secure digital and facial identity verification to help government agencies make sure claimants are who they say they are.

L&I first implemented ID.me in the PUA system on October 8, 2020. ID.me was implemented in L&I's modernized UC system for initial claims on July 16, 2021, which means all new claims filed on or after this date require claimants to verify their identity through ID.me. On July 22, 2021, ID.me was implemented for the weekly certifications process on claims that were initially filed on March 1, 2021, or after.

During the week of May 19, 2022, ID.me was implemented in the Individual Registration process. During the week of June 23, 2022, ID.me was implemented for: additional/reopened claims, new claims filed on existing accounts, and password resets.

When the information is returned from ID.me, if the required identity data points match, the user's account is officially created and will go through the multi-factor authentication (MFA) process. If the identity data points do not match, the user will receive a pop-up window and be taken back to the beginning of the registration process.

Some individuals may have trouble getting through the ID.me process for various reasons; the most common being no access to a smart device or webcam, which is needed for facial recognition. The best option for these claimants is for them to visit their local PA CareerLink® and verify their identity in person.

### ***Multi-Factor Authentication***

Effective February 27, 2022, the Pennsylvania Department of Labor & Industry added Multi-Factor Authentication (MFA) to provide additional identity verification. The additional authentication is performed with the claimant's cell phone or email address on record to identify the user and provide an additional layer of protection against unauthorized users accessing the claim.

How it Works

The user will only be presented with MFA when using a device to access the system for the first time. After the individual registers and creates an account or enters the system, if the user continues to use the same device when accessing the system in the future, MFA will not be required.

When registering and signing into the system, the user selects a verification option and gets a six-digit code to verify identity. The code is sent via SMS text message or email. The process checks that the cell phone number is a valid text number and if the email address is valid.

If the cell phone number is not valid, an email is sent with the code instead of a text. If the cell phone number and email account are both invalid, staff must correct both items before a new code is issued.

If the user has not provided a cell phone number or email address, he/she is provided instructions to contact UC staff for assistance. This screen also is displayed if the cell phone number and email address are not valid.

Claimants must enter the six-digit code into the UC system upon registration or login if a claimant registered before the feature was activated. MFA is also required if the claimant attempts to change the bank account information on record.

### ***UI Integrity Center Resources***

Pennsylvania will continue to utilize web service/real-time connectivity to the IDH, submitting initial, continued, and reopen/additional claims. Pennsylvania will continue to take advantage of the Integrity Center's state services by meeting monthly with our Integrity Workgroup, as well as attending the bi-weekly IDH update meetings. Lastly, Pennsylvania will continue to utilize the trainings and guides made available in the Knowledge Exchange Library and Academy.

### **Website - Request for Lien Payoffs**

One improvement to our website is the lien payoff request section on the [www.uc.pa.gov](http://www.uc.pa.gov) site. The link provides pertinent information about lien payoff requests and allows users to submit these requests electronically. The goal is to assist claimants and other parties more quickly.

### ***SIDES***

Pennsylvania continues to use SIDES and SIDES E-Response to help improve the integrity of the UC program by identifying previously unknown potential separation issues, as well as some fraudulent claims, from the responses to Separation Information requests. For every six initial claim applications, approximately seven Separation Information requests are sent via SIDES or SIDES E-Response, and about three quarters of the requests receive a response. Over the past year, over \$500,000 has been saved in paper and mailing costs, with a total savings of approximately \$3.5 million since Pennsylvania began using the program.

### ***Treasury Offset Program (TOP)***

Since going live with the new UC system, the department has now submitted 1,136 new names to the Internal Revenue Service, with a total dollar amount of \$7,863,291. As of October 6, 2023, the department has recovered \$6,363,255.83 from 2022 federal income tax returns. Since the program's inception in 2011, the department has recouped approximately \$170.71 million in fraudulent UC and EB overpayments through federal tax refunds.

## **Interstate Reciprocal Overpayment Recovery Arrangement (IRORA)**

PA does not have an active connection to IRORA. PA’s contracted vendor Geographic Solutions, Inc (GSI) is enhancing the functionality to process the recovery through the new system. Our staff have been recovering IRORA payments from other states.

### ***Pennsylvania New Hires Cross Matches***

PA utilizes the National and State Directory of New Hires, the Quarterly Wage, and the Incarceration cross matches to identify claimants who are filing for benefits while working or incarcerated.

As of August 1, 2023, the department has recovered \$524,322.24 from State Directory of New Hires and \$76,689.12 from National Directory of New Hires for the calendar year 2023. During this period, the National and State Directories of New Hires detected 3,341 overpayments of UC benefits. Staff wrote \$26,490.00 in overpayments and recovered \$601,011.36 during this time.

The Quarterly Wage cross match compares wages provided by the employer against PA UC benefits paid to the claimant. Information regarding the number of matches for this period is currently unavailable.

### ***PUPS***

As of October 17, 2023, SSA has approved Pennsylvania’s access to its PUPS (Prisoner data) via ICON. The amended PA Information Exchange Agreement (IEA-F) codifying this new exchange is currently pending signatures.

## **Addressing Worker Misclassification**

The table below displays the additional unemployment tax contributions resulting from misclassified workers discovered in the Unemployment Compensation Tax Services (UCTS) audit program. The entire focus of the program is to identify misclassified and unreported workers, reclassify and report them as employees, and ensure compliance with the reporting provisions of the UC Law. UCTS has an Audit Support Unit which is continuously looking for audit leads of businesses and employers who may be misclassifying or not reporting workers. As part of this effort, the unit has established data cross matches with various state and federal agencies to identify misclassification and underreporting. In addition, UCTS is constantly looking for changes to our audit selection process to produce the best possible leads to better focus auditor efforts where it is most beneficial.

Misclassified Workers	
Number of Misclassified Workers Discovered	10,542
Total Misclassified Contributions Due	\$3,906,408.09

## **New Employer Status Determinations Time Lapse**

The U.S. Department of Labor reviews performance data for the period April 1, 2022, through March 31, 2023. For the four quarters during the rating period, Pennsylvania’s score of 39% fell below the acceptable level of performance (ALP) of 70 percent of Newly Liable Status Determinations made within 90 days of the quarter ending date.



