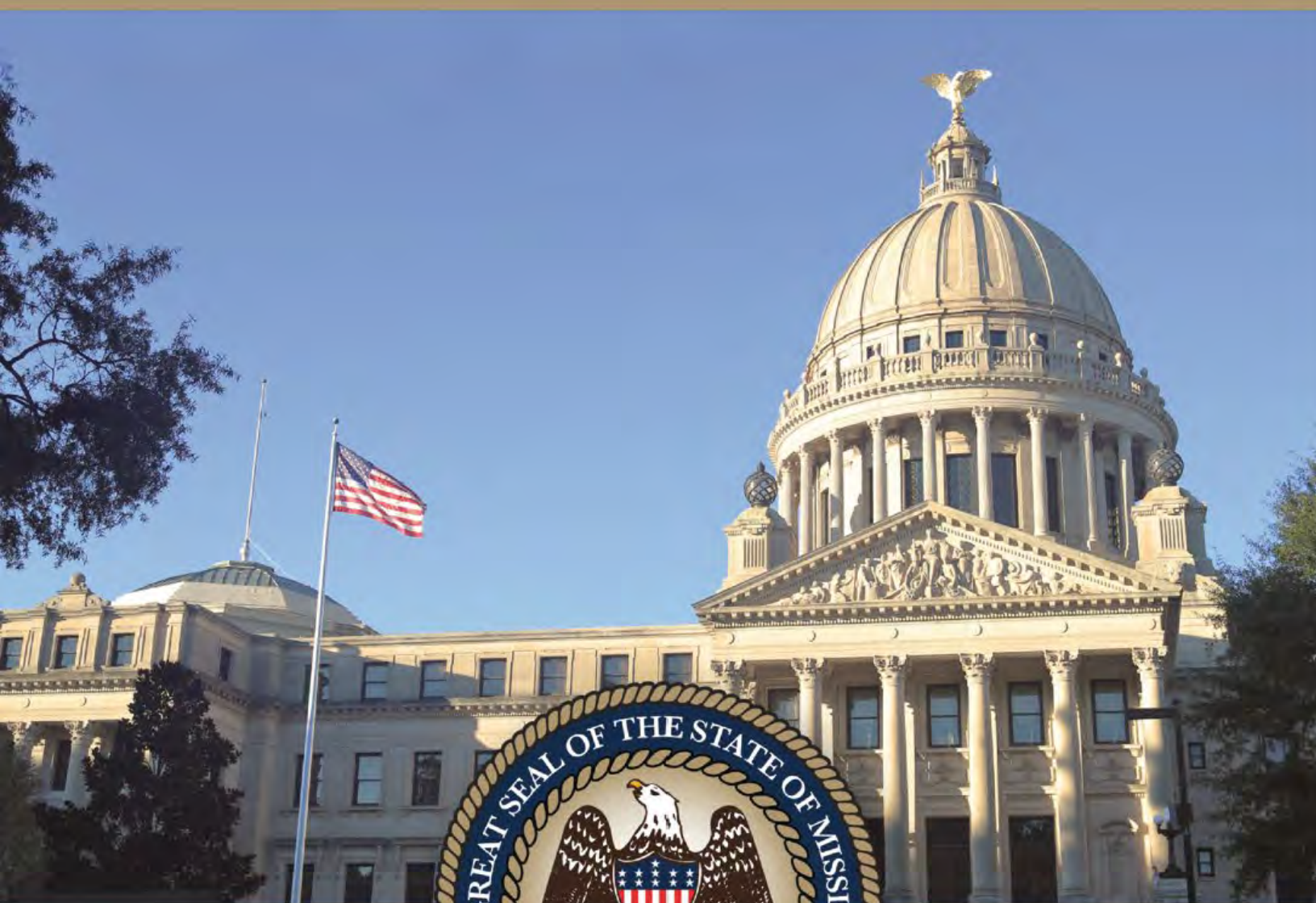


# 2024 MISSISSIPPI WORKFORCE INNOVATION & OPPORTUNITY ACT STATE PLAN



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# I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

## a. WIOA STATE PLAN TYPE

This is a combined plan.

### COMBINED PLAN PARTNER PROGRAMS

#### COMBINED PLAN PARTNER PROGRAM(S)

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

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.))

## b. PLAN INTRODUCTION

The state of Mississippi has opted to submit a Combined Plan to meet the requirements of the Workforce Innovation and Opportunity Act (WIOA). This Combined Plan is built around Governor Tate Reeves' commitment to helping the people and businesses of Mississippi flourish. To accomplish this mission, Governor Reeves has implemented a variety of strategies that are attracting new business investment and creating a robust workforce. This momentum is growing the State's economy while also ensuring that the resulting economic development provides Mississippi workers with pathways to family-sustaining employment opportunities.

In 2020, to drive progress on the creation of a skilled and competitive state talent pool, Governor Reeves and the Mississippi Legislature established the Office of Workforce Development, AccelerateMS, to serve as the coordinating entity for all workforce development stakeholder agencies in Mississippi. The charter legislation charged AccelerateMS with the creation of a statewide workforce development strategy aligned to Governor Reeve's vision. That strategic vision, developed and led by AccelerateMS, is to create a state-wide and fully integrated workforce development system that provides every Mississippian with the opportunity to become a competitive candidate within the local talent pool and secure quality employment, as well as providing employers with the range of talent necessary to promote and sustain business growth.

This Combined Plan supports the state's vision and aligns all workforce and WIOA stakeholders around a unified strategy that directly addresses the challenges workers face to gain the credentials and skills to meet industry

needs and secure quality employment. Mississippi's Combined Plan includes the six required state programs: the Adult Program, the Dislocated Worker Program, the Youth Program, the Adult Education and Family Literacy Act Program, the Wagner-Peyser Act Program, and the Vocational Rehabilitation Program—along with Temporary Assistance for Needy Families (TANF), Unemployment Insurance (UI), Trade Adjustment Assistance (TAA), Jobs for Veterans State Grants Program (JVSG), and Senior Community Service Employment Program (SCSEP).

Mississippi's 2020 WIOA plan centered on unifying workforce stakeholders to increase workforce participation across the state, meeting the talent needs of current and prospective businesses, and connecting job seekers with key support, guidance, and resources. A key focus was closing the gap between the supply of and demand for workers with post-secondary specialized skills.

Since the inception of the plan, Mississippi's WIOA Core partners have transformed the state's workforce delivery system to better serve individuals and businesses. Processes associated with training and job placement have been streamlined. Mississippi's Adult Education (AE) providers have embraced and expanded a career pathway model throughout education and training activities integrating key skills and industry recognized credentials into high school equivalency, literacy, and other programs. Local Workforce Development Areas (LWDAs) and vocational rehabilitation partners are connecting adults, including senior citizens, youth, SNAP and TANF recipients, workers with disabilities, and those from other vulnerable populations with training and workforce services directly aligned to high-demand industry sectors.

The four Core partners responsible for WIOA Training programs, workforce services, wraparound services, AE, and vocational rehabilitation are now digitally connected through a referral hub. The referral allows staff from any WIOA partner agency to electronically refer participants, ensuring they have access to the necessary supports to pursue a high-quality career pathway. In addition to electronic communications advances in how partners collaborate to meet participant needs, the state's physical infrastructure for workforce delivery continues to evolve through comprehensive One-Stop centers and providing virtual support options as well as in-person services.

The state's primary strategy is a career pathway model aligned with growth sectors and emerging occupations. The workforce delivery system now includes 1) Comprehensive One-Stop Centers, 2) Affiliate One-Stop Centers, 3) Virtual Access One-Stop Centers, and 4) Call Center Support. Policies and regulations for the WIOA Combined Plan Partners' workforce ecosystem have been established and reaffirmed, incorporating improved technology integration that leverages the state's nation-leading longitudinal data system.

Mississippi's system serves people from various backgrounds, including displaced workers, those entering the workforce for the first time, or pursuing postsecondary education. The system continues to provide wraparound services, addressing needs such as childcare, transportation, nutrition, as well as offering support for basic literacy, numeracy, and English language skills improvement.

The foundation for Mississippi's Combined Plan is rooted in the economic and workforce analysis prescribed by WIOA, with a customized approach based on the state's current workforce and industrial profile. Operationally, the state will continue to undertake the following activities to align the workforce development ecosystem with education, training, and economic development initiatives to meet labor market challenges:

1. Align WIOA Combined Plan Partners services around a Career Pathway Model, designed to guide Mississippians from any state of work-readiness into gainful employment.

2. Build on the state's current information technology infrastructure to coordinate and align the case management activities of all WIOA Combined Plan Partners in education, training, workforce, and supportive services to realize greater efficiency in service delivery, reduce duplication of effort, and ensure that every Mississippian receives the highest level of coordinated assistance in connecting to the labor market.
3. Build on the state's current network of WIOA Combined Plan Partners to ensure that every Mississippian has access to an education and training ecosystem that drives participation, retention, and completion of post-secondary credentials and employment.
4. Develop performance measures and other measures of socioeconomic mobility that give the state workforce system the ability to assess program effectiveness and pursue a data-driven approach to strategic planning.
5. Engage in continuous research to understand the workforce needs of Mississippi's employers in the context of local and regional economic sectors, and make the results of this analysis available for economic development and other strategic workforce planning purposes.
6. Provide a common vision for WIOA Combined Plan Partners for state workforce, training, education, and supportive services through coordinating entities such as the State Workforce Investment Board (SWIB) and Mississippi's four local workforce development boards.

Mississippi continues to have a positive economic outlook. The state's labor market is projected to grow approximately 10% over the next decade, driven primarily by growth across a strong concentration of key industries. Additionally, the state has experienced a rapid increase in post-secondary credential attainment, moving swiftly towards aggressive achievement goals. Additional economic and workforce data indicate that the state is in an excellent position to improve its total workforce participation rate by increasing worker skills that are in demand by employers. Analysis reveals that the state's largest skill gap is in opportunity occupations—those requiring more than a high school diploma but less than a four-year college degree, often in combination with some level of technical proficiency, and pay at least \$18 per hour within five years of the completion of training.

To address this opportunity, Mississippi's Combined Plan leverages classroom training focused on industry credentials, practical experience, and necessary (soft) skills to ensure Mississippians emerge as qualified talent prepared to meet the needs of the state's industrial base. Focusing workforce resources on the state's skill gap improves job-seeker's ability to secure employment that matches their credentials and career aspirations. Via this approach, participants have access to the requisite tools to identify and pursue a career pathway that is relevant to current and future labor markets. Similarly, current, and prospective businesses are served via streamlined processes that make it easy to partner with the state to train and place new employees.

Leadership from the Office of the Governor and AccelerateMS will continue to drive the state to develop and implement the most comprehensive WIOA workforce system in the country. This approach will ensure the creation of quality opportunities for Mississippians and provide employers with a competitive and capable workforce that possesses the skills and core competencies required for businesses to remain competitive in a global economy.

## II. STRATEGIC ELEMENTS (II)

### a. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

#### 1. ECONOMIC AND WORKFORCE ANALYSIS

The Economic and Workforce Analysis is organized by the State's four designated Local Workforce Development Areas (LWDAs - see Figure 1), which are aligned to the planning and development district structure in the state as outlined by the Mississippi Comprehensive Workforce Training and Education Consolidation Act of 2004. Planning and development districts serve as the fiscal agents to manage funds and to oversee and support local workforce development boards.

The four LWDAs follow demographic and economic boundaries. Each LWDA contributes to Mississippi's economic sector goals, identified by the Mississippi Development Authority's (MDA) core and horizon industry targets. While each LWDA has a strong overall economic identity, some economic and demographic variability exists within these areas. In recognition of LWDA economic sub-areas, AccelerateMS has additionally defined eight workforce ecosystems that allow for a finer calibration of workforce and economic development efforts in LWDAs while preserving existing governance structures. Figure 2 illustrates the approximate location of these ecosystems.

Figure 1: Local Workforce Development Areas

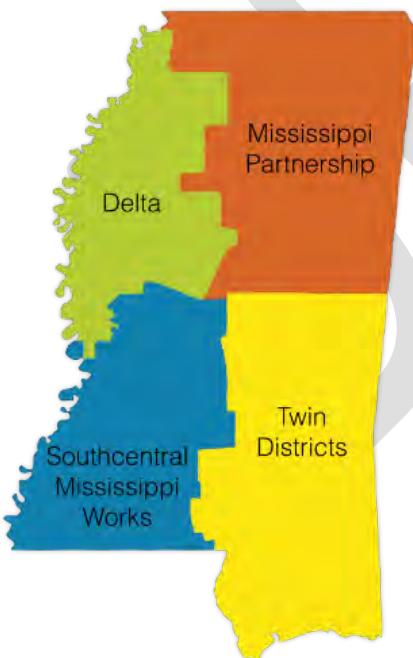
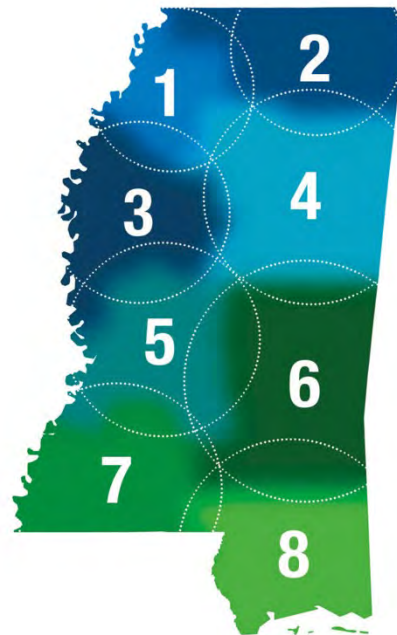


Figure 2: Workforce Ecosystems



A. Economic Analysis

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

The Mississippi economy is currently valued at around \$136B and is predicted to experience slow growth over the next five years, averaging an increase of approximately 1.1% per year (a rate that represents approximately half of the overall US economic growth rate during that same period). This growth is projected to drive a corresponding increase in employment - approximately .4% per year. The state’s top industries are largely related to government and other local-serving sectors, such as healthcare and retail, as well as a portfolio of traded sectors led by activities including manufacturing, tourism, agriculture, and natural resource extraction.

The corresponding labor market supports just over 1.3 million jobs and provides average earnings of \$56,400 annually. Of this job portfolio, approximately three-quarters require a 2-year degree or less and pay an average wage between \$16.71 and \$26.44. The labor market’s mix of educational requirements are not predicted to change over the next decade. Jobs are primarily concentrated in the Jackson, Gulfport, and Greater Memphis regions in the state.

i. Existing Demand Industry Sectors and Occupations

Mississippi Works Labor Exchange data show Mississippi’s largest employers represent a mix of local-serving sectors such as healthcare, retail trade, and government, and traded sectors such as manufacturing and natural resource extraction. The state’s traded sectors generally offer some of the strongest employment opportunities, supporting many of the highest-paid positions in the job market.

Table 1: Labor Market Demand by Industry

Industry	Total	Percent	Earnings	Establishments
Health Care and Social Assistance	177,229.00	15.5	\$ 52,210	8,261.00
Wholesale/Retail Trade	174,685.00	15.3	\$ 39,816	16,791.00
Manufacturing	148,647.00	13	\$ 57,218	2,424.00
Leisure and Hospitality	135,291.00	11.8	\$ 21,606	7,251.00
Educational Services	107,581.00	9.4	\$ 46,407	1,597.00
Administrative and Waste Services	70,802.00	6.2	\$ 34,664	5,272.00
Transportation and Warehousing	65,297.00	5.7	\$ 51,792	3,634.00
Public Administration	64,086.00	5.6	\$ 47,918	1,520.00
Construction	48,964.00	4.3	\$ 58,398	6,238.00
Financial Activities	44,404.00	3.9	\$ 63,004	8,640.00
Professional, Scientific, and Technical Ser	40,796.00	3.6	\$ 67,390	9,878.00
Other Services (except Public Administrat	21,444.00	1.9	\$ 43,130	4,948.00
Natural Resources and Mining	14,392.00	1.3	\$ 54,957	2,067.00
Information	11,352.00	1	\$ 56,331	1,449.00
Management of Companies and Enterpris	10,962.00	1	\$ 109,621	632.00
Utilities	9,438.00	0.8	\$ 86,239	628.00
Totals	1,145,370.00	100	\$ 47,420	81,230.00

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages.

Mississippi has a strong concentration of traded sectors, particularly traditional manufacturing including furniture manufacturing, ship building, and food processing, as well as several high growth subsectors that are well-positioned to drive future economic growth in Mississippi, such as automotive and parts manufacturing and machinery manufacturing. The bulk of these traded sectors are anticipated to grow over the next decade, and several feature extremely high employment concentrations compared to other states, demonstrating a strong competitive edge for Mississippi.

Table 2: Labor Market Demand by Traded Sector

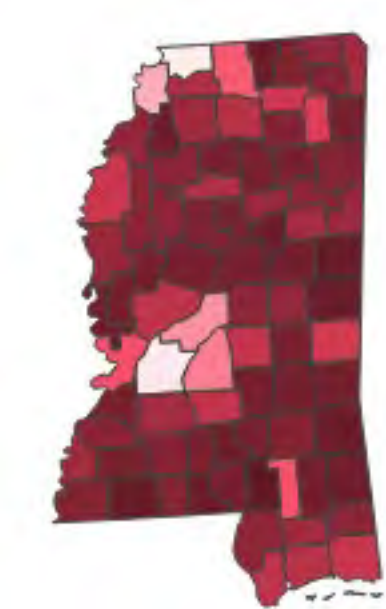
Description	2022 Jobs	2022 Employment Concentration	2022-2032 % Job Change	Avg Earnings Per Job
General Warehousing and Storage	21,568	1.58	18%	\$52,557
Poultry Processing	16,858	9.42	-1%	\$51,843
Upholstered Household Furniture Manufacturing	13,764	31	-9%	\$49,139
Ship Building and Repairing	12,041	15.42	-21%	\$93,643
General Freight Trucking, Long-Distance, Truckload	11,455	2.18	3%	\$69,184
Corporate, Subsidiary, and Regional Managing Offices	10,679	0.57	-2%	\$131,630
Couriers and Express Delivery Services	7,998	1.02	30%	\$41,923
Crop Production	7,902	1.18	9%	\$35,708
Automobile and Light Duty Motor Vehicle Manufacturing	6,546	3.5	9%	\$93,837
Animal Production	6,361	1.74	5%	\$49,645
Computer Systems Design Services	4,995	0.53	33%	\$92,300
Engineering Services	4,511	0.52	3%	\$95,504
Sawmills	4,144	6.23	16%	\$70,297
Electric Power Distribution	4,138	2.45	3%	\$137,540
Specialized Freight (except Used Goods) Trucking, Long-Distance	3,713	3.45	13%	\$74,821

Source: Lightcast Datarun, 2023

Employment is generally concentrated in three urban areas (Jackson, Gulfport, and Tupelo) with Jackson accounting for almost 20% of job postings at the time of the latest data pull (Jun '22 – Jun '23).



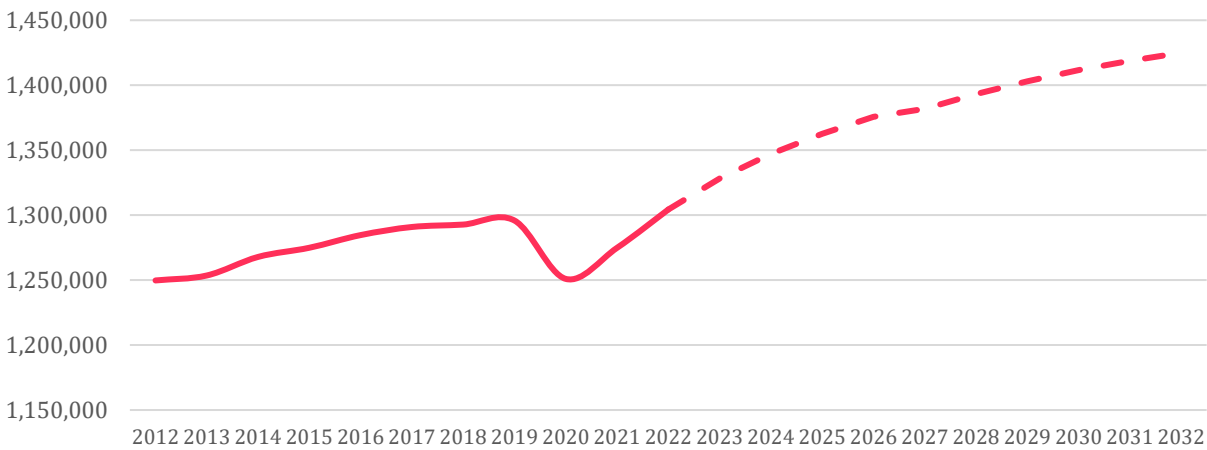
Figure 3: Job Postings by Geography



Source: Lightcast Datarun, 2023

Since recovering from the labor market contraction caused by COVID-19, the state's job market has been on an upward trend and is predicted to grow by approximately 9% over the next decade, adding an estimated ~121,000 jobs.

Figure 4: Forecasted Number of Jobs Added by 2032



Source: Lightcast Datarun, 2023

Growth will not be distributed equally across the state, with the Mississippi Partnership LWDA projected to see the highest job growth over the next decade.

Table 3: Anticipated Job Growth by LWDA

Region	2022 Jobs	2032 Jobs	2022 – 2032 Job Change	2022 - 2032 % Job Change	Avg. Earnings Per Job
Mississippi	1,304,299	1,424,926	120,628	9%	\$56,413
Mississippi Partnership	375,000	422,600	47,600	13%	\$52,758
Delta Region	95,600	98,284	2,684	3%	\$47,534
Southcentral Region	365,961	385,963	20,002	5%	\$59,368
Twin Districts	415,060	445,117	30,057	7%	\$56,573

Source: Lightcast Datarun, 2023

Each LWDA has a unique economic profile, offering a diverse portfolio of employment opportunities aligned to its geography, natural resources, and industrial history.

Table 4: Economic Activity Within Each LWDA

Activity	Delta	MS Partnership	Southcentral MS Works	Twin Districts
Advanced Manufacturing	X	X	X	X
Aerospace and Defense	X	X		X
Agriculture, Food, and Beverage	X	X	X	
Automotive	X	X		
Distribution and Logistics	X		X	X
Forestry, Energy, and Chemicals		X		X
Health Care			X	X
Shipbuilding				X
Data Centers and Information Technology			X	X

Source: Lightcast Datarun, 2023

**The Mississippi Partnership LWDA** is the largest LWDA and is predicted to experience the state’s largest increase (13%) in job gains over the next decade. The region’s high Labor Force Participation Rate (LFPR) (60%) and low unemployment rate (5.3%) indicate a tight labor market, although average earnings are slightly below the overall state average. Manufacturing primarily drives economic growth in this region, which contains 40% of the state’s manufacturing activities in a production portfolio that includes aerospace, electronics/computer, automotive, furniture, chemical and metal fabrication.

Industries like plastics and rubber manufacturing, transportation equipment manufacturing, and furniture manufacturing are growing and shifting from low-skill manufacturing to middle-skill and advanced. Large manufacturing employers such as Goodyear Tires, Toyota, Stark Aerospace, Airbus Helicopters, Aurora Flight Sciences, Ashley Furniture, and Milwaukee Tools all have a footprint in the Mississippi Partnership LWDA. The LWDA’s northwest section has 44.5% of all distribution jobs in the state with distribution facilities for large companies such as Amazon, FedEx, Nike, Wal-Mart, and Volvo.

**The Southcentral Mississippi Works LWDA** includes the state capital and has an industrial profile defined by healthcare, energy, and agribusiness. Four of the top ten counties specializing in these sectors fall within the borders of this LWDA. Because of a strong hospital system and medical education focus, the Southcentral Mississippi Works LWDA serves as a healthcare hub for the entire state. The presence of oil and natural gas deposits in the region give Southcentral Mississippi Works its strength in the energy sector, and it is becoming a key hub for the automotive industry with large manufacturers such as Nissan and Continental Tire.

**The Twin Districts LWDA**, located in the southeastern part of the state, has the largest population and labor force when compared to the three other LWDA's. Core economic activities include manufacturing, healthcare, and tourism. Within manufacturing, top industries include transportation equipment manufacturing, shipbuilding, and electrical equipment, appliance, and component manufacturing. The combination of the Stennis Space Center and military installations such as Keesler Air Force Base, Naval Construction Battalion Center, Meridian Naval Air Station, and Camp Shelby Joint Forces Training Center reinforce a strong defense presence in the area and support the shipbuilding and aerospace industries. Other sectors with concentrations in the region include agribusiness and tourism.

**The Delta LWDA** lags behind its three counterparts on critical economic indicators, including lowest labor force participation rate, average wages, and predicted job growth over the next decade. This region is known for its agricultural production and contains nine of the top ten crop production counties in Mississippi. Economic and workforce activities in the region are focused on diversification, targeting information technology and healthcare with service providers like Mid-Delta and pharmaceutical manufacturers/preparers such as Baxter and Needle Specialty.

*ii. Emerging Demand Industry Sectors and Occupations*

The Mississippi Development Authority (MDA) has identified horizon sector opportunities that are likely to be important to Mississippi's economic future. These include advanced manufacturing; blue economy; renewable energy; information, operations, and data; and mobility technology innovation. Along with sector targets, MDA is also pursuing the goal of attracting corporate headquarters, across all sectors, in Mississippi.

Additionally, the state's strong core of traded sectors is driving growing demand across the industrial portfolio. The state identified those sectors displaying the strongest growth opportunities as defined by the following criteria:

- Employ over 500 people in the state
- Anticipated to grow by over 30% during the next decade
- Provide average earnings about \$55,000 per year

Table 5: Strongest Economic Growth Opportunities

NAICS	Description	2022 Jobs	2032 Jobs	2022-2032 Job Change	2022-2032 % Job Change	2022 Employment Concentration	Avg Earnings Per Job
333991	Power-Driven Handtool Manufacturing	2,845	3,939	1,094	38%	25.96	\$58,583
333310	Commercial and Service Industry Machinery Manufacturing	1,365	1,880	515	38%	1.93	\$63,989
332321	Metal Window and Door Manufacturing	966	1,274	308	32%	1.76	\$72,658
336211	Motor Vehicle Body Manufacturing	944	1,350	406	43%	2.21	\$61,305
115310	Support Activities for Forestry	916	1,218	302	33%	5.04	\$65,574
524291	Claims Adjusting	904	1,226	321	36%	1.56	\$89,158
333111	Farm Machinery and Equipment Manufacturing	862	1,186	324	38%	1.65	\$66,423
332993	Ammunition (except Small Arms) Manufacturing	842	1,440	598	71%	6.73	\$71,151
335312	Motor and Generator Manufacturing	716	972	255	36%	2.47	\$80,429
325991	Custom Compounding of Purchased Resins	630	922	293	47%	4.61	\$102,422
213111	Drilling Oil and Gas Wells	572	909	338	59%	1.53	\$98,575
486210	Pipeline Transportation of Natural Gas	551	799	248	45%	2.26	\$136,700
335314	Relay and Industrial Control Manufacturing	549	919	370	67%	1.68	\$63,623
339920	Sporting and Athletic Goods Manufacturing	540	774	234	43%	1.3	\$74,274
336212	Truck Trailer Manufacturing	504	729	225	45%	1.56	\$72,451
321999	All Other Miscellaneous Wood Product Manufacturing	500	699	199	40%	1.8	\$68,066

Source: Lightcast Datarun, 2023

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.

The Mississippi labor market is primarily defined by jobs that require less than a bachelor's degree. Labor market data reveals that 77% of jobs require an associate degree or below. In the absence of strategic intervention designed to drive economic growth in knowledge- and/or technology-intensive sectors, this mix of jobs & associated requirements is not predicted to change over the next decade.

The Mississippi Economic Council, the State Chamber of Commerce, conducts an annual tour across Mississippi to listen to local leaders from retail business, education, healthcare, the hospitality industry, manufacturing, professional associations, professional services, and other sectors, as well as local elected officials and government, regarding their concerns and ideas on three critical issues.

- Mississippi business climate
- Education, workforce, and skills training
- Talent retention and attraction

Technical skills, soft skills, and mitigation of barriers to employment were identified as priorities if Mississippi is to successfully meet the needs of existing and emerging businesses and grow the economy.

Table 6: Employer Need by Education Level

Education Level	2022 Jobs	2032 Jobs	2022 – 2032 Job Change	2022 – 2032 % Job Change	US % Job Change	Avg Hourly Earnings	Average Advertised Salary (from Job Postings)
No formal educational credential	324,885	353,323	28,439	9%	10%	\$16.71	
High school diploma or equivalent	522,495	563,366	40,872	8%	9%	\$21.21	\$39,595
Some college, no degree	26,554	28,154	1,600	6%	7%	\$22.87	
Postsecondary nondegree award	95,002	104,512	9,510	10%	12%	\$23.58	
Associate's degree	24,888	27,650	2,762	11%	14%	\$26.44	\$59,603
Bachelor's degree	239,817	269,816	29,999	13%	14%	\$33.90	\$85,013
Master's degree	23,411	27,439	4,028	17%	20%	\$37.61	\$89,557
Doctoral or professional degree	30,831	34,453	3,623	12%	14%	\$84.17	\$110,068
<b>Total Across All Occs</b>	<b>1,287,882</b>	<b>1,408,714</b>	<b>120,832</b>	<b>9%</b>	<b>11%</b>	<b>\$27.25</b>	

Source: Lightcast Datarun, 2023

Job posting data aligns to the labor market data presented in previous sections, showing that industry and occupation demand is primarily driven by local-serving sectors such as healthcare, retail trade, and government, and traded sectors such as manufacturing.

Table 7: Employer Demand by Industry & Occupation

Industry	Unique Postings	Occupation	Unique Postings
General Medical and Surgical Hospitals	16,011	Registered Nurse	12,051
Employment Placement Agencies	8,957	Retail Sales Associate	9,617
Limited-Service Restaurants	7,419	Retail Store Manager / Supervisor	8,876
All Other General Merchandise Retailers	7,394	Sales Representative	6,635
Colleges, Universities, and Professional Schools	6,459	Customer Service Representative	5,684
Department Stores	6,419	Tractor-Trailer Truck Driver	5,651
Offices of Physicians (except Mental Health Specialists)	5,441	Laborer / Warehouse Worker	5,238
Commercial Banking	4,345	Software Developer / Engineer	3,824
Direct Health and Medical Insurance Carriers	4,055	Restaurant / Food Service Manager	3,477
Temporary Help Services	3,967	Office / Administrative Assistant	3,298
Engineering Services	3,788	Fast Food / Counter Worker	3,093
Casino Hotels	3,732	Building and General Maintenance Technician	3,020
Full-Service Restaurants	3,616	Merchandiser	3,020
Hotels (except Casino Hotels) and Motels	3,283	Licensed Practical / Vocational Nurse	2,898
		Cashier	2,839

Source: Lightcast Datarun, 2023

Analysis of job posting data by skill and qualification highlights those capabilities aligned with the occupations listed above:

Table 8: Employer Need by Skill

Specialized Skills	% of Postings	Common Skills	% of Postings2	Software Skills	% of Postings4
Merchandising	9%	Communications	33%	Microsoft Office	7%
Nursing	7%	Customer Service	29%	Microsoft Excel	7%
Marketing	6%	Management	25%	Microsoft PowerPoint	4%
Auditing	5%	Sales	18%	Microsoft Outlook	3%
Cash Register	5%	Operations	17%	Microsoft Word	2%
Project Management	5%	Leadership	16%	SQL (Programming Language)	2%
Warehousing	5%	Writing	12%	Spreadsheets	1%
Restaurant Operation	4%	Detail Oriented	10%	Python (Programming Language)	1%
Cash Handling	4%	Problem Solving	10%	JavaScript (Programming Language)	1%
Accounting	4%	Planning	9%	SAP Applications	1%
Selling Techniques	4%	Interpersonal Communications	8%	Operating Systems	1%
Housekeeping	3%	Lifting Ability	8%	Microsoft Access	1%
Finance	3%	Computer Literacy	7%	Amazon Web Services	1%
Stocking Merchandise	3%	Verbal Communication Skills	7%	Salesforce	1%
General Mathematics	3%	Organizational Skills	7%	Microsoft Azure	1%

Source: Lightcast Datarun, 2023

Table 9: Employer Need by Qualification

Qualifications	Postings
Valid Driver's License	36,443
Registered Nurse (RN)	19,099
Basic Life Support (BLS) Certification	8,511
Cardiopulmonary Resuscitation (CPR) Certification	5,412
Licensed Practical Nurse (LPN)	5,178
Advanced Cardiovascular Life Support (ACLS) Certification	3,449
Commercial Driver's License (CDL)	2,878
Security Clearance	2,748
Certified Nursing Assistant (CNA)	2,515
CDL Class A License	2,433
Master Of Business Administration (MBA)	1,908
Nurse Practitioner (APRN-CNP)	1,823
Secret Clearance	1,540
Pediatric Advanced Life Support (PALS)	1,455
Board Certified/Board Eligible	1,354

Source: Lightcast Datarun, 2023

## B. Workforce Analysis

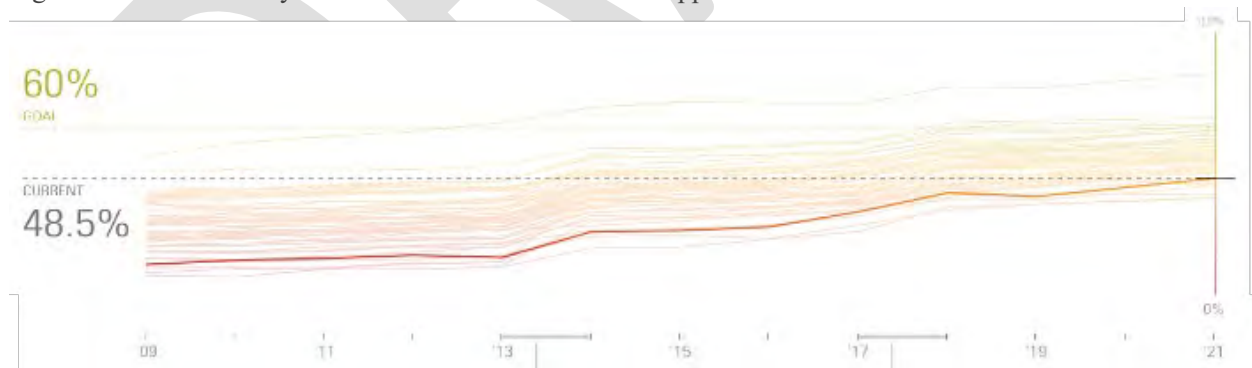
The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA<sup>4</sup>. This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes—

[4] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals.

[5] Veterans, unemployed workers, and youth, and others that the State may identify.

Overall, Mississippi’s labor force is growing and rapidly becoming increasingly educated. According to the Mississippi State University (MSU) projections outlined in the 2023 report “Mississippi Population and Labor Force Profile,” the state population is predicted to grow approximately 9% by 2030, driving a 12% increase in the size of the labor force. Educational data from Lumina Foundation indicates that post-secondary credential attainment currently hovers around 48.5% and is increasing across the state - a trend that is anticipated to continue over the next decade. These findings are supported by the MSU report, showing that both in-state and out-of-state community college, undergraduate, and graduate completion rates have been rising over the last decade.

Figure 5: Post-Secondary Credential Attainment in Mississippi



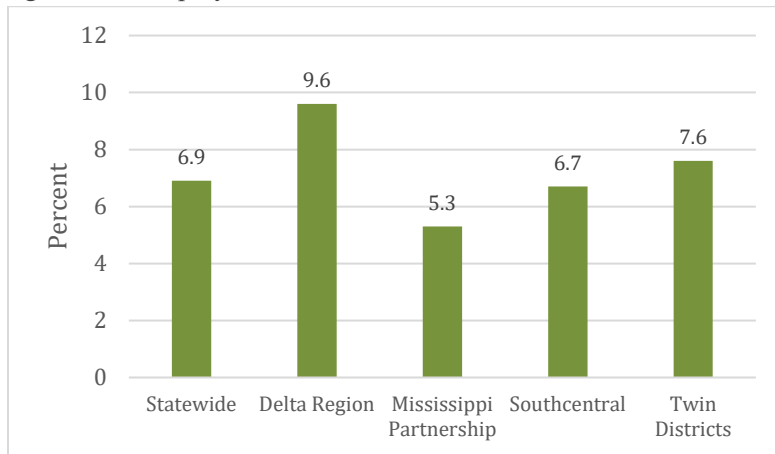
Source: Lumina Foundation, 2021

*i. Employment and Unemployment*

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

Unemployment rates in Mississippi have been on a downward trend over the past decade, and have more than recovered since the COVID-caused spike in 2020. As with many factors in the labor market, unemployment is not distributed equally throughout the state but impacts certain regions more than others, with the Delta region currently and historically experiencing the state’s highest unemployment rate.

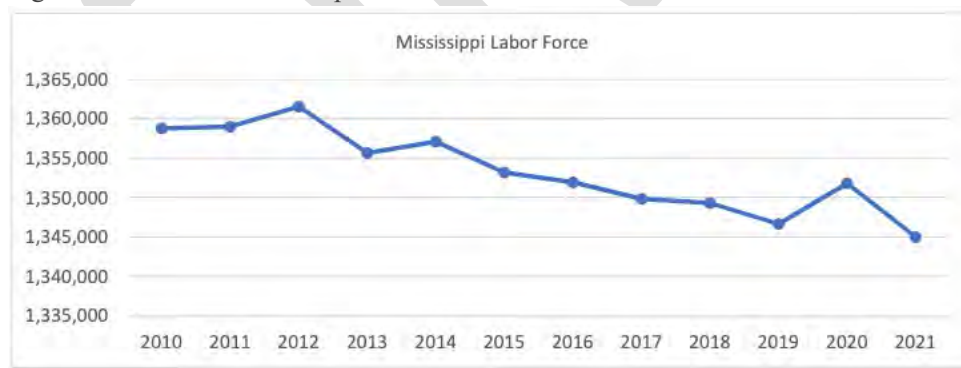
Figure 6: Unemployment Rate



Source: Lightcast Datarun, 2023

The state’s overall Labor Force Participation Rate has largely trended downwards since 2019, and is now lower than during the pandemic, indicating that workers/potential workers have been leaving or failing to join the labor pool.

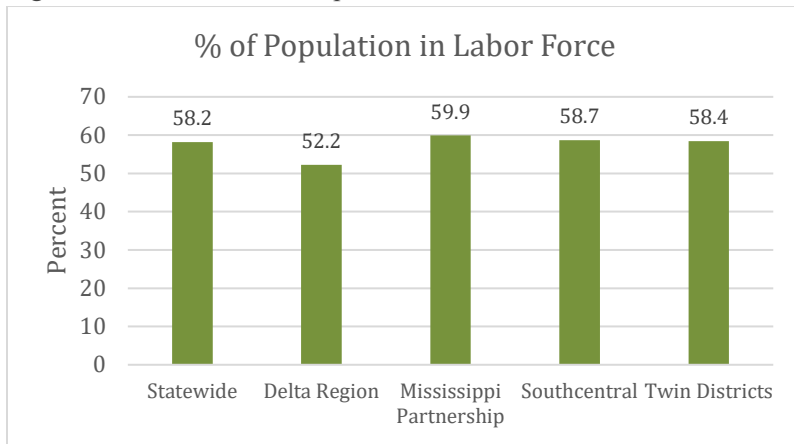
Figure 7: Labor Force Participation Rate Trends



Source: Lightcast Datarun, 2023



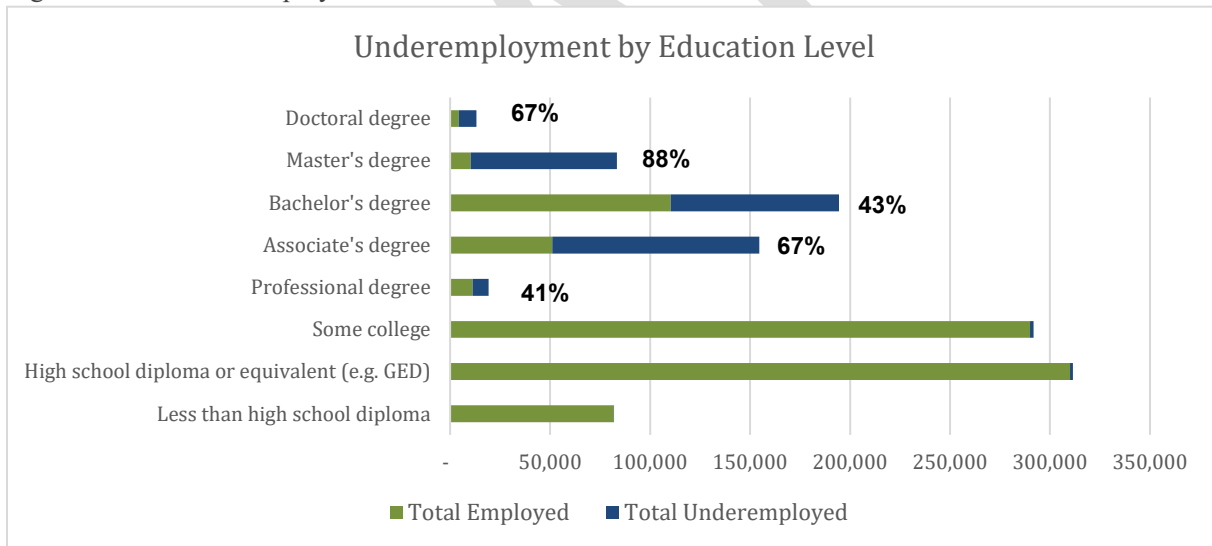
Figure 8: Labor Force Participation Rate



Source: Lightcast Datarun, 2023

Data from the American Community Survey (ACS) shows that underemployment continues to be extremely high in Mississippi, with the bulk of the state’s most educated workers employed in an occupation for which the typical level of education required is less than that attained by the individual. This aligns to data from the job market, which indicates that only 23% of jobs in the state require a bachelor’s degree or higher.

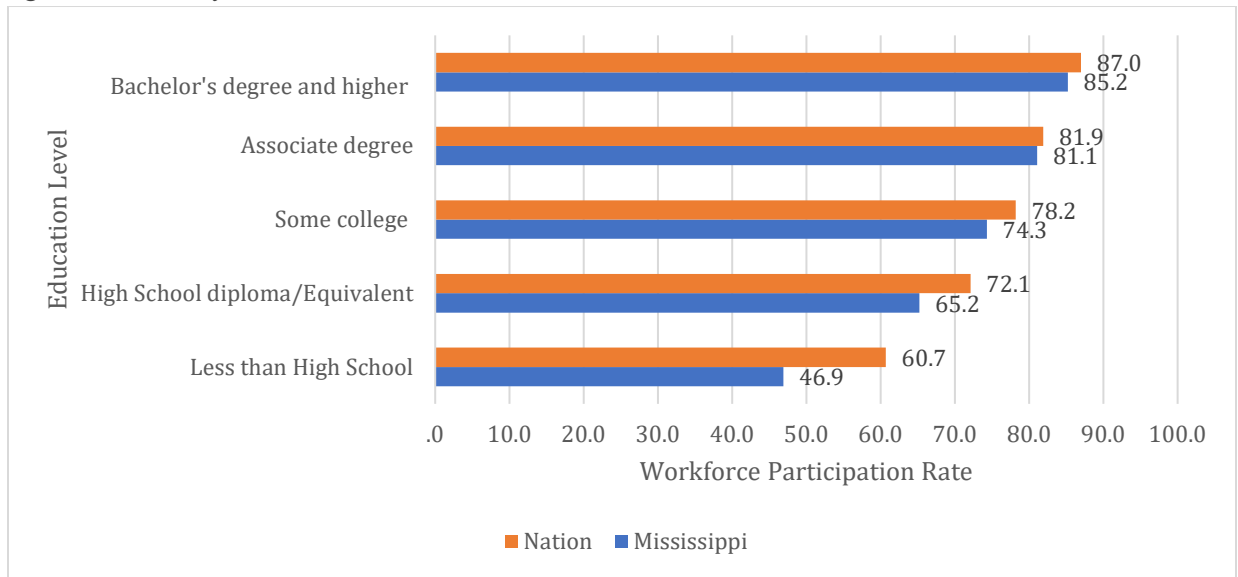
Figure 9: State Underemployment



Source: Lightcast analysis of ACS data, 2017-2021 5 Year Estimates

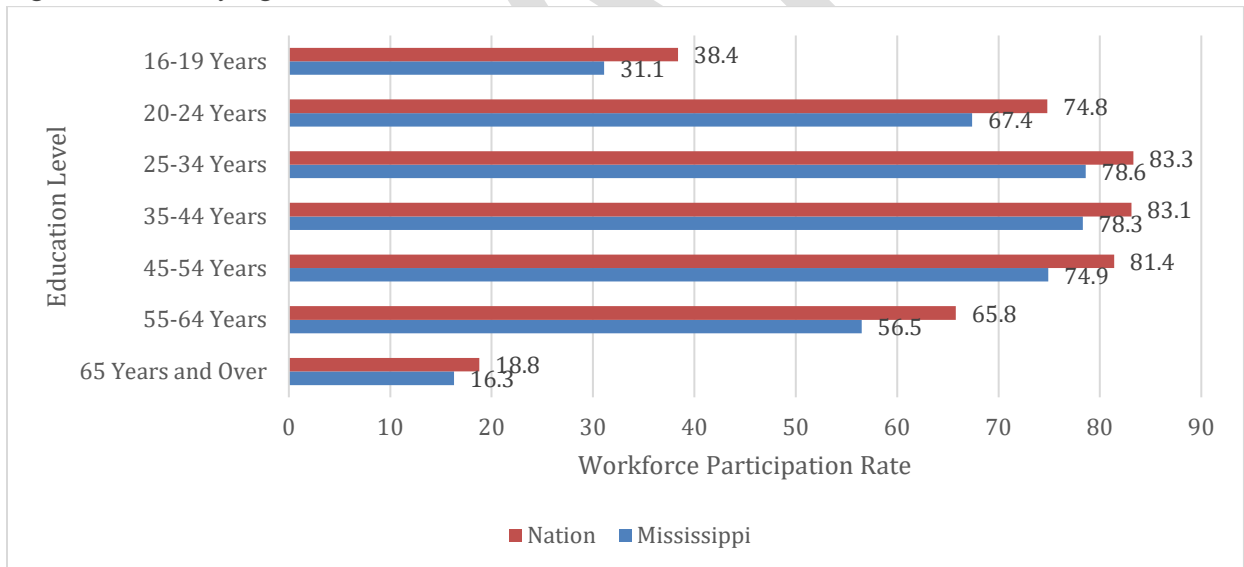
ACS data of the LFPR by education level and age demonstrates that Mississippi lags slightly behind the nation. Participation rate by education increases with overall attainment, with the highest levels of participation seen in individuals with a bachelor’s degree or higher, and the lowest levels in those with less than a high school diploma. Workforce participation by age aligns with expected participation patterns, with the highest levels of participation occurring during prime working years (those between 25 and 54).

Figure 10: LFPR by Education



Source: ACS data, 2017-2021 5 Year Estimates

Figure 11: LFPR by Age



Source: ACS data, 2017-2021 5 Year Estimates

Individuals with the highest barriers to employment include single parents, older individuals, low-income individuals, and individuals with disabilities.

Table 10: Populations with Barriers to Employment

Group*	Number
<b>Low-Income Individuals(18-64)</b>	<b>307,826</b>
<b>American Indians/Alaska Natives/Native Hawaiians</b>	<b>14,486</b>
<b>Individuals with Disabilities(18-64)</b>	<b>262,580</b>
<b>Older Individuals(&gt;=65)</b>	<b>461,472</b>
<b>Older Individuals, Low-Income</b>	<b>60,914</b>
<b>Ex-Offenders (18-64)<sup>1</sup></b>	<b>5,674</b>
<b>Homeless children and youth<sup>2</sup></b>	<b>6,920</b>
<b>Children in Foster care<sup>3</sup></b>	<b>3,540</b>
<b>English Language Learners with Low Level of Literacy<sup>4</sup></b>	<b>5,457</b>
<b>Migrants or Seasonal Farmworkers<sup>5</sup></b>	<b>3,530</b>
<b>Individuals within 2 Years of Exhausting TANF Eligibility<sup>6</sup></b>	<b>497</b>
<b>Single Parent Households</b>	<b>577,849</b>
<b>Single Mother Households</b>	<b>368,058</b>
<b>Single Fathers Households</b>	<b>209,791</b>
<b>Disconnected Youth<sup>7</sup></b>	<b>18,000</b>

Sources: American Community Survey, 2021 5-Year Estimates;<sup>1</sup>Mississippi Department of Corrections, 2023; <sup>2</sup>Mississippi Department of Education, 2023; <sup>3</sup>U.S. Department of Health & Human Services, Administration for Children & Families, Children’s Bureau, 2023; <sup>4</sup>Adult Basic Education, 2023 <sup>5</sup>U.S. Department of Agriculture, 2017; <sup>6</sup>Mississippi Department of Human Services, 2023; <sup>7</sup>National Kids Count Data, 2017. Disconnected youth are teenagers between age 16 and 19 who are not enrolled in school and not employed.

\*: An individual may belong to several groups.

Data shows that individuals with disabilities suffer from the lowest LFPR, while low-income individuals and veterans experience the highest unemployment rates.

Table 11: Unemployment and LFPR of Vulnerable Populations

Group	Percent
<b>Veterans</b>	
Unemployment Rate	4.2
Workforce Participation Rate	44.5
<b>Disabled</b>	
Unemployment Rate	3.2
Workforce Participation Rate	17.7
<b>Low Income</b>	
Unemployment Rate	13
Workforce Participation Rate	28.5
<b>Native American/Hawaiian</b>	
Unemployment Rate	0
Workforce Participation Rate	43.7
<b>Age 16-19 (Overall)</b>	
Unemployment Rate	2.3
Workforce Participation Rate	28.4
<b>Age 16-19 Not enrolled in School</b>	
Unemployment Rate	2.3
Workforce Participation Rate	79.8
<b>Age 16 and over with a Disability</b>	
Unemployment Rate	0
Workforce Participation Rate	14

Source: U.S. Census Bureau, Current Population Survey, March 2022.

*ii. Labor Market Trends*

**Provide an analysis of key labor market trends, including across existing industries and occupations.**

A key labor market trend is the growth of middle skill jobs (those requiring more than a high school diploma but less than a four-year degree) and the rapidly increasing education levels of the population. This provides an opportunity to align economic and workforce development, ensuring that plans for each work together to create the talent needed by industry, and incentivize employers to bring quality job opportunities to the state.

Table 12: Fasted Growing Industries by Projected Net Job Change 2022-2032

NAICS	Industry	2022 Jobs	2032 Jobs	2022-2032 Job Change	2022-2032 % Job Change	Avg Earnings Per Job
7225	Restaurants and Other Eating Places	92,692	105,297	12,605	14%	\$20,934
5614	Business Support Services	10,438	16,442	6,004	58%	\$42,353
6241	Individual and Family Services	16,265	22,081	5,816	36%	\$30,414
4931	Warehousing and Storage	22,358	26,446	4,088	18%	\$52,728
7211	Traveler Accommodation	25,056	29,039	3,983	16%	\$37,587
6213	Offices of Other Health Practitioners	10,121	13,628	3,508	35%	\$62,804
9036	Education and Hospitals (Local Government)	98,797	102,047	3,250	3%	\$58,364
5415	Computer Systems Design and Related Services	7,659	10,367	2,709	35%	\$96,867
4552	Warehouse Clubs, Supercenters, and Other General Merchandise Retailers	31,491	34,150	2,659	8%	\$32,860
4921	Couriers and Express Delivery Services	7,998	10,404	2,406	30%	\$41,923
6243	Vocational Rehabilitation Services	4,209	6,488	2,278	54%	\$20,884
5416	Management, Scientific, and Technical Consulting Services	5,245	7,451	2,207	42%	\$73,430
8131	Religious Organizations	17,681	19,828	2,147	12%	\$20,550
5613	Employment Services	28,529	30,629	2,100	7%	\$42,064
6211	Offices of Physicians	21,913	23,735	1,822	8%	\$107,968

Source: Lightcast Datarun, 2023

Table 13: Fasted Growing Occupations by Projected Net Job Change 2022-2032

SOC	Occupation	Typical Entry-Level Education	2022 Jobs	2022-2032 Job Change	2022-2032 % Job Change	Median Hourly Earnings
31-1128	Home Health and Personal Care Aides	High school diploma or equiv	19,526	5,990	31%	\$10.53
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	No formal education	30,929	4,142	13%	\$14.62
35-2014	Cooks, Restaurant	No formal education	10,173	3,997	39%	\$13.13
11-1021	General and Operations Managers	Bachelor's degree	26,934	3,340	12%	\$32.58
53-3032	Heavy and Tractor-Trailer Truck Drivers	Postsecondary nondegree award	27,853	3,291	12%	\$22.61
43-4051	Customer Service Representatives	High school diploma or equiv	21,560	2,922	14%	\$14.76
35-3031	Waiters and Waitresses	No formal education	17,398	2,859	16%	\$8.79
35-3023	Fast Food and Counter Workers	No formal education	30,725	2,688	9%	\$10.02
41-2031	Retail Salespersons	No formal education	34,668	2,371	7%	\$12.46
25-1099	Postsecondary Teachers	Doctoral or professional degree	12,444	2,146	17%	\$30.10
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	No formal education	19,201	2,003	10%	\$11.57
53-3033	Light Truck Drivers	High school diploma or equiv	8,511	1,736	20%	\$17.84
15-1252	Software Developers	Bachelor's degree	3,116	1,690	54%	\$44.10
53-7065	Stockers and Order Fillers	High school diploma or equiv	24,840	1,670	7%	\$14.43
35-1012	First-Line Supervisors of Food Preparation and Serving Workers	High school diploma or equiv	11,846	1,583	13%	\$13.86

Source: Lightcast Datarun, 2023

*It is worth noting that these assumptions are based on the continuation of the status quo and will change in response to economic factors.*

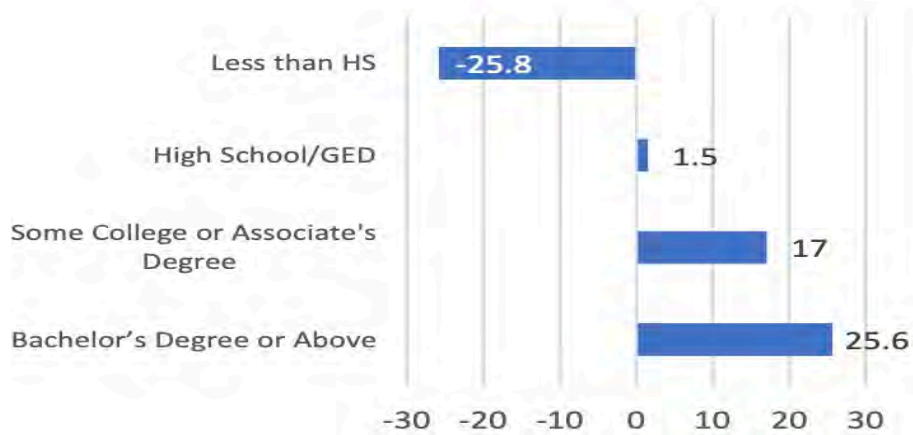
Simultaneously, the workforce is increasing rapidly in educational attainment, growing the number of people with post-secondary credentials in the state, and driving increases in underemployment. Currently, the state stands at 48.5% post-secondary credential attainment, and is poised to increase that number to 55% by 2030.

*iii. Education and Skill Levels of the Workforce*

Mississippi currently ranks 44<sup>th</sup> in the nation as measured by education levels of the workforce, per Lumina Foundation data. Educational attainment within the general population has been on a strong upward trend in the state for the past decade, thanks to a well-coordinated state-wide effort to increase post-secondary credential attainment. The number of residents with a bachelor’s degree or higher has increased by over 25% since 2010, and those with some college or an associate degree by 17%. Simultaneously, the number of workers with less than a high school degree has declined by over 25%.

Translated into the workforce, this has resulted in a 16% increase in workers with a bachelor’s degree or more, and 6.2% increase in workers with some college or an associate degree, as well as a 10.5% decrease in workers with only a high school diploma/GED, and a 33% decrease in workers with less than a high school degree. Driving this progress is significant increases in the graduation rates of high school, community college, and university students.

Figure 12: Mississippi Population – Percent Change by Educational Attainment



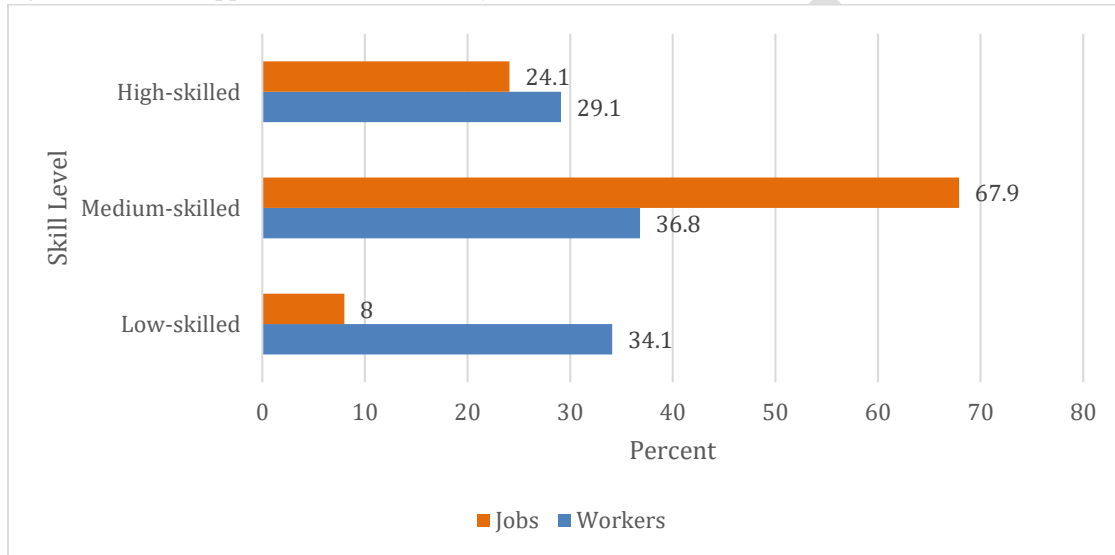
Source: Mississippi Population and Labor Force Profile, 2023 Report, Mississippi State University National Strategic Planning and Analysis Research Center

*iv. Skill Gaps*

The state’s biggest skill gaps occur in jobs that demand medium-skilled workers – generally defined as those with more than a high school diploma, but less than a 4-year degree. Currently the state’s workforce exceeds demand for high-skilled and low-skilled workers.

Current data show that 69% of jobs in Mississippi fall within the definition of middle-skill, but only 37% of the state’s workforce has the requirements to fill a middle-skill job (see Figure 13). In contrast, Mississippi has more workers than available jobs in the low-skill category. This oversupply of labor also exists for high-skill jobs that require college credentials and beyond. Given that there is a middle-skill gap, the availability of such jobs indicates that many Mississippians could attain gainful employment by seeking additional education and training.

Figure 13: Mississippi Jobs and Workers by Skill



Source: U.S. Bureau of Labor Statistics, OEWS, 2022; ONET, 2023; U.S. Census Bureau, American Community Survey, 2021 5-Year Estimates.

The Middle Skill gap in the state is largely driven by a shortage of workers in the state’s largest industries, including advanced manufacturing, healthcare support, tourism, and other large sectors.

Table 14: Supply and Demand for Middle-Skill Occupations in New and Established Sectors

Sector	Supply	Demand	Gap
<b>Advanced Manufacturing Industry</b>	<b>1,547</b>	<b>2,940</b>	<b>1,393</b>
<b>Healthcare Support Industry</b>	<b>893</b>	<b>3,001</b>	<b>2,108</b>
<b>Tourism Industry</b>	<b>981</b>	<b>10,920</b>	<b>9,939</b>
<b>Well-Established Sectors</b>	<b>1,763</b>	<b>16,239</b>	<b>14,476</b>
<b>Total</b>	<b>5,184</b>	<b>33,100</b>	<b>27,916</b>

Source: Mississippi Department of Employment Security, 2023; Mississippi State Longitudinal Data System, 2023; Mississippi Works, 2023; Mississippi Community College Board, 2023.

## 2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ANALYSIS

### A. The State's Workforce Development Activities

#### *Core Program Activities*

**Title I – Adult, Dislocated Worker, and Youth Programs:** The Mississippi Department Employment Security (MDES) is the recipient of WIOA Title I funds. The funds are allocated by formula to Mississippi's four Local Workforce Development Boards (LWDB) for the administration of Adult, Dislocated Worker, and Youth services. WIOA staff-assisted services focus on providing the following: (1) comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, (2) individual employment plans to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participants to achieve employment goals, (3) job search and career planning, (4) short-term work readiness services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment.

Adult and Dislocated Worker services are delivered through a network of American Job Centers known as Workforce Investment Network Job Centers (WIN Job Centers) operated by community colleges and MDES. Services are provided in three categories: basic career services, individualized career services, and follow-up services. During the period between July 1, 2022 and June 30, 2023 approximately 12,217 unique individuals received services: 2,905 individuals enrolled in occupational and academic training, and 985 individuals enrolled in on the job training. Manufacturing continues to be in the largest demand for on-the-job training, while health-related occupations and truck driving demonstrate the highest demand for academic and occupational training.

Business services are a key component of Title I services. Businesses operating in Mississippi or considering a move to the state are assisted in the search for qualified employees; researching state, local and federal regulations; and exploring the state's economic development services. In support of Mississippi businesses, WIN Job Centers provide a vast array of services, including providing E-Verify, hosting job fairs, posting jobs, screening potential workers, providing meaningful data about Mississippi's labor market, and providing training services at no cost to businesses and workers. 33 Governor's Job Fair events were held between July 1, 2022, and June 30, 2023, serving 763 employers/organizations. In addition to the Governor's Job Fair Network events, 622 job fairs were held statewide at the WIN Job Centers for individual employers.

WIOA Youth services are provided by local community-based organizations, LWDBs, and educational institutions. Service providers offer program activities to eligible youth ages 14 - 24 who face barriers to education, training, or employment. Strategies for serving youth include the 14 WIOA required program elements beginning with career exploration coupled with support for educational attainment, skill training aligned with in-demand occupations and culminating with employment, apprenticeship, or post-secondary education.

**Title II – Adult Education and Family Literacy Act:** The Mississippi Community College Board (MCCB) Office of Adult Education (OAE) is the recipient of WIOS Title II funds. The OAE manages and distributes federal and state funds, provides leadership and technical assistance related to adult education and literacy instructions, and offers High School Equivalency (HSE) testing throughout the state. The OAE strives to ensure the availability of high-quality education programs in which individuals may earn high school credentials,



improve English language skills, prepare for the workforce, and prepare for post secondary education and training programs.

The OAE established the following four goals for Mississippi’s adult education delivery system to ensure the opportunity for academic success of all learners:

- Improve Outcomes by Scaling Effective Models and Strategies Across the State
- Increase Postsecondary Transitions and Credential Attainment
- Strengthen College and Career Readiness for Adult Learners
- Develop Multi-Level; Career Pathway Options.

During program year 2022-2023, Title II programs served 6,403 individuals with 1,585 receiving their high school equivalency diplomas.

**Title III – Wagner-Peyser:** Wagner-Peyser funds are administered by MDES. The Wagner-Peyser Employment Service program focuses on providing a variety of services, including job search assistance, job referrals and placement assistance for job seekers. For the period of July 1, 2021 through June 30, 2022, MDES received 238,598 job orders with a total of 350,762 openings.

**Title IV – Vocational Rehabilitation:** The Mississippi Department of Vocational Rehabilitation (MDVR) administers Title IV programs. Office of Vocational Rehabilitation helps eligible individuals with disabilities obtain, retain, or advance in competitive integrated employment (careers) that are consistent with the individual’s unique employment factors – strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choices. Vocational Rehabilitation (VR) begins with an assessment to help determine the individual’s employment factors. The counselor and the participant work together to develop an Individualized Plan for Employment (IPE) that outlines the employment objective and VR services required to meet the employment goal. In PY 2021, 2,038 individuals received VR Training Services. In Plan Year (PY) 2021, 2,003 individuals were enrolled in an education or training program; 1,445 individuals achieved a measurable skill gain at a rate of 72.1%; and 31.9% of participants earned a recognized credential.

#### *Combined Plan Partners*

**Jobs for Veterans State Grant (JVSG) Program:** JVSG is fully integrated as an essential part of the WIN Job Center network. Between July 1, 2021, and June 3, 2022, 224 veterans were served under the JVSG program. Of these, 98.2% of veterans received individualized career services. Veterans in case management face a variety of employment barriers, including homelessness, low-income, disability, and justice-involvement.

**Disabled Veterans Outreach Program (DVOP):** Specialists funded through the Jobs for Veterans State Grant (JVSG) are included among the WIN Job Center partner staff. The WIN Job Center staff assist veterans, eligible spouses, and other covered persons. Participants are asked to complete an assessment form to determine if they have significant barriers to employment. The WIN Job Center staff provide initial basic career services and refer veterans/eligible spouses with barriers to the DVOP Specialist for individualized career services. Local Veterans Employment Representatives (LVER) are viable and effective partners in the WIN Job Center delivery system. LVERs are key members of the MDES Business Services Team participating in business development activities, employer outreach efforts, and job development for veterans, helping create a coordinated approach to business outreach and service delivery by including other WIN Job Center staff to better assist businesses in hiring veterans.

**Unemployment Compensation Programs:** MDES is the state's major tax collection agency, administering the audit and collection of payroll taxes and maintaining the employment records for more than 1.5 million workers. The Benefits Department is charged with determining eligibility of nonmonetary investigations, where the main objectives are making timely and quality decisions in accordance with Department of Labor (DOL) guidelines. For the period of July 1, 2021, through June 30, 2022, the Benefits Department completed 57,759 timely investigations and 48,124 timely adjudications. The Benefits Department is also responsible for processing Federal, Military, and Combined Wage Claims; as well as processing statement of charges for employers and conducting work search audits.

**Self-Employment Assistance Program (SEAP):** Mississippi has reestablished the SEAP, which is housed within the Benefits Department. This is a voluntary program designed for unemployed individuals who are interested in starting their own business. Eligible claimants who meet certain criteria and are likely to exhaust regular UI benefits before returning to work may qualify for this program. With SEAP, work-search requirements for weekly certification are waived while working on self-employment activities. When eligible participants earn money from their business, those earnings are not deducted from their weekly benefit payment. MDES will work through partnerships with external resources such as governmental organizations and businesses in order to provide additional resources. Those resources include entrepreneurial training, business counseling, and technical support for approved claimants. The goal is to offer unemployed individuals the opportunity to focus on the development of a business venture that may lead to a new business in the state, which in turn boosts job production.

**Reemployment Services and Eligibility Assessment (RESEA):** The Reemployment Services and Eligibility Assessment (RESEA) initiative in Mississippi provides intensive career services to reconnect Unemployment Insurance (UI) beneficiaries with work as quickly as possible. RESEA participants receive up to three one-on-one assessments and career counseling sessions. Each session assists the participant by providing labor market information, job matching, skills gap analysis, and soft skills training. RESEA participants are also contacted by staff and given encouragement, practical job search tips, targeted work search assistance, and job referrals. Virtual RESEA appointments were implemented on June 13, 2022, to aid underserved areas of the state. MDES completed 6,999 counseling sessions between July 1, 2021 and June 30, 2022.

**Trade Adjustment Assistance Program:** The Trade Adjustment Assistance (TAA) Program helps workers who have lost or may lose their jobs as a result of foreign trade. The program provides workers with opportunities to obtain the skills, credentials, resources, and support necessary to become re-employed. Workers who have been laid off or who will be laid off from a business which is covered under a Trade petition from DOL and are still within their individual deadlines may be eligible for benefits.

**Senior Community Service Employment Program:** SCSEP supports low-income and unemployed individuals ages 55 and above, and helps them find work via part-time training assignments in non-profit or other public organizations. Participants have access to employment assistance through WIN Job Centers. SCSEP participants gain work experience in a variety of community service activities at nonprofit and public facilities, including schools, hospitals, childcare centers, and senior centers. SCSEP is administered in 80 counties in Mississippi. This training serves as a bridge to unsubsidized employment opportunities for participants. Enrollment priority is given to veterans and qualified spouses, then to individuals who are older than 65, have a disability, have low literacy skills or limited English proficiency, reside in a rural area, are homeless or at risk of homelessness, have low employment prospects, or have failed to find employment after using services through the WIN Job Center system.

**National Farmworker Jobs Program:** MDES manages the Migrant Seasonal Farm Worker (MSFW) and H-2A Temporary Agricultural Labor Certification Program. MDES supports the H-2A program by referring U.S. farm workers to farmers when hiring in the state. The MSFW program provides outreach and basic labor exchange services to those who are identified as migrant or seasonal farm workers. The H-2A program helps employers recruit temporary visa workers when qualified U.S. workers are not available. H-2A regulations require participating employers to provide proof of available housing and clean water before certifying eligibility. MDES successfully certified 48 employer’s housing locations with wells. The H-2A continues to see exponential growth. Forty-eight new employers were registered from July 2021 through June of 2022.