## Effective Audit Measure

The Effective Audit Measure combines three audit-computed measures and the average number of misclassified workers found per audit into an overall measure, scoring each to evaluate the effectiveness of a state's UC audit program. A minimum score is required in each area, and a combined total score, higher than the minimums, is also required. Pennsylvania's results for 2022 are:

Audit Measure	Minimum Required	CY 2022 score
Percent Total Wage Change from Audit	2	8.30
Percent of Contributory Employers Audited	1	0.91
Annualized Percent of Total Wages Audited	1	0.79
Average Number of Misclassified Workers Per Audit	1	3.37
Effective Audit Measure Score	7	13.37

For Calendar Year 2022, Pennsylvania met and/or exceeded two of the four factors and had an overall score of 13.37, more than double the required score to pass the overall Effective Audit Measure. Pennsylvania was not able to meet the minimum required score for Percent of Contributory Employers Audited and Annualized Percent of Total Wages Audited due to ongoing limited staffing, new agents in training, and agents on loan to the Internal Audits Division working full time on benefit fraud and identity theft cases. The Audit Support Unit controls audit assignments and tracks performance. This unit will assist with a focus on auditing and finding misclassified workers. Coupled with getting our agents on loan back to auditing and our goal of securing a full complement of agents, we will hopefully meet or exceed all EAM Audit performance standards in the near future as we were able to do pre-pandemic.

## Tax Quality

The Tax Quality measure is used to assess the accuracy and completeness of the Tax Program by scoring all 13 acceptance and estimation samples from the Tax Performance System (TPS) on a pass/fail basis. If four or more samples fail the annual TPS review in any year (part A), or if any sample fails for three consecutive years (part B), a Corrective Action Plan (CAP) is required.

Pennsylvania conducted 11 of the 13 acceptance samples. Of the eleven acceptance samples that were completed, all eleven passed the review. Completion of the Cashiering sample was exempt according to TPS rules, and Tax Rates are not due to be reviewed until 2024. Pennsylvania passed Reports Delinquency, Collections, Reports Processing, Debits/Billing-Contributory, Debits/Billing-Reimbursable, Credits/Refunds, Status-Successor, Status-New Employer/Reinstatements, Status-Terminations, Employer Charging, and Field Audit for 2022.

Pennsylvania passed the Tax Quality Measure – Part A because we passed 11 of the 11 required reviews. Pennsylvania passed the Tax Quality Measure – Part B because we didn't fail any sample for three years in a row.

## **C. FEDERAL EMPHASIS - GPRA GOALS**

The department continues to strive to improve its speed and quality of claims intake and processing. Pennsylvania's UC Program places high emphasis on process integrity and is taking action to meet or

exceed US Department of Labor performance targets, in accordance with the requirements of the Government Performance and Results Act (GPRA) and the GPRA Modernization Act, to “Provide income support when work is impossible or unavailable and facilitate return to work.” The department offers the following in response to GPRA Strategic Goals:

#### *Establish Tax Accounts Promptly*

Pennsylvania’s score for this report is 90.28%, exceeding the GPRA goal of 90.0% for FY 2023. We will continue to monitor performance.

#### *Make Timely Benefit Payments*

Pennsylvania experienced an unprecedented number of new claims applications during the pandemic. At the end of the quarter ending June 30, 2023, Pennsylvania was still processing claims taken during the pandemic. As a result, first payment timelapse percentages improved each quarter during the last year. In the next fiscal year, we will continue to decrease our backlog and continue to work towards the GPRA goal of 87% for FY 2024.

#### *Detect Benefit Overpayments*

The department is committed to achieving the FY 2022 GPRA goal of establishing at least 57.5 percent of the estimated detectable, recoverable overpayments and is taking the following actions:

Developing and implementing fraud procedures.

Implementing additional fraud detection tools. Pennsylvania has utilized the IDH tool to detect claimants filing in other states.

Having the department’s Internal Audit Division conduct investigations into various earnings issues and detecting fraudulent applicants.

Conducting NASWA’s fraud prevention and detection training for UC staff.

#### **D. PROGRAM REVIEW DEFICIENCIES**

The department is unaware of any program review deficiencies.

#### **E. PROGRAM DEFICIENCIES**

##### **Incorrect recording of Issue Detection Dates**

Federal timeliness standards require that at least 80 percent of nonmonetary determinations must be issued within 21 days from the date the agency first detected the issue. For determinations issued during the time period April 1, 2022, through March 31, 2023, Pennsylvania had an issue detection (IDD) accuracy rate of 69.11% for separation determinations and 66.48% for non-separation determinations.

#### **F. REPORTING DEFICIENCIES**

The department is unaware of any reporting deficiencies.

**G. CUSTOMER SERVICE SURVEYS (OPTIONAL)**

**H. OTHER**

**I. ASSURANCES**

The department certifies that it will comply with the assurances listed in Handbook 336, 18<sup>th</sup> Edition, Change 3.

- a. Assurance of Equal Opportunity (EO)
- b. Assurance of Administrative Requirements and Allowable Cost Standards
- c. Assurance of Management Systems, Reporting, and Recordkeeping
- d. Assurance of Program Quality
- e. Assurance on Use of Unobligated Funds
- f. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93)
- g. Drug-Free Workplace (29 CFR Part 98)
- h. Assurance of Contingency Planning

Information Technology (IT) Contingency Plan Implemented: 3/22/16  
IT Contingency Plan Reviewed/Updated: 08/31/2023  
IT Contingency Plan Tested: 9/21/2021

Contingency/Continuity plans identify tasks and resources needed within a unified approach to support the business needs, and to ensure the mission critical applications are brought online within the business objectives and the impacted business functions are not disrupted beyond the stated objectives.

- i. Assurance of Conformity and Compliance
- j. Assurance of Automated Information Systems Security

Risk Assessment Conducted: June 2022 and February 2023

A cyber risk assessment was conducted by the Commonwealth’s Office of Administration Enterprise Information Security Office and utilized a cyber scorecard approach leveraging the CIS Controls Framework. High-level risks were shared with the agency during the steering committee meeting in June 2022. Additionally, a National Cyber Security Review assessment based on the NIST CSF (Cyber Security Framework) was performed and submitted for the Department of Labor & Industry in February 2022.

System Security Plan Reviewed/Updated: 09/29/2023

- k. Assurance of Confidentiality
- l. Assurance of Disaster Unemployment Assistance

- Conducted Annual DUA Training for DUA Staff X Yes No  
Provide the date of the training: Training was conducted on May 5, 2023.
- Developed and/or Maintained a Standard Operating  
Procedures for use during a major disaster declaration X Yes No

**Senior Community Service Employment Program (SCSEP) (OMB Control Number: 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 2018 and 2028. 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 4,216 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)
4855	Charter Bus Industry	2,110	2,130	20	0.9%
4854	School and Employee Bus Transportation	24,900	26,550	1,650	6.6%
8122	Death Care Services	7,230	7,320	90	1.2%
8131	Religious Organizations	73,230	71,380	-1,850	-2.5%
3131	Fiber, Yarn, and Thread Mills	390	390	0	0.0%
4853	Taxi and Limousine Service	1,950	1,610	-340	-17.4%
4531	Florists	3,120	2,540	-580	-18.6%
3159	Apparel Accessories and Other Apparel Manufacturing	480	510	30	6.3%
4911	Postal Service	27,880	24,320	-3,560	-12.8%
4871	Scenic and Sightseeing Transportation, Land	470	530	60	12.8%
4851	Urban Transit Systems	270	210	-60	-22.2%
4859	Other Transit and Ground Passenger Transportation	4,530	5,670	1,140	25.2%
3346	Manufacturing and Reproducing Magnetic and Optical Media	240	150	-90	-37.5%
3152	Cut and Sew Apparel Manufacturing	3,410	2,290	-1,120	-32.8%
6112	Junior Colleges	16,920	17,040	120	0.7%
4831	Deep Sea, Coastal, and Great Lakes Water Transportation	230	190	-40	-17.4%

3333	Commercial and Service Industry Machinery Manufacturing	2,510	2,200	-310	-12.4%
4245	Farm Product Raw Material Merchant Wholesalers	700	740	40	5.7%
8139	Business, Professional, Labor, Political, and Similar Organizations	17,600	17,230	-370	-2.1%
2213	Water, Sewage and Other Systems	2,560	2,740	180	7.0%
4231	Motor Vehicle and Motor Vehicle Parts and Supplies Merchant Wholesalers	15,290	14,970	-320	-2.1%
3221	Pulp, Paper, and Paperboard Mills	2,920	2,680	-240	-8.2%
3132	Fabric Mills	2,510	2,420	-90	-3.6%
4811	Scheduled Air Transportation	12,060	12,630	570	4.7%
3344	Semiconductor and Other Electronic Component Manufacturing	9,800	9,170	-630	-6.4%
4855	Charter Bus Industry	2,110	2,130	20	0.9%

Source: Long-Term Industry Employment Projections (2018-2028)

### 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	30,160	32,680	8.4%	4,216	\$21,840	\$32,490
21-2011	Clergy	BD	13,590	13,880	2.1%	1,517	\$27,850	\$53,470
43-5052	Postal Service Mail Carriers	ST OJT	14,230	12,580	-11.6%	830	\$38,720	\$52,850
43-6014	Secretaries	ST OJT	100,060	90,740	-9.3%	9,746	\$25,980	\$38,940
21-2021	Directors, Religious Activities & Education	BD+	9,650	9,690	0.4%	1,201	\$22,480	\$43,990
43-9061	Office Clerks, General	ST OJT	167,470	161,630	-3.5%	19,111	\$24,420	\$38,360
37-2011	Janitors & Cleaners	ST OJT	96,770	102,460	5.9%	13,688	\$21,190	\$30,440
43-5053	Postal Service Mail Sorters, Processors & Processing Machine Oprs	ST OJT	5,010	4,210	-16.0%	302	\$37,140	\$52,050
13-1075	Labor Relations Specialists	BD+	4,660	4,330	-7.1%	419	\$47,160	\$82,540
43-3031	Bookkeeping, Accounting & Auditing Clerks	PS+	60,730	58,130	-4.3%	6,664	\$28,440	\$42,220
53-7062	Laborers & Freight, Stock & Material Movers	ST OJT	152,080	165,200	8.6%	23,346	\$24,570	\$33,910
53-3033	Light Truck or Delivery Services Drivers	ST OJT	38,250	40,690	6.4%	4,731	\$22,000	\$38,330
43-5051	Postal Service Clerks	ST OJT	3,620	3,200	-11.6%	217	\$39,200	\$51,260
49-9071	Maintenance & Repair Workers, General	MT OJT	63,220	67,240	6.4%	6,725	\$28,080	\$43,500
53-3041	Taxi Drivers & Chauffeurs	ST OJT	13,580	15,870	16.9%	1,825	\$21,840	\$32,490
11-1021	General & Operations Managers	BD+	82,580	88,220	6.8%	7,980	\$59,350	\$131,060
21-2099	Religious Workers, Other	BD	3,730	3,740	0.3%	482	\$17,490	\$29,990
27-2042	Musicians & Singers	LT OJT	5,940	5,800	-2.4%	684	N/A	N/A
25-2011	Preschool Teachers	AD	16,970	18,050	6.4%	1,866	\$21,970	\$31,850
43-1011	Supervisors - Office & Administrative Support Workers	WK EXP	70,360	69,400	-1.4%	7,225	\$40,460	\$63,070
27-2041	Music Directors & Composers	BD+	2,680	2,620	-2.2%	309	\$23,570	\$49,730
39-9011	Childcare Workers	ST OJT	46,690	48,100	3.0%	7,211	\$18,240	\$24,070
39-4021	Funeral Attendants	ST OJT	2,470	2,560	3.6%	412	\$19,770	\$33,410
25-3021	Self-Enrichment Education Teachers	WK EXP	14,500	15,590	7.5%	1,824	\$20,840	\$36,920
37-3011	Landscaping & Groundskeeping Workers	ST OJT	40,440	43,230	6.9%	5,697	\$23,790	\$32,440
51-2028	Electrical & Electronic Equipment Assemblers	MT OJT	14,060	14,430	2.6%	1,656	\$26,400	\$37,540
53-3021	Bus Drivers, Transit & Intercity	MT OJT	4,980	5,170	3.8%	659	\$27,850	\$41,880
43-4181	Reservation & Transportation Ticket Agents & Travel Clerks	ST OJT	3,130	3,250	3.8%	375	\$27,020	\$44,770
41-4012	Sales Representatives	MT OJT	62,190	64,380	3.5%	6,857	\$38,190	\$75,360
51-6031	Sewing Machine Operators	ST OJT	4,440	3,990	-10.1%	427	\$20,700	\$28,200