**Temporary Assistance for Needy Families (TANF):** Mississippi Department of Human Services administers the Temporary Assistance for Needy Families (TANF) Work Program (TWP) MDHS and MDES partner together to provide needy families with a pathway to self-sufficiency. Employment and training activities are an integral part of TWP. In addition, support services like childcare, transportation, and employment expenses are made available to help participants prepare for self-sustaining employment.

### *State Programs*

**Mississippi Works Fund:** The Mississippi Works Fund serves to grow the state’s dedicated and skilled workforce to meet the demands of the state’s new and existing businesses. Eligible projects include job creation projects and work ready projects. Grants are used to maximize existing training resources available through the Workforce Enhancement Training Funds (WET), WIOA, and other sources. Funds should be targeted towards high growth industries as identified by the Mississippi Development Authority.

**Workforce Enhancement Training Fund:** The Mississippi Workforce Enhancement Training Fund (WET) serves to provide reimbursement for approved costs related to training for employers in order to enhance employee productivity in priority occupations. Eligible projects for priority industries include 1) training new or existing employees by the local community college, contractor, or business; 2) train-the-trainer activities for disciplines not currently available through the local community college or company; and 3) vendor training.

## **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.**

### General Strengths:

Created in the 2020 legislative session, AccelerateMS has implemented a strategic approach to workforce development, tailored to the state’s economic needs and key workforce partners including employers, workers/potential workers, educational institutions, and others. Through AccelerateMS, the state is taking a unified approach to workforce development that boosts efficiency and productivity of all systems, stakeholders, and partners.

**Workforce Data Analysis:** Mississippi optimizes the collection and analysis of workforce data to understand key factors including existing need and gaps in workforce development services. The state’s data-driven approach to designing, testing, and analyzing workforce activities is a significant strength as it allows partners to direct resources towards the state’s areas of highest need.

**Coordination Among Partners:** The state’s integrated communication and data-management prevents duplication of efforts and allows diverse state entities to coordinate efficiently to provide quality services to both individuals and businesses, ensuring resources are used to create maximum impact on participants and the economy.

General Weaknesses:

**Labor Shortage and Compensation Disparity:** Core partner agencies are experiencing recruitment, retention and labor shortages exceeding 30% which adversely impacts service delivery.

**Ineffective Outreach and Underutilization of Workforce Services:** Current outreach, awareness, and messaging strategy is not effective in reaching underserved and prime age populations, and participant counts have not returned to pre-pandemic levels.

**Broad Lack of Career Awareness:** The educational system leaves many students and adults unprepared to make informed decisions about their careers. These gaps include lack of exposure to employment pathways and mobility; lack of knowledge around educational requirements and credential value; and lack of professional preparation.

**Barriers to Accessing Training:** 1) Financial challenges including inability to afford tuition or forego wages during training hinder participation - most people seeking training opportunities cannot afford to pay tuition or forego earnings while in training (even if the training is free). To successfully participate in and complete training, participants will need to earn some sort of income (that does not require them to immediately relinquish public assistance benefits). 2) Additionally, access to key workforce training and wraparound services is often constrained by administrative requirements. 3) Job training and employment opportunities are clustered in urban centers, while 54% of the population is distributed across disconnected communities without easy access to those services/jobs. Workforce partners will need to work with employers, non-profits, and other state agencies to ensure rural residents have access to the training and resources that will allow them to successfully maintain employment.

### 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 state’s capacity for effective change rests in the supportive nature of its cultural and political environment, the strength of its technology and data systems, its programmatic capacity to support the success of vulnerable individuals, and the distribution of its physical infrastructure.

**Political and Cultural Capacity:** In 2020, to promote additional improvements in workforce training and education initiatives, Governor Reeves and the Mississippi Legislature established the new Office of Workforce Development (AccelerateMS). The charter legislation charged AccelerateMS with a mission to review existing programs; provide information, guidance, and significant influence on how funding sources should be utilized for the purposes of workforce development; and serve as the coordinating entity for all workforce development stakeholder agencies in Mississippi.

**Technology and Data Capacity:** To date, the state has developed and implemented an integrated technology-based workforce system called Mississippi Works. Mississippi Works is a mature, real-time, integrated web and

mobile solution providing labor exchange services to job seekers and employers and allowing MDES One-Stop partner staff to perform case management activities. The system was developed in Mississippi through a partnership between MDES and the National Strategic Planning and Analysis Research Center (NSPARC) at Mississippi State University (MSU). Mississippi Works currently supports the calculation of common participation periods across what have become all WIOA Title I and Title III programs. The system fully integrates Unemployment Insurance, Trade Adjustment Assistance, Adults, Dislocated Workers, Youth, Veterans, and the Work Opportunity Tax Credit Program. Mississippi Works is interoperable with other case management systems run by Rehabilitation Services, AE, and TANF.

The state has also developed and implemented a State Longitudinal Data System (SLDS) to improve performance-based management. The SLDS Governing Board is responsible for the management and oversight of data sharing and data use. Board members include representatives from each workforce and education sector in the state. The SLDS Governing Board has developed a clear set of rules that define the scope of the system along with those ensuring data integrity, security, confidentiality, and privacy (see Appendix B).

**Capacity to Support the Success of Vulnerable Populations:** Mississippi's capacity to support individuals with barriers to employment has greatly expanded with the development of the WIOA referral hub. All partners collect a basic set of diagnostic information from program participants allowing for an automated assessment of participant needs. As a result, participants are not left to navigate the workforce or social services system alone. No matter which Combined Plan Partner the participant visits first, he or she is fully assessed and connected with supportive services that enables the participant to have the best possible opportunity to succeed in training for or entering in-demand occupations.

Core Partners also depend on the expertise and connections of local community-based organizations to address the specific needs of a community or population. This approach expands outreach to vulnerable and underserved populations.

**Physical Infrastructure Capacity:** The workforce system also relies on infrastructure with multiple points of access provided by WIOA Combined Plan Partners.

**WIN Job Centers:** American Job Centers in Mississippi have been branded under the Workforce Investment Network (WIN) and are known as WIN Job Centers. There are 43 centers across the state, and most Mississippi residents are within 30 miles of a center. These centers provide employment services, to include education and training for workers, human resource assistance for businesses, and information for economic developers. In support of Mississippi businesses, WIN Job Centers offer a vast array of services, including providing E-Verify, hosting job fairs, posting jobs, screening potential workers, communicating meaningful data about Mississippi's labor market, and providing training services — all at no cost to businesses and workers.

**Rehabilitation Services Local Offices:** The Mississippi Department of Rehabilitation Services (MDRS), Office of Vocational Rehabilitation (OVR) and Office of Vocational Rehabilitation for the Blind (OVRB) provide vocational rehabilitation services through a variety of local offices, affiliates, and itinerant teachers. MDRS operates 10 district offices and provides services through numerous physical locations throughout Mississippi. The AbilityWorks division of MDRS is a network of 17 community rehabilitation programs that provide vocational assessment, job training, and work experience for individuals with disabilities. Three MDRS work locations are WIN Job Centers.

**Human Services County Offices:** The Mississippi Department of Human Services (MDHS) operates through seven programmatic divisions and has offices in all 82 counties of Mississippi. The 82 county offices are divided among nine regions. A regional director is responsible for oversight of the counties within each region. At the state office, staff provide support for policy, procedures, training, and technical assistance needed for program administration.

In addition to county offices, the Division of Economic Assistance (DEA) of MDHS is responsible for programs that ensure nutrition and other basic needs are met for low- and medium-income individuals and families in Mississippi. The DEA has offices in each county of the state under the guidance of a county director. Staff development and training within MDHS county offices are focused on supporting professional growth by providing training programs and workshops based on the specific needs of the agency office.

MDHS has also developed a web-based portal accessible to any agency, organization, business or individual in need to assist in locating available resources to aid in barrier mitigation. My Resources is available for use nationwide and resides on the MDHS web page and located at <https://myresources.mdhs.ms.gov>.

**Adult Education Access Points:** The MCCB offers AE through a variety of physical locations, including 15 community colleges, three public schools, and all correctional facilities.

## **b. STATE STRATEGIC VISION AND GOALS**

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

### **1. VISION**

**Describe the State’s strategic vision for its workforce development system.**

The state’s strategic vision is to create a world-class workforce aligned to Mississippi’s unique economic portfolio and labor market, which drives increased and sustained individual, community, and statewide prosperity. This vision will be attained through the development of a unified workforce system that acts as a connected ecosystem where all parts are aligned and work together to achieve common goals. Through this system, every Mississippian will have the opportunity to be work- or career-ready and to secure his or her dream job right here at home.

From the moment one enters the education and workforce system, he or she will be presented with the necessary tools to choose and pursue a career pathway that is relevant to current and future labor markets. Similarly, from the moment current and prospective businesses enter into a partnership with Mississippi’s education and workforce system, resources will be aligned to cultivate the sustainable, high-performance workforce critical for maintaining and expanding businesses’ long-term economic viability, in turn creating better and more sustainable employment opportunities for Mississippians.

To achieve this vision, WIOA partners will work together to:

- Create a talent pool with the skills, knowledge, & experience required by local employers in both the current & future job markets
- Develop the outreach, education, & training infrastructure that drives participation, retention, & completion of post-secondary credentials
- Leverage workforce development investments & resources to promote state, community, business, & individual prosperity

## 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.**

WIOA Combined Plan Partners will realize this vision by achieving seven goals focused on developing an educated and skilled workforce aligned to the needs of employers.

1. Jointly develop policies that will coordinate service delivery among all WIOA Combined Plan Partners to achieve a no-wrong-door approach for WIOA participants and employers.
2. Strengthen interagency partnerships.
3. Develop defined, articulated pathways across educational sectors (K-16+) to create a pipeline for the workforce.
4. Develop cross-program performance metrics. Engage partners to establish a plan to remain abreast of changing industry needs and the metrics to measure outcomes to realize the potential of the state’s workforce programs and delivery systems.
5. Develop a service delivery approach that maximizes the use of technology advancements.
6. Invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives.
7. Develop and communicate a unified vision and message.

**Goals 1, 2, and 5** aim to decrease programmatic fragmentation in order to serve all eligible individuals via an efficient and productive way, creating a “no-wrong-door” approach that ensures individuals seeking a connection to the workforce will be routed to the correct partner regardless of where they enter the system. Out-of-school youth, including current or former foster youth, will be routed to youth providers; those with barriers to employment will be routed to partners with services that address their specific barriers to training or work.

Partners have committed to extending a no-wrong-door approach to employer engagement and other programs to include childcare and mental health. Over the next two years, partners will work to coordinate the management of employers using integrated technologies to track and facilitate interactions and results. The goals of this approach are to streamline employer engagement and activities like needs assessments, as well as to predict future workforce needs and boost access to support services.

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**Goals 3 and 6** aim to produce a workforce that meets the needs of Mississippi’s existing and potential employers in partnership with educational institutions. Mississippi’s use of longitudinal employer needs data informs the creation of articulated pathways into the workforce. K-12 leverages career clusters and occupational pathways that guide a student’s academic work. In partnership with K-12, Mississippi’s community and junior colleges have created dual enrollment opportunities so students in high school gain credit toward work-ready credentials prior to graduation and transition to subsequent two-year or four-year programs designed to complete the student’s work-readiness in his or her chosen pathway. Employer participation on the SWIB provides WIOA partner agencies with a constant source of feedback on the effectiveness of the state’s workforce development tactics.

**Goals 4, 5, and 6** ensure that Mississippi’s efforts to create a skilled workforce are measurable. Use of technology goes beyond its real-time application in case management and includes ongoing and retrospective analysis of outcomes so that performance can be measured. Outcomes are measured via two standards—federally prescribed performance measures and measurements defined by the state. AccelerateMS is charged with recommending comprehensive, results-oriented measures that will apply across Mississippi’s workforce development system. To support these measurements, Mississippi continues to invest in the SLDS, which brings together administrative data from all WIOA partners and educational institutions in a well-governed, secure clearinghouse that enables performance measurement calculations, cohort analysis, and strategic planning.

**Goal 7** aims to create a differentiated brand identity based in AccelerateMS’ state workforce development strategy. Via this strategy workforce development activities and funds will be used efficiently and to maximum effect, streamlining services, enhancing communication and networking between partners, and boosting results for participants. Through the creation of curated messaging, this vision will be clearly communicated to partners, stakeholders, and participants helping align all interested parties and driving workforce development progress across the state.

### 3. PERFORMANCE GOALS

**Using the tables provided within each Core Program section, 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.)**

In order to assess performance for a full four quarters after program exit, projected baseline figures for WIOA core programs were based on available data from the most recent quarters.

WIOA mandates six performance measures, as identified in Appendix G, for its core programs. Performance number baselines were calculated using the following methodology:

1. *Employment, Quarter 2.* This employment measure is the percentage of participants who are in unsubsidized employment during the second quarter after exit from the program in question; the measure for youth also includes the percentage who were in education or training activities during the second quarter after exit.
2. *Employment, Quarter 4.* This employment measure is the percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program in question; the measure for youth also includes the percentage who were in education or training activities during the fourth quarter after exit.

3. *Median Earnings, Quarter 2*. This measure identifies the median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.
4. *Credential Attainment Rate* (except Wagner-Peyser). The credential attainment rate is expressed as the percentage of participants who obtained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year of exit from the program. A participant who has obtained a secondary school diploma or its recognized equivalent is only included in this measure if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after program exit.
5. *Measurable Skill Gains* (except Wagner-Peyser). Measurable skill gains are expressed as the percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, which are defined as documented academic, technical, occupational, or other forms of progress toward such a credential or employment.
6. *Effectiveness in Serving Employers*. Per current WIOA requirements, Mississippi has chosen two of three options proposed for measuring effectiveness in serving employers for data collection and reporting: employee retention rate and repeat business customer rate.

Other measures for which baseline calculations are not required to be computed in this document are:

- *Measurable Skill Gains* (except Wagner-Peyser). Measurable skill gains are expressed as the percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, which are defined as documented academic, technical, occupational, or other forms of progress toward such a credential or employment.
- *Effectiveness in Serving Employers*. Per current WIOA requirements, Mississippi has chosen two of three options proposed for measuring effectiveness in serving employers for data collection and reporting: employee retention rate and repeat business customer rate.

Agencies administering the WIOA core programs will be required to provide data for WIOA federal reporting, and AccelerateMS may establish other metrics to be used internally for strategic planning.

## 4. ASSESSMENT

**Describe how the State will assess the overall effectiveness of the workforce development system in the State and how it will use the results of this assessment and other feedback to make continuous or quality improvements.**

AccelerateMS has engaged in several measurement strategies to evaluate program effectiveness. The Office conducts data analysis and incorporates project evaluation metrics that measure outcomes, and determine both impact and return on investment. Performance monitoring is embedded in all workforce projects.

To assess progress towards achieving each of its seven goals, Mississippi considers both system and long-term individual outcomes.

**Assessing Goal 1, “Work together to develop policies that will coordinate service delivery with all WIOA Combined Plan Partners,” and Goal 2, “Strengthen interagency partnerships”:** Progress towards achieving Goals 1 and 2 are assessed through system-level analysis to determine whether clear policies exist to coordinate service delivery from all partners. At the individual level, measuring the degree of co-enrollment in programs is a key metric by which Mississippi assesses the effectiveness of these policy efforts. This metric is gathered via Mississippi’s WIOA Referral Hub, which keeps a record of every partner-to-partner referral and service enrollment.

**Assessing Goal 3, “Develop defined, articulated pathways across educational sectors (K-16+) to create a pipeline for the workforce,” and Goal 6, “Engage partners to establish the plan to remain abreast of changing industry needs and the metrics to measure outcomes to realize the potential of the state’s workforce programs and delivery systems”:** Measuring progress towards the achievement of Goals 3 and 6 chiefly involves the use of longitudinal data analysis. The closer the workforce development system in Mississippi comes to achieving goals 3 and 6, the more we expect to see a match between employer need and education/training pathways. Employer needs will be measured through labor market analysis of demand by occupation. These needs will be compared to the pipeline of labor supply from secondary, post-secondary, and workforce training providers. Gaps in supply will be identified and this assessment will inform the efforts of policy makers, educators, and employers to address progress towards these goals.

**Assessing Goal 4, “Develop cross-program performance metrics”:** As a starting point, Mississippi uses the WIOA-prescribed individual performance measures described in II.b.3 across all programs. In addition to measures of individual performance, the state calculates the number of referrals passing between each partner using WIOA Referral Hub technology. AccelerateMS is planning to define additional workforce performance metrics to supplement the current evaluation options.

**Assessing Goal 5, “Invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives”:** Measuring progress towards the achievement of Goal 5 will be accomplished by introduction of a maturity model for WIOA. AccelerateMS charged with the responsibility to recommend comprehensive, results-oriented measures that will apply to all of Mississippi’s workforce development system. To support these measurements, Mississippi continues to invest in its longitudinal data system, to bring together administrative data from all WIOA partners and educational institutions in a well-governed, secure clearinghouse that enables performance measure calculations, cohort analysis, and strategic planning.

**Assessing Goal 7, “Develop and communicate a unified vision/message”:** Measuring progress towards communicating a unified vision and message has historically been a qualitative, system-wide measurement based on partner interactions with participants and employers. Progress towards this goal can be seen in the formation of AccelerateMS, charged with creating a state strategy that will unify workforce development efforts across the state. As part of this strategy, AccelerateMS will articulate performance metrics for all aspects of workforce development, including the development of a more quantitative approach to measuring the extent to which employers and participants feel as though they are being served by an approach that presents a unified vision and message.

### c. State Strategy

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

- **1. Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). “Career pathway” is defined at WIOA section 3(7) and includes registered apprenticeship. “In-demand industry sector or occupation” is defined at WIOA section 3(23)**
- **2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2)**

*Defined, Articulated Pathways across Educational Sectors (K-16+) to Create a Pipeline for the Workforce aligned to in demand sectors.*

Mississippi will identify and align occupational runways, industry credentials, work-based learning, training delivery modalities, and develop a participant stipend structure to increase recruitment, engagement, enrollment, persistence, completion, and career navigation for in demand industry sectors.

High level objectives are:

- Develop occupational runways aligned to workforce needs
- Design plan to integrate industry-aligned credentials into runways
- Develop recommendations for work-based learning activities
- Create participant stipend framework

Tactics to achieve these objectives include:

**Aligning sector strategies with secondary career technical education initiatives to advance career pathways for high school graduates:** Following recommendations from the Council of Chief State School Officers (CCSSO), the Mississippi Department of Education (MDE) has adopted a framework to enhance its

career technical education programs to prepare high school graduates for post-secondary credentialing and, ultimately, for high-skill, high-demand jobs in the state. The focus of this framework is to line up workforce needs with secondary and postsecondary student preparation. Via this initiative a seamless system of career education and labor market opportunities for high school students can be developed in line with sector strategy goals of the state.

**Career Coaches:** A statewide career coach program was created during the 2022 legislative session and expanded during the 2023 legislative session. The Career Coach program was funded via the expansion in workforce investments from \$8 Million to \$12 Million for fiscal year 2024. The program places coaches in schools to help students explore high quality careers in Mississippi. The coaches work to support students' pursuit of pathways leading to quality careers through job shadowing, internship opportunities, connection and other activities.

**Registered Apprenticeship Programs (RAPs):** RAP is an industry-driven, high-quality, customizable, earn-as-you-learn career pathway training model. The State has received four cycles of Registered Apprenticeship (RA) Grant funding since 2016. The first two cycles included the Accelerator and Expansion Grants. The Mississippi Apprenticeship Program (MAP) received a third cycle of continuation funding for the State Apprenticeship Expansion Grant (SAE) and also received funding through the Apprenticeship State Expansion Grant (ASE). MDES will continue to expand RAPs in Mississippi through the MAP initiative. MAP is positioning RAPs as a viable pathway that aligns Mississippi's workforce and educational systems, strengthens economic competitiveness for our businesses, and makes good-paying jobs more accessible for our citizens. The three major project goals of the initiative are to expand RAP Sponsors, expand state capacity to support RAPs, and target and increase the participation and completion rates of diverse populations. All RAPs are subject to training provider eligibility procedures.

**Increasing the participation of underrepresented populations:** To accomplish this, the Mississippi Office of Apprenticeship will leverage the community college system by using community college sponsor contacts and College & Career Navigators from the Mississippi Integrated Basic Education and Skills Training (MI-BEST) initiative to conduct and coordinate outreach, recruitment, and support of underrepresented populations in RA programs. MI-BEST is an evidence-based, integrated pathways initiative currently implemented by all 15 community colleges.

Students in MI-BEST concurrently enroll in a) High School Equivalency (HSE) preparation classes if they lack a high school credential or academic skills (reading, writing, math), b) workforce preparation activities through the Smart Start Pathway Course, and/or c) occupational training provided by the college's credit-level Career and Technical Education programs or the Workforce Education divisions. MI-BEST programs are implemented in over 60 occupational pathways across the colleges, and 44% of these programs are in the advanced manufacturing and automotive sectors. Colleges hire full-time College and Career Navigators who recruit and work to retain students in MI-BEST. The College and Career Navigator at each college receives training about the navigation role, interfaces regularly with the faculty in the program, and many also engage with employers [3] [4] to help students access apprenticeships or employment opportunities.

Community College Sponsor contacts and MI-BEST Student Navigators can closely follow each participant to monitor their progress and support successful completion. Working collaboratively with the WIN Job Centers' case managers, Community College Sponsor Contacts and MI-BEST Student Navigators is well positioned to serve as the "recruitment and support services hub" to identify potential participants, along with existing, and perhaps underutilized, resources that are currently not well coordinated to maximize their benefit to Registered

Apprentices. The Navigators can leverage relationships with other college student support personnel and external workforce system support service partners to address barriers to apprenticeship entry and retention, such as lack of a high school credential, childcare, transportation, or other obstacles. Working with MI-BEST Student Navigators as a “recruitment point person” provides a more efficient way for RA program sponsors to communicate selection standards to multiple organizations seeking to prepare participants for entry into these programs.

**Leveraging funding opportunities** – To expand its capacity and enhance its ability to address sector-specific industry needs and cater to underserved populations, AccelerateMS actively pursues federal funding opportunities. Mississippi is the recipient of an EDA Phase I Recompete award. The project in partnership with Local Workforce Development Boards, focuses on supporting Mississippians residing in designated service areas who encounter significant challenges in accessing education and job training opportunities. The proposed initiative aims to overcome these access barriers by strategically citing training facilities in underserved communities and emulating a successful telehealth model to enhance workforce training accessibility. Additionally, measures will be implemented to address transportation obstacles for program participants including rideshare vouchers, vans, or hybrid delivery methods.

Mississippi has also received grant funds from the DoD’s Defense Manufacturing Community Support Program. Funds are being used for workforce development initiatives designed to increase the defense sector’s capacity, capability, and resilience in Mississippi.

**Identification of internship opportunities with employers across the state:** The Institutions of Higher Learning board has already developed a central office to coordinate these efforts and has contacted several businesses to identify critical areas for which employers would like to have interns. The state has also modified its technology to allow employers to post internships on the Mississippi Works Labor Exchange. Currently, in the high-growth, high-demand sectors, the typical areas that employers identify as critical for internships include engineering and management.

**Development of Data Tools:** Three data tools will be developed to fully assess overall performance of the state workforce system: dashboards, pathway evaluators, and supply and demand analysis. Supply and demand analyses will help address questions about skill gaps and provide information to direct resources so that they better meet employer demand. This type of analysis will assess the extent to which education and training systems are aligned with economic strategies and growth of economic opportunities in the state.

*Engage Partners to Establish a Plan to Remain Abreast of Changing Industry Needs and the Metrics to Measure Outcomes to Realize the Potential of the State’s Workforce Programs and Delivery Systems*

This strategy focuses on ensuring that workforce training programs and funds are focused on those skills and occupations in highest demand. Success on this front will ensure that students are competitive hires for in-demand, well-paying jobs and industry has the talent it needs to promote growth and success.

Tactics in support of this strategy include effective partner engagement, including streamlined outreach, communication, and management of employer relationships as described above. Another key tool is the SLDS where research questions and policy can be developed. The state has already created the scientific capacity that creates basic knowledge to inform continuous system improvement. This capacity expands as state leaders, AccelerateMS, agency partners, training and education partners, employers, and other stakeholders identify critical research areas important to the economic development of the state.

## *Joint Development of Strategies That Will Coordinate Service Delivery with WIOA Combined Plan Partners*

This strategy focuses on leveraging WIOA One-Stop Centers. Local workforce development boards are responsible for certification, operation, and oversight of the One-Stop Centers. Memorandums of understanding (MOUs) detail each partner's role, the resources provided, and expectations for the One-Stop Center.

Under Mississippi's WIOA implementation, the One-Stop Center system includes five models of service delivery: 1) Comprehensive One-Stop Centers, 2) Affiliate One-Stop Centers, 3) Virtual Access One-Stop Centers, 4) Call Center Support, and 5) Sector Training Plus Comprehensive One-Stop Centers. The virtual Access One- Stop Centers will be expanded for better coordinated services, increased access and decreased cost.

1. **Comprehensive One-Stop Centers** - Comprehensive One-Stop Centers physically house the consortium of Combined Plan Partners designated by the SWIB and LWDBs. One staff member from each of the Combined Plan Partners is co-located in each of the comprehensive centers. Each of the four LWDBs will house at least one Comprehensive One-Stop Center that provides access to the services of the Combined Plan programs and other partners. Decisions to create additional Comprehensive One-Stop Centers beyond the required four centers will be made by all Combined Plan Partners. Each Comprehensive One-Stop Center is strategically designed to meet the workforce needs of the job seekers and employers based on the geography, population, and industry requirements of the area. Comprehensive One-Stop Center staff are expected to have a working knowledge of all programs and services offered through the One-Stop Center and to be able to provide participants with the information necessary to make informed decisions.
2. **Affiliate One-Stop Centers** - Unlike the Comprehensive One-Stop Centers, Affiliate One-Stop Centers do not require a staff representative from all of the WIOA Combined Plan Partners. However, each Affiliate One-Stop Center must include staff from at least two Combined Plan Partner programs. The primary purpose of Affiliate One-Stop Centers is to provide the core services that meet the needs of local areas while maintaining a direct line to the larger comprehensive centers.
  - a. The flexibility of the Affiliate One-Stop Center structure allows for the unique, customized inclusion of multiple access points. Access to services within affiliate centers may include fully assisted service, partially assisted service, self-service, or a combination of all three. Fully assisted service describes one-on-one assistance with a qualified, cross-trained counselor. Partially assisted service involves the presence of a trained counselor who may provide assistance if necessary but who is not required to provide one-on-one support. Affiliate centers may also include computer stations to facilitate self-service access. Self-service access simply requires internet access and does not include the assistance of trained counselors or staff.
3. **Virtual Access One-Stop Center** – A key mode of service delivery is virtual access. In line with the concept of a universally accessible workforce system, virtual access provides participants access to a MDES staff person. As long as an individual has internet access, he or she can directly connect to the services provided through One-Stop Centers.
4. **Digital One-Stop Centers** - In the WIOA planning process, Core Program partners reached a consensus to establish state-of-the-art Digital One Stop Centers. These centers are equipped with cutting-edge communication technologies and offer participants convenient access to workforce services with efficiency in mind. The implementation of digital offices is expected to yield several benefits, including reduced infrastructure cost, optimized staffing requirements, increased accessibility, and improved coordination of services.

To enhance user experience, appointments will be offered to minimize wait times. Digital workforce specialists will be present in these offices to assist participants in various ways, such as:

- Engaging in real time conversations with workforce partners through phone or video chat.
- Sending and receiving messages securely through methods like secure messaging email and secure file exchange
- Utilizing resources kiosk for efficient job searches
- Harnessing AI for optimizing job searches and skill matching

This innovative approach ensures that participants can seamlessly navigate and leverage digital tools to access workforce services, ultimately enhancing the overall effectiveness and increasing program reach.

5. **Call Center Support** - For participants who lack computer access, MDES operates a call center staffed to assist with most One-Stop services.
6. **Sector Training Plus Comprehensive One-Stop Centers** –Sector Training Plus Comprehensive One-Stop Centers will provide access to all of the services represented in the comprehensive centers as well as sector-focused workforce training. These centers will be strategically placed according to sector needs across the state, with placement informed by industry sector labor sheds and LWDAs.

One-Stop Center employees and staff are required to know the essential characteristics of the services offered by all Combined Plan Partner and Strategic Partner programs. Cross-program professional development provides working knowledge about individual programs, specific contact information for area experts (communication plan), and the relationships among programs. To accomplish this task, all Combined Plan Partners developed easy-to-reference fact sheets to be compiled into a resource page accessible in the Mississippi Works Labor Exchange system. A strategic plan to distribute resources and provide training to One-Stop Center staff was developed and implemented by curriculum experts. Training resources are made available through the Mississippi Works Labor Exchange system to facilitate training at local offices.

### III. OPERATIONAL PLANNING ELEMENTS

#### 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).**

Mississippi's SWIB chair is appointed by the Governor, and the board works through a committee structure under the guidance of the Office of Workforce Development, AccelerateMS. Committees include an executive committee, several standing committees, and ad hoc committees created to address specific needs. Each member is involved in planning and implementing the State's workforce development strategy as required under both Federal laws. The board conducts face-to-face meetings and makes use of electronic communication between meetings. Meetings are posted on the SWIB website (swib.ms.gov).



The SWIB and AccelerateMS perform the following services for the Governor:

- Providing oversight and policy direction to ensure State workforce development activities are aligned and serving the needs of the State’s employers, incumbent workers, and jobseekers
- Developing, implementing, and modifying the State workforce development plan
- Reviewing statewide workforce policies, programs, and recommendations on actions to be taken by the State to align workforce development programs and funding to support a comprehensive and streamlined workforce development system
- Recommending measures for development and continuous improvement of the workforce development system in the State, including updating comprehensive State performance accountability measures (workforce success measures)
- Continuing to identify and disseminate information on promising practices in the area of workforce development
- Performing other related work that is required of the board by the Workforce Innovation and Opportunity Act (WIOA) or requested by the governor

## 2. IMPLEMENTATION OF STATE STRATEGY

### 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.**

*Mississippi Department of Employment Security – Title I, Title III, UI, TAA, Veterans, SCSEP*

MDES administers core programs and services for adults, dislocated workers, and youth (WIOA Title I) and core programs and services covered in the Wagner-Peyser Act (WIOA Title III). MDES also administers four additional Mississippi Combined Plan programs: Trade Adjustment Assistance (Title II-Chapter 2 of the Trade Act of 1974), services for veterans (Chapter 41 of Title 38 United States Code), programs authorized under state unemployment compensation law (Title 71 of the Mississippi Code of 1972), and Senior Community Service Employment Programs (Title V of the Older Americans Act of 1956).

*Core Program Activities to Implement the State’s Strategy*

WIOA Core Partners will continue the following activities to implement the state's seven goals:

1. WIOA Combined Plan Partners will jointly develop policies to coordinate service delivery with regard to WIOA Combined Plan programs through the SWIB.
2. To strengthen interagency partnerships, Core Partners will:
  - Support the co-enrollment of any Combined Plan Partner participant into Wagner-Peyser once the participant has received partner services and is referred for work or training-related services

- Continue support for, and further development of the Mississippi Works Common Intake and Reporting System to coordinate case management data across WIOA partners in consultation with the SWIB
  - Set policies to govern the 1) structure and service delivery model of One-Stop Center operations, and 2) the creation and operation of Comprehensive, Sector Training Plus, Digital Centers and Affiliate One-Stop Centers
  - Conduct training to ensure core program partner staff fully understand the Combined Plan programs and Career Pathway Models
  - Implement modifications to the Mississippi Works Labor Exchange that enable participants to access their Individualized Success Plans
  - Support integration efforts to interface with the Referral Hub to share data related to the intake of WIOA participants, delivery of services to WIOA participants, WIOA participant Individualized Success Plans, and electronic referrals to Combined Plan Partners
  - Act upon referrals received by Combined Plan Partners through the Referral Hub
  - Share system infrastructure costs
  - Continue outreach efforts to assist long-term unemployed and newly unemployed individuals
3. To develop defined, articulated pathways across educational sectors (K-16+) to create a pipeline for workforce, Core Partners will:
    - Modify the Mississippi Works Labor Exchange to generate a Work-Ready Report Card on the basis of workforce profile information, labor market information, and sector analysis data. The Work-Ready Report Card will enable direction of participants toward training aligned with employer labor market needs
    - Continue to support, develop, and promote MSGradJobs.com and MSTechJobs.com to connect four-year college and community college students with work opportunities
  4. To develop cross-program performance metrics, Core Partners will:
    - Work closely with the SLDS Governing Board to provide the data necessary for workforce analysis
    - Ensure that all participants receiving services create a profile in the Mississippi Works Labor Exchange
  5. Support integrated technology to meet the unified technology requirements of WIOA and other federal initiatives.
  6. Establish a plan to remain abreast of changing industry needs and the metrics to measure outcomes to realize the potential of the state's workforce programs and delivery systems, Core Partners will continue to participate in the SLDS, contributing workforce data and UI wage data necessary to address issues related to the production and valuation of human capital.
  7. To develop and communicate a unified vision and message, Core Partners will work together to align the following efforts and activities to the new state strategy, and integrate updated messaging throughout each as appropriate.

- System-wide efforts to increase awareness of the Mississippi workforce system among employers and job seekers
- Activities designed to market the state to prospective businesses
- Efforts designed to make students in K-16 aware of occupations and Mississippi career pathways
- Efforts to increase employer awareness of One-Stop Center employer services
- Efforts to increase awareness of the Mississippi workforce system among employers and job seekers
- Digital transformation activities

## **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.**

Mississippi Combined Plan Partners include workforce, education, and human services partners linked by a common data system. Even One-Stop Center and Youth operators in Mississippi make use of the Mississippi Works Labor Exchange to align with programs not explicitly included in the Combined Plan. This means that most alignment is achieved both programmatically, as partners outside the plan operate under required operational plans, and technologically, as all partners use the same case management system.

The few state partners that operate outside of Combined Plan Partners (e.g., career and technical education) align with partners at the local level through participation in LWDBs and at the state level through participation in the SWIB and the SLDS Governing Board. The SLDS Governing Board brings together all data-contributing workforce, human services, and education and training entities throughout the state to enable data-driven strategic planning.