43-4051	Customer Service Representatives	ST OJT	125,710	122,300	-2.7%	16,186	\$25,640	\$38,760
49-3031	Bus & Truck Mechanics & Diesel Engine Specialists	LT OJT	13,700	14,480	5.7%	1,381	\$36,840	\$50,930
43-4171	Receptionists & Information Clerks	ST OJT	40,520	42,550	5.0%	5,784	\$21,890	\$30,960
25-9041	Teacher Assistants	PS	46,840	50,130	7.0%	5,439	\$20,500	\$27,920
27-3031	Public Relations Specialists	BD	9,170	9,800	6.9%	1,047	\$36,800	\$64,090
13-2011	Accountants & Auditors	BD	57,540	61,020	6.0%	5,871	\$50,090	\$77,810
41-2022	Parts Salespersons	MT OJT	8,900	9,180	3.1%	1,116	\$22,920	\$34,010
27-1023	Floral Designers	MT OJT	2,060	1,810	-12.1%	168	\$21,100	\$28,870
41-2031	Retail Salespersons	ST OJT	169,250	165,660	-2.1%	24,101	\$19,560	\$29,580
39-4031	Morticians, Undertakers & Funeral Directors	AD+	N/A	N/A	N/A	N/A	\$29,460	\$50,120
43-6011	Executive Secretaries & Executive Administrative Assistants	WK EXP	19,270	15,640	-18.8%	1,591	\$43,960	\$63,160
49-3011	Aircraft Mechanics & Service Technicians	PS	2,990	3,050	2.0%	254	\$49,570	\$72,270
37-2012	Maids & Housekeeping Cleaners	ST OJT	51,210	52,140	1.8%	7,051	\$20,320	\$26,800
51-9196	Paper Goods Machine Operators	MT OJT	6,030	5,890	-2.3%	633	\$32,270	\$43,570
51-1011	Supervisors - Production & Operating Workers	WK EXP	28,520	29,050	1.9%	2,995	\$42,290	\$64,400
49-3023	Automotive Service Technicians & Mechanics	PS	35,900	36,510	1.7%	3,586	\$28,070	\$43,160
25-1011	Business Teachers, Postsecondary	PhD	5,520	6,380	15.6%	578	\$49,110	\$108,320
25-1194	Vocational Education Teachers, Postsecondary	BD+	4,940	5,070	2.6%	426	\$38,200	\$61,070
51-8031	Water & Wastewater Treatment Plant & System Operators	LT OJT	5,380	5,090	-5.4%	446	\$40,290	\$54,970
17-3023	Electrical & Electronic Engineering Technicians	AD	4,840	4,990	3.1%	494	\$38,880	\$59,610
33-9032	Security Guards	ST OJT	44,620	46,230	3.6%	6,007	\$22,440	\$31,490
13-1199	Business Operations Specialists, Other	BD	18,370	19,210	4.6%	1,887	\$52,680	\$86,160
53-1048	Supervisors - Transportation & Vehicle Operators	WK EXP	20,090	21,610	7.6%	2,378	\$37,980	\$59,050
43-5081	Stock Clerks & Order Fillers	ST OJT	85,950	87,500	1.8%	11,699	\$21,290	\$29,140
25-1123	English Language & Literature Teachers, Postsecondary	PhD	3,840	4,070	6.0%	351	\$49,220	\$76,850
51-9061	Inspectors, Testers, Sorters, Samplers & Weighers	MT OJT	22,690	19,250	-15.2%	2,239	\$29,290	\$43,450
25-2021	Elementary School Teachers	BD+	53,040	56,820	7.1%	4,430	\$49,660	\$69,410
43-5071	Shipping, Receiving & Traffic Clerks	ST OJT	25,550	25,780	0.9%	2,570	\$26,550	\$37,930
11-9131	Postmasters & Mail Superintendents	WK EXP	760	610	-19.7%	35	\$68,990	\$80,070
43-5061	Production, Planning & Expediting Clerks	MT OJT	11,370	11,970	5.3%	1,276	\$34,340	\$49,190
49-1011	Supervisors - Mechanics, Installers & Repairers	WK EXP	20,110	21,060	4.7%	1,983	\$50,550	\$74,090
43-5032	Dispatchers	MT OJT	7,540	7,650	1.5%	730	\$29,000	\$43,240
39-9032	Recreation Workers	ST OJT	15,720	16,800	6.9%	2,809	\$19,170	\$28,510
25-1071	Health Specialties Teachers, Postsecondary	PhD	7,540	9,230	22.4%	863	\$46,050	\$111,720
13-1161	Market Research Analysts & Marketing Specialists	BD	26,820	30,090	12.2%	3,237	\$39,960	\$70,320
25-1121	Art, Drama & Music Teachers, Postsecondary	MD	5,130	5,530	7.8%	479	\$42,740	\$81,600
51-2098	Team Assemblers	MT OJT	46,570	41,100	-11.7%	4,558	\$24,620	\$35,730
25-1072	Nursing Instructors & Teachers, Postsecondary	PhD	4,010	4,890	21.9%	455	\$52,460	\$78,360
25-3097	Teachers & Instructors, Other, Except Substitutes	BD	8,120	8,850	9.0%	1,040	\$21,400	\$45,980
25-1022	Mathematical Science Teachers, Postsecondary	PhD	2,460	2,600	5.7%	224	\$50,080	\$91,030
41-3099	Sales Representatives, Other Services	MT OJT	36,220	38,970	7.6%	5,035	\$35,700	\$73,830
11-9061	Funeral Service Managers	AD+	1,000	1,040	4.0%	82	\$57,170	\$88,440
15-1151	Computer User Support Specialists	PS	27,120	29,610	9.2%	2,574	\$36,790	\$55,600
13-1121	Meeting, Convention & Event Planners	BD	4,520	4,820	6.6%	563	\$33,320	\$52,820
51-6063	Textile Knitting & Weaving Machine Operators	ST OJT	770	740	-3.9%	81	\$27,680	\$35,040
53-7061	Cleaners of Vehicles & Equipment	ST OJT	14,160	14,950	5.6%	2,198	\$20,210	\$27,980

Source: Long-Term Occupational Projections (2018-28) and Occupational Wages (2020)

*(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 (23,346 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 as a Retail Sales Person (24,101 annual demand), Office Clerks, General (19,111 annual demand), and Customer Service Representatives (15,154 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. Jobs in retail sales and customer service require a minimal amount of skills and often 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 with a Total Annual Demand of 1,000 or More**

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	151,530	174,050	14.9%	31,240	\$17,920	\$22,800
41-2011	Cashiers	ST OJT	145,340	139,100	-4.3%	26,204	\$18,200	\$23,070
41-2031	Retail Salespersons	ST OJT	169,250	165,660	-2.1%	24,101	\$19,560	\$29,580
53-7062	Laborers & Freight, Stock & Material Movers	ST OJT	152,080	165,200	8.6%	23,346	\$24,570	\$33,910
39-9021	Personal Care Aides	ST OJT	119,450	150,620	26.1%	21,939	\$22,130	\$26,510
35-3031	Waiters & Waitresses	ST OJT	98,520	102,860	4.4%	19,760	\$17,880	\$26,270
43-9061	Office Clerks, General	ST OJT	167,470	161,630	-3.5%	19,111	\$24,420	\$38,360
43-4051	Customer Service Representatives	ST OJT	125,710	122,300	-2.7%	16,186	\$25,640	\$38,760
37-2011	Janitors & Cleaners	ST OJT	96,770	102,460	5.9%	13,688	\$21,190	\$30,440
43-5081	Stock Clerks & Order Fillers	ST OJT	85,950	87,500	1.8%	11,699	\$21,290	\$29,140
43-6014	Secretaries	ST OJT	100,060	90,740	-9.3%	9,746	\$25,980	\$38,940
31-1011	Home Health Aides	ST OJT	46,450	59,840	28.8%	7,295	\$22,130	\$26,510
39-9011	Childcare Workers	ST OJT	46,690	48,100	3.0%	7,211	\$18,240	\$24,070
37-2012	Maids & Housekeeping Cleaners	ST OJT	51,210	52,140	1.8%	7,051	\$20,320	\$26,800
47-2061	Construction Laborers	ST OJT	55,340	59,970	8.4%	6,876	\$29,870	\$45,000
41-4012	Sales Representatives	MT OJT	62,190	64,380	3.5%	6,857	\$38,190	\$75,360
49-9071	Maintenance & Repair Workers, General	MT OJT	63,220	67,240	6.4%	6,725	\$28,080	\$43,500
35-3011	Bartenders	ST OJT	33,110	34,270	3.5%	6,042	\$17,860	\$25,930

33-9032	Security Guards	ST OJT	44,620	46,230	3.6%	6,007	\$22,440	\$31,490
43-4171	Receptionists & Information Clerks	ST OJT	40,520	42,550	5.0%	5,784	\$21,890	\$30,960
37-3011	Landscaping & Groundskeeping Workers	ST OJT	40,440	43,230	6.9%	5,697	\$23,790	\$32,440
41-3099	Sales Representatives, Other Services	MT OJT	36,220	38,970	7.6%	5,035	\$35,700	\$73,830
53-3033	Light Truck or Delivery Services Drivers	ST OJT	38,250	40,690	6.4%	4,731	\$22,000	\$38,330
51-2098	Team Assemblers	MT OJT	46,570	41,100	-11.7%	4,558	\$24,620	\$35,730
53-3022	Bus Drivers, School or Special Client	ST OJT	30,160	32,680	8.4%	4,216	\$21,840	\$32,490
35-9031	Hosts & Hostesses: Restaurant, Lounge & Coffee Shop	ST OJT	16,180	17,610	8.8%	4,012	\$17,760	\$21,810
35-2021	Food Preparation Workers	ST OJT	20,840	22,370	7.3%	3,889	\$18,160	\$24,410
53-7051	Industrial Truck & Tractor Operators	ST OJT	31,480	33,430	6.2%	3,846	\$31,260	\$39,640
53-7064	Packers & Packers, Hand	ST OJT	26,460	26,420	-0.2%	3,805	\$21,550	\$28,770
35-9021	Dishwashers	ST OJT	22,570	23,100	2.3%	3,678	\$18,320	\$23,230
45-2092	Farmworkers & Laborers, Crop, Nursery & Greenhouse	ST OJT	21,890	22,060	0.8%	3,604	\$20,160	\$32,550
35-9011	Dining Room & Cafeteria Attendants & Bartender Helpers	ST OJT	15,710	17,060	8.6%	2,934	\$17,800	\$21,960
43-6013	Medical Secretaries	MT OJT	21,180	24,270	14.6%	2,853	\$28,460	\$37,800
39-9032	Recreation Workers	ST OJT	15,720	16,800	6.9%	2,809	\$19,170	\$28,510
43-3021	Billing & Posting Clerks	MT OJT	22,900	24,960	9.0%	2,803	\$30,630	\$40,960
47-2073	Operating Engineers & Other Construction Equipment Oprs	MT OJT	22,300	23,730	6.4%	2,796	\$38,680	\$56,240
39-9031	Fitness Trainers & Aerobics Instructors	ST OJT	14,420	15,920	10.4%	2,670	\$20,460	\$38,590
21-1093	Social & Human Service Assistants	ST OJT	19,750	21,670	9.7%	2,654	\$25,960	\$35,550
43-5071	Shipping, Receiving & Traffic Clerks	ST OJT	25,550	25,780	0.9%	2,570	\$26,550	\$37,930
51-9198	Helpers--Production Workers	ST OJT	15,940	17,070	7.1%	2,546	\$24,170	\$33,630
51-9111	Packaging & Filling Machine Operators	MT OJT	20,660	21,480	4.0%	2,529	\$25,440	\$36,780
39-3091	Amusement & Recreation Attendants	ST OJT	10,200	11,030	8.1%	2,528	\$17,720	\$21,820
35-2012	Cooks, Institution & Cafeteria	ST OJT	16,310	17,450	7.0%	2,502	\$22,460	\$30,580
35-3022	Counter Attendants, Cafeteria, Food Concession & Coffee Shop	ST OJT	10,820	11,350	4.9%	2,458	\$17,920	\$22,800
51-9061	Inspectors, Testers, Sorters, Samplers & Weighers	MT OJT	22,690	19,250	-15.2%	2,239	\$29,290	\$43,450
53-7061	Cleaners of Vehicles & Equipment	ST OJT	14,160	14,950	5.6%	2,198	\$20,210	\$27,980
33-3051	Police & Sheriff's Patrol Officers	MT OJT	28,680	29,760	3.8%	2,158	\$45,010	\$70,970
43-3071	Tellers	ST OJT	20,260	17,580	-13.2%	2,011	\$26,560	\$32,030
35-3041	Food Servers, Nonrestaurant	ST OJT	11,520	12,630	9.6%	1,998	\$19,840	\$24,620
51-4121	Welders, Cutters, Solderers & Brazers	MT OJT	16,720	17,630	5.4%	1,973	\$33,810	\$46,870
53-3031	Driver/Sales Workers	ST OJT	17,170	16,710	-2.7%	1,879	\$17,910	\$31,340
53-3041	Taxi Drivers & Chauffeurs	ST OJT	13,580	15,870	16.9%	1,825	\$21,840	\$32,490
41-3021	Insurance Sales Agents	MT OJT	16,600	17,990	8.4%	1,820	\$29,640	\$66,430
39-2021	Nonfarm Animal Caretakers	ST OJT	9,470	10,720	13.2%	1,761	\$19,010	\$27,960
51-2028	Electrical & Electronic Equipment Assemblers	MT OJT	14,060	14,430	2.6%	1,656	\$26,400	\$37,540
29-2052	Pharmacy Technicians	MT OJT	18,150	19,350	6.6%	1,632	\$24,130	\$31,760
41-2021	Counter & Rental Clerks	ST OJT	11,720	12,270	4.7%	1,594	\$20,410	\$31,630
33-9092	Lifeguards, Ski Patrol & Other Recreational Protective Service	ST OJT	6,150	6,530	6.2%	1,569	\$17,770	\$21,850
43-4081	Hotel, Motel & Resort Desk Clerks	ST OJT	8,830	8,470	-4.1%	1,429	\$19,020	\$24,510
33-3012	Correctional Officers & Jailers	MT OJT	17,550	16,360	-6.8%	1,376	\$42,780	\$57,220
41-9022	Real Estate Sales Agents	MT OJT	13,410	14,070	4.9%	1,371	\$34,590	\$57,420
39-3031	Ushers, Lobby Attendants & Ticket Takers	ST OJT	5,400	5,530	2.4%	1,342	\$17,950	\$23,710
47-4051	Highway Maintenance Workers	MT OJT	11,400	11,850	3.9%	1,335	\$31,200	\$44,000
45-2093	Farmworkers, Farm, Ranch & Aquacultural Animals	ST OJT	8,120	7,900	-2.7%	1,285	\$19,640	\$29,020
43-4111	Interviewers	ST OJT	9,990	10,280	2.9%	1,276	\$25,440	\$37,850
43-5061	Production, Planning & Expediting Clerks	MT OJT	11,370	11,970	5.3%	1,276	\$34,340	\$49,190