In addition to coordinated alignment through boards, state agencies will continue fruitful point-to-point alliances. For example, MDES has partnered with the Mississippi Department of Corrections (MDOC) to address prisoner recidivism. MDOC operates pre-release and post-release occupational skills training programs to transition ex-offenders to the workforce. The MDOC/MDES partnership created the Employment Connections project designed to allow system-connected individuals who are nearing release to create a workforce profile in the Mississippi Works Labor Exchange that "goes live" upon release. As part of reentry activities, system-connected individuals are given a print-out with information for logging into the Mississippi Works Labor Exchange and finding the nearest One-Stop Center.

MDES has also formed relationships with individual educational institutions, including community colleges and public universities, to connect campus career centers with the Mississippi Works Labor Exchange through MSGradJobs.com and MSTechJobs.com. These systems keep Mississippi students informed about opportunities in in-demand occupations.

Alignment with Registered Apprenticeship Programs (RAP) takes place through the Mississippi Apprenticeship Program (MAP), which is operated by MDES' Office of Apprenticeship. MAP helps companies create or grow apprenticeship programs and, since 2016, has administered state funds to grow and sustain RAPs.

### 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.**

MDES plays a key role in the development and maintenance of this coordinated system, having taken the lead in developing the WIOA Referral Hub and in training One-Stop Center and Youth Providers to use the Mississippi Works Labor Exchange.

MDES-affiliated One-Stop Centers and Youth Providers are the key coordinating entities that conduct outreach and receive referrals for workforce assessment. These coordinating entities contact each participant and set appointments to assist individuals in registering in the Mississippi Works Labor Exchange. Through Wagner-Peyser services, MDES provides job search, referral, and placement services. MDES funds *adult training* programs administered by local workforce development boards based on the needs of each LWDA. To serve *dislocated workers*, MDES coordinates Rapid Response services that assist employers and employees affected by layoffs or plant closures. MDES serves *youth* through specially trained Youth Providers who connect youth to targeted youth programs, other eligible core programs, and education and training opportunities based on the specific needs of the individual. In addition, there are two employment outreach groups: Local Veterans Employment Representatives (LVER) and Disabled Veteran Outreach Specialists (DVOP). To fill job openings, LVER staff work directly with businesses, and DVOP staff work directly with unemployed or underemployed veterans.

As the administrative/fiscal agent for Title II Adult Education and Family Literacy Act (AEFLA) services, MCCB funds local programs to provide services to eligible individuals who are 16 years old, are not enrolled or required to be enrolled in secondary school under the MS Compulsory School Attendance Law, are basic skills deficient, do not have a secondary school diploma or its recognized equivalent, or are English language learners. AE serves as the Combined Plan Partner entry point for individuals who are basic skills deficient or lack a high school diploma. AE remediation is offered at 15 community college campuses, three public schools, and numerous correctional facilities. AE providers identify the most appropriate starting point for the participant.

MDRS works with MDHS and JVSG to serve participants with disabilities and leverage resources to serve more participants. MDRS does not operate a specific career pathway, but its local offices are often the entry point for Mississippi workers who require vocational rehabilitation services to access the labor market. As appropriate in the rehabilitation process, MDRS will refer the participant to a One-Stop Center or Youth Provider to perform a workforce assessment and direct the participant to an appropriate career pathway.

MDRS provides supportive services that will be included explicitly in Individualized Success Plans and coordinated with supportive services offered by other partners to avoid duplication. MDHS serves individuals and families through several economic assistance programs that address barriers to work such as food security, transportation, and childcare.

The TANF program, a Combined Plan Partner program, provides benefits for families with needy children under age 18. The TANF program is designed to help needy families achieve self-sufficiency through employment and training activities provided by the TANF Work Program (TWP). TANF supportive services, such as assistance with childcare and transportation expenses, are available to help adults in the family prepare for employment and to promote self-sufficiency. These supportive service enrollments will be transmitted to the WIOA Referral Hub to ensure that no other Combined Plan Partners provide overlapping services.

The Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) program provides access to the necessary skills, training, or experience to increase an eligible recipient's ability to obtain gainful employment. The services provided by the SNAP E&T program include case management services, a career assessment by a career and technical advisor, assistance with grant and scholarship applications, enrollment in career education and training programs, assistance with eligible tuition expenses not covered by federal or state grants or scholarships, participants support and barrier mitigation, and other education, training, work, and employment services.

MDHS provides Community Services Block Grant funding to Community Action Agencies across the state. These agencies have been encouraged to join their local WIOA offices to coordinate services in education, employment, and housing. These offices refer participants to other services in their local area if those services are not provided at their offices.

To support Mississippi's workforce, the MDHS Child Care Payment Program (CCPP), funded through the federal Child Care and Development Fund (CCDF), provides childcare subsidies to low income working parents and families. CCPP provides parents with incomes below 85% of the state median income vouchers to offset the high cost of childcare and after school services for children from birth to age 12. Parents must work and/or participate in workforce education/development programs in universities, colleges, community colleges, adult education programs, and other accredited trade schools. Parents choose the childcare provider that meets the needs of the family and has been approved by MDHS to provide childcare services. Core partner programs collaborate with local CBOs to strengthen outreach and awareness initiatives, overcome participation barriers, and customize support services for targeted populations. AccelerateMS has implemented this place-based strategy by providing funding to CBOs for the delivery of ARPA workforce services. This approach ensures a localized and effective implementation of programs to address the specific needs of their respective communities.

#### **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.**

MDES coordinates and aligns its services to employers through outreach efforts by their Business Service Team (consisting of MDES Business Relations staff members, WIN Job Center Managers, MDES Area Directors, WIOA staff, LVERs, staff from the Governor’s Job Fair Network, and other partner staff as needed) and through the Mississippi Works Labor Exchange. The Mississippi Works Labor Exchange empowers employers to explore labor matches through the candidate search function. Employers can find candidates who seem promising and target passive job seekers who may be interested in a career change. The interactive search allows employers to search for candidates by keyword, highest level of education, occupational experience, and proximity.

The Mississippi Works Labor Exchange also provides convenient tools for employers to manage the application process, including the ability to set interview times and the status of applications. Providing good tools to employers is a way to attract them to enter job orders into the system. Employers who list jobs provide an indication of what skills are in demand; this information, in turn, informs data-driven prioritization of training and workforce development activities. Workforce data of this type provide the hub around which the state’s economic success rotates because it becomes a primary source of actionable data. To encourage the entry of job orders into the Mississippi Works Labor Exchange, MDES has developed a business relations team charged with recruiting businesses to post job listings through MDES and Mississippi Works.

MCCB coordinates AE courses through a variety of local providers. Some courses are sponsored by employers and conducted at employer worksites. Local employers also often serve as a source of initial referral of an employee to AE classes.

MDRS works with employers to determine needs for open positions. MDRS uses this information to put together a mix of training and assistive technologies that enable participants to meet job demands. In addition, MDRS coordinates on-the-job training with employers and provides the training that enables an existing worker or trainee to use assistive technologies or other accommodations to fulfill job requirements.

MDHS staff engage employers directly. This engagement takes the form of direct contact with employers to check on job openings and the efforts of county directors to form relationships with community employers who are able to hire TANF or SNAP recipients with work requirements. MDHS works with MDES to enter local job openings into the Mississippi Works Labor Exchange and refer work-eligible SNAP or TANF recipients to these openings via the system to ensure that records of these labor matches are captured by the system and thus available to inform ongoing labor market research.

## **E. Partner Engagement with Educational Institutions**

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

MDES - MDES has begun creating a job-driven education and training system by aligning the training services it provides to youth and adults under WIOA Title I with the skills-based training provided by community colleges. Often this alignment occurs through Affiliate One-Stop Centers, which are organized and administered by community colleges. These Affiliate One-Stop Centers use the Mississippi Works Labor Exchange to administer individual training accounts and record WIOA services into which trainees are enrolled.

Mississippi's career and technical education schools, largely consisting of public community colleges, also contribute to the state's job-driven education and training system by implementing the Smart Start Pathway Course, an intensive course that combines foundational skills necessary to meet employer needs, such as work environment expectations, with training necessary to attain work-readiness credentials. Although the Smart Start course was originally designed to support acquisition only of foundational or basic skills, it has grown to be one component of a more full-orbed work-readiness certificate recognized as a credential. These educational institutions and the MCCB as a whole, will also continue to work with local AE providers in order to align the AE services, such as high school equivalency programs, with the career training provided by its 15-member community colleges. Through these partnerships, Mississippi will offer a robust system of easily accessible AE programs, career and technical education programs, and workforce programs.

**MDRS** – MDRS supports the state's job-driven education and training system by providing eligible students with transition counselors and special education teachers. This outreach helps create pathways from education to work by arranging internships and other transitional employment for students with special needs prior to graduation.

**MDHS** – MDHS works directly with community colleges to support the state's job-driven education and training system by reconnecting SNAP recipients with the labor market. MDHS coordinates the use of SNAP E&T funds to support approved training activities designed to connect participants with work. MDHS refers work-eligible TANF and SNAP recipients to One-Stop Centers or Youth Providers for assessment and then connects them with pathways that lead to training through AE partners, community colleges, public universities, or other training providers.

## **F. Partner Engagement with Other Education and Training Providers**

**Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.**

**MDES** - MDES supports the work of LWDA's by maintaining an electronic Eligible Training Provider List (ETPL) that establishes an approved list of service providers that may receive Title I (Youth, Adult, and Dislocated), TAA, SCSEP, and other training funds to serve customers enrolled in MDES programs. All local One-Stop centers use the Mississippi Works Labor Exchange to administer training accounts and record training services provided to participants by eligible training providers. In addition, the MDES Mississippi Works Labor Exchange will be modified to provide self-service training discovery to customers, with links to training information for all occupations allowing a participant to see, in the context of viewing a job order, what kind of training courses will be appropriate for the given job.

The database supporting this self-service feature will contain all relevant providers, including community colleges, private training institutions (e.g., commercial truck driving training programs), and institutions of higher learning. MDES engages with training providers on the ETPL lists as partners in the state's workforce development ecosystem. Many of the training providers are community colleges and MDES has established affiliate One-Stop centers that enable the provider to deliver workforce services on campus. For private providers on the ETPL list, MDES partners with these training entities to receive quarterly data required to calculate performance metrics. While there are few eligible providers that are not public institutions, private providers that

deliver training such as commercial driving instruction are valued partners. At the local level coordination between One-Stop staff, participants, and the provider ensures that training needs, driven by the LWDA's sector strategy, are met.

**MCCB** – The MCCB member colleges are listed in the MDES ETPL demonstrating job-driven services through structured training courses leading to a post-secondary credential. Each community college works directly with WIOA partners and LWDA's to determine eligibility and approval to allow direct contracts for services and individual training accounts (ITA) through Title I, TANF recipients, SNAP E&T participants, and participants receiving rehabilitation services. By attending LWDA's regular meetings, the MCCB member colleges have the opportunity to develop relationships with representatives from the LWDA's employers, elected representatives, and other WIOA agency community partners ensuring the area's sector strategy, and the occupational demand drives prioritization of training and investment.

**MDRS** - MDRS works directly with community colleges and other specialized training providers to provide occupational training for participants enrolled in rehabilitative services. MDRS participants enrolled in WIOA Title I training will receive training through courses listed in the MDES ETPL based on labor market needs in each local area. Training funded by PELL, TANF, or other partner funds may come from any provider meeting MDRS policies. MDRS works closely with local community rehabilitation programs that provide vocational assessment, job training, and actual work experience for MDRS customers. These programs build relationships with local employers and then drive training and education activities based on employer need to ensure that trainees gain appropriate skills for employment.

**MDHS** - MDHS works directly with community colleges and other training providers, including the MCCB/AE, to provide occupational training for participants enrolled in TANF. TANF participants enrolled in WIOA Title I training will receive training through courses listed in the MDES ETPL based on labor market needs in each local area. Through the SNAP E&T program, some SNAP recipients will receive training through participating community colleges that combine necessary (soft skills) training with occupational training. Training funded by PELL, TANF, or other partner funds may come from any provider meeting MDHS's policies.

## **G. Leveraging Resources to Increase Educational Access**

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

MDES's community college Affiliate One-Stop Centers will leverage WIOA training funds, Pell Grants, and other supportive services provided by Combined Plan Partners as indicated on the participant's Individualized Success Plan.

AE funding is distributed according to the targeted needs of an area and the number of people without a high school diploma. Funding for AE programs is provided through a competitive grant award and is based on the annual appropriation from the Department of Education, Office of Career, Technical, and Adult Education. Grantees are aligned with system-wide goals and labor market needs of local program areas and have the capability to provide Smart Start Pathway Course services throughout the state.



AccelerateMS provides funding for approved training programs through the state's WET fund, a state funding source derived from employer unemployment insurance taxes.

MDRS leverages a variety of funds to better serve the training and education needs of participants. Sources of leveraged funds include participant health insurance, Medicaid waiver programs, Pell Grants, WIOA Title I individual training accounts (ITA), Social Security insurance, Social Security disability insurance, and WIOA partner funds through Temporary Assistance for Needy Families (TANF).

MDHS will assist work-eligible SNAP or TANF recipients who enroll in approved training programs to leverage WIOA Title I, Pell, E&T Matching Funds, and other training resources to support training.

## H. Improving Access to Postsecondary Credentials

**Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.**

The number of jobs requiring at least some postsecondary education or training is growing. Strategies to improve access to postsecondary credentials are described below, organized by agency partner. LWDBs will identify strategies for credential attainment based upon area employer requirements. Once the needs of the employers are identified, pathways to meet those needs are established to include:

- Leveraging the DOL Quick-Start Tool Kit and pre-apprenticeship guide to establish a RAP with the employer and foster community support
- Identifying one-stop customers meeting the minimum criteria to immediately be enrolled into a RAP
- Facilitating the transition of the one-stop customer from the soft skills and pre-vocational training into a RAP, an employer provided On the Job Training (OJT) program, full- or part-time employment, or additional occupational training
- Provision of a national DOL certificate of completion that follows apprentices anywhere in the United States

For participants who require a postsecondary credential to attain a career goal, MDRS will develop an Individualized Success Plan that captures the supportive services, partner referrals, and any MDRS-specific addenda required to achieve the goal. In line with informed participant choice, MDRS will then refer the participant for workforce evaluation at a One-Stop Center or Youth Provider to help develop the participant's Individualized Success Plans further and create a pathway referral moving the participant closer to attaining the credential.

Supportive services provided under TANF will enable work eligible TANF recipients to overcome barriers to training, and will help recipients earn high school equivalency, Career Readiness Certificates, or other AE credentials. Supportive services provided under SNAP will likewise enable work-eligible SNAP recipients to overcome barriers to training and help recipients earn high school equivalency, Career Readiness Certificates, or other AE credentials, as well as career-technical education or workforce skills. Two MCCB member community colleges operate Affiliate One-Stop Centers that coordinate with MDES through the use of the Mississippi Works Labor Exchange to provide Adult, Youth, and Dislocated Worker training.

Launched in 2017, educational program [Complete 2 Compete](#) aims to increase the number of Mississippians with postsecondary credentials by identifying students who either have completed enough credits to qualify for an associate degree or are on the cusp of completing a degree. Many postsecondary and adult learners with their sights set on a four-year degree don't realize that they've already earned enough credits for a credential. Under the program, more than 28,000 students already qualify to receive an associate degree without any further education or training.

In October 2020, the Mississippi Education Achievement Council adopted a post-secondary attainment goal for the state. This initiative, *Ascent to 55* aims to create a college-going culture, remove barriers to access for underrepresented populations, increase college preparedness, and ensure high school students enroll in and succeed in postsecondary education. Mississippi aims to increase the postsecondary attainment of its workforce to 55% by 2030 and 60% by 2035.

The *Ascent to 55%* initiative provides Mississippians with resources to prepare themselves for better jobs. The goal is simple: to help Mississippi workers get the training and education needed to earn an industry-recognized credential or college degree from a community college or university.

### *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.*

**AccelerateMS:** AccelerateMS will lead all activity via the development of a state-wide strategy based on an economic analysis of the state's largest industries and biggest growth opportunities compared to a labor market analysis showing existing skills and skills gaps. This strategy will also dictate state goals and objectives and define tactics for meeting them. The WIOA plan is a key part of this strategy.

**MDES:** MDES will coordinate with economic development strategies by supporting the Mississippi Development Authority's (MDA) efforts to market the state workforce system to prospective businesses. This support may take the form of live demonstrations of the Mississippi Works Labor Exchange or of responding to ad hoc data analysis requests designed to demonstrate the regional availability of workers with specialized skills.

MDES will also continue to provide workforce and unemployment insurance data to the State Data Clearing House to enable sector and pathway analysis that will guide the activities of local workforce development boards to align training goals with regional needs.

**MCCB:** - The MCCB and its member community colleges participate directly in efforts by MDA to recruit prospective businesses to Mississippi by developing specialized work training programs leading to credentials that meet the needs of targeted sectors. Institutions then coordinate with MDES to ensure that applicants receive credit for these credentials within the Mississippi Works Labor Exchange when applying to partner employers.

**MDRS:** MDRS will coordinate with economic development strategies by assisting MDA projects and providing technical assistance in accessibility assessments to prospective employers of workers with disabilities.

**MDHS:** MDHS will coordinate with economic development strategies by supporting training and education pathways for TANF and SNAP recipients that meet SWIB sector priorities.

## **b. STATE OPERATING SYSTEMS AND POLICIES**

### **A. State Operating Systems that Support Coordinated Implementation of State Strategies (e.g. labor market information systems, data systems, communication systems, case-management systems, job banks, etc).**

#### **Describe the state operating systems used to support coordinated implementation.**

Mississippi's Combined Plan Partners currently use a variety of agency-specific data systems to manage service delivery and case management data. Every Combined Partner data system shares data regularly with SLDS for retrospective analysis and with the WIOA Referral Hub that enables real-time partner data integration.

Combined Plan Partner data systems that are integrated include, by agency:

**MDES:** The Mississippi Works Labor Exchange is the current workforce management software system used by MDES to administer, track, and report case management activities for Title I Adult, Dislocated Worker, and Youth services; Title III Wagner-Peyser services; Senior Community Service Employment Program services (SCSEP); Trade Adjustment Assistance (TAA) services; Jobs for Veterans State Grants Program services; and other workforce services.

In addition, MDES administers the state Unemployment Insurance system using ReemployMS, a web application. Currently, Mississippi Works and ReemployMS integrate to 1) ensure that participant contact information remains updated in both systems, 2) allow ReemployMS to fetch job matches for unemployment insurance benefits recipients, 3) allow workforce staff using the Mississippi Works Labor Exchange to access the UI status of a participant, and 4) allow workforce staff to log into both applications with one set of credentials (single sign-on).

**MDRS:** MRDS, OVR, and OVRB administers vocational rehabilitation services using a commercial software package, AwareVR, created by Alliance Enterprises. This modern web application allows for complete program-specific case management of OVR/OVRB participants. AwareVR supports web services and connects in real time to the WIOA Referral Hub.

**MCCB:** The MCCB, OAE currently administers AE services via the Literacy, Adult and Community Education System (LACES), a web-based software system created by Literacy PRO Systems, specifically for Title II, Adult Education programs. The system allows the OAE and its local providers to enroll students and track performance outcomes. In addition, the system allows the OAE to spot poorly attended classes before funds are spent inefficiently on instruction for classes with few students. The OAE uses a state-developed system, Mississippi Adult Education (MAE), to connect to the WIOA Referral Hub.

**MDHS:** MDHS administers the TANF program through several legacy applications, including MAVERICS and JAWS. MAVERICS supports case management data such as intake and eligibility information, and JAWS supports TANF Work Program data. While these systems do not support web services, the new MDHS WIOA Hub Module allows for data exchanges with the WIOA Referral Hub.

Mississippi Works technology consists of several systems with complementary roles.

**Mississippi Works Labor Exchange:** The Mississippi Works Labor Exchange is a web system used by MDES agency staff, job seekers, and employers to coordinate all DOL programs such as Wagner-Peyser, Youth Services, Adult and Dislocated Worker Services, Trade Adjustment Assistance, and others. The Mississippi Works Labor Exchange already supports the calculation of common participation periods across what have become WIOA Title I, WIOA Title III, and Trade-related programs. The system also disseminates labor market information.

**MDES/MDOC Employment Connections:** The Employment Connections system allows system connected individuals nearing release from MDOC facilities to create a pending workforce profile in the Mississippi Works Labor Exchange that “goes live” when the individual is released. As part of exit activities, the profile is entered into the Mississippi Works Labor Exchange, and the individual is given a reentry packet detailing his or her Mississippi Works Labor Exchange username and password along with the address of the nearest One-Stop Center.

## **B. Data-Collection and Reporting Processes Used for All Programs and Activities, Including Those Present in One-Stop Centers**

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

Data collection for all programs and activities will be accomplished through the integration of partner systems within the WIOA Referral Hub. Real-time data sharing from partner systems to the WIOA Referral Hub automates the sharing of case management data and will allow for real-time labor market analysis.

Under the leadership of AccelerateMS agencies will continue to further integrate their systems with the WIOA Referral Hub until all workforce data is shared in real time. Data sharing for reporting purposes will be conducted according to the clear set of rules developed by the SLDS Governing Board that ensure data integrity, security, confidentiality, and privacy.

Appendix B contains complete rules for data sharing under the SLDS. A summary of the procedures relevant to data sharing for reporting purposes is that novel requests for reports that involve data from multiple state agencies are sent to the entire SLDS governing board either through an expedited or standard review process. In the case of WIOA federal reporting, often these requests involve aligning participant data from agency administrative data with outcomes in education data and wage data. A single report may result in the need to align data from three or even four WIOA strategic and core partners. Ongoing reports of this type become “standing reports” that do not require subsequent review. The methodology for creating federal reports that require data sharing is approved by the governing board once and then carried out as needed when partners engage in quarterly or annual reporting.

## **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 PROGRAM’S CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM.**

To guide the establishment, implementation, and maintenance of quality workforce development services, the state has developed policies that outline legislative, regulatory, and service quality requirements within Mississippi’s workforce system. Core agency policies and systems will comply with data collection, reporting processes, information management, integrated service delivery, and performance management requirements outlined by WIOA and respective federal and state legislation. As the primary developer of WIOA-related state policies, MDES develops state policies and related communication plans. MDES disseminates these documents to local workforce development boards where they guide the implementation process at the LWDA level. The state will continue to encourage coordination among WIOA Combined Plan and Strategic Partner agencies to strengthen the alignment between the Governor’s vision and the strategies needed to meet that vision.

The One-Stop Certification Policy includes a checklist that all centers must adhere to including partnerships function at the site and the roles of each core partner. This checklist includes requirements for providing services including enrollments for all available services for which the customer is eligible (i.e., co-enrollment) as well as making certain that regardless of the services requested, the customer can obtain all eligible services through a single application (i.e., universal intake). The One Stop Certification Policy can be reviewed in its entirety in Appendix N or at the following link: [WIOA-2022-Appendix-N-Policy-16-One-Stop-Certification.pdf \(acceleratems.org\)](https://www.acceleratems.org/WIOA-2022-Appendix-N-Policy-16-One-Stop-Certification.pdf).

To establish funding guidelines for partner contributions to the One-Stop delivery system, partners develop a unified business plan, in coordination with LWDBs, that specifies formula or procedures for funding coordinated delivery of services to participants. These documents specify how an individualized business plan will be developed to accompany each participant’s individual WIOA Success Plan when such a plan involves services from more than one Combined Plan Partner. Appendix J contains the Office of the Governor’s guidelines for the creation of LWBD WIOA plans. Each local board is required to describe how service delivery will be coordinated across all Combined Plan Partner programs at the local level in accordance with labor market realities and development goals. In addition, local boards describe how funds will be allocated in accordance with the business plan and how funds are allocated to support shared infrastructure costs.

*Infrastructure Funding Agreement (IFA)*: WIOA requires the agreed upon contributions towards infrastructure costs by each one stop-partner to be memorialized in an IFA between the LWDB or its designee and all WIOA-required one-stop partners and any additional partners. For the purpose of affiliate and specialized centers, only the LWDB or its designee and those partners participating in the operation of that center are required to enter into the IFA for that particular center.

### 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.**

Workforce development activities in Mississippi have been on a decades-long trajectory toward cooperation and partnership. State leadership has successfully encouraged a unified, jobs-focused approach to workforce and reemployment services by its creation of and support for the Mississippi Works network of partners, technologies, and services and now, through the creation of AccelerateMS, to further focus efforts on enhancing the skills of Mississippi's workforce. The current agency structure has produced notable agency-to-agency partnerships such as the MDES/MDOC Corrections Connection job search program for system connected individuals. WIOA implementation has provided an opportunity to enrich those connections.

Figure 14 depicts the state agency structure under which workforce-related services are administered by the agencies that will be Combined Plan and Strategic Partners under WIOA.

The Governor appoints the chair of the SWIB.

The SWIB appoints the executive director of the Office of Workforce Development, AccelerateMS.

The Governor appoints the executive directors of MDOC, MDA, MDHS, and MDES.

MCCB, MDRS, and MDE are governed by separate boards that appoint each agency's executive director.

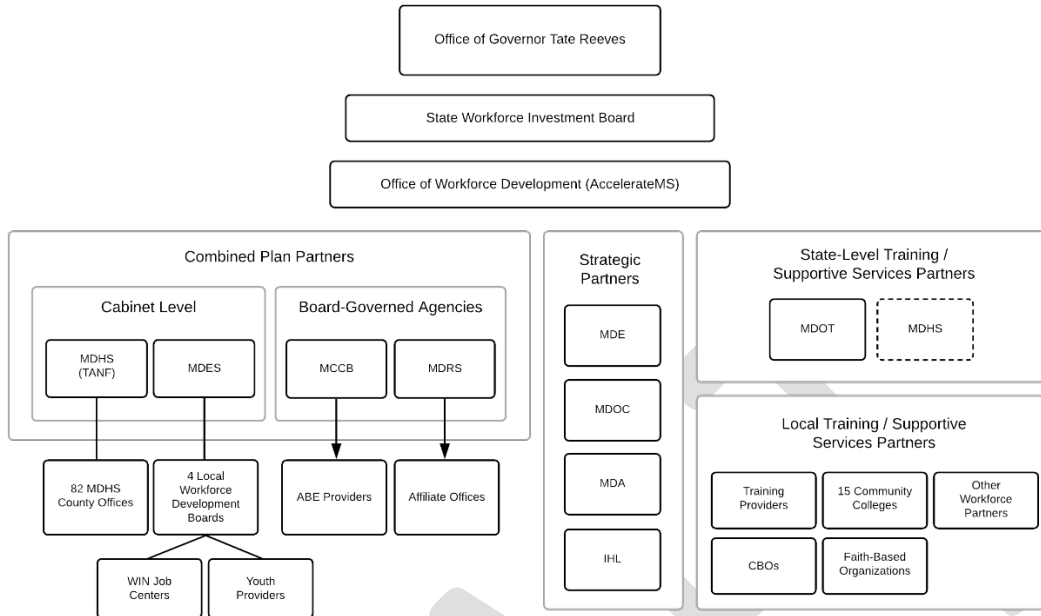
The MCCB OAE offers AE services through its 15 member colleges and local programs approved through a formal request-for-application process.

MDRS provides services to the community via a combination of its own offices and through contracting organizations.

MDHS provides services to individuals and families through a network of 82 county offices.

MDOC manages a network of state and private correctional facilities.

Figure 14: State Agency WIOA Organization



## B. State Board

Mississippi's SWIB consults with the Governor's Office to establish and promote state workforce priorities in consultation with Combined Plan Partners. The SWIB is also responsible for ensuring that Mississippi's Combined Plan is executed as well as reviewing and approving any agency-specific regulations created by partners that may impact WIOA Combined Plan programs.

### i. Membership Roster

**Provide a membership roster for the State Board, including members' organizational affiliations.**

State Workforce Investment Board Roster						
	Last Name	First	Representing	Required		May Include
<b>Governor</b>						
<u>1</u>	<u>Windham</u>	<u>Kristen Powe</u>	<u>Governor or Designee</u>	<u>X</u>	<u>(1)(A)</u>	-
<b>Member of each chamber of State Legislature (non-voting)</b>						

<u>2</u>	<u>Bell</u>	<u>Donnie</u>	<u>State Representative</u>	<u>X</u>	<u>(1)(B)</u>	-
<u>3</u>	<u>Parker</u>	<u>David</u>	<u>State Senate</u>	<u>X</u>	<u>(1)(B)</u>	-
<b>Business - Must have policy making or hiring authority</b>						
<u>4</u>	<u>McNair</u>	<u>Fontaine</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(II)</u>	-
<u>5</u>	<u>Waller</u>	<u>Scott</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<u>6</u>	<u>Parish</u>	<u>Nic</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(II)</u>	-
<u>7</u>	<u>Diaz</u>	<u>Pablo</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<u>8</u>	<u>Howell</u>	<u>Frank</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<u>9</u>	<u>Harrigill</u>	<u>Monica</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(I)</u>	-
<u>10</u>	<u>Jones</u>	<u>JR</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(I)</u>	-
<u>11</u>	<u>Bonds</u>	<u>Brad</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(II)</u>	-
<u>12</u>	<u>Luse</u>	<u>Christi</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<u>13</u>	<u>McKay</u>	<u>John</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<u>14</u>	<u>Morgan</u>	<u>Bobby</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(I)</u>	-
<u>15</u>	<u>Sullivan</u>	<u>Patrick</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<u>16</u>	<u>Swanson</u>	<u>John Brent</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(I)</u>	-
<u>17</u>	<u>Hipp</u>	<u>Laura</u>	<u>Business and Industry</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<u>18</u>	<u>Flanagan</u>	<u>Jim</u>	<u>Economic Development</u>	<u>X</u>	<u>(C)(i)(III)</u>	-
<b>Labor and Apprenticeship - 20% required. May include CBO and Youth</b>						
<u>19</u>	<u>Johnson</u>	<u>Darius</u>	<u>Joint Apprenticeship</u>	<u>X</u>	<u>(C)(ii)(I)</u>	-
<u>20</u>	<u>Christian</u>	<u>Sondia</u>	<u>Apprenticeship</u>	<u>X</u>	<u>(C)(ii)(II)</u>	-



<u>21</u>	<u>Morgigno</u>	<u>Ray</u>	<u>Youth</u>	-	<u>(C)(ii)(IV)</u>	<u>X</u>
<u>22</u>	<u>Towner</u>	<u>Valmadge</u>	<u>Youth</u>	-	<u>(C)(ii)(IV)</u>	<u>X</u>
<u>23</u>	<u>Rankins</u>	<u>Al</u>	<u>Youth</u>	-	<u>(C)(ii)(IV)</u>	<u>X</u>
<u>20</u>	<u>Beasley</u>	<u>Jackie</u>	<u>Community Based Organization</u>	-	<u>(C)(ii)(III)</u>	<u>X</u>
<b>Core Programs</b>						
<u>21</u>	<u>Howard</u>	<u>Chris</u>	<u>Dept. of Rehab,</u>	<u>X</u>	<u>(C)(iii)(aa)</u>	-
<u>22</u>	<u>Stewart</u>	<u>Robin</u>	<u>MDES, WP/WIA/Trade/UI/SCSEP/VET</u>	<u>X</u>	<u>(C)(iii)(aa)</u>	-
<u>23</u>	<u>Anderson</u>	<u>Bob</u>	<u>MDHS- TANF</u>	<u>X</u>	<u>(C)(iii)(aa)</u>	-
<u>24</u>	<u>Smith</u>	<u>Kell</u>	<u>MCCB -Adult Basic Ed.</u>	<u>X</u>	<u>(C)(iii)(aa)</u>	-
<b>Chief elected officials City and County 1 from each</b>						
<u>25</u>	<u>Baxter</u>	<u>Trey</u>	<u>MS Association of Supervisors</u>	<u>X</u>	<u>(C)(iii)(bb)</u>	-
<u>26</u>	<u>McAdams</u>	<u>Carolyn</u>	<u>Mayor</u>	<u>X</u>	<u>(C)(iii)(bb)</u>	-

**ii. Board Activities**

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

The SWIB hold yearly face-to-face meetings and conducts additional business electronically. AccelerateMS has been tasked by the SWIB to implement and modify Mississippi’s Combined Plan and convening of meetings with all required partners and stakeholders. The SWIB consults with the Governor to ensure the transparent execution of Mississippi’s Combined Plan seeking input from representatives of local boards, chief elected officials, businesses, representatives of labor organizations, CBOs, adult and youth education and workforce development providers, institutions of higher education, disability service entities, youth-service programs, and other stakeholders including the public.

Other SWIB activities include coordinating economic and workforce data analysis activities with the SLDS Governing Board to ensure that local economic developers have access to detailed information to formulate sector strategies in local areas. SLDS was created to help meet data needs for reporting requirements and to answer critical policy questions relevant to education, workforce, and economic development. The Governing

Board for the system consists of the executive directors of all data-contributing agencies in Mississippi, all of which are either Combined Plan Partner agencies or Strategic Partner agencies under WIOA.

SLDS plays an integral role in combined WIOA reporting. Because all Combined Plan Partners currently contribute data to SLDS, and because SLDS was created, in part, for the purpose of assisting state agencies with reporting and strategic planning, Mississippi will be able to meet its reporting requirements efficiently. Further, SLDS will play a continuing role in the Mississippi Works Smart Start Career Pathway model by coordinating with the SWIB to produce a state WIOA system reporting page on the Lifetracks.ms.gov website that contains dashboard statistics, pathway analysis, and supply/demand analysis numbers that will enable state and local economic development professionals to organize all career pathway training around data-driven sector strategies in labor sheds that often cross LWDA boundaries.

SLDS is built upon the clearinghouse model that relies on strong partnerships and coordination between strategic partners. Mississippi's data clearinghouse is the National Strategic Planning and Analysis Research Center at Mississippi State University, NSPARC. The clearinghouse includes data from early childhood entities (e.g., Head Start); MDE; all 15 community colleges and the MCCB; all eight public universities and the IHL; MDES; MDHS; MDRS; MDOC; MDA; Mississippi State Department of Health (MSDH); and Mississippi Division of Medicaid (DOM).

The clearinghouse includes data from 2000 to the present. Partners regularly transmit data through a secure transfer according to SLDS Governing Board rules and regulations and via memoranda of understanding (MOUs). The state data clearinghouse developed and manages Mississippi's online SLDS reporting system, (www.lifetracks.ms.gov). All data are stored in a state-of-the-art data center built for managing large databases and hosting mission critical systems. The Mississippi SLDS also has access to one of the most powerful computing systems in the country for high-performance computations and complex modeling.

## 4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP 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.**

Mississippi's climate of data cooperation enables a smooth implementation of WIOA program assessment and reporting requirements.

The agency administering each Combined Plan Partner program is expected to negotiate performance targets with its federal office. AccelerateMS will review performance targets to ensure partners are effectively moving the state toward workforce development goals established by the SWIB. Data will be collected from Combined Plan Partners and compiled into an annual report and used by AccelerateMS to evaluate the workforce system. This report will include demographics, the state's workforce participation rate, and training outcomes by target industry sectors.

LWDBs negotiate performance targets with the state. Negotiations take into account local and regional ecosystem labor market information and planning goals. LWDB performance is monitored regularly to ensure they are contributing to overall state goals.

All Combined Plan Partners provide data required for WIOA federal reporting and local workforce development boards. Additionally, the SWIB may establish other metrics to be used internally for strategic planning. A common participation period occurs when an individual is co-enrolled in more than one WIOA core program. Under these conditions, the individual's performance will be reflected in reporting for all appropriate programs two and four quarters after exit.

Based on legislation and rules, WIOA reporting involves tracking data needed to compute eight primary indicators:

- Percent employed 2nd quarter after exit (Adult)
- Placement in employment or education 2nd quarter after exit (Youth)
- Percent employed 4th quarter after exit (Adult)
- Placement in employment or education 4th quarter after exit (Youth)
- Median earnings 2nd quarter after exit (all programs)
- Credential attainment up to one year after exit (all programs except Wagner-Peyser)
- Measurable skill gains (all programs except Wagner-Peyser)
- Effectiveness in serving employers (all programs)

Several indicators rely on the concept of the "exit" that, under current DOL regulations, occurs when an enrolled participant goes 90 days without receiving a service under a relevant program. The SLDS will assist all WIOA partners in calculating these indicators.

## **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.**

Assessment of One-Stop Partner programs will take place according to 1) WIOA performance measures and 2) specific longitudinal measures of socioeconomic mobility and program effectiveness set by the SWIB. Data for assessment will initially be provided through a coordinated schedule of data transfers to the SLDS. Once all coordinated technologies are able to submit real-time data to the WIOA Referral Hub an assessment of all partner programs will occur in near real-time.

Assessment of One-Stop Partner programs is also conducted in accordance with the One-Stop Certification policy and the Memorandum of Understanding established among partner programs. The policy can be accessed with this link <https://acceleratems.org/wp-content/uploads/WIOA-2022-Appendix-N-Policy-16-One-Stop-Certification.pdf>

### 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.**

Assessment results, based on WIOA performance measures, were computed for 1) all WIOA core programs, 2) Unemployment Insurance, and 3) Temporary Assistance for Needy Families (TANF). Employer retention was computed as a percentage of those employed in Q2 who had the same employer in Q4. Table 15 contains the results for fiscal year 2022, and Table 16 contains results for fiscal year 2023. These two fiscal years are the most recent years available based on wage data and the need to calculate measures four quarters from participant exit.

Table 15: Assessment Results of Combined Plan Programs, FY 2022 (July 1, 2021-June 30, 2022)

	Quarter 2 Employment	Quarter 4 Employment	Quarter 2 Earning	Credential Attainment Rate	Skill Gain Rate
	(%)	(%)	(\$)	(%)	(%)
UI	67.8	70.1	\$5,195	28.3	77.7
MDRS	49.6	49.6	\$6,113	18.8	76.9
ABE	50.8	51.2	\$3,241	13.4	48.4
TANF	57.8	57.8	\$2,517	---	---
WIOA Adults	87.8	86.3	\$7,362	63.1	59.9
WIOA Dislocated Workers	74.8	75.1	\$6,315	61.6	58.1
WIOA Youth	82.9	80.2	\$3,242	82.8	76.6
Wagner-Peyser	75.5	73.2	\$5,537	-	-

\*: This data is preliminary, which may be revised.

---: Value is suppressed due to small sample size.

Table 16: Assessment Results of Combined Plan Programs, FY 2023 (July 1, 2022-June 30, 2023)

	Quarter 2 Employment	Quarter 4 Employment*	Quarter 2 Earning	Credential Attainment Rate	Skill Gain Rate
	(%)	(%)	(\$)	(%)	(%)
UI	71.1	69.9	\$6,174	32.0	76.1
MDRS	51.0	49.4	\$6,152	25.9	69.5
ABE	49.1	47.5	\$3,534	13.0	40.4
TANF	60.9	60.9	\$2,350	---	---
WIOA Adults	90.0	89.4	\$7,699	73.4	71.6
WIOA Dislocated Workers	79.5	79.3	\$6,868	76.6	69.3
WIOA Youth	88.3	85.7	\$3,390	71.6	74.7
Wagner-Peyser	80.4	78.8	\$5,981	-	-

\*: This data is preliminary, which may be revised.

---: Value is suppressed due to small sample size.

During the period covered by this performance analysis, MDES had already completed a transition to viewing all of its programs in the context of employment services. All participants registering for Unemployment Insurance benefits, Adult services, Dislocated Worker services, and Youth services joined Wagner-Peyser participants in completing a workforce profile in the Mississippi Works Labor Exchange as a part of overall agency intake. Employment performance measures for Q2 and Q4 demonstrate the benefits of the reemployment mindset in producing consistently good employment outcomes for participants in programs that partner with employment services.

These performance results emphasize the positive impact on employment that may be realized through partnership strategies that involve participants in any state workforce or supportive program with concurrent reemployment activities.

## **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.**

Evaluations and research projects conducted within or across WIOA core programs will be coordinated by AccelerateMS, local boards and state agencies through the SLDS Governing Board. See Appendix B for rules governing the work of the Mississippi SLDS board. Appendix B can be accessed at the following link: [https://acceleratems.org/wp-content/uploads/WIOA\\_2022\\_Appendix\\_B.pdf](https://acceleratems.org/wp-content/uploads/WIOA_2022_Appendix_B.pdf).

## **5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS**

### **A. For Title I Programs**

#### ***i. Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)***

Funds will be distributed according to WIOA requirements along with factors developed by the SWIB. These additional factors will be developed to ensure that funds are allocated in accordance with the Mississippi Works Smart Start Career Pathway Model and the implementation of the One-Stop Center system. LWDAs will also be required to develop a business plan that clearly outlines how funding streams from multiple programs will be aligned with the activities of the Mississippi Works Smart Start Career Pathway Model. As a result, Mississippi job seekers from every part of the state will have the opportunity to take advantage of an efficient, coordinated, and tailored workforce system.

The MDES Office of Grant Management writes a WIOA Communication each year to inform the LWDAs of the distribution of funds for Title I programs serving youth, adult, and dislocated workers. Funds are distributed through the Notice of Funds Availability process in the Mississippi Works GranTrak financial tracking module.

Appendix H provides a sample WIOA Allocation Communication, [https://acceleratems.org/wp-content/uploads/WIOA\\_2022\\_Appendix\\_H.pdf](https://acceleratems.org/wp-content/uploads/WIOA_2022_Appendix_H.pdf).

***ii. Adult and Training Activities in Accordance with WIOA Section 133(b)(2) or (b)(3)***

MDES Office of Grant Management writes a WIOA Communication each year to inform the LWDA's of distribution of funds for Title I programs serving youth, adult, and dislocated workers. Funds are distributed through the Notice of Funds Availability process in the MS Works GranTrak financial tracking module. Appendix H provides a sample WIOA Allocation Communication, [https://acceleratems.org/wp-content/uploads/WIOA\\_2022\\_Appendix\\_H.pdf](https://acceleratems.org/wp-content/uploads/WIOA_2022_Appendix_H.pdf).

***iii. Dislocated Worker Employment and Training Activities In Accordance with WIOA Section 133(b)(2) and Based on Data and Weights Assigned***

The MDES Office of Grant Management writes a WIOA Communication each year to inform the LWDA's of distribution of funds for Title I programs serving youth, adult, and dislocated workers. Funds are distributed through the Notice of Funds Availability process in the MS Works GranTrak financial tracking module. Appendix H provides a sample WIOA Allocation Communication. Appendix H can be accessed at the following link: [WIOA\\_2022\\_Appendix\\_H.pdf \(acceleratems.org\)](https://acceleratems.org/wp-content/uploads/WIOA_2022_Appendix_H.pdf).

**B. For Title II Programs**

***i. Describe How The Eligible Agency Will Award Multi-Year Grants or Contracts on a Competitive Basis to Eligible Providers in the State, Including How Eligible Agencies Will Establish That Eligible Providers Are Organizations of Demonstrated Effectiveness***

The MCCB OAE is the state's eligible agency for adult education and family literacy services.. The OAE is responsible for administering funds to eligible providers and providing program/performance oversight to grantees. The OAE will provide funding to eligible local entities for the provision of AE services through a competitive Request for Proposals (RFP) process. The RFP is the mechanism through which the OAE will identify, assess, and award multi-year grants to eligible providers throughout the state.

To meet the standard of demonstrated effectiveness an applicant must provide evidence of two program years of performance data on its record in improving the literacy skills of eligible individuals, in particular individuals who are basic skills deficient in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the application for funds.

To be considered eligible, an applicant must also provide information regarding its outcomes for participants related to employment, attainment of a secondary school diploma or its recognized equivalent, and transition to post-secondary education and training.

Applicants applying as a consortium are required to provide evidence of demonstrated effectiveness and submit performance data for each entity that is a member of the consortium.

An eligible provider is an organization that has demonstrated effectiveness in providing AE activities to eligible individuals and may include:

- A local education agency
- A community-based or faith-based organization
- A volunteer literacy organization
- An institution of higher education
- A public or private nonprofit agency
- A library
- A public housing authority
- A nonprofit institution with the ability to provide AE and literacy services
- A consortium or coalition of agencies, organizations, institutions, libraries, or authorities described above
- A partnership between an employer and an entity described above

WIOA defines the term “eligible individual” as an individual who:

- Has attained 16 years of age
- Is not enrolled or required to be enrolled in secondary school under state law
- Is basic skills deficient:
  - Does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education or
  - Is an English language learner

***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 MCCB OAE ensures all eligible providers have direct and equitable access to apply and compete for grants. The grant competition is publicized through a variety of print and electronic media throughout the state. Information is shared via the MCCB Office of Communications and Public Relations in the form of a formal press release, a posting on the MCCB website, social media outlets, and other means of available communication.

The MCCB OAE awards funds to eligible providers for the delivery of AE services. These services provide academic instruction below the postsecondary level that increase an individual’s ability to:

- Read, write and speak English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent
- Transition to postsecondary education and training

- Obtain employment

In accordance with federal regulation, eligible providers may receive AE funding for the delivery of any of the following AE and literacy activities:

- Adult education
- Literacy
- Workplace adult education and literacy activities
- Family literacy activities
- English language and acquisition activities
- Integrated English literacy and civics education
- Workforce preparation activities
- Integrated education and training

The MCCB OAE will use the following process to distribute funds to approved applicants:

1. Not less than 82.5 percent of the grant funds to award grants and contacts under section 231 and to carry out section 225, Programs for Corrections Education and Other Institutionalized Individuals, of which not more than 20 percent of such amount shall be available to carry out section 225;
2. Shall not use more than 12.5 percent of the grant funds to carry out state leadership activities under section 223; and
3. Shall use not more than 5 percent of the grant funds, or \$85,000, whichever is greater, for administrative expenses of the eligible agency.

Federal funds may be used to increase the level of nonfederal funds that would be available in the absence of federal funds, and, in no case, replace those nonfederal funds. Federal funds must not be used for the purpose of supplanting, only for supplementing.

See Program Specific Requirements for Core Programs, Title II, Adult Education and Literacy Programs for additional details regarding the processes for distribution of funds and the request for application process.

### **C. Vocational Rehabilitation Program**

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

Vocational Rehabilitation General and Vocational Rehabilitation for the Blind operate under the same administrative structure within the MDRS as a Combined State Vocational Rehabilitation Agency. These programs report to a common administrative director. They share programmatic staff as well as agency resources to eliminate overlap and unnecessary duplication. Funds are allocated for both programs based on average cost



per participant served in each program and with consideration of additional costs for facility accessibility and training cost requirements for blind individuals.

## 6. PROGRAM DATA

### A. Data Alignment and Integration

#### *i. Describe the State's Plans to Make the Management Information Systems for Core Programs Interoperable to Maximize the Efficient Exchange of Common Data Elements to Support Assessment and Evaluation.*

Combined Plan Partners currently use a variety of agency-specific data systems to manage service delivery and case management data. Every Combined Partner data system shares data regularly with the SLDS for retrospective analysis and with the WIOA Referral Hub to enable real-time partner data integration.

Combined Plan Partner data systems that are integrated include, by agency:

- **MDES:** The Mississippi Works Labor Exchange is the workforce management system used by MDES to manage participant activity for Title I Adult, Dislocated Worker, and Youth services; Title III Wagner-Peyser services; Senior Community Service Employment Program services (SCSEP); Trade Adjustment Assistance (TAA) services; Jobs for Veterans State Grants Program services; and other workforce services. Mississippi Works supports the calculation of common participation periods across all WIOA Title I and Title III programs, leverages web services to integrate with external systems.

Additionally, MDES administers the state UI system using ReemployMS, a web application. Mississippi Works and ReemployMS integrate to 1) ensure participant contact information is available in both systems, 2) allow ReemployMS to locate job matches for UI benefits recipients, 3) allow workforce staff using the Mississippi Works Labor Exchange to access the UI status of a participant, and 4) allow workforce staff to leverage a single sign-on approach.

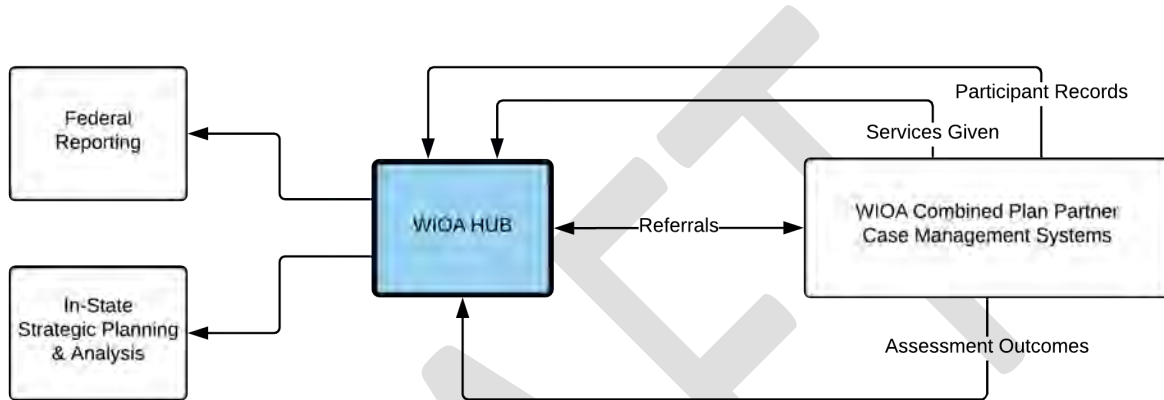
- **MDRS:** MDRS, OVR, and OVRB administer vocational rehabilitation services using a commercial software package, AwareVR, created by Alliance Enterprises. This modern web application allows for complete program-specific case management of OVR/OVRB participants. AwareVR supports web services and connects to the WIOA Referral Hub.
- **MCCB:** The MCCB currently administers Adult Education services via the Literacy, Adult and Community Education System (LACES), a web-based software system created by Literacy PRO Systems, specifically for Title II, AE programs. The system allows the OAE and its local providers to enroll students and track outcomes.
- **MDHS:** MDHS administers the TANF program through several legacy applications, including MAVERICS and JAWS. MAVERICS supports case management data such as intake and eligibility information, and JAWS supports TANF Work Program data. While these systems do not inherently support web services, data exchanges with the MDHS WIOA Hub Module allow for data exchanges with the WIOA Referral Hub.

All current Combined Plan Partner data systems have either 1) been modified from their current state of interoperability to support real-time, cross-program data exchanges with the WIOA Referral Hub through the

use of web services, or 2) were augmented by intermediate systems able to mediate between the agency's case management system and the WIOA Referral Hub.

Figure 15 illustrates how all WIOA Combined Plan Partners will interface with the WIOA Referral Hub in order to ensure that agencies are coordinated not only for the purposes of reporting and performance measurement but also in their approaches to individual case management.

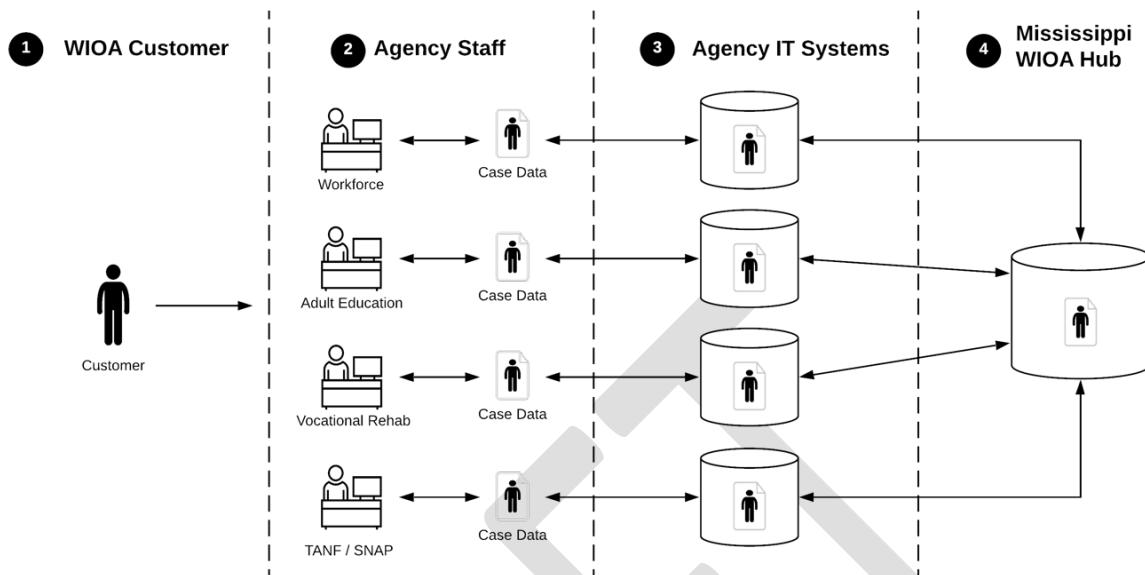
FIGURE 15: Data Exchanged Between Partners



During the course of case management activities, each Combined Plan Partner will generate participant data such as participant records (basic information), information on services given to the participant, information on assessment outcomes, and referrals to partner programs. These data items will be passed from Combined Plan Partner systems to the WIOA Referral Hub. In addition, Combined Plan Partners will receive referrals submitted by other Plan Partners. Information will be used to compute Combined Plan Partner performance measures for reporting to the DOL and to conduct data-driven, in-state strategic planning.

In order to exchange program data, the WIOA Referral Hub provides a machine interface. Agency systems use the machine interface to ensure that data are reported properly and in real time while enabling their staff to continue to use familiar case management technology. Figure 16 illustrates that 1) a WIOA customer may access WIOA services from any WIOA partner, 2) the partner's caseworkers access the WIOA Hub through their own internal agency systems, and 3) the partner systems communicate with each other through the WIOA Referral Hub, and 4) the WIOA Referral Hub itself is a headless, coordinating system.

FIGURE 16: Conceptual Model of Agency Integration



***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***

AccelerateMS will ensure the alignment of technology and data systems through collaboration with three state entities: MDES, the SLDS Governing Board, and NSPARC at Mississippi State, the state data clearinghouse.

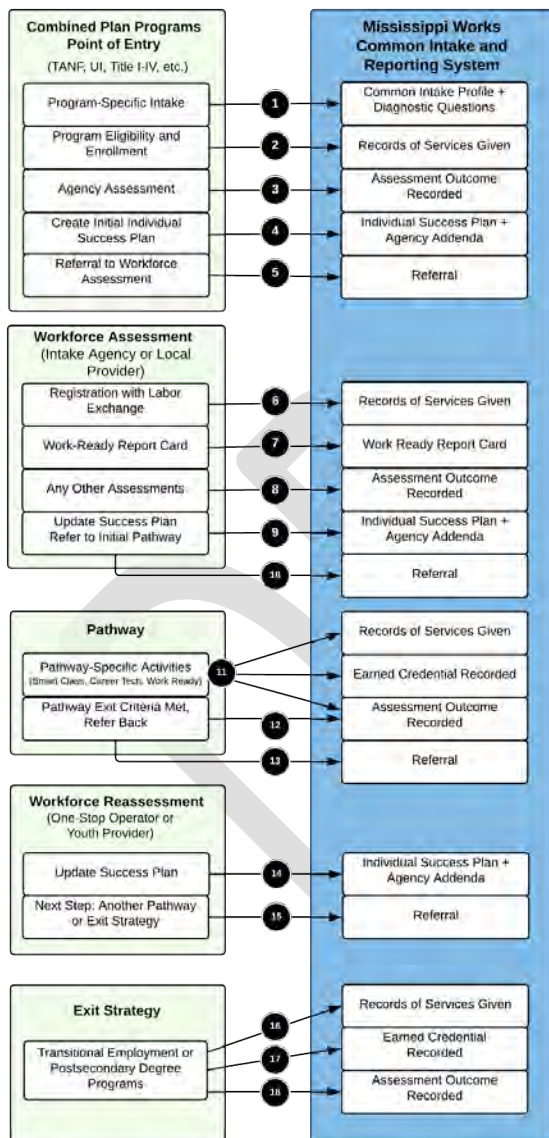
Mississippi designed and developed a data system called the “WIOA Referral Hub” to assist individuals across the WIOA partner agencies. The Hub allows agencies to work together to ensure that customers get connected to the mixture of services they need to succeed. The Hub plays a key role in allowing agencies to refer customers electronically, with the goal that no one falls through procedural cracks. The Hub is like a post office and every participating WIOA partner agency can use their own systems (mailboxes) to send and receive referrals to each other.

MDES will continue to develop and maintain the WIOA Referral Hub according to AccelerateMS priorities, and AccelerateMS will convene committees of all Combined Plan Partners as needed to inform the ongoing evolution of the system to support cross-agency coordination of case management.

Agency-to-agency referrals are electronic records created in the WIOA Referral Hub to connect a participant who receives services from one WIOA Combined Plan Partner to another partner. The benefit of a formalized referral process is that it facilitates follow-ups, assessments of partner cooperation, and greater accountability for participants who have work search requirements associated with Combined Plan Program enrollments. Referrals have several attributes, including the referring partner, the recipient partner, the recommended partner service, status, and staff notes.

All new referrals receive the status "pending." Combined Plan Partner staff in local partner offices and Comprehensive One-Stop Centers are able to access a real-time list of referrals for participants in their local area. After a partner system downloads the referral, the status of a referral changes from "pending" to "received". This allows the receiving agency partner staff to view the participant's Individualized Success Plan, view the referring agency's referral note, and access contact information so that the partner can contact the individual for a phone or in-person interview. Once a participant receives a service through the agency that received the referral, the referral will change to "resolved." If the participant is ineligible or does not need the services offered by the partner, the partner can mark the referral "closed" and choose a reason from a drop-down list to indicate why the participant received no services as a result of the referral.

FIGURE 17: Data Created and Aligned in the Mississippi Smart Start Career Pathway Model



The SLDS Governing Board, consisting of representatives from all state data-contributing agencies, will continue to work with the SWIB to conduct data analysis and performance assessments and assist with federal reporting.

NSPARC serves the SLDS Governing Board by operating the State Data Clearinghouse. NSPARC will assist MDES in the ongoing development and maintenance of the WIOA Referral Hub and in the integration activities necessary to make Combined Plan Partner systems interoperable with the common system.

Based on Memoranda of Understanding (MOU), WIOA partners will continue to work with the SLDS and the State Data Clearinghouse to develop and produce the reports required under WIOA. These MOUs allow WIOA partners to submit their administrative records into the Mississippi State Data Clearinghouse, where the wage records and program participation data can be securely aligned by the clearinghouse's data science professionals.

After wage records and participation data are aligned, additional education and demographic information is integrated from the SLDS. This process creates a comprehensive dataset containing the participant, employment, education, and demographic data that are necessary to complete the reports that are required under WIOA section 116(d)(2). This data is then shared out with WIOA partners, who use it to calculate performance measures and produce reports that are aligned with the PIRL format.

Furthermore, the data science professionals at the State Data Clearinghouse are continuously available to WIOA partners, and are able to provide on-demand technical assistance in calculating the performance measures or generating the reports.

***iii. Explain How the State Board Will Assist the Governor In Aligning Technology and Data Systems Across Required One-Stop Partner Programs (Including Design and Implementation of Common Intake, Data Collection, etc.) and How Such Alignment Will Improve Service Delivery to Individuals, Including Unemployed Individuals***

The State Board and AccelerateMS will ensure the alignment of technology and data systems through collaboration with three state entities: MDES, the SLDS Governing Board, and the NSPARC.

MDES will continue to develop and maintain the WIOA Referral Hub according to AccelerateMS priorities, and AccelerateMS will convene committees of all Combined Plan Partners as needed to inform the ongoing evolution of the system to support cross-agency coordination of case management.

The SLDS Governing Board will continue to work with SWIB to conduct data analysis and performance assessments and assist with federal reporting.

NSPARC serves the SLDS Governing Board by operating the state data clearinghouse. NSPARC will assist MDES in the ongoing development and maintenance of the WIOA Referral Hub and in the integration activities necessary to make Combined Plan Partner systems interoperable with the common system.

***iv. Describe the State’s Plans to Develop and Produce the Reports Required Under Section 116, Performance Accountability Section (WIOA section 116(d)(2)0***

WIOA partners have entered into an MOU and will continue to work with the SLDS and the State Data Clearinghouse to develop and produce the reports required under WIOA. These MOUs allow WIOA partners to submit their administrative records into the State Data Clearinghouse, where the wage records and program participation data can be securely aligned by the clearinghouse’s data science professionals. After wage records and participation data are aligned, additional education and demographic information is integrated from SLDS. This process creates a comprehensive dataset containing the participant, employment, education, and demographic data that are necessary to complete the reports that are required under WIOA section 116(d)(2). This data is then shared out with WIOA partners, who use it to calculate performance measures and produce reports that are aligned with the PIRL format. Furthermore, the data science professionals at the State Data Clearinghouse are continuously available to WIOA partners and are able to provide on-demand technical assistance in calculating the performance measures or generating the reports.

MDES has created and continues to develop the GranTrak application that facilitates the tracking of awarded grant funds. This application allows MDES to track grants received from DOL and to allocate the funds to local workforce development boards or to Planning and Development Districts that further track funds spent to serve WIOA participants. At the end of the life cycle of a given grant, GranTrak generates ETA 9130 reports from the initiation to the close-out of the funds for DOL reporting. GranTrak features automatic notifications of funds availability, reminders for deadlines, data validation, report generation, personnel approvals, and attachment/uploading of supporting documents that capture, for instance, approval signatures from local elected officials.

**B. Assessment of Participant’s 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.**

Through the SLDS, education, workforce, and other measures of well-being will be tracked not only in the second and fourth quarters after exit from WIOA-related services but also in the five to 10 years after exit to reveal economic and workforce trends, which will enable the state to compare actual outcomes more effectively with desired outcomes. Results for relevant measures will be available, in the aggregate, to all Mississippians via the SLDS online reporting website (LifeTracks.ms.gov) and will be used by the SWIB to further improve and coordinate Combined Plan Partner activities. In particular, this analysis will be used to ensure that combined activities support outcome improvements for all sub-populations, including veterans, persons with disabilities, at-risk youth, and other vulnerable Mississippians.

## 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.)**

Mississippi uses quarterly wage record information to measure progress on state and local performance measures. Currently, MDES has a data sharing agreement with NSPARC to provide performance reporting through the ETA 9173 and the Title I and Title III Standardized Reporting Data (PIRL) reports. State UI wage records and State Wage Interchange System (SWIS) data are transferred to the National Strategic Planning and Analysis Research Center via a MDES secure web file server. Safeguards are in place to ensure that NSPARC deletes all SWIS quarterly wage data after the ETA 9173 and the PIRL reports are generated and delivered to MDES. State UI wage records, however, are stored by the National Strategic Planning and Analysis Research Center on behalf of and for the use of SLDS for which NSPARC is the state data clearinghouse.

## 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.**

Integrity of data and privacy protection are incorporated into the state's workforce development systems. To protect the privacy of Mississippians, all partners that provide and share data in collaboration efforts, through Mississippi Works and other aligned technologies, have agreed on a memorandum of understanding (MOU) to ensure security of sensitive information. All partners expressly agree to abide by all applicable federal, state, and local laws regarding confidential information and to adhere to the same standards of confidentiality as state employees, including but not limited to:

- 29 U.S.C. 2935; as amended by WIOA - reports, recordkeeping, and investigations
- 29 U.S.C. 2871(f)(3); as amended by WIOA - regarding confidentiality
- 20 CFR Part 603 - safeguards and security requirements regarding disclosed information under Unemployment Compensation
- 42 U.S.C. 503 - regarding state laws governing Unemployed Insurance operations
- 20 CFR 617.57(b) - regarding disclosure of information under the Trade Act
- 29 U.S.C. 49I-2(a)(2); as amended under WIOA - regarding information to be confidential under the Wagner-Peyser Act
- The Privacy Act (5 U.S.C. 552)
- The Family Educational Rights and Privacy Act (20 U.S.C. 1232g)
- 34 CFR 361.38 - protection, use, and release of personal information of Vocational Rehabilitation Services participants
- HIPAA: 45 CFR 164.500 - 164.534
- 2 CFR 200.303 - regarding reasonable measures to safeguard protected personally identifiable information

Each partner ensures that the collection and use of any information, systems, or records that contain personally identifiable information will be limited to purposes that support the programs and activities described by relevant memorandums of understanding (MOUs) as part of the Mississippi workforce development system and SLDS Rules and Regulations (see Appendix B) as provided for in Miss. Code Ann. §37-154-1 and §37-154-3.

Each partner ensures that access to software systems and files under its control that contain personally identifiable information will be limited to authorized staff members who are assigned responsibilities in support of the services and activities provided as part of the Mississippi workforce development system and who must access the information to perform those responsibilities. Each partner expressly agrees to take measures to ensure that no personally identifiable information is accessible by unauthorized individuals.

## 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.**

To ensure veterans receive consideration for all opportunities for which they qualify, MDES will ensure 1) covered persons are aware of their entitlement to priority of service, 2) covered persons are aware of the full array of employment, training, and placement services available through One-Stop Centers and all service points, and 3) that all applicable eligibility requirements for these programs are understood and applied.

MDES will also utilize the following to provide priority of service:

- Under normal funding circumstances, refer qualified veterans to new job openings, especially Federal Contractor job orders, prior to all non-veteran job referral activity
- Veteran normal funding circumstances, refer qualified veterans to new job openings, especially Federal Contractor job orders, prior to all non-veteran job referral

MDES management monitors priority of service by reviewing quarterly performance reports, manager reports, and MS Works reports. MDES management will monitor priority of service in covered programs at two levels. WIN Job Centers will continue to use established protocol of identifying targeted groups. At the state level, management will continue to analyze performance reports, manager reports, and MS Works reports. WIN Job Center services are made available and provided to eligible veterans, transitioning service members, VA VR & E Chapter 31 veterans, Native American Veterans, other groups targeted for special consideration, and veterans with significant barriers to employment through outreach activities performed by Disabled Veteran Outreach Specialists (DVOPs). MDES will continue to encourage non-DOL program partners to focus on providing priority of service to targeted groups for special consideration.

DVOPs are integrated into the WIN Job Center service delivery system at the local job center level. Eligible veterans and eligible persons with significant barriers to employment are identified by intake forms or by electronic registration and referred to or assigned to DVOPs after other One-Stop Center staff complete initial service intake. DVOPs are cross-trained to understand the full complement of WIOA and Combined Plan Partner



programs that may be available. In instances when a DVOP is not available or has reached the predetermined caseload, another One-Stop Center staff will provide services to veterans and eligible persons as appropriate.

State Policy Number 6, Priority of Services for Veterans can be accessed using this link. <https://acceleratems.org/wp-content/uploads/WIOA-2022-Appendix-K-Priority-of-Service-for-Veterans-and-Eligible-Spouses.pdf>

## **8. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WITH DISABILITIES**

**Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) 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.**

In order to be certified, One-Stop Centers and the One-Stop delivery system are evaluated and must meet or exceed the standards established for programmatic and physical accessibility. Evaluations of accessibility take into consideration the feedback from one-stop customers, and how well the one-stop center ensures equal opportunity for individuals, regardless of disability or cultural background, to participate in or benefit from one-stop center services. These evaluations must include criteria evaluating how well the centers and delivery systems take actions to comply with the disability-related regulations implementing WIOA sec. 188 and 29 CFR Part 38. Such actions include, but are not limited to:

1. Providing reasonable accommodations for individuals with disabilities;
2. Making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination against persons with disabilities;
3. Administering programs in the most integrated setting appropriate;
4. Communicating with persons with disabilities as effectively as with others;
5. Providing appropriate auxiliary aids and services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity; and
6. Providing for the physical accessibility of the one-stop center to individuals with disabilities.

To better serve individuals with disabilities, WIN Job Centers have accessibility workstations with ergonomics, braille keyboards, and enlarging document capabilities (Ultra Magnifier) for the visually impaired. WIN Job

Centers also have capabilities with Microsoft Accessibility software for speech, hearing and vision on computers, including read screens with text- to-speech or braille displays. Additionally, the MDES EOO conducts quarterly meetings with Local EO officers providing training, technical support, and best practices. Cross-training sessions also occur in partnership with MDRS covering topics such as disability etiquette and service coordination.

The One-Stop Certification policy, <https://acceleratems.org/wp-content/uploads/WIOA-2022-Appendix-N-Policy-16-One-Stop-Certification.pdf> describes the State's accessibility criteria.

## 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.**

MDES specifies its policies for assisting Limited English Proficiency individuals in its “Limited English Proficient (LEP) Individuals Policy Statement and Procedures.” This document establishes policies designed to ensure the accessibility of all services to individuals with limited English proficiency in One-Stop Centers, Youth Providers, and any recipients of federal financial assistance. Staff will first determine an individual’s primary language using “I Speak” language posters. Using printed “I Speak” resources, staff will then inform the LEP individual that interpreter services are available at no cost. If the LEP individual cannot understand written or verbal English, staff can access several options for interpretation: local partner interpreter services; Language Line Interpreter Services; and the individual’s own interpreter, if requested. Policies also specify that vital documents will be translated into appropriate languages.

Other opportunities for EL services include classes offered through Title II AE providers. One-stop partners are able to refer to and co-enroll these constituents in the local AE program for assistance.