51-4011	Computer-Controlled Machine Tool Operators	MT OJT	11,440	11,890	3.9%	1,242	\$32,160	\$44,220
33-9091	Crossing Guards	ST OJT	6,970	7,390	6.0%	1,217	\$19,810	\$32,130
39-9041	Residential Advisors	ST OJT	7,280	7,890	8.4%	1,213	\$23,710	\$32,420
51-3092	Food Batchmakers	MT OJT	7,620	7,800	2.4%	1,161	\$24,310	\$37,430
43-9041	Insurance Claims & Policy Processing Clerks	MT OJT	11,010	11,170	1.5%	1,119	\$33,020	\$48,750
41-2022	Parts Salespersons	MT OJT	8,900	9,180	3.1%	1,116	\$22,920	\$34,010
51-6011	Laundry & Dry-Cleaning Workers	ST OJT	7,800	8,090	3.7%	1,089	\$19,970	\$25,820
47-2141	Painters, Construction & Maintenance	MT OJT	9,860	10,460	6.1%	1,088	\$31,720	\$48,300
43-3011	Bill & Account Collectors	MT OJT	9,760	9,120	-6.6%	1,062	\$29,280	\$40,230

Source: Long-Term Occupational Projections (2018-28) and Occupational Wages (2020)

## 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 subgrantees. 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 381 | Page 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 2021, Volume II, August 3, 2022 the minority population in the Commonwealth was 27.4 percent. Based on the Minority Report, 49.8 percent of the individuals served in the SCSEP were minorities, which is almost 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 issued a Request for Grant Applications for SCSEP services in least 42 of the 52 AAA

Planning and Service Areas (PSAs) in December 2022. The AARP Foundation was awarded the subgrantee contract in the four designated AAA PSA Regions beginning July 1, 2023 and will continue for the next four program years, with an option to continue the contract through the 2028 program year.

*(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 takes into account 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; Formerly incarcerated.

*(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 2023 to include the number of SCSEP authorized positions and any change from PY 2022 to PY 2023: Adams 2; Armstrong 15; Berks 9; Bradford 12; Bucks 13; Butler 26; Cambria 6; Carbon 2; Chester 7; Clarion 3; Columbia 12; Cumberland 23; Dauphin 5; Delaware 12; Erie 12; Fayette 7; Franklin 6; Greene 1; Indiana 5; Jefferson 3; Lackawanna 6; Lancaster 15; Lebanon 3; Lehigh 9; Luzerne 12; Lycoming 5; Monroe 10; Montgomery 20; Montour 3; Northampton 5; Philadelphia 96 (+1); Pike 6; Potter 3; Schuylkill 5; Somerset 16; Susquehanna 2;; Venango 12; Washington 6; Wayne 3; Westmoreland 13; Wyoming 2 ; York 7.