## IV. COORDINATION WITH STATE PLAN PROGRAMS

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

### *Planning Workgroups*

For the 2024 WIOA Combined State Plan revision, AccelerateMS convened a series of five interagency meetings, beginning in Fall of 2023, to bring together all WIOA strategic and core partners along with representatives of all local workforce areas. Partners reviewed progress towards implementation of WIOA plan revisions and noted successes and challenges. Data analysis activities undertaken to completely update the strategic and operational aspects of the state plan revealed success in meeting the original plan’s goal of helping Mississippians find work through in-demand opportunity occupations. The consensus was that the state is now realizing positive outcomes from the implementation of the original WIOA strategy and that continuing to

improve our ability to operate as a workforce ecosystem would help to fulfill the goal of ensuring that Mississippians have high-quality, in-state career pathways that will enable their children and grandchildren to live here, raise families, and grow the state.

To kick off the development of the workforce plan, AccelerateMS met with education and workforce stakeholders. Working groups were established to seek input for the development of the strategic and operational aspects of the workforce plan. A focus group was conducted to gather input from the business community.

Throughout the process, LWDA's were represented in each workgroup and provided comments on the draft of the Combined Plan.

In efforts to support the Governor's vision of an integrated workforce ecosystem and collaboration across stakeholders statewide, seven planning workgroups reflecting the two major planning elements (i.e., strategic planning and operational planning) of the WIOA were established. Each of these workgroups was tasked with specific roles and responsibilities to help focus efforts on critical components of the WIOA. A chair and a vice chair were selected from each group to help align internal workgroup activities. The seven planning workgroups were organized as follows:

Strategic Planning Workgroups	Operational Planning Workgroups
<ul style="list-style-type: none"> <li>● Planning and Communication Workgroup</li> </ul>	<ul style="list-style-type: none"> <li>● One-Stop Operations Workgroup</li> </ul>
<ul style="list-style-type: none"> <li>● Aligned and Integrated Technology Workgroup</li> </ul>	<ul style="list-style-type: none"> <li>● Career Pathways and Assessment Workgroup</li> </ul>
<ul style="list-style-type: none"> <li>● Sector Strategies Workgroup</li> </ul>	<ul style="list-style-type: none"> <li>● Performance and Accountability Workgroup</li> </ul>

The workforce groups organized under the Strategic Planning Element worked collaboratively on identifying strategies and goals for bringing the Governor's vision of a unified workforce ecosystem to fruition. These workgroups included the Planning and Communication Workgroup, the Aligned and Integrated Technology Workgroup, and the Sector Strategies Workgroup.

Operational Planning Workgroups was shared with the SWIB and all members of the other workgroups.

*State Workforce Investment Board (SWIB) Website*

The SWIB website ([swib.ms.gov](http://swib.ms.gov)) is used to keep Mississippians informed about the state's WIOA planning and revision process. The 2024 plan revision was reviewed internally by Core Partners and posted to the SWIB website for a public comment period. Comments from the public were incorporated in the final plan prior to submission. Each combined plan partner also followed program-specific rules for public comments and open meetings.

## V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The State Plan must include	Include
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;	Yes
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;	Yes
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;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (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;	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;	Yes
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);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
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;	Yes
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;	Yes

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

**VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

**VII. PROGRAM SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS**

DRAFT

# 2024 MISSISSIPPI WORKFORCE INNOVATION & OPPORTUNITY ACT STATE PLAN



# Program Specific Requirements for Core Programs

## Title I-B

### a. General Requirements

*Identify the regions and the local workforce development areas designated in the State.*

The State has re-designated four local workforce development areas. Each of the four local workforce development areas have also been identified as regions. Regions are aligned with the four local workforce development areas. The State identified regions using the following data: common labor markets, common economic development areas; community college districts; geography, population density; commuting patterns and sufficiency of Title II providers. The analysis is included in the combined plan. Planning meetings were held with local boards and chief elected officials.

*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.*

WIOA Policy #1 (Local Workforce Development Area Designation, Appendix C) outlines the process used for designating local areas. The policy was developed in consultation with the State Workforce Investment Board and posted on websites for public comment. The policy defines performed successfully as meeting or exceeding the adjusted levels of performance for each performance goal for two consecutive years immediately preceding the enactment of the WIOA. See Appendix C for a full description of the process. Sustained fiscal integrity is defined as the administration of WIOA programs for the two consecutive years immediately preceding the enactment of WIOA with no formal determination of mis-expended funds or gross negligence. Each local workforce area submitted a request for initial designation supported by documentation of successful performance and sustained fiscal integrity.

WIOA creates a two-step process for designating a LWDA. First, WIOA Section 106(b)(2) provides for an “initial designation” for “the first 2 full program years following the enactment of this Act,” to allow for a transition to the new requirements of WIOA. Then at the end of the initial designation, Section 106(b)(3) calls for a “subsequent designation,” based on a review of the performance of the LWDA during the initial designation period.

On May 10, 2017, Governor Bryant extended the initial designation of the four local workforce development areas (LWDAs) because of a U.S. Department of Labor regulation, under the Workforce Innovation and Opportunity Act (WIOA) until June 30, 2018.

Prior to subsequent designation, MDES began reviewing the local areas to verify that they had performed successfully and sustained fiscal integrity, as required by WIOA Section 106(c)(1). The local areas sent requests for subsequent designation along with their verification that they had performed successfully and sustained fiscal integrity. After reviewing the requests and verification of performance from both the LWDA and MDES, on June 29, 2018, the governor approved the subsequent designation of each of the four LWDAs as a local workforce development area.

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

If an existing local workforce area under the WIA requests but is not granted designation as a local workforce development area under WIOA Section 106(b)(2) or Section 106(b)(3), the unit (or combination of units) of general local government or grant recipient may submit an appeal to the State Board under an appeal process established in the State Plan. Specific Appeals process information is provided in the Local Workforce Development Area Designation Policy in Appendix C.

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

State entities responsible for the administration of Adult, Dislocated Worker, Youth, TANF, WP, AE, SCSEP, and Rehabilitation Services have agreed to physically co-locate in at least one comprehensive center in each workforce area. An MOU will be developed to describe roles and responsibilities and shared cost for infrastructure. The State developed a WIOA policy that established a process related to determinations for infrastructure funding.

Policy 20: WIOA Local One-Stop Infrastructure Policy, provided in Appendix I2E states that If the LWDB is unable to reach an agreement on the funding of infrastructure costs with all partners by July 1 of each program year (or after the applicable extension of time deadline, if granted), the LWDB or affected partner must immediately notify OGM that an agreement cannot be reached using the Report of Outcomes from Local Infrastructure Funding Agreement Negotiations (Attachment B). Once notified, the Governor must administer the State funding formula to determine the appropriate share of infrastructure contributions for all partners for the program year impacted. Please note, failure to agree on additional costs amongst partners will not be considered an impasse, nor will it trigger the state funding mechanism.

*Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities*

Mississippi Senate Bill 2958 of the 2014 Mississippi Regular Legislative Session amended Section 71-5-353, Mississippi Code of 1972 to provide that money in the state workforce investment board bank account shall be used for administration of state workforce investment board business, grants related to training, and other projects as determined appropriate by the state workforce investment board.

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

WIOA provides Governor's set aside funding to be used for "statewide employment and training activities" (WIOA Section 134). Statewide activities include required and allowable activities. Funds must be reserved for mandatory activities before optional activities are funded.

Mississippi plans to use the funding primarily for mandatory statewide WIOA activities as follows:

- Administering Mississippi's WIOA system. This activity happens at MDES and is capped at 5% of the total WIOA allocation. Included costs are accounting, staffing, policy and procedure issuance, monitoring and audit, planning, grant management and liaison with USDOL and the local areas.
- Operating the State's management information systems. The largest expense within the state's Governor's reserve has been the MIS system. Data elements are collected from every participant, each data element is validated and entered into the MIS system and reports are delivered to USDOL and the four local workforce development areas.
- Incentive grants and technical assistance for local areas.
- Eligible Training Provider information (ETPL). WIOA requires that states maintain and disseminate a list of every approved training program, including detailed performance information such as student completion and employment rates. Customers of all the WIN Job Centers use this list and the performance information to select their training program. Youth programs are also tracked statewide.

ETPL is a statewide, comprehensive, real-time system for the agency's WIOA training programs. Mississippi has automated the processes for eligible training providers' registration, application of training courses and subsequent eligibility. The system also includes the automation of the Individual Training Account (ITA) obligations, the ITA payment system (expenditures),



and provides the local workforce development areas and one-stop operators the ability to track obligations, expenditures, and accruals in real time. Mississippi's ETPL system interfaces with the Mississippi Department of Finance and Administration's statewide accounting system for daily invoice payment and reconciliation.

Evaluation and continuous improvement. All statewide WIOA programs are to be evaluated with a goal for continuous improvement. Evaluation activities are conducted using MS Works System and on-site monitoring of all programs.

Any expenditures from the Governor's Set Aside Funding will be in compliance with Section 134 of the WIOA.

The Mississippi Department of Employment Security (MDES) is the lead agency for Rapid Response services in Mississippi. The State also allocates a share of available Rapid Response funds to local workforce development areas based on mass layoff or plant closure activity. Each workforce area has designated a staff member as their Rapid Response and dislocated worker program coordinator.

MDES responds to both the Worker Adjustment and Retraining Notification Act (WARN) and non-WARN events, that is, events involving fewer than 50 individuals. MDES receives official WARN notices of impending closures or mass layoff events from the affected business. To ensure that assistance and services are provided to as many dislocated workers as possible, MDES responds to non-WARN events, regardless of the number of individuals affected, in the same manner as WARN events. MDES may learn of non-WARN events from the media, partner agencies, local economic development offices, WIN Job Center and local workforce area staff, businesses, affected workers, community college, rapid response coordinators, and other local sources.

Within 24 hours of the receipt of a WARN or non-WARN notice, MDES staff contacts the company to discuss available Rapid Response services and offers assistance to the company and the affected workers. An electronic briefing or an on-site visit with the company representative, and when appropriate, the union or employee representative, is scheduled as soon as possible.

Working in coordination with local workforce development areas and WIN Job Center staff, Community College staff, and the Unemployment Insurance coordinator, a plan of action is developed to deliver services to the affected dislocated workers. Whenever possible, Rapid Response services are delivered on-site prior to layoff, on-site at the company, and on company time. Providing services on-site is dependent upon the company's willingness to allow workers to attend sessions during work hours and the availability of meeting space at the site.

The State developed an employee survey form to determine the specific assistance needed by the affected workers. The form collects information on the employee's education and skill levels, work history, employment assistance needs, and training interests. The survey is completed by the employee as part of the on-site session, collected, and reviewed by the Rapid Response team. The team identifies the worker's specific needs and coordinates with the WIN Job Center and community college to facilitate the delivery of services from the appropriate partner agencies.

MDES has established a policy for providing Layoff Aversion activities. State Policy Number 21: Rapid Response - Layoff Aversion Policy and Procedures, provided in Appendix I2H, applies to Local Workforce Development Areas (LWDA), and other entities that receive Rapid Response funds by the allocation, pass-through, and subgrant award methods. The Rapid Response unit works in conjunction with local workforce development boards, chief elected officials, and other stakeholders to determine which strategies and activities are applicable in given situations. The strategies and activities are designed to prevent or minimize the duration of unemployment.

Each LWDA submits a Layoff Aversion Plan annually to MDES's Office of Grant Management that describes its strategies to assist employers and to avert layoffs. Each LWDA has designated staff to carry out the Layoff Aversion plan within the area.

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

Because MDES serves as the lead agency for Rapid Response in the state, it is uniquely positioned to provide mandated services in the case of natural disasters. As outlined in the MDES Continuity of Operations Plan, the Rapid Response staff are part of the agency's disaster response team. Staff assists in the identification of businesses adversely affected and workers who lost jobs as a result of the disaster. This information is important for the development of requests for National

Dislocated Worker Grant funds. Rapid Response staff also assist in disseminating information on emergency unemployment insurance and reemployment services available. The agency disaster response team works with FEMA and other appropriate state and federal agencies to develop strategies for addressing natural disasters to ensure rapid access to the broad range of assistance.

MDES developed a process and worked with the mass layoff team to create one Initial Employer Email that met the needs of employers and employees that allowed employers to file one mass Unemployment Insurance (UI) claim for all of its employees at the same time.

*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 Mississippi Department of Employment Security administers the Trade Adjustment Assistance (TAA) Act. Providing early intervention to worker groups on whose behalf a TAA petition has been filed:

- The MDES leads Rapid Response efforts across the state. When working with a trade-affected business to provide Rapid Response services, the State Rapid Response Coordinator and the State TAA Coordinator provide Rapid Response services.

Whenever possible, the team conducts on-site presentations at the business location. Every effort is made to provide information sessions prior to the commencement of the lay-offs and/or plant closure. The presentation consists of an overview of the benefits and services that can be expected from each of the partner groups.

- During these sessions, the Rapid Response team emphasizes how the partner agency staff representatives will be working together as a team to offer the customer individualized comprehensive reemployment benefits and services.
- Once a petition is approved, additional sessions with affected workers are scheduled to provide information about TAA services only. These sessions give the workers the opportunity to ask detailed questions or questions directly related to the workers' individual needs. The sessions may be set up through the employer if the place of business is still open or through TAA staff at the nearest WIN Job Center or at another location.
- When an individual enters the WIN Job center and is identified as Trade eligible, a Trade case manager provides them with an orientation to explain available Trade benefits and services.

Funds are used for staff to monitor, identify, and communicate with worker groups that file a TAA petition.

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

#### *b. Adult and Dislocated Workers Program Requirements*

##### *Work-Based Training Models*

Not Applicable, as the alternative training models are previously included in the training strategy of the plan.

*Describe how the state will incorporate Registered Apprenticeship.*

An increasing number of jobs opportunities and low unemployment rates means there are not enough people to fill middle skill jobs in Mississippi. Apprenticeship is one way we are using to fill the middle skill gap. The Mississippi Registered Apprenticeship Program is changing lives, providing more sustainable wages, and promoting a better quality of life for many Mississippians. Apprenticeship in Mississippi is gaining new ground as the state received new funding from the

statewide Apprenticeship StateExpansion Grant (ASE) and new guidance provided by DOL regarding Non-Registered Apprenticeships.

Since 2016, Mississippi has received a total of four Apprenticeship grants and created new partnerships under the leadership of the Mississippi Apprenticeship Program (MAP). MAP partners include the Governor's Office, the MS Departments of Employment Security (MDES), Human Services (MDHS), Rehabilitation Services (MDRS), Education (MDE), the Mississippi

Community College Board (MCCB), and the Mississippi Development Authority (MDA). This collaboration has improved communication and accountability for MAP's expansion goals.

Mississippi currently has 1263 registered apprentices, 202 new businesses engaged, and 8 new Registered Apprenticeship programs. Mississippi is breaking into new industry sectors such as Finance and Banking, Hospitality and Tourism, and Information Technology which will train individuals for the jobs of the future.

### *Training Provider Eligibility Procedure*

The State will continue to use its current web based Eligible Training Provider List (ETPL) system for the registration, initial eligibility, and continued eligibility of all WIOA training service providers, including Registered Apprenticeship programs. State Policy #9: WIOA Eligible Training Provider Certification describes these processes in detail. (Appendix I2A) The Eligible Training Provider Certification (ETP) Policy provides a link to the MDES Eligible Training Provider List System page. The policy may be found by selecting the "Training Provider/System Administrator" option; then selecting "Resource Menu". The link provided is intended to provide persons interested in the ETPL all the resources to be successful.

The MDES Office of Apprenticeship will identify Registered Apprenticeship Program (RAP) sponsors. The Local Workforce Development Areas will reach out to the Registered Apprenticeship sponsors in their respective areas. The state will ensure that information regarding RAP automatic eligibility is disseminated through a variety of media, including online platforms targeting RAP sponsors statewide.

The state will use the current web-based application processes for the registration of Apprenticeship sponsors and their program(s) of study. Apprenticeship sponsors will not be required to meet the state's minimum performance standards published in state policy, will be granted automatic approval, and will not be required to meet continued eligibility requirements.

The Office of Apprenticeship will train with the WIN Job Centers to operate as a state-level WIN Job Center to process the creation of ITAs so that EPTL can generate reimbursements for RA programs partnered with MAP.

*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 for both career and training services must be given recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in accordance with the federal requirements.

At any of the workforce partners, participants are asked the six questions that route the person in the HUB to the various partners. As staff determine the participants' eligibility, information about two of the three priority of service barriers is entered into the MSWorks system. NSPARC is working to implement the ability to capture Basic Skills Deficiency in MSWorks.

At the state level, staff will analyze quarterly performance reports from MSWorks and the PIRL to assess priority of service to persons with these barriers. The state will provide reports to the Local Workforce Development Areas (LWDAs) and to the WIN Job Center managers.

LWDA staff will monitor the WIN Job Centers to verify compliance with the priority of service requirements, ensure that front-line staff are continuously trained, and to provide technical assistance.

At the local level, WIN Job Centers' management will train staff on the requirements for priority of service to adults with these barriers and will monitor and assess the productivity and quality of services provided to these individuals based on reports provided by the state.

A description of how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, or individuals who are basic skills deficient is also provided in Priority of Service for WIOA Adult Program Participants, State Policy #7 (Appendix I2B).

*Describe the State's criteria regarding local area transfer of funds.*

The State empowers the local areas to determine their need to transfer funds between the Adult and Dislocated Worker programs based on workforce demands and needs of each local area.

Requests to transfer funds between the Adult and Dislocated Worker programs are initiated at the LWDA level. When LWDA fiscal and programmatic staff determine that there is a need to transfer funds and determine a projected amount to transfer, they put that request on the agenda of the next Local Workforce Development Board (LWDB) meeting. They also notify the area's liaison at the MDES Office of Grant Management, who are always invited guests at the board meetings.

After the board votes on the transfer, the transfer document is signed by the LWDB Chair and LWDA staff upload that document and a copy of the minutes into the state's online GranTrak fiscal reporting system, appended to a Request to Transfer Funds. GranTrak automatically notifies MDES staff of the pending request in their workflow.

The OGM staff that is liaison to that area reviews the request and the attached signed request and board minutes and verifies accuracy before approving. MDES fiscal staff are then notified and review the transfer at two levels for fiscal accuracy before it is sent in the workflow for signature by the Executive Director. After signature, the funds are available for use in the new program.

The State's criteria regarding local area transfer of funds is also provided in the State's WIOA Allocation Policy, Policy #11 (Appendix I2C).

*c. Youth Program Requirements*

With respect to youth workforce investment activities authorized in section 129 of WIOA—

*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.[11]*  
*[11] Sec. 102(b)(2)(D)(i)(V).*

The State continues to meet with the local workforce development area directors to discuss the RFP process for youth providers. During these meetings, requirements are outlined to include performance indicators. Local workforce development areas develop their own RFP process with assistance from The State. The State reviewed the RFP templates prepared by the local workforce development boards and the rating tools. The rating tools are designed to ensure awareness and capacity to meet WIOA performance indicators.

*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.*

The State continues to implement a WIOA Common Intake and Reporting System that will capture common participant information for the four core programs. The system will align resources and generate automatic referrals among the core programs. All participants develop an individualized success plan that coordinates the optimum blend of services and funding to achieve their goals for success. This success plan indicates the pathways in the Smart Start Pathways Model to which the participant will be assigned. Career pathways plan must be included as part of a youth's individual service

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strategy or MS Smart Start Success plan. This model is an integrated compilation of programs and services intended to develop basic, technical and employability skills; provide continuous education and training; and work supports that lead to high-demand jobs in targeted sectors.

*Describe available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element.*

Services to eligible youth are delivered through a network of youth providers. The local workforce areas continue to competitively procure independent contractors to deliver youth services. The State and LWDA's require these contractors to ensure that these services include all 14 program elements outlined in WIOA Section 129(c)(2).

The State's participant tracking system, MS Works, has been modified to capture all 14 program elements. Innovative approaches used by youth providers include the Gateway youth programs and Out-of-School Youth Work Experience/Internships.

The Office of Apprenticeship can leverage adult education programs in meeting a critical need for mid-skilled workers in Mississippi by utilizing MIBEST as a pre-apprenticeship program. MIBEST assists 17 to 24 year-old Out-of-School Youth who need to get their GED or HSE while enrolled in skills training. Through partnership with Mississippi's 15 community colleges, which offer adult education programs to increase the number of qualified, skilled, and workforce ready individuals, Mississippi can ensure that both current and potential employees have practical and soft skills to be successful in the workplace.

*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.*

The state includes in Policy Number 13 – WIOA Youth Eligibility a definition for youth requiring additional assistance. Youth requiring additional assistance to enter or complete an educational program or to secure and hold employment is defined as an in-school or out-of-school youth who is low income, and meets one of the following criteria:

- Lacking relevant work experience to secure or hold employment;
- Lacking credential related to local or regional targeted sectors; or
- In need of an ITA to complete the Start Smart or Career Technical Pathway.
- Criteria defined by local board and included in the local plan.

The WIOA Youth Eligibility Policy, Policy Number 13 is provided in Appendix I2F.

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

Alternative education is defined in as a specialized structured curriculum that may:

- Provide academically rigorous preparation for work and/or post-secondary education;
- Assist with the transition to work and/or post-secondary education;
- Address the youth's barriers to work and/or education.

Some examples include:

- Alternative high schools;

- Juvenile boot camps;
- Wilderness treatment.

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

Mississippi is using the basic skills deficient definition as contained in WIOA, as follows:

1. BASIC SKILLS DEFICIENT. The term “basic skills deficient” means, with respect to an individual—
  - (1) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
  - (2) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

*d. Single-area State Requirements (D1-D4)*

Mississippi is not a single area state.

*A description of the roles and resource contributions of the one-stop partners.*

N/A

*The competitive process used to award the subgrants and contracts for Title I activities.*

N/A

How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.

N/A

*How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.*

N/A

*Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.*

N/A

*e. Waiver Request (optional) (e1-e6)*

Statutory and/or Regulatory Requirements to be Waived- 75 Percent Out-of-School Youth (OSY) Expenditure Requirements

*Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;*

The State of Mississippi is seeking to renew the waiver of the requirements at WIOA Section 129 (a)(4)(A) and 20 CFR 681.410, which requires not less than 75 percent of funds allotted to states under Section 127(b)(1)(C), reserved under

section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for OSY.

1. A waiver of the requirement to expend 75 percent of funding on the OSY population. Mississippi is requesting that this percentage be lowered to 50 percent.
2. A waiver of the requirement that local funding must meet the 75 percent minimum expenditure requirement. Mississippi is requesting that this percentage be lowered to 50 percent.
3. A waiver of the requirement to expend 75 percent of Statewide activities funding on the OSY population. Mississippi is requesting that this percentage be lowered to 50 percent.

## **Background**

Approximately three out of every four public school children in Mississippi live below the poverty guidelines. Research shows that students from low-income families are more likely to drop out of high school than their more advantaged classmates. With more than 60 percent of jobs in Mississippi requiring post-secondary education and training, intervention strategies that increase a student's opportunity to remain in school and graduate are critical to the success of our state's youth.

This waiver request is consistent with the MS WIOA Combined State Plan and its "no wrong door" strategies. Increasing the percentage of funding available to In-School Youth (ISY) will open doors to work experience, pre-apprenticeship programs, and career pathways to at-risk students.

*Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;*

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver.

*Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;*

**Goal 1:** Increase access to the MS Smart Start Career Pathway based on need and without regard to educational status to at-risk youth in local communities. The Smart Start Career Pathway provides manageable steps leading to successively higher credentials and employment outcomes tailored to current life situations.

Outcome: Approval of this waiver will allow the state to provide work-based learning opportunities as well as mitigate dropout behaviors and improve student retention. Early intervention will increase attachment to the workforce and enrollment in post-secondary training.

**Goal 2:** Build on strategic partnerships to improve services and leverage resources.

Outcome: Approval of this waiver will enhance linkages to local education agencies and human services agencies and maximize the use of scarce state and local resources.

### **LWDA anticipated outcomes:**

During PY22, Southcentral MS Works (SMW) LWDA anticipates implementing an Apprenticeship program. One of the main target populations will be ISY who are enrolled in Career Tech programs of study at Community Colleges in the workforce area, with emphasis on students who are enrolled in courses of study related to the workforce area's targeted sectors of manufacturing, healthcare, and transportation/logistics. Also targeted will be ISY high school seniors in the schools' career tech programs. It is expected that during PY22 the WF area will enroll 40 ISY in Apprenticeship training and that during PY 23 an additional 50 ISY will be enrolled.

Quantifiable and measurable outcomes MS Partnership LWDA expects to achieve because of the waiver are to increase the number of students that are ready for entry into the workplace by teaching essential, necessary soft skills and providing work-based learning opportunities to ISY.

The Delta LWDA will serve 50 to 60 in-school youths annually with the expectation that these youths will be work-ready upon completion of high school and prepared to meet the DWDA WIOA performance measures. For example, in their current ISY program, the participants are training for certification in pharmacy tech, CDL, and welding, which requires consistency. They are more of a somewhat captive audience which is the opposite of out-of-school youth.

Many youths are not interested in the continuation to higher education, and they get lost the summer in which they graduate. Currently, DWDA is finding many of these youths with high school degrees with a lackluster desire for training in their out-of-school youth programs, perhaps due to a lag. The local area is putting forth efforts to close this gap with stronger relationships with school counselors.

OSY will continue to be the priority in Twin Districts LWDA, but they believe the partnership with ISY at high schools is increasingly important. If granted the waiver, Twin Districts believes they could substantially increase the number of enrollments. Schools are asking for ISY partnerships, and it is needed to help students who may not have thrived during the pandemic and now may be basic skills deficient.

*Describes how the waiver will align with the Department's policy priorities, such as:*

- a. *supporting employer engagement;*
- b. *connecting education and training strategies;*
- c. *supporting work-based learning;*
- d. *improving job and career results, and*
- e. *other guidance issued by the Department.*

The WIOA encourages strategies that connect education and training as well as supporting work-based learning and improving job and career results. This waiver request will increase the connection between education and training, provide work-based learning opportunities that include work experience and pre-apprenticeship, and increase access to workforce services to disadvantaged youth.

A partnership between Twin Districts LWDA and Kemper County School District has provided an unprecedented opportunity for students enrolled in the Work-Based Learning program. Students have been afforded job placement previously unavailable and employers have benefitted from the additional and much needed workforce. The staff of the workforce area has worked closely with students to ensure that they arrive at their first interview prepared with proper job search skills and once hired, armed with the soft skills and work ethics needed to succeed. Using the Kemper County School District model, the LWDA can easily replicate the program. It has expanded to the Hattiesburg Public School District and they anticipate more growth throughout the workforce area in 2022. ***Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and***

Approximately three out of every four public school children in Mississippi live below the poverty guidelines. Research shows that students from low-income families are more likely to drop out of high school than their more advantaged classmates. With more than 60 percent of jobs in Mississippi requiring post-secondary education and training, intervention strategies that increase a student's opportunity to remain in school and graduate are critical to the success of our state's youth.

Mississippi's at-risk and disadvantaged youth, employers, parents, service providers, post-secondary institutions and American Job Centers will benefit from this waiver.

*Describes the processes used to:*

- a. *Monitor the progress in implementing the waiver;*



Annual WIOA on-site programmatic reviews will include an evaluation of how local waivers are being utilized and the success of achieving goals and outcomes. Youth service providers will also be responsible for assessing the use of and the effectiveness of waivers.

The LWDA's will adhere to the budgeted amount and criteria for the waiver. The current MS monitoring policy will be followed. Participants will be monitored at least monthly for goal achievements. The LWDA's will work closely with the partnerships they are engaged with to achieve positive outcomes.

The MDES Office of Performance Reporting will work closely with the Office of Grant Management to track performance outcomes of the four LWDA's and statewide performance for the waiver. Quarterly review of IS and OOS enrollment and performance on a local area and statewide basis will provide technical assistance subject matter for LWDA's and subgrantees. Another outcome that MDES intends to track is the dropout rate of the WIOA In-School population versus the dropout rate of the general population of same-aged students.

*b. Provide notice to any local board affected by the waiver;*

See answer at section (D) below

*c. Provide any local board affected by the waiver an opportunity to comment on the request;*

See answer at section (D) below

*d. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.*

This waiver request was developed at the request of and with input from the Local Workforce Development Areas. In accordance with WIOA Regulations at 20 CFR 679.620 (ii) (iii) and (iv), this waiver request was provided to all local workforce development boards. The waiver request is currently posted on our website for comment and review by required partners and the general public.

The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

Provide more discrete projected outcome information as well as the following:

*a. Evidence that the state and/or local areas are in jeopardy of missing 75 percent OR information on past years' attempts to reach 75 percent. (If the data shows states are spending it, what is the data behind your request?)*

Moving from a 75/25 split to a 50/50 split between ISY/OSY requires time to shift the model to include innovative programs and strategies. All four workforce development areas in Mississippi are on board for making this shift to address the needs of at-risk ISY. However, the PY18 waiver was not approved until after the workforce areas' youth providers had been procured, which delayed the implementation of the new plans for some of the areas.

The Mississippi Partnership was the first workforce area in the state to begin implementing the new 50/50 strategy, using the waiver during PY18 - PY20.

Despite two years of the Covid-19 pandemic hampering all workforce activities and implementation of In-School Youth strategies in particular, two more local workforce areas have begun implementing enhanced In-School Youth programs. These are described in greater detail below in Section D.

Table 12: In-School and Out-of-School Expenditures, PY 19-PY 22

Program Year	In-School Expenditures	IS % of Total	Out-of-School Expenditures	OOS % of Total
PY 19	\$ 1,394,292.24	15.75%	\$ 7,459,894.80	84.25%
PY 20	\$ 2,349,954.80	21.60%	\$ 8,527,387.62	78.40%
PY 21	\$ 1,911,707.00	20.93%	\$ 7,221,019.23	79.07%
PY 22 through Dec. 2023	\$ 1,418,797.73	25.48%	\$ 4,149,096.93	74.52%

b. Description of how the State will continue to serve OSY.

Out-of-school youth will continue to be served in the state following established strategies. Adding more in-school youth funding will be an enhancement to the total number of youth served, as described by two of the local workforce areas in the state.

For instance, Twin District LWDA will continue to serve OSY in the same capacity; all five OSY providers will continue to serve OSY. An increase of ISY will not decrease our OSY numbers. Adding more ISY will be an enhancement to the total number of youth served in the TDWDA. In PY19 Twin Districts served 199 OSY and 0 ISY, in PY20 they served 176 OSY and 35 ISY. All of our current providers are community colleges and we co-enroll with Adult Ed. We also have an open line of communication with high school guidance counselors to make referrals for both OSY and ISY. Career fairs are also a way for us to reach high school graduates (or seniors) who are in need of additional assistance in determining their career path. We will work with the colleges’ retention department to try to re-engage those youth who are no longer enrolled at the community college.

The Mississippi Partnership currently has out-of-school youth programs that serves 19 out of 27 counties in our workforce area and served 392 out-of-school youth and 270 in-school youth in PY19. Due to Covid, the number of both groups reduced to 304 out-of-school and 243 in-school. The percentage of in-school served increased year to year though, from 59.21% out-of-school and 40.78% in-school in PY19 to 55.57% out-of-school and 44.42% in-school in PY20. The MS Partnership will continue to provide out-of-school youth services and prepare out-of-school youth for the workforce and continued education.

Outreach strategies The MS Partnership used to attract and serve OSY include effective social media campaigns which showcases the opportunities offered at by the WIOA OSY program and informs followers of events, activities, offerings and news at the college. Presentations to local organizations, such as non-profits, churches, rotary clubs, etc. informing the public of the opportunities of the OSY program. The MS Partnership also has expanded its OSY program beyond its brick-and-mortar youth programs and developed an online portal through which youth can apply for the WIOA youth program, submit required documentation, and access WIOA youth services virtually rather than in person.

The Apprenticeship effort that South Central MSWorks LWDA will implement will not preclude nor reduce the efforts within the WF area to enroll and serve OSY. For a number of years, the WF area has issued subaward agreements to several OSY youth service providers. Both the Madison County and the Yazoo County Youth Courts provide workforce services to adjudicated youth as dispensation for their cases. Services include many workforce preparation activities such as HSE and NCRC attainment, basic skills attainment, and placement into internships. The Refill Jackson Initiative youth services provider recruits, identifies and enrolls hard to serve inner city OSY and provides them with HSE and NCRC credential attainment, resume and job interview skills, and placement into internships. Mid-West youth services provider recruits, identifies and enrolls OSY with mental disabilities and provides them with appropriate job skills and placement. In addition, the area’s community colleges and WIN Job Centers recruit OSY and enroll them into appropriate career tech training.

The Delta LWDA plans the following outreach methods to attract and serve OSY:

- Offering overviews of the training service;
- Contacting area high school counselors and distributing pamphlets for referrals;
- Community outreach to establish relationships with businesses, churches and youth-serving organizations;
- Involving participants in community services projects;
- Supplying local newspapers with articles portraying successful participants;
- Using work experience as a tool to allay work-related apprehension;
- Using word of mouth; and
- Providing programmatic incentives for participants.

Currently, the area is increasing occupational skills training with community colleges, providing online and in-person participation for training completion and retention, increasing the amount of supportive services available, and increasing the work experience wage for the area.

*c. What are the barriers or is the state requesting because it has a unique strategy (homeless in-school youth)?*

Numerous school districts in the state have limited resources, high poverty rates, low test scores, and basic skills deficiencies. Many of the at-risk students that need to be served have limited access to on-line learning. Therefore, we anticipate a rise in the basic skill deficient students due to the remote/on-line school activities that have become necessary due to the Covid-19 crisis. Increasing the state's funding for ISY will allow the state to intervene and expose at-risk students to the necessary skills that will prepare them for self-sufficiency. The earlier at-risk students are exposed to work ready skills and career pathways, the more likely the youth will continue in the school system increasing their graduation rate and future employability.

Innovative programs, such as Ethic/Readiness, Financial Literacy, Introduction (with LMI) to Workforce Development Area sectors, WorkKeys Assessments, and Work Experience will help face these barriers head-on and increase the success of the state's youth programs.

All four areas note the lack of public transportation and the overall rural nature of the state as being barriers. However, two of the areas – Twin Districts and Southcentral MS Works – note that they also have unique issues that they see as barriers to finding and serving OSY. Twin Districts LWDA notes that workforce numbers appear to be lower, particularly employment and training program enrollment. The people we serve are changing. We attribute much of this to people moving into the gig economy, i.e.: Instacart, Uber, etc., where they make quick money, get paid when they want, and work when they want. The way we conduct training has changed to a hybrid of in-person and virtual service and we believe this trend will have to continue to attract participants.

Three of the 17 counties of Southcentral MS Works LWDA are in the Jackson, MS, metropolitan area. Jackson has one of the highest crime rates in the country and suffers from daily gun violence. While not all crime is committed by individuals under the age of 24, it is reasonable to say that OSY who are not actively engaged in some type of training or employment are much more likely to be involved in these criminal activities. The LWDA also notes that the southern counties in the workforce area are very rural in nature, with sparse employment opportunities. Youth who are high school graduates or dropouts are limited in options if they remain in the area. The WF area continually recruits these individuals in attempts to engage them in training and we are heavily involved with economic development efforts in that area in hopes of bringing more employment opportunities to the residents.

*d. As a renewal – provide evidence that the State met its goals (performance result) for the last approved waiver.*

**Goal:** Increase the number of work-ready and post-secondary ready students in each local area and build a pipeline of students with work-ready skills identified by employers and necessary to meet employer needs. The goal is to increase

the number of students eligible for college dual enrollment and industry recognized credentials and to build a strong partnership with local business and industry.

The waiver was approved in November of 2018 for PY18 and PY19. The Mississippi Partnership provides data for the success of this waiver. The other three workforce development areas were in the process of implementing programs for ISY when the COVID-19 crisis developed. All areas will use many of the same strategies as the Mississippi Partnership.

In PY18, the Mississippi Partnership served 134 in-school youth. In PY19, they served 270 in-school youth despite the COVID-19 pandemic situation. During PY20, the Mississippi Partnership LWDA used the 50/50 youth waiver. As predicted, the number of participants was lower due to COVID, however the **percentage of in-school youth (ISY) rose from 40.78% in PY19 to 44.42% in PY20**. The LWDA reports, “the waiver has had a positive impact on our youth performance outcomes and has allowed us to expand our target base for youth services.” The increase from PY18 to PY19 and the percentage increase from PY19 to PY20 is a direct result of having the waiver to spend up to 50% of youth funds on in-school youth. They have also been able to build stronger partnerships with local business and industry as a direct result of being able to serve the in-school youth. The Mississippi Partnership is working to link the in-school youth program with industry recognized apprenticeships at local community colleges so there will be a seamless transition for in-school youth who choose to continue their education in career tech fields within LWDA target sectors.

The Mississippi Partnership LWDA has been able to build strategic partnerships to improve services and leverage resources for youth in the workforce area. They have enhanced linkages to local education agencies and other agencies and maximized the use of workforce programs. This is helping to build a progressive pipeline of employees for industry by exposing and linking youth in high school to short-term (up to 2 years) workforce programs after high school graduation.

The State of Mississippi’s graduation requirements changed for students who entered the 9th grade in August 2018, and all students are required to complete a College & Career Readiness Course or complete 140 hours of work-based learning activities. This waiver has helped the Mississippi Partnership LWDA provide work-based learning opportunities and career exploration as well as mitigate dropout behaviors and improve student retention. Early intervention will increase attachment to the workforce and enrollment in post-secondary training.

The state will build on the success of the Mississippi Partnership in Program Year 2021 with the Delta LWDA planning an in-school pilot project that involves two youth providers and a community college. This LWDA planned expansion will require the LWDA to take advantage of the waiver.

The Twin Districts LWDA will also be expanding their PY20 ISY pilot project. One of the goals of the TDWDA Sector Strategy Plan is to establish a growing partnership with high school CTE programs. In order to achieve the goal, SMPDD formed a partnership with the Mississippi Department of Education to provide WIOA youth services to high school career and technical students. Through the partnership, the objectives of both programs are met. SMPDD has worked with local CTE Directors, Work based Learning Coordinators, and Guidance Counselors to enroll CTE students into WIOA youth programs. The high school CTE programs provide the youth training in a specific pathway and the WIOA youth programs provide work readiness skills training, supportive services, and connect the youth to work based learning opportunities. Because COVID required TDWDA to adapt their training model to be able to provide remote services, they now have the ability to connect with all CTE programs in the local area. TDWDA piloted the program with Kemper County High School and Hattiesburg High School and although they only enrolled 35 in-school youth in program year 2020, the plan is to expand to several CTE programs across the TDWDA 24 county service area and therefore, enroll many more in-school youth into the WIOA youth program utilizing the 50/50 waiver. SMPDD and TDWDA are currently participating in statewide Perkins V taskforce planning team meetings to better align their funding streams, reduce duplication, and coordinate services.

### **New Waiver Request**

*Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;*

N/A

Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

N/A

*Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;*

*Describes how the waiver will align with the Department's policy priorities, such as: supporting employer engagement;*

N/A

- a. connecting education and training strategies;

N/A

- b. supporting work-based learning;

N/A

- c. improving job and career

results, andN/A

- d. other guidance issued by the department

N/A

*Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and*

N/A

*Describes the processes used to Monitor the progress in implementing the waiver;*

N/A

*Provide notice to any local board affected by the waiver;*

N/A

*Provide any local board affected by the waiver an opportunity to comment on the request;*

N/A

*Ensure meaningful public comment, including comment by business and organized labor, on the waiver.*

N/A

*Collect and report information about waiver outcomes in the State's WIOA Annual Report.*

N/A

*The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.*

Title I-B Assurances

The State Plan must include	Include
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;	Yes
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;	Yes
3. The State 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;	Yes
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);	Yes
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;	No
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;	Yes
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);	Yes
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;	Yes
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;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
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);	Yes

## Wagner-Peyser Act Programs (Employment Services)

### A. Employment Service Staff

*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.*

MDES is currently in compliance with 20 CFR Part 651, 652, 653 and 658. MDES plans to utilize merit based Wagner-Peyser staff.

*Describe how the State will utilize professional development activities for Employment Service staff to ensure staff are able to provide high quality services to both jobseekers and employers.*

MDES utilizes a one-hour weekly staff meeting to share information and train staff. Quarterly managers' meetings are held to provide training to management staff. Each MDES staff member has an Individual Development Plan on file that includes the requirements to complete Professional development activities. MDES operates a twelve month Leadership Development program that all Wagner Peyser supervisors must attend. The curriculum includes courses on Self-Awareness, Self- Development, Team Development and Organizational Development. In addition, Wagner Peyser staff members attend regional and national workforce training conferences and National Veterans Training Institute courses. Staff attend workforce conferences, including Southeastern Employment and Training Association (SETA) and National Association of State Workforce Agencies (NASWA).

*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.*

All Wagner-Peyser staff are cross trained to identify Unemployment Insurance eligibility issues and participate in training along with WIOA staff. Wagner-Peyser staff members utilize an issue detection worksheet that is submitted to Unemployment

Insurance management when potential issues are detected. Wagner-Peyser management works closely with Unemployment Insurance management to provide continuous training to staff on updated policy information.

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

Wagner-Peyser staff will provide staff assisted services to help unemployment insurance claimants file online. Resource rooms with internet access are available in all one-stop centers to UI claimants and resource room attendants are available to assist claimants during the filing process.

Mississippi uses an integrated workforce technology system called ReEmployMS to make a direct linkage by assisting customers with claims filing in the resource rooms of the WIN Job Centers. WIN Job Center management can directly contact a more knowledgeable Unemployment Insurance staff member remotely to provide immediate assistance for customers as needed.

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

MDES operates the Reemployment Services and Eligibility Assessment (RESEA) program to provide assistance to UI claimants. The Reemployment Services and Eligibility Assessment (RESEA) program is an initiative in Mississippi to provide individualized career services to help reconnect UI beneficiaries with work as quickly as possible. Services to claimants in the programs include customized labor market information, development of an Individual Employment Plan, orientation of services and programs offered, registration in MDES' workforce technology system, job match, skills gap

analysis, and soft skills training. The MDES Workforce Intake Call Center works remotely to provide job search assistance to UI Claimants throughout the state.

*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;*

Wagner-Peyser staff will provide staff assisted services to help Unemployment Insurance claimants file online. Resource rooms with internet access are available in all one-stop centers to UI claimants and resource room attendants are available to assist claimants during the filing process.

Mississippi uses an integrated workforce technology system called ReEmployMS to make a direct linkage by assisting customers with claims filing in the resource rooms of the WIN Job Centers. WIN Job Center management can directly contact a more knowledgeable Unemployment Insurance staff member remotely to provide immediate assistance for customers as needed.

WIOA partner staff are trained in many different ways, including a one-hour weekly staff meeting to share information and train staff. Partner staff also shadow Wagner-Peyser staff to learn the functions of ReEmployMS to be able to assist claimants as they navigate the claims processes in the system. WIOA partner staff are positioned within the WIN Job Center to assist claimants with staff-assisted career services as the claimant requests further career and training needs.

*2. Registration of UI claimants with the State's employment service if required by State law;*

MDES has an integrated workforce registration system that captures common ES and UI data elements and provides real time triage. Mississippi State Law requires UI claimants to enroll in the Wagner-Peyser program by requiring claimants to perform a weekly work search. The real time triage creates an initial profile in the job match system and presents claimants with a list of jobs that may match their skills and past work experience.

*3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and*

MDES Wagner-Peyser staff are cross-trained and have a process in place to administer the work test including making eligibility assessments for UI claimants. Wagner-Peyser staff provide staff assisted reemployment services to UI claimants. UI claimants also have access to self-service labor exchange features in the workforce technology system. As potential availability issues are detected by WIN Job Center staff during interviews with individuals receiving Unemployment compensation, they are reported to UI staff for adjudication.

*4. Provision of referrals to and application assistance for training and education programs and resources.*

MDES Wagner-Peyser staff are cross-trained to provide referrals and application assistance for training and education programs and resources. MDES utilizes a one-hour weekly staff meeting to share information with partners and to train staff. Staff are trained in the use of the Eligible Training Provider List (ETPL) online system where claimants can search for approved WIOA training and education programs in Mississippi. WIOA staff in the WIN Job Center are physically present to receive a warm hand-off referral and assist the claimant in their training and education needs.

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

*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.*



Due to the low number of migrant and seasonal farm workers in Mississippi, it is considered a non-significant state relative to the Migrant and Seasonal Farm Worker (MSFW) program. The estimated number of MSFWs during the peak season in the state is 17,000. This is based on data supplied by the WIOA Title 1 section 167 National Farmworker Jobs Program (NFJP) grantee, other MSFW organizations, employer organizations, and federal and/or state agency data sources such as the U.S. Department of Agriculture and the Employment and Training Administration (ETA).

Mississippi shares information related to the MSFW program with farmworkers during monitoring visits. Literature and other resources of benefit are also provided. For farmers and farmworkers with internet capability, they are introduced to the MDES website, which can help provide a full range of services and training opportunities that may be provided.

MDES works with the Mississippi Delta Council to assess the unique needs of farmworkers in the state. Many farmworkers need additional training to reach self-sufficiency. During housing inspections and monitoring visits, a need for proper healthcare resources has been observed. The two most significant reported barriers to care among MSFWs are cost and language. Information on healthcare resources is made available as needed.

*2. 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.*

Due to the low number of migrant and seasonal farm workers in Mississippi, it is considered a non-significant state relative to the Migrant and Seasonal Farm Worker (MSFW) program. The estimated number of MSFWs during the peak season in the state is 17,000. This is based on data supplied by the WIOA Title 1 section 167 National Farmworker Jobs Program (NFJP) grantee, other MSFW organizations, employer organizations, and federal and/or state agency data sources such as the U.S. Department of Agriculture and the Employment and Training Administration (ETA).

Spring, summer, and fall represent the planting to harvest seasons in the 58 counties where the majority of crops are grown. The number of seasonal farmworkers remains constant during these months with more migrant workers coming in during the harvest season (fall).

The Mississippi Department of Employment Security (MDES) entered into a non-financial cooperative agreement with the Mississippi Delta Council for Farm Workers Opportunities, Inc. (MDC), which is the state's Workforce Innovation and Opportunity Act (WIOA) 167 Grantee. MDES and MDC work together to identify major labor-intensive crop activity relative to MSFWs. MDC, in its outreach team efforts, has identified that the Delta and semi-Delta counties in the state are where 90% of MSFWs reside and work. There are small pockets of MSFWs throughout the state involved in agricultural production; however, most of the labor-intensive crops are produced in the Delta.

The top five crops include: broiler eggs, cotton, corn, soybeans, and forestry. Other important crops include cattle, catfish, hay, sweet potatoes, and specialty crops. Dairy and poultry farming are located in the hilly section of the state. The coastal and southeastern areas include tree farming (timber) and nursery commodities. Agricultural employers in the state are predominantly focused on hiring local workers. In instances where they are unable to obtain an adequate workforce, employers turn their focus to hiring migrant seasonal farmworkers. However, when there is a scarcity of agricultural workers, they utilize MSFWs and the H-2A and H-2B Foreign Labor program. Agricultural employers are challenged to meet a constantly evolving market demand for commodities, which affects their economic viability. Agriculture in the state is impacted by market demand; as well as by natural disasters, such as the recent drought throughout the entire state.

*3. 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*

An assessment of migrant, seasonal, and year-round farm worker characteristics indicates that migrant and seasonal workers are predominately Hispanic during the peak season, while year-round workers are predominately African American. Typically, migrant, and seasonal workers speak Spanish and year-round workers speak English. MDC, the state NFJP 167 grantee, has bilingual staff available to assist Hispanic workers.

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

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

MDES achieves many of the state's outreach goals for ensuring that basic ES services are provided for MSFWs when the SMA and outreach staff are conducting farm visits where information and resources are provided on other employment opportunities. Though Mississippi is a non-significant state, the SMA provides resource material provided by the DOL to American Job Centers by way of hand delivery or the web. The SMA attends local and state job fairs providing resource information on the MSFW program and attends local community events that have a direct impact on farm related activities. In addition, members of the statewide MDES Business Outreach team conduct MSFW outreach during non-peak and peak agricultural seasons. The team members consist of four full time outreach staff funded by Wagner-Peyser and numerous Wagner-Peyser staff from the American Job Centers.

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

The MDES Department Chief and the SMA provide training to MSFW outreach staff in person, remotely and electronically. In addition, they attend staff development meetings in American Job Centers to train employees and partners on services. Services provided to MSFWs in the American Job Center's includes information on unemployment insurance, assessment, counseling, job referrals, job development contacts, training, support services and job placement assistance. Currently, Mississippi's SMA attends basic unemployment insurance staff development trainings when possible to stay abreast of changing UI regulations. The SMA, Department Chief and outreach staff attend state, regional and national conferences such as Southeastern Employment and Training Association (SETA) and National Association of State Workforce Agencies (NASWA). They also attend USDOL training in person and electronically.

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

Outreach workers are trained on identifying UI eligibility issues. All outreach workers completed Unemployment Insurance (UI) refresher training in 2020. Outreach workers are cross trained on all core programs. Joint training is held periodically with staff members from UI and Wagner-Peyser. Annual UI training will continue to occur for all outreach workers.

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

State merit staff outreach workers attend professional development activities. Activities include USDOL sponsored training, online training from the RAM, agency sponsored training, workforce conferences and National Veterans Training Institute courses. All outreach workers have completed a training conference on all WIOA core programs

*5) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.*

The SWA staff person coordinates with the SMA, to coordinate with the MDC to ensure that appropriate outreach activities are carried out. The State SWA staff, as well as staff of the MDC which conducts the outreach to MSFW, attend appropriate conferences and training, as well as participate in DOL conference calls relative to outreach activities. The SWA staff provides appropriate training to local one-stop staff as appropriate. SWA staff also coordinates with the MDC regarding outreach and other activities.

#### *5. Services Provided to farmworkers and agricultural employers through the one-stop delivery system*

##### *1) 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:*

Staff in each MDES local one-stop and MDC work cooperatively to ensure information on each agency's services is available to MSFWs upon entering local offices. This includes MDES Grievance Procedures, which are available for dissemination to the farm workers in the language prevalent among the farm worker population in that area through such means as posters, pamphlets, use of the media, and workshops.

The Mississippi Delta Council for Farm Workers Opportunities, Inc. (MDC/FWOI) was organized in 1971 as a private non-profit corporation chartered to operate programs to assist migrants and seasonal farm workers in the State of Mississippi. Its two primary objectives are: to help farm workers seek alternatives to agricultural labor; and to improve the agricultural lifestyle of those who wish to remain in agriculture.

As the WIOA Title 1 section 167 grantee, MDC receives a grant from the Department of Labor to address the needs of MSFW related to employment or personal needs. Some of the agencies MDC partners with to meet the personal needs of MSFW are Delta Housing and community action agencies, which offer assistance with paying utility bills, local food banks supplement food needs, health departments/agencies help with free or low-cost health and dental care, the local community college offer training and certification opportunities. MDC also provides pesticide training and farm safety training to MSFW's and makes referrals to agricultural employers for job opportunities. MDC refers MSFWs to the WIN Job Centers as appropriate for other job certifications.

MDES is able to reach out to agricultural employers for job development, assistance with job orders, and to ensure that the agricultural employers are able to secure a reliable labor force. MDES staff market the services of the WIN Job Centers to agricultural employers. MDES strives to offer technical assistance to agricultural employers in a continued effort to meet their needs and requirements. Upon initial contact with the SWA, the agricultural employer must register their job order with the state's WIN Job Center. The job order includes the agricultural employer's requirement of job specifications, number of required workers, and length of employment. MDES is then able to job match applicants tailored to the specific requirements of the agricultural employer. Appropriate referrals of applicants are made to the employer. MDES will continue to work with MDC and other partnering agencies to ensure agricultural employers are continuing to be educated on MSFWs policies, procedures, and regulations.

##### *2) Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups*

Outreach and resource materials are translated into languages other than English so that Limited English Proficient (LEP) clients can understand and access one-stop services. Local WIN Job Centers have access to translators via an 800-telephone number and a listing of local individuals who can provide translation services at no cost to the individual. This same information is also transmitted through the SMA who educates and explains to farmers and farmworkers alike how the complaint system works. Business Outreach staff members provide complaint system resources to farmworkers and farmers who may enter the local offices or while they are conducting outreach throughout the state.

##### *3) Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.*

As a MSFW non-significant state, Mississippi strives to ensure that employment and training services required under WIOA Title I are provided to MSFWs at the WIN Job Center as well through the MDES website. As previously mentioned, services provided to MSFWs in the WIN Job Center include information on unemployment insurance, assessment, counseling, job referrals, job development contacts, training, support services and job placement assistance.

Appropriate assessments for each MSFW that registers at the WIN Job Center are conducted to determine the specific

employment and training needs of that worker. The MDES self-service system for employment and unemployment opportunities streamlines the process of getting immediate service that can be delivered anywhere, anytime. Posters and other printed material are posted at farms to provide contact information for the MSFW department. Such information is also provided to local partnering agencies that often come into contact with MSFW many times per year.

## 6. Other Requirements

### A. Collaboration

MDES and MDC work in collaboration where an estimated 500 MSFWs are served each year. MDES is also working to form a stronger relationship with the Regional Equality Opportunity Office. This partnership will ensure U.S. workers and MSFWs alike are afforded equal opportunities to jobs, as well as, ensuring worker's rights are not being violated and protected. As MDES' farm worker program continues to grow, the goal is to seek out and form closer relationships with other agencies and advocacy groups.

### B. Review and Public Comment

The State Monitor Advocate works for MDES; and was afforded the opportunity to review and comment on the Program Year 2024 AOP.

1. 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.

The Mississippi AOP for Program Year 2024 was reviewed by the 167 NFJP grantee, and at the discretion of the NFJP other interested groups affiliated with the NFJP were given an opportunity to comment on the state AOP.

2. The plan was posted on the MDES public web site available to the public for review and comment. Although solicited, no additional information and no comments were received.

### C. Data Assessment

While Mississippi is a non-significant MSFW state, ongoing training occurs to identify all MSFW's that visit American Job Centers. Mississippi strives to ensure delivery of services both qualitatively and quantitatively to our non-significant MSFW population. Ongoing training will occur to ensure all goals are met.

### D. Assessment of Progress

MDES is completing an AOP for Program Year 2024 in accordance with DOL guidance. PY 2023 data is the most recent data,

Previous year's history based on Program Year (PY) 2023 data:

- Approximately 950 agricultural job orders and openings were received.
- There were no agricultural job orders filled entirely by MSFWs.
- Most job orders were filled with a combination of H2A and MSFW applicants totaling 100%.
- There were 346 interstate clearance orders received.
- There were 604 interstate clearance orders initiated.

Based on historical data and previous performance, MDES anticipates achieving the following goals for MSFW:

- Approximately 750 agricultural job orders and openings to be received.

- Most job orders filled will be a combination of H2A and MSFW applicants totaling 100%.
- Approximately 1% of the job orders are expected to be filled by MSFWs.
- Project 647 interstate clearance orders to be received and initiated.

*State Monitor Advocate*

The State Monitor Advocate works for MDES; and was afforded the opportunity to review and comment on the Program Year 2024 AOP.

*Wagner-Peyser Assurances*

<b>The State Plan must include</b>	<b>Include</b>
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	No
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: <ol style="list-style-type: none"> <li>1) Initiate the discontinuation of services;</li> <li>2) Make the determination that services need to be discontinued;</li> <li>3) Make the determination to reinstate services after the services have been discontinued;</li> <li>4) Approve corrective action plans;</li> <li>5) Approve the removal of an employer’s clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;</li> <li>6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs’ behalf (if the SWA so chooses); and</li> <li>7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.</li> </ol>	Yes

## Adult Education and Family Literacy Act Programs

### A. *Aligning of Content Standards*

The Mississippi Community College Board (MCCB), Office of Adult Education (OAE), has strategically advanced its commitment to excellence by adopting the College and Career Readiness Standards (CCRS) for Adult Education (AE) released by the U.S. Department of Education, Office of Career, Technical and Adult Education (OCTAE). This decision, made in July of 2016, aimed to enhance the quality of instruction in AE classrooms and align standards seamlessly with Mississippi's K-12 standards, reflecting the latest instructional practices.

In pursuit of this vision, a comprehensive statewide CCRS implementation team was established, comprising of AE instructors, local program directors, and state staff. This team engaged in the CCRS Standards-in-Action training, led by LINCS Trainers, to adeptly implement the standards across Mississippi AE eligible providers. The Literacy Information and Communication System (LINCS) is a national leadership initiative funded by the U.S. Department of Education (ED), OCTAE, to expand evidence-based practice in the field of adult education. The primary objective, both historically and presently, is to form cohorts of well-trained instructors in all subject areas, ensuring the continuation of standards-based instruction through ongoing training initiatives.

Recognizing the significance of digital access and equity, the OAE took a significant step forward in June 2022 by launching the Canvas Standards Foundational courses. Canvas is a cloud-based learning management system (LMS) that facilitates online education by providing a platform for educators to create, manage, and deliver digital courses and content. These courses offer on-demand, in-depth training on current standards. All new teachers entering a Mississippi AE program are mandated to complete the Foundational courses, specifically covering CCRS English Language Arts (ELA) and CCRS Math.

Furthermore, to address the imperative needs of educational equity, access, and rigor for adult English Language Learners (ELLs), the OAE has embraced the English Language Proficiency (ELP) Standards for Adult Education. Released by the U.S. Department of Education in October 2016, these standards ensure that adult ELLs acquire the essential knowledge and skills for employment and self-sufficiency through integrated English Language instruction, workplace preparation activities, mathematics instruction, and digital literacy. To support this initiative, ELL instructors underwent comprehensive training on the ELP Standards and implementation strategies. Notably, a dedicated team of ELL instructors actively participated in the 2021 national training for implementing standards-based instruction for ELLs, reinforcing the commitment to excellence in adult education across the state.

Education and Literacy Activities (Section 203 of WIOA)

### B. 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;*
- *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.*

The OAE is strategically shaping its plan to administer the Workforce Innovation and Opportunity Act (WIOA) of 2014 – Title II Adult Education and Family Literacy Act (AEFLA). This plan positions the OAE as the pivotal agency responsible for overseeing the allocation of funds to eligible providers and ensuring program and performance oversight. The overarching objective is to propel adult education and literacy services throughout the state, aligning with the goals outlined in the State Plan.

To drive this vision forward, the OAE has set forth comprehensive goals:

Improve Outcomes by Scaling Effective Models and Strategies: The OAE will focus on building, expanding, and scaling comprehensive career pathways systems across every adult education program. The aim is to achieve the expansion of evidence-based models, enhancing the overall effectiveness of adult education initiatives.

1. **Increase Postsecondary Transitions and Credential Attainment:** By providing support and training to eligible providers, the OAE aims to ensure that students seamlessly transition to postsecondary education or training, earning in-demand credentials for self-sustaining employment. The integration of adult education with occupational education and training will be a key focus, promoting the development of career pathways systems.
2. **Strengthen College and Career Readiness for Adult Learners:** The OAE will provide training and support to eligible providers, preparing adult learners for success in postsecondary education and the workforce. Emphasizing the Smart Start Course, based on the U.S. Department of Education's Employability Skills Framework, will be integral to this goal. The Smart Start Course was developed by the OAE and is an educational initiative aimed at equipping individuals with essential academic foundational knowledge and job readiness skills. Individuals not only gain fundamental education but also benefit from the ACT® WorkKeys Curriculum. This integration empowers individuals with a unique opportunity to earn the National Career Readiness Certificate®.
3. **Develop Multi-Level Career Pathways Options:** The OAE aims to enable the creation of multiple entry points into postsecondary education tailored to various functioning levels of adult education learners. These pathways will align with identified student readiness levels and lead to credentials, certifications, and degrees that open doors to employment in high-growth, family-supporting jobs.

In terms of funding, the OAE employs a competitive Request for Proposal (RFP) process to identify, assess, and award multi-year grants to eligible providers. This includes Adult Education (Section 231), Corrections Education and other Institutionalized Individuals (Section 225), Integrated English Literacy and Civics Education (IELCE) (Section 243). Anticipating the period from July 1, 2025, through June 30, 2030, the OAE is committed to conducting a competitive process that ensures equitable access for all eligible providers.

The thirteen considerations as specified in WIOA, Title II, Sec. 231 (e) are used as the basis to determine funding decisions, as well as to ensure that applicants only use AEFLA grant funds to serve eligible individuals as specified in WIOA section 203(4). Applicants are evaluated using a scoring rubric that includes:

- The thirteen considerations

- Alignment to the local workforce development boards (LWDB) strategies and goals
- Description of strategies and activities that promote concurrent enrollment with title i services and core partner responsibilities
- Data collection process
- Demonstrated effectiveness
- Program performance and
- The ability to provide services that meet the needs of the target population

As required by WIOA Section 107(d)(11)(B), the RFP process also includes a procedure to ensure the applicable LWDBs review the application and provide comments and/or recommendations regarding the application’s alignment to the strategies and goals of the local plan under Section 108 of WIOA.

In preparation for the competition, the OAE will review the most current U.S. Census and American Community Survey data, along with regional-specific labor market information, setting new enrollment targets for applicants. The application process places a strong emphasis on addressing barriers to equitable access and participation, as outlined in Section 427 of the General Education Provision Act (GEPA), ensuring a fair and inclusive opportunity for all.

In terms of eligible providers, the OAE recognizes organizations demonstrating effectiveness in providing adult education activities. The RFP requires applicants to furnish performance data supporting their funding request, and eligible providers may include:

- Local education agency
- Community-based or faith-based organization
- Volunteer literacy organization
- Institution of higher education
- Public or private nonprofit agency
- Library
- Public housing authority
- Nonprofit institution with the ability to provide adult education and literacy services
- Consortium or coalition of agencies, organizations, institutions, libraries, or authorities described above
- Partnership between an employer and an entity described above

Each applicant requesting funds is required to include a description of the steps the applicant proposes to take to ensure equitable access to and participation in its federally assisted program for students, teachers, and other program beneficiaries with special needs. Section 427 of the GEPA highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, applicants determine whether these or other barriers may prevent participation in the program or activities and outline in their applications the specific steps they intend to take to overcome any identified barriers.

The funds allocated to local providers are intended to establish and operate programs that provide adult education and literacy services to learners meeting the statutory definition of an “eligible individual” as defined in Section 203. Eligible individuals include those who are at least 16 years of age, are not enrolled or required to be enrolled in secondary school under the State law, are basic skills deficient, do not have a secondary school diploma or its recognized equivalent, or are English language learners. Services include Adult Basic Education (ABE), Adult Secondary Education (ASE),



English Language Acquisition (ELA), Integrated Education and Training (IET), Integrated English Literacy and Civics Education (IELCE), Correctional Education Programs, Workforce Preparation, and Workforce Training.

Furthermore, providers are required to implement evidence and research-based strategies that accelerate learning and promote readiness for postsecondary education and employment. This commitment includes standards-based instruction, technology integration and distance learning, career pathways development, postsecondary bridge programs, alignment of services through concurrent enrollment, and collaborative agreements with the local WIN Job Centers.

The success of this comprehensive plan hinges on effective collaboration, data-driven decision-making, and a commitment to meeting the diverse needs of adult learners. The OAE's forward-looking approach positions it as a catalyst for positive change, ensuring that adult education in Mississippi evolves to meet the demands of the 21st-century workforce and aligns with the broader goals of the State Plan and federal legislation.

ensure students as jobseekers have access to information and services that lead to positive employment outcomes.

### C. 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.*

*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.*

The OAE is dedicated to advancing the educational opportunities for incarcerated individuals through the allocation of Section 225 grant funds. To streamline the award process, we employ the same RFP process and timeline outlined for Section 231 funds, adhering to the guidelines set forth in Adult Education and Literacy Activities (Section 203 of WIOA).

Our commitment to fostering excellence in correctional education is underscored by the implementation of multi-year (five year) grants, awarded through a rigorous and competitive RFP process. The next RFP will award grants for the term July 1, 2025 through June 30, 2030. Evaluation of applications is conducted systematically, utilizing the 13 considerations outlined in Title II of WIOA. Notably, priority will be accorded to initiatives catering to individuals likely to exit correctional institutions within five years of program participation.

Services offered include adult education and literacy activities, special education (as determined by the agency), integrated education and training, career pathways, concurrent enrollment, peer tutoring, and transition to re-entry initiatives, aligning with our overarching goal of reducing recidivism (Section 225(b)).

The OAE will continue collaborating with the MS Department of Corrections and other correctional facilities, aligning curriculum, student performance standards, data accountability systems, and teacher/peer tutor training. A focal point of our efforts involves developing programs that seamlessly integrate basic skills instruction with essential life skills, digital

literacy, and employability skills, as found in the Smart Start Course. This holistic approach ensures students acquire the multifaceted abilities necessary for sustained self-sufficiency post-incarceration.

Ongoing collaboration between the OAE and correctional facilities ensures instructional activities align with regional needs. Correctional facilities play an instrumental role in the referral process, guiding individuals towards adult education programs in their release areas and local community colleges. Participants who are within 12 months of release are also given the opportunity to participate in the Reentry Academy where they receive Pathway to Employment strategies for those who are capable of work. In addition, through collaborative efforts with employers and community leaders, students have the opportunity to participate in job fairs and mock interviews.

Within the correctional facilities, participants meet with counselors and/or a Reentry Transition Specialist who link them to external reentry/rehabilitation services through the various core partners (MS Department of Rehabilitation Services, WIN Job Centers, MS Department of Health Services, and the Office of Adult Education) for post-release success. Participants who earn their high school equivalency are encouraged to enroll into college programs, if available, while incarcerated as well as after release.

Building on participation in OCTAE's Integrated Education and Training in Correctional and Reentry Education Technical Assistance program from spring 2021 to spring 2022, the OAE remains steadfast in providing comprehensive technical assistance, advising, and on-site guidance to assist correctional education programs in the development and implementation of IET programs. Primary focus is on the development of new programs tailored to Mississippi's workforce needs, creation of multi-level career pathways with stackable credential opportunities, and the refinement of processes to incorporate contextualized instruction, a single set of learning objectives, and team-teaching methodologies. This commitment ensures that our correctional education programs remain dynamic, relevant, and aligned with the evolving landscape of education and workforce demands.

#### D. 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.*

The OAE awards Section 243 grant funds for Integrated English Literacy and Civics Education (IELCE) programs using the same RFP process and timeline described for Section 231 and 225 funds; see Adult Education and Literacy Activities (Section 203 of WIOA) above. The OAE awards multi-year (five year) grants to eligible providers through a competitive RFP. The review of applications includes evaluation based on the 13 considerations outlined in Title II of WIOA. All applications are evaluated using the same rubric and scoring criteria. Applicants provide narrative details to demonstrate how they will meet the criteria. Eligible providers showcasing demonstrated effectiveness in providing adult education and literacy activities are eligible to apply for WIOA Section 243 funding. The funds are aimed at preparing adult English Language Learners, including professionals with degrees and credentials in their native countries, for unsubsidized employment in in-demand industries and occupations leading to economic self-sufficiency. The next RFP awards grants for the term July 1, 2025 through June 30, 2030.

Eligible providers are required to describe how they will align the IELCE program with the local workforce development system to carry out the activities of the program. Each eligible provider

will prepare English language learners for unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency by delivering the following activities under WIOA:

- Integrate literacy and English language instruction with occupational skill/s training
- Foster connections with employers through collaboration with College and Career Navigators (CCN) and post-secondary relationships with career and technical education and workforce. CCNs play an integral role in fostering student persistence and success through direct guidance and coordination of campus and community-based services.

Programs applying for IELCE funds under Section 243 are required to offer an IET program. State priorities include implementing stackable credentials, multi-level career pathways, and IET program/s. Applicants are required to provide extensive data to demonstrate the need and potential for success of IELCE activities in conjunction with integrated education and training in the proposed service area. Such data will include, but is not limited to, immigration trends, demographics of the English language learners in the area where the program will be provided and employment and labor market statistics for the area. In addition, applicants will be asked to provide evidence they have developed or will be able to develop in a timely fashion, partnerships that support the purpose of the program. Funding under this title will be awarded based upon the criteria for evaluation of programs applications contained in Section 243 of WIOA.

IELCE providers collaborate with the LWDBs. LWDB representatives review applications for alignment with the local plan and provide ongoing collaboration and technical assistance to develop IET programs responsive to local labor market demands. Mississippi has four designated LWDBs that are tasked with selecting and identifying target sectors while developing goals and activities to address the workforce needs in their respective economies. Aligning with the identified sector strategies, Mississippi's community colleges provide training and education, through short-term workforce training and/or career-technical education to Mississippians, giving focus to specific industries important to a region.

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

## E. STATE LEADERSHIP

Describe how the state will use the funds to carry out the required state leadership activities under Section 223 of WIOA

1. *The alignment of adult education and literacy activities with other core programs and one-stop partners, including eligible providers, to implement the strategy identified in the unified State plan under section 102 or the combined State plan under section 103, including the development of career pathways to provide access to employment and training services for individuals in adult education and literacy activities.*

The primary use of state leadership funds is to provide high-quality professional development and technical assistance to the adult education programs that align with the goals of the state and local workforce development plans. The system emphasizes data and evidence-based technical assistance and professional development opportunities that promote program improvement. State leadership activities are permitted up to 12.5 percent of the grant funds under Section 223.