*(3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.*

Pennsylvania has 7 counties over-served with a +5-slot variance and 8 counties under-served with a -5-slot variance. Counties such as Butler and Lehigh are over-served because there are larger eligible applicant pools, more viable job opportunities and higher placement outcomes for the population that we serve. They were also able to find more suitable training with the COVID restrictions. Counties such as Philadelphia, Cumberland, and Montgomery are under-served due to the COVID-19 restrictions and an unwillingness of people to enroll in SCSEP with the fear of infection. These specific, densely populated areas have had harder times finding eligible participants and host agencies. The effects of COVID-19 host agency and recruitment restrictions has also led to the problem of under enrollment throughout the state. Pennsylvania unemployment rate is currently at 5.4%, 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.

*(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 were we are able to conduct outreach safely. 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 and Montgomery participants are underserved by the state grantee and the national grantee. This is also true for some of the over-served regions like Cambria. Philadelphia is just now opening up due to COVID-19 and should be able to fill all of its 25 open positions by the end of the first quarter of 2021. These counties are over served in both the state and national grantees. In Monroe Co, the state program has been instructed to forward any referrals to the National grantee as NCOA is under served in this county. In Lehigh, the AARP Foundation is overserved as a State sub-grantee but underserved as a National grantee. They are in the process of opening more participants on the National grant. NCOA overserved in most of the same counties the state programs are also overserved.

*(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 22-23 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)
<b>Pennsylvania</b>	<b>12,380,284</b>	<b>3,990,528</b>	<b>494,108</b>	<b>12.4%</b>	<b>3,496,420</b>	<b>87.6%</b>
Adams County	98,301	34,657	2,790	8.1%	31,867	91.9%
Allegheny County	1,189,220	395,049	48,347	12.2%	346,702	87.8%
Armstrong County	65,167	24,629	3,646	14.8%	20,983	85.2%
Beaver County	163,216	60,496	6,846	11.3%	53,650	88.7%
Bedford County	47,728	18,077	2,829	15.6%	15,248	84.4%
Berks County	404,844	124,543	13,694	11.0%	110,849	89.0%
Blair County	120,340	41,728	5,846	14.0%	35,882	86.0%
Bradford County	60,147	21,644	2,901	13.4%	18,743	86.6%
Bucks County	618,415	208,878	14,729	7.1%	194,149	92.9%
Butler County	181,455	61,729	6,178	10.0%	55,551	90.0%
Cambria County	126,423	48,748	7,393	15.2%	41,355	84.8%
Cameron County	4,572	2,022	313	15.5%	1,709	84.5%
Carbon County	62,558	22,885	2,876	12.6%	20,009	87.4%
Centre County	143,344	39,453	3,174	8.0%	36,279	92.0%
Chester County	506,870	152,593	10,746	7.0%	141,847	93.0%
Clarion County	37,537	12,757	1,935	15.2%	10,822	84.8%
Clearfield County	74,047	26,907	4,062	15.1%	22,845	84.9%
Clinton County	37,185	12,027	1,601	13.3%	10,426	86.7%
Columbia County	61,000	21,223	3,104	14.6%	18,119	85.4%
Crawford County	81,944	29,564	4,157	14.1%	25,407	85.9%
Cumberland County	235,647	76,321	5,528	7.2%	70,793	92.8%
Dauphin County	271,057	82,782	9,538	11.5%	73,244	88.5%
Delaware County	543,919	165,422	17,100	10.3%	148,322	89.7%
Elk County	29,922	11,321	1,257	11.1%	10,064	88.9%
Erie County	260,956	83,996	11,392	13.6%	72,604	86.4%
Fayette County	126,862	46,290	8,057	17.4%	38,233	82.6%
Forest County	3,613	2,230	414	18.6%	1,816	81.4%
Franklin County	151,885	49,679	4,865	9.8%	44,814	90.2%



Fulton County	14,409	5,209	661	12.7%	4,548	87.3%
Greene County	33,320	11,654	1,773	15.2%	9,881	84.8%
Huntingdon County	39,825	14,937	2,048	13.7%	12,889	86.3%
Indiana County	79,196	27,561	3,678	13.3%	23,883	86.7%
Jefferson County	42,983	15,354	2,184	14.2%	13,170	85.8%
Juniata County	24,326	8,192	1,083	13.2%	7,109	86.8%
Lackawanna County	202,694	68,869	9,660	14.0%	59,209	86.0%
Lancaster County	528,680	160,968	15,165	9.4%	145,803	90.6%
Lawrence County	84,605	31,602	4,821	15.3%	26,781	84.7%
Lebanon County	136,039	44,226	4,812	10.9%	39,414	89.1%
Lehigh County	355,304	104,774	11,831	11.3%	92,943	88.7%
Luzerne County	305,739	103,343	14,057	13.6%	89,286	86.4%
Lycoming County	107,874	36,962	4,404	11.9%	32,558	88.1%
McKean County	38,319	13,529	1,771	13.1%	11,758	86.9%
Mercer County	104,066	39,050	4,157	10.6%	34,893	89.4%
Mifflin County	45,537	15,830	1,896	12.0%	13,934	88.0%
Monroe County	165,579	54,222	6,524	12.0%	47,698	88.0%
Montgomery County	802,207	251,000	17,003	6.8%	233,997	93.2%
Montour County	17,546	6,217	796	12.8%	5,421	87.2%
Northampton County	291,401	97,675	8,975	9.2%	88,700	90.8%
Northumberland County	87,589	31,748	4,400	13.9%	27,348	86.1%
Perry County	45,442	15,020	1,669	11.1%	13,351	88.9%
Philadelphia County	1,535,277	387,103	99,311	25.7%	287,792	74.3%
Pike County	54,989	21,400	1,972	9.2%	19,428	90.8%
Potter County	16,554	6,485	1,107	17.1%	5,378	82.9%
Schuylkill County	135,206	47,473	6,744	14.2%	40,729	85.8%
Snyder County	38,125	12,711	1,393	11.0%	11,318	89.0%
Somerset County	69,090	26,597	3,676	13.8%	22,921	86.2%
Sullivan County	5,925	2,737	388	14.2%	2,349	85.8%
Susquehanna County	40,454	16,230	2,006	12.4%	14,224	87.6%
Tioga County	40,362	14,775	2,310	15.6%	12,465	84.4%
Union County	36,023	12,506	1,344	10.7%	11,162	89.3%
Venango County	50,605	19,848	2,738	13.8%	17,110	86.2%
Warren County	39,012	15,068	1,847	12.3%	13,221	87.7%
Washington County	202,068	72,647	7,949	10.9%	64,698	89.1%
Wayne County	47,703	19,662	2,532	12.9%	17,130	87.1%
Westmoreland County	345,567	133,291	15,211	11.4%	118,080	88.6%
Wyoming County	26,519	9,750	1,114	11.4%	8,636	88.6%
York County	435,951	136,653	13,780	10.1%	122,873	89.9%