In an effort to align services across the state and support the no wrong door policy, Mississippi core partners provide ongoing training for state, regional and local staff. This training enhances professional growth and development, covering topics such as common intake procedures, common referral processes and specific programmatic information for each core partner. The OAE assists programs in coordinating and delivering key services within the one-stop delivery system. These services may include instruction, assessment, support and referral services. The OAE develops and provides relevant training to assist locals in the development of partnerships within the one-stop system.

Additionally, the development of sector partnerships and career pathway development continues to be a priority, focusing on aligning services as students transition from adult education through integrated education and training, furthering their education and employment opportunities.

Annually, the OAE provides statewide training in coordination with local adult education programs and WIOA Core Partners, including the Mississippi Department of Employment Security, Mississippi Department of Human Services, and the Mississippi Department of Rehabilitation Services. The training fosters increased awareness of services offered through the various entities, eliminates duplication of services, and enhances service delivery. In addition to the annual core partner training, additional training occurs with strategic partners across the state to provide staff with knowledge of services to offer students holistic wrap-around service.

To enhance the connection between programs, students, and employers, the OAE has dedicated staff to represent adult education by serving on the Governor’s Job Fair Network Committee, allowing opportunities to engage employers and gain further understanding of Mississippi’s workforce landscape. In addition, CCNs and local adult education directors are encouraged to participate in the job fairs in their districts.

Mississippi has four LWDB(s), and all Title II funded programs are required to develop written agreements to ensure service alignment. Programs align services with local plans to promote concurrent enrollment and activities in order to meet the state adjusted levels of performance and collect data to report performance indicators. Additionally, all adult education providers describe how they will fulfill one-stop responsibilities in their region.

*2. The establishment or operation of high quality professional development programs to improve the instruction provided pursuant to local activities required under section 231(b), including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners, instruction provided by volunteers or by personnel of a State or outlying area, and dissemination of information about models and promising practices related to such programs*

The OAE is responsible for designing, implementing, and operating statewide professional development activities for all AEFLA funded programs. The OAE utilizes state leadership funds to plan, coordinate, and continue implementation of the College and Career Readiness Standards (CCRS) for all programs in the state. State leadership funding supports conferences and other training academies and institutes to ensure ongoing professional development in standards-based instruction and other OAE priority areas.

Improving teacher effectiveness has been a long-term goal for the OAE and continues to be a priority to enable every adult learner in Mississippi to acquire the necessary basic skills— reading, writing, math computation, speaking and listening, and digital literacy skills—to compete successfully in today’s workplace, strengthen family foundations, and exercise full citizenship.

Professional development in reading literacy, math literacy, and digital literacy skills offer strategies for teachers to use in their classroom to assist adult learners in developing these skills. Digital Literacy has emerged as a crucial focal point in adult education, recognizing it as an indispensable skill that every adult must possess to actively engage in the workforce and navigate the demands of everyday life. These trainings are recorded and uploaded to a Canvas course where teachers can access the webinars on-demand. Reading Literacy webinars include a focus on evidence-based instruction with vocabulary, text complexity, and comprehension.

The OAE will continue to partner with the Barbara Bush Foundation, Literacy Information and Communication System (LINCS), the Coalition on Adult Basic Education (COABE), American Institutes for Research (AIR), and the NRS in an effort to enhance instructors’ proficiencies to directly impact the students, empowering them with essential skills needed for everyday life and employment.

To meet the needs of adult learners with learning disabilities and mental health concerns, the OAE will continue to provide training sessions that include comprehensive guidance and support to create an inclusive environment where individuals can flourish personally and academically.

The annual New Teacher Academy provides an intensive workshop-style experience for all incoming teachers in adult education, covering the most current and effective strategies for managing a classroom and creating curriculum aligned to the diverse needs of adult learners.

The Teachers Mentoring Teachers Institute (TMT) transforms teacher support at the local level. This online, on-demand, Canvas course was created to equip Lead/Mentor teachers with the essential skills needed to effectively

guide and support new teachers. Recognizing that fostering a trusting environment through personalized guidance is pivotal for the growth and retention of new teachers, the TMT Institute is poised to become a cornerstone in elevating the mentorship experience within the educational landscape.

In adult education, Diversity, Equity, and Inclusion (DEI) are paramount for cultivating an enriching and effective learning environment. Recognizing and embracing diverse backgrounds, perspectives, and experiences among adult learners fosters a dynamic exchange of ideas and promotes a more inclusive educational landscape. Equity ensures fair access to resources, opportunities, and support, fostering an environment where every learner can thrive. Inclusion goes beyond mere representation, creating a space where individuals feel valued and respected. The OAE provides DEI training through an on-demand course offered through LINCS. The training is included on the professional development calendar which is disseminated to the programs.

*3. The provision of technical assistance to eligible providers of adult education and literacy activities receiving funds under this title, including—*

1. the development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training;
2. the role of eligible providers as a one-stop partner to provide access to employment, education, and training services; and
3. assistance in the use of technology, including for staff training, to eligible providers, especially the use of technology to improve system efficiencies.

State leadership funds are used to provide professional development and technical assistance to build a systemic approach incorporating all aspects of adult education. This is done by sharing promising practices on high-quality, research-based instruction and programming. Technical assistance and professional development activities are designed around programmatic needs assessments as well as targeted areas identified through monitoring and evaluation efforts. The OAE disseminates resources such as CCRS implementation, distance education, digital literacy, math numeracy training, ELL, assessment training, IET, career navigation, workforce preparedness, learning disabilities, high school equivalency and mental health training through various channels such as the Skill UP website and Canvas.

Training modalities include the following: annual MS Association of Adult and Community Education (MAACE) Summer Conference, annual New Teacher Academy, Teachers Mentoring Teachers Institute (TMTI) for Lead Teachers and Mentees, biannual Directors Retreats, CCN peer meetings, monthly data meetings with data managers, and other trainings as requested.

The OAE works collaboratively with other core programs and partner agencies to provide comprehensive and wraparound services to program participants. To align and improve access to employment, training, and education programs, Title II eligible providers are required to partner with Mississippi's Comprehensive One-Stop Centers. Through a Memorandum of Understanding (MOU), adult education programs assist with the coordination and delivery of key services, such as instruction, workshops, assessments, ACT WorkKeys® Curriculum, ACT WorkKeys® testing, Individual Training Accounts (ITA), and referral services.

Partnering with the one-stop center provides numerous opportunities to coordinate efforts with adult education to create and develop efficient and effective referral processes, co-enrollment of services, and program design to prepare students to enter the workforce.

Throughout the state's four workforce areas, adult education representatives attend local LWDB meetings in order to create and nurture partnerships with community agencies and other WIOA partners. Examples of collaboration between adult education, the one-stop center, and the LWDB are outlined below:

- The LWDB actively participates in the approval and allocation of funding for the Eligible Training Provider's List, showcasing a unified commitment to supporting essential training programs.
- Adult education providers play a pivotal role by offering classes directly at the one-stop center, creating a synergistic learning environment that seamlessly integrates education into the broader workforce ecosystem.
- Adult education providers engage in the strategic development of career pathways tailored to high-demand job sectors, aligning these initiatives with the directives of their respective LWDBs and the overarching framework of MS Pathfinder.
- The collaborative efforts extend to facilitating referrals between adult education and the one-stop center, as well as fostering connections with other key core partners. This interconnected approach ensures that individuals can access a continuum of services, enhancing their journey toward educational and career success.

The OAE is dedicated to advancing educator’s proficiencies through annual training centered around the use of technology to improve classroom effectiveness and program outcomes. Training focuses on the National Reporting System (NRS) processes and the effective use of the statewide data system in order to maintain accurate student data. The OAE also provides technical assistance to prepare instructors and program administrators to identify and utilize technology to enhance classroom experiences and digital literacy skills among adult learners.

*The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State.*

Local eligible providers are responsible for meeting all programmatic goals and outcomes required in their approved RFP. To ensure excellence, performance outcomes for each provider are to meet or exceed the levels of performance for each of the established NRS benchmarks. The OAE is actively engaged in assessing the quality of adult education and literacy activities provided by the local entities through ongoing data reviews, monitoring visits, and performance reports.

As part of a comprehensive monitoring strategy, 100% of AEFLA funded programs are monitored continuously through desk reviews and the requirement of quarterly submissions of the Desktop Monitoring Tool (DMT) from the local providers. The DMT incorporates relevant data, enabling adult educators to gain insights and draw meaningful lessons from their own data and is based on the NRSs Educational Functioning Levels (EFL), Measurable Skill Gains (MSG), High School Equivalency (HSE) attainment, and postsecondary education and training. Mississippi included additional indicators to include Post-test rate goal, Smart Start Credential, National Career Readiness Certificate®, and Integrated Education and Training enrollment.

The monitoring and evaluating process, whether conducted informally or formally, frequently prompts targeted technical assistance of specific performance areas, often involving a more in-depth assessment/evaluation. Within Canvas, the OAE created a repository of readily available resources and shared proven practices that adult educators can implement in order to have a transformative educational setting. All recipients will receive an on-site monitoring visit at least once every three years.

*e. 2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable*

In addition to the required State Leadership Activities, the OAE provides additional training on activities such as:

- Implementing technology in the classroom to enhance instructional practices
- Utilizing data for program improvement and support
- Aligning instructional methods with standards and competencies, evidence-based curricula, workplace readiness activities and phonemic awareness
- Designing content models for integrated education and training and career pathways through collaboration between local providers, post-secondary institutions, and business and industry
- Coordinating with other agencies to increase enrollment and successful completion in adult education programs

Online professional development courses make it possible for Mississippi's adult educators to receive information without disrupting local programs' services for adults. Improved consistency of instruction and reduced travel costs for trainers and attendees are also important considerations for implementing distance learning. Online courses can be accessed at the convenience of the educator, thereby enabling new instructors to begin learning about their roles and responsibilities immediately without waiting for the annual state-sponsored New Teachers Academy training. The OAE records all webinars and uploads them into a Canvas course for instructors to access on-demand.

Additionally, all new employees in adult education are required to take the *Back 2 Basics* course. The interactive course is designed to ensure directors, instructors and staff are knowledgeable on the policies and guidelines for the state. The course has embedded assessments and local examples to ensure transfer of information is occurring. The following interactive modules have been developed:

- Program Overview: AEFLA and WIOA
- Mississippi Assessment Policy
- Intake and Orientation
- Cumulative Folder Checklist
- National Reporting System and Data Collection
- Instructional Practices
- Retention
- Transition Services

Mississippi's online job system, MS Works, is an innovative platform that allows students to establish comprehensive profiles, actively engage in occupation research, and access real-time job openings, complete with detailed requirements. As such, a requirement of all local adult education programs' core services is to verify students are registered in MS Works. MS Works not only enhances the educational experience but also provides students with a dynamic tool to navigate and explore the evolving landscape of employment opportunities in the state.

In addition to their primary adult education and literacy service offerings, adult education programs must incorporate the state's workforce preparation course, the Smart Start Course. This course encompasses two pivotal state-recognized certifications in Mississippi: the National Career Readiness Certificate® (NCRC) and the Smart Start Certificate and/or Credential, seamlessly aligning with the State WIOA Plan.

The Smart Start Course provides comprehensive instruction and engaging activities to equip individuals with a blend of academic proficiency, critical thinking abilities, digital literacy, and workplace discipline. This multifaceted approach ensures their successful transition into postsecondary education, training, or employment. Through Smart Start, students gain valuable insights into Mississippi's workforce areas, job sector strategies, and economic development specific to Mississippi's workforce needs. Beyond preparing individuals for middle-skill level employment, the course fosters the development of essential job skills, cultivates effective work habits, and hones communication skills crucial for successful employment. Upon completing the course, passing with a 75% or higher, and receiving a bronze or higher on the ACT WorkKeys® Assessments leading to the National Career Readiness Credential® (NCRC), students are awarded the Smart Start Credential. Both credentials demonstrate to training providers and employers that the participant possesses the essential skills needed to be successful in further training or a job. Several community colleges are allowing college credit through prior learning credit or dual credit to students meeting the minimum requirements of the Smart Start Course. Students enrolled in IET pathways are required to take the Smart Start Course and have a bronze or higher on the NCRC since the course meets the workforce preparation component for an IET.

The OAE will continue developing and enhancing multilevel, bridge and integrated education and training programs and prioritize the alignment of adult education and literacy activities with other core programs and one-stop partners, providing adults access to employment and training services.

## f. 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.*

The OAE uses data reviews, desktop monitoring, on-site monitoring reviews, and programmatic resources to evaluate the success or areas for technical assistance ensuring program improvement for each local program.

### **Data Reviews:**

The OAE employs a variety of informal tools to monitor adult education and literacy activities such as:

- Utilizing NRS Table 4 and Table 2A to identify retention concerns and provide technical assistance to locals when developing a retention plan
- Monitoring average daily attendance bi-annually to ensure local programs are being good stewards of funds and that funds are used in appropriate areas
- Referring to the Student Diagnostic Search assists with identifying issues in student data

### **Desktop Monitoring Tool:**

The OAE utilizes a *Desktop Monitoring Tool* to track program effectiveness in the following areas:

- Performance met by each Educational Functioning Levels (EFL) as identified by the NRS
- High School Equivalency attainment
- Enrollment in postsecondary education and training
- Posttest-rate goal
- Smart Start Credential attainment
- National Career Readiness Certificate® attainment
- Career Pathway enrollment

Programs submit the Desktop Monitoring Tool quarterly; however, if a program fails to meet year-end program performance targets, they are placed on a Program Improvement Plan and must submit their Desktop Monitoring Tool each month. After the completion of the internal desk audit and review of the Desktop Monitoring Tool from each local program, the OAE contacts programs by phone, email, or a scheduled visit to discuss recommendations for improvement and to provide technical assistance as needed.

### **On-site Monitoring:**

Each year, the OAE selects six programs for on-site monitoring. Adult education programs are monitored on a three-year rotation. During the 2022-2023 fiscal year, Mississippi created the *Program Quality and Compliance Review (PQCR)* instrument which is used to follow-up on recommendations and technical assistance provided from the previous on-site monitoring visits.

The Program Quality and Compliance Review (PQCR) identifies six vital components in the areas of Program Quality:

- Demonstrated past effectiveness
- Efficient data quality
- Relevant professional development
- WIOA and state plan coordination
- Transition opportunities through career pathways/IET
- Fiscal management

In cases where a program is found to be noncompliant with state and federal policies related to local data management and program services, the program is placed on a Corrective Action Plan. Programs are given 45 days to prepare and submit a written plan of action describing the plan of resolution.



### **Programmatic Resources:**

To ensure local teachers are delivering the highest quality instruction, the OAE created the *MS Adult Education Educator Evaluation* tool to serve as a rubric for classroom observations. The rubric can be utilized by OAE staff, program directors, or lead teachers when observing instructors in areas of planning, instruction, learning environment, and professional practices. Program directors evaluate instructors annually, conducting a minimum of at least two classroom observations per instructor. The OAE reviews local instructor evaluations during on-site monitoring visits.

Each program has a lead instructor who assists the program director with developing and implementing targeted professional development that enriches skills, knowledge, and instructional quality, addressing both student and teacher needs.

Local programs also utilize student surveys to measure instructor effectiveness with surveys administered at random times and upon exiting the program.

In order to promote continuous improvement of adult education and literacy activities and the impact on student learning outcomes, the OAE will continue ongoing and systematic assessments to evaluate the adult education program's overall design and the impact on student learning outcomes.

Adult Education and Family Literacy Act Program Assurances

The State Plan must include	Include
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);	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;	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;	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.	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).	Yes

Adult Education and Family Literacy Act Program Certifications

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	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;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

*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>.*

All AEFLA-funded programs are mandated to incorporate within their RFP a comprehensive outline detailing the proactive measures intended to ensure equitable access and participation for teachers, students, and other program beneficiaries with special needs, as mandated by Section 427 of the GEPA. This statute discerns six potential barriers—gender, race, national origin, color, disability, or age—that might impede fair access or participation. Local programs are to assess these barriers to determine if they prevent students, teachers, etc. from participating in the project and/or services. In addition, local programs must identify the steps proposed to mitigate these obstacles. The OAE monitors each local program's compliance with their stated GEPA plan, which is submitted as part of their application.

In its role as the coordinating body for the Mississippi community colleges, the MCCB strongly advocates for full compliance with federal and state nondiscrimination laws and executive orders. Emphasizing the importance of equal employment opportunities, the MCCB urges each community college under its purview to eliminate any form of exclusion, denial of benefits, or discrimination based on gender, race, national origin, color, disability, age, or any other protected group within their programs or activities. The MCCB is committed to the principles of equal educational and employment opportunity. The OAE aligns its practices with this guidance and Section 427 of the GEPA when administering federal Title II Adult Education and Family Literacy Act funds, including State Leadership funds designated for professional development.

The OAE is dedicated to ensuring comprehensive access, participation, and suitable educational opportunities for all recipients of federally funded local adult education programs, encompassing faculty, staff, and students with special needs. The OAE ensures that activities, programs, and services are designed to be accessible to all stakeholders with special needs, facilitating their full participation in projects and/or services. To cater to the diverse needs of students, faculty, community members, and other participants, the OAE provides reasonable and appropriate accommodations. For instance, professional development initiatives are conducted through face-to-face, virtual, and/or online hybrid formats to maximize accessibility for all adult education faculty and staff.

## Vocational Rehabilitation

### A. Input of State Rehabilitation Center

*(1) Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;*

In matters of program administration and planning, the Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind has a strong commitment to seeking the advice of consumers of vocational rehabilitation services, service providers, family members, advocates, employers and others interested in disability issues.

Comprised of representatives of these stakeholder groups, the State Rehabilitation Council makes a major contribution to the OVR/OVRB program through advice provided during regular SRC business meetings, Policy Committee meetings, and other activities the members determine to be appropriate.

The SRC meets quarterly. The SRC Minutes, which are maintained for all SRC meetings, summarize the advice and recommendation provided to VR and VRB. VR and VRB continued to work closely with the SRC this year, providing the SRC with ongoing reports in regard to policy and procedure changes, RSA 911 submission updates, RSA Data dashboard information, client services, etc.

The DSU accepts the comments and recommendations from the SRC. Below are the comments and the DSU's responses to those comments.

#### **SRC Comment/Question:**

2020 has been a difficult year. I appreciate everyone who has done out-of-the-box thinking to get services to clients and helped keep spirits high amongst clients who are feeling down or frustrated at the closeness of service due to Covid-19.

#### **DSU Response:**

Yes, 2020 and 2021 have been a difficult year. However, COVID-19 did push OVR/OVRB into thinking of ways to serve clients. Some of the techniques such as providing services virtually, Counselors being supplied with a cell phone to be able to work from any location to communicate with their clients, etc. More than likely these new processes will continue and were determined to be very beneficial and needed in order to continue providing services.

#### **SRC Comment/Question:**

The VRB Training Needs Survey should be disseminated to all current VRB referrals, applicants, and clients; state partners, including SRC members, School for the Blind, DD Council; IL Providers, among others and all VRB staff for dissemination and for sharing with Mississippians who experience blindness. The results will help VRB to plan the Structured Discovery Service provision that is being proposed to best meet the needs of Mississippians who need this service.

#### **SRC Comment/Question:**

I am looking forward to learning more about the goal to establish the Structured Discovery Learning program in Mississippi. This sounds like a great opportunity to keep Mississippians who need this service.

#### **SRC Comment/Question:**

If the order of selection is ever initiated, please make sure consumers are aware of the process. The policy appears to follow all law and regulation. It is outstanding to think that no categories have been closed since 2009. This is impressive. This signifies to me that staff are utilizing resources very efficiently.

#### **DSU Response:**

We are currently under an Order of Selection. However, all categories are open at this time. At any time that resources do not permit all eligible consumers to be served and a Priority Category has to be closed, all clients and individuals in the state will be notified.

**SRC Comment/Question:**

The summer job programs are very exciting. Hopefully every employer will have a successful experience and see the benefit of employing our customers.

**SRC Comment/Question:**

Combining WIPA with the Independent Living for the Blind doesn't seem to fit. It seems to overwhelm staff, which can cause delays in WIPA Services and WIPA Services being less intense than needed when a benefits recipient is making choices about work and benefits.

**DSU Response:**

On August 2021, SSA suspended the 80% directive that requires 80% of WIPA referrals to originate from the Ticket to Work Help. What this means is that MPIC can accept direct referrals from any service entity until this directive is reinstated. As of August 31, 2021, MPIC has received a total of 78 referrals (46 from the Helpline and 32 from other entities). MPIC is on track to reaching the Referral goal of 500. However, as you know, there are 6 Community Work Incentive Coordinators (CWICs) that provide direct services throughout the state. 2 full time and 4-part time CWICs. The 4-part time CWICs only work 2 days per week providing WIPA services. To ensure that all staff have an equitable caseload based on their time worked, all referrals will need to be sent to me, Lynda Hall, Program Manager; [lhall@mdrs.ms.gov](mailto:lhall@mdrs.ms.gov) I will assign referrals based on the CWIC workload. Also, to ensure that all consumers are receiving timely and quality services., the referral process will include:

- WIPA Program Manager will receive all referrals from service entities.
- WIPA Program Manager will assign all referrals to the CWICs
- WIPA Program Manager will email all referral sources with the CWIC contact information and date of assignment
- CWIC has 5 days to contact the referral (3 attempts will be made within a 10-day period)

• CWICs will follow-up with an email to Program Manager and Referral source once contact has been made  
WIPA Program Manager will follow-up with Referral source to discuss initial contact, quality of services, etc. 30 days after referral is received. These steps are being implemented so that the Program Manager can track referrals when needed, ensure that consumers are receiving timely services, and staff have an equitable caseload. MPIC goal is timely and quality services for all consumers.

If you have any questions or concerns, please feel free to call me 662-320-6656

**SRC Comment/Question:**

It's always nice to see positive comments. It is important to constantly check up on the negative comments, trying to see if service delivery could be better, check to help resolve complaints The satisfaction surveys indicate overall satisfaction. It seems that both surveys should ask the same questions and use the same scale for best use. I believe that staff take customer satisfaction seriously and review the results frequently with changes made when needed to bring about better satisfaction. Spend time at the next meeting reviewing satisfaction information. How do you keep the "Bias" out of people doing surveys? Planning survey questions; administering survey, interpreting responses. Should a neutral party be contracted to develop and administer survey?

**DSU Response:**

The negative or not so positive complaints and comments are submitted to the District Manager to review and address. Normally contact is made with the individual to help resolve the issue.

**SRC Comment/Question:**

Who makes the survey calls? Is it done in house or by a third party?

**DSU Response:**

*MDRS Program Integrity completed the consumer satisfaction survey for open cases and Mississippi State completes the quarterly consumer satisfaction for closed cases.*

**SRC Comment/Question:**

I think that the service delivery to MDRS employees needing accommodations can stand some improvements.

**DSU Response:**

*OVR/OVRB will continuously respond to and improve our efforts to ensure that our staff that need reasonable accommodation receive this accommodation.*

**SRC Comment/Question:**

I am excited about the idea of having Structured Discovery for our OVRB clients. I had no idea that some clients had to leave the state for an extended period of time to receive Structured Discovery. This will be a great benefit for our OVRB community. I think VR/VRB are working really hard toward meeting their goals. The make Mississippi proud.

**DSU Response:**

*The need to establish a Structured Discovery CRP and enhance the capability to services individuals with Autism and othersocial skills impairments can only benefit the individuals we serve and increase their ability to be successful in obtaining competitive integrated employment.*

**SRC Comment/Question:**

I'm impressed with the work the MDRS team is beginning to put in place. People in internships, establish careers opportunities and outreach to the business community.

VR & VRB have continual new approaches that bring about good outcomes for people with disabilities. I was impressed tohear about the way that all high quality services are available, even if out of state.

Great work. Keep striving to get out numbers back up to pre-Covid levels. It's been a tough year and we are all thankful forthe hard work to get us to the other side of the crisis.

**DSU Response:**

*OVR/OVRB continue to look for ways to expand services. We continue to increase the number of individuals who receive work based learning experiences, internships, etc.*

**SRC Comment/Question:**

It will be exciting to see the information from the Florida vendors and how it can be implemented in Mississippi. It is great toshare resources.

**DSU Response:**

The DSU is continuously looking for ways to serve clients and provide services.

**SRC Comment/Question:**

Very good report. I love that this area is getting the needed attention.

The resources for staff prepared by your new coordinator are excellent. Resources for employers could be helpful. Training to the public could assist as well.

Great Report Jennifer. I am so glad that MDRS is focusing on the success of individuals with Autism. I love that you arecollaborating on every case for individuals with Autism. That is awesome.

**DSU Response:**

Being able to serve more individuals with Autism and help these individuals obtain competitive integrated employment is one of our goals. A new process for staffing cases for individuals with Autism was developed to ensure that cases are not closed or fall through the cracks because the lack of receiving appropriate services. The need for more CRPs that provide services for individuals with Autism in addressed in the updated State Plan for 2022 – 2023.

**SRC Comment/Question:**

This is a great report. It really helped me understand what OOS means. I am glad that all categories are currently able to receive services and that there is an appeal procedure just in case it is needed.

**DSU Response:**

As stated, all of OVR/OVRB priority categories are open. Due to the impact of COVID-19 and access to adults and students, funds were available to provide services to all individuals who applied for and were determined eligible for services.

**SRC Comment/Question:**

I am thankful for your efforts in writing for the funds to reimburse business owners who lost merchandise during COVID.

**DSU Response:**

OVRB would like to thank the Committee of Blind Vendors and the MDRS Business Enterprise Program for their work and commitment to serve our clients even during COVID.

**SRC Comment/Question:**

The VRB Career Reboot sounds like a great program. Thank you for inviting Deana Criess to present to the SRC about the program. I also appreciated Betsy Simoneaux following up by email with informative materials to the group after Deana's presentation on the VRB Career Reboot Program. I am happy to learn more about this resource and to learn that it is being utilized with people in our state.

**DSU Response:**

OVRB will continue to monitor this program for assisting clients with finding competitive integrated employment.

**SRC Comment/Question:**

The idea to do the brief SRC Orientation was excellent. It would be super to have an extended session. May be good for someone from NCSRC to come to Mississippi and share SRC roles, responsibilities and other state practices as an orientation for new members, current members and other parties.

**DSU Response:**

At the December 2021 meeting, Sherry Taylor, Vice President and Treasurer of the NCSRC attended and made a presentation virtually to the SRC. She discussed SRC roles, responsibilities. Ms. Taylor did give a brief overview of what a few states have done to orientate new members and current members to the SRC. She encouraged SRC participation and invited them to the national SRC meeting/training. At the October meeting, the VR Director conducted a brief orientation for new members. We will continue to provide an SRC Orientation for new members and current members. We accept therecommendation to have an extended session and will work toward this for a future meeting.

**SRC Comment/Question:**

This agenda Item was tabled due to insufficient time. The SRC agenda needs to be expanded in length of time as not to rush the presenters and as not to discourage discussion from SRC members.

How will Needs Assessment be utilized? May want to have a neutral party analyze and evaluate needs assessment and how to improve and increase services as expressed in the October 13, 2021 meeting. I like how the assessments are done on open ongoing and at the end of closed cases.

**DSU Response to 4H:**

At the December meeting, the DSU agreed that a work group, including SRC members, would be developed to carefully analyze the results of the most recent Comprehensive Needs Assessment. The DSU and the SRC will move forward with implementing this team of individuals. This will help in developing new goals and objectives, as well as assist in determining ways to improve the delivery of services to individuals with disabilities.

*Results of the Annual 2020 - 2021 SRC Consumer Satisfaction Survey*

A consumer satisfaction survey is conducted four times per year to determine the consumer satisfaction regarding closed cases during the year.

An outside marketing firm, Wolfgang Frese Survey Research Laboratory of Mississippi State University, conducted the survey for the SRC.

The ratings for the various services consumers received are presented below using the average (means) score given to each item by all respondents interviewed. If an item did not apply to a particular respondent or if the consumer did not know or refused to rate an item he/she is not included in calculating the average score for that item. The seven items rated are in Table 1 (for exact wording, reference the questionnaire.) Chart 1 is included for an easy visual comparison. The respondents were asked to rate the items (Questions 1-9) on a scale from 1 to 5, with 1 being very bad and 5 being very good.. Thus, a high score indicates that the service was good and a low score indicates that it was poor.

*Table 1 - Service Ratings by Consumer*

*Rate the following items on a scale of '1 to 5', with '1' being poor and '5' being excellent.*

	# of Consumers	Average Rating Mean
Q1 The help the OVR staff provided at the time you applied for VR services	998	4.79
Q2 The help from the OVR staff during the planning of your services	993	4.80
Q3 The help from the OVR staff when you were receiving your VR Services	991	4.81
Q4 The help you received from other agencies or service providers	176	5.54
Q7 Your employment outcome	776	4.61
Q8 Employment benefits provided by your new employer	394	4.13
Q9 Overall, how do you rate the services you received?	992	4.80



*(2) The designated State unit's response to the Council's input and recommendations; and*

**DSU Responses:**

The VR and VRB Director will continue to provide the SRC with updates regarding the numbers served and overall performance data. We will continue to implement strategies to promote good customer service and promote outreach in the community regarding VR Services. The consumer satisfaction surveys will continue to be provided as a means of providing the DSU with feedback regarding the quality of client services. We will implement training for staff in this area to help address concerns and to help improve the overall quality of services. The DSU will also examine ways to improve the survey and accept the recommendation/suggestions regarding the rating scale, etc.

**DSU Response:**

Yes, 2020 and 2021 have been a difficult year. However, COVID-19 did push OVR/OVRB into thinking of ways to serve clients. Some of the techniques such as providing services virtually, Counselors being supplied with a cell phone to be able to work from any location to communicate with their clients, etc. More than likely these new processes will continue and were determined to be very beneficial and needed in order to continue providing services.

**DSU Response:**

We are currently under an Order of Selection. However, all categories are open at this time. At any time that resources do not permit all eligible consumers to be served and a Priority Category has to be closed, all clients and individuals in the state will be notified.

**DSU Response:**

On August 2021, SSA suspended the 80% directive that requires 80% of WIPA referrals to originate from the Ticket to Work Help. What this means is that MPIC can accept direct referrals from any service entity until this directive is reinstated. As of August 31, 2021, MPIC has received a total of 78 referrals (46 from the Helpline and 32 from other entities). MPIC is on track to reaching the Referral goal of 500. However, as you know, there are 6 Community Work Incentive Coordinators (CWICs) that provide direct services throughout the state. 2 full time and 4-part time CWICs. The 4-part time CWICs only work 2 days per week providing WIPA services. To ensure that all staff have an equitable caseload based on their time worked, all referrals will need to be sent to me, Lynda Hall, Program Manager; [lhall@mdrs.ms.gov](mailto:lhall@mdrs.ms.gov) I will assign referrals based on the CWIC workload. Also, to ensure that all consumers are receiving timely and quality services., the referral process will include:

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If you have any questions or concerns, please feel free to call me 662-320-6656

**DSU Response:**

The negative or not so positive complaints and comments are submitted to the District Manager to review and address. Normally contact is made with the individual to help resolve the issue.

**DSU Response:**

MDRS Program Integrity completed the consumer satisfaction survey for open cases and Mississippi State completes the quarterly consumer satisfaction for closed cases.

**DSU Response:**

OVR/OVRB will continuously respond to and improve our efforts to ensure that our staff that need reasonable accommodation receive this accommodation.

**DSU Response:**

The need to establish a Structured Discovery CRP and enhance the capability to services individuals with Autism and other social skills impairments can only benefit the individuals we serve and increase their ability to be successful in obtaining competitive integrated employment.

**DSU Response:**

OVR/OVRB continue to look for ways to expand services. We continue to increase the number of individuals who receive work based learning experiences, internships, etc.

**DSU Response:**

The DSU is continuously looking for ways to serve clients and provide services.

**DSU Response:**

Being able to serve more individuals with Autism and help these individuals obtain competitive integrated employment is one of our goals. A new process for staffing cases for individuals with Autism was developed to ensure that cases are not closed or fall through the cracks because of the lack of receiving appropriate services. The need for more CRPs that provide services for individuals with Autism in addressed in the updated State Plan for 2022 – 2023.

**DSU Response:**

As stated, all of OVR/OVRB priority categories are open. Due to the impact of COVID-19 and access to adults and students, funds were available to provide services to all individuals who applied for and were determined eligible for services.

**DSU Response:**

OVRB would like to thank the Committee of Blind Vendors and the MDRS Business Enterprise Program for their work and commitment to serve our clients even during COVID.

**DSU Response:**

OVRB will continue to monitor this program for assisting clients with finding competitive integrated employment.

**DSU Response:**

At the December 2021 meeting, Sherry Taylor, Vice President and Treasurer of the NCSRC attended and made a presentation virtually to the SRC. She discussed SRC roles, responsibilities. Ms. Taylor did give a brief overview of what a few states have done to orientate new members and current members to the SRC. She encouraged SRC participation and invited them to the national SRC meeting/training. At the October meeting, the VR Director conducted a brief orientation for new members. We will continue to provide an SRC Orientation for new members and current members. We accept the recommendation to have an extended session and will work toward this for a future meeting.

**DSU Response to 4H:**

At the December meeting, the DSU agreed that a work group, including SRC members, would be developed to carefully analyze the results of the most recent Comprehensive Needs Assessment. The DSU and the SRC will move forward with implementing this team of individuals. This will help in developing new goals and objectives, as well as, assist in determining ways to improve the delivery of services to individuals with disabilities.

**In 2018, VR and VRB implemented a Consumer Satisfaction Survey** for open VR Cases. This would allow the agency to identify any areas of client dissatisfaction with agency services and take corrective action on such issues while the client is still an active participant in agency services. The hope was that increasing client satisfaction would lead to more successful employment outcomes. Therefore, a multi-step plan was devised to develop and complete a service satisfaction survey. Upon completion of the survey, results were compiled and analyzed, and a written report was produced. These results are now presented at the SRC meetings. As we work with more Transition aged students, we continue to see caseloads increase. Initially, the Counselors caseloads were restructured so that more counselors would serve students with

disabilities. However, as we move further from the first year of implementation of the new law and regulations in WIOA, we continue to see an increase in caseload size. Recommendations for new Counselors' positions have been made and the need for CRPs that will be able to provide to Pre-ETS to potentially eligible.

When the results of the Consumer Satisfaction Survey are received, this report is provided to the District Managers. When caseloads are identified that show significant weaknesses, managers work with the staff to determine