Source: American Community Survey 1-Year Estimate (2020)

(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 22-23 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, 2020 American Community Survey, there were 494,108 individuals in the Commonwealth who were age 55 and older and whose incomes were below 125 percent of the poverty level. Based on the final FY 12-23 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 90 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 22-23 who were below the poverty level (90 percent) exceeded the statewide percentage of eligible individuals that are below the poverty level (12 percent).

*(C) Are minorities*

According to the SCSEP Analysis of Service to Minority Individuals PY 2019, Volume II, August 3, 2021 the minority population in the Commonwealth was 25.7 percent. Based on the final FY 19-20 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 60 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, 2020 American Community Survey, 4.2 percent of the SCSEP eligible population in the Commonwealth did not speak English well. Based on the final FY 22-23 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 4 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 22-23 who had limited English proficiency (4 percent) is equal to 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; at risk of homelessness; and formerly incarcerated. 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 22-23 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors all exceed their most in need targets.

*(F) Formerly incarcerated individuals, as defined in TEGl 17-20*



According to the most current available data from the Pennsylvania Department of Corrections, 1 in 28 individuals in Pennsylvania are either incarcerated or under some form of parole/probation supervision. This accounts for 3.6% of Pennsylvania's total population. Approximately 90% of all incarcerated individuals in Pennsylvania will be release, with 81% of these individuals reporting possessing no skills and limited literacy. Currently the SCSEP program population consists of 3.7% of individuals meeting the Formerly Incarcerated priority of service criteria. SCSEP sub-grantees will continue to coordinate the Pennsylvania Department of Corrections through the local Workforce Development system to identify and enroll formerly incarcerated individuals that are in need of skills training into the SCSEP.

*(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 subgrantees; 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	12
Luzerne/Wyoming AAA	Wyoming	2
Philadelphia Corp on Aging	Philadelphia	96
Southwestern Pennsylvania AAA	Fayette	7
Southwestern Pennsylvania AAA	Greene	2
Southwestern Pennsylvania AAA	Washington	6
Lycoming/Clinton AAA	Lycoming	5

### Local Affiliates

County	AARP Region	Number of Authorized Positions
Bradford	Northern Region AARP	12
Carbon	Northern Region AARP	2
Columbia	Northern Region AARP	12
Lackawanna	Northern Region AARP	6
Monroe	Northern Region AARP	10
Montour	Northern Region AARP	3
Pike	Northern Region AARP	6
potter	Northern Region AARP	3
Schuylkill	Northern Region AARP	5
Susquehanna	Northern Region AARP	2
Wayne	Northern Region AARP	3
Adams	Central AARP	2
Cumberland	Central AARP	23
Dauphin	Central AARP	5
Franklin	Central AARP	6
Lebanon	Central AARP	3
York	Central AARP	7
Cambria	Central AARP	6
Somerset	Central AARP	16
Armstrong	Western Region AARP	15
Butler	Western Region AARP	26
Clarion	Western Region AARP	3
Indiana	Western Region AARP	5
Jefferson	Western Region AARP	3
Venango	Western Region AARP	12

Berks	Eastern Region AARP	9
Bucks	Eastern Region AARP	13
Chester	Eastern Region AARP	7
Delaware	Eastern Region AARP	12
Lehigh	Eastern Region AARP	9
Montgomery	Eastern Region AARP	20
Northampton	Eastern Region AARP	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](mailto: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](mailto: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 and conditions of poverty identified in local assessments of community need. Only federally designated Community Action Agencies (CAA) receive funding, therefore in PA, there are 43 CAAs that cover all 67 PA counties. CAA services and activities include a variety of community engagement activities and collaborative activism to remove obstacles that block the achievement of self-sufficiency; i.e. community stakeholder collaboration and linkages; literacy activities; employment and training resource provision; affordable housing access; early childhood education; food access; and other activities as need indicates.

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 CBSG 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 continue to be part of the fabric of the public workforce system through this agreement.

*(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.*

- Allegheny County Department of Human Services utilized CSBG dollars to support an expansion of workforce services through the CareerLink program and local non-profit human service organizations, libraries, and other community gathering sites. Local community organizations hosted CareerLink staff and established space and infrastructure for dedicated CareerLink computer kiosks which provided unemployed and underemployed community members with improved access to CareerLink services and resources. This targeted community outreach under the leadership of the county's workforce investment board with funding and support from the community action agency established a network of community organizations as partners to deliver accessible and high-quality workforce services to vulnerable persons in our county. This effort has shown promising results leading to the employment of adults and young adults in high demand fields which pay wages that often exceed the locally defined living wage standard. This effort has also led to an intentional strategy by the local workforce investment board and CareerLink to continue to support an improved community-based service delivery model.
- In partnership with Bucks County Community College, Bucks County Opportunity Council launched the Coaches on Campus pilot program in 2022. Founded in a belief that the key to self-sufficiency is acquiring the education and training necessary to earn a livable wage, Coaches on Campus seeks to address low retention and graduation rates at the community college. BCOC Self-Sufficiency Coaches are now housed within the student services department of the college, spending two days a week on the Newtown campus. Through this partnership, BCOC offers coaching, financial support, and resources to students struggling to stay in school. Coaches on Campus is part of a larger, long-term goal to expand BCOC's Economic Self-Sufficiency (ES) Program. For the first time, in 2022, BCOC utilized funding from the Department of Community and Economic Development to expand ES, including hiring an additional coach and expanding enrollment in the program.

## **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 or requests for a letter of support can be sent to the Department of Corrections Workforce Development Specialist, Dorenda Hamarlund at [dhamarlund@pa.gov](mailto:dhamarlund@pa.gov). 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 Division 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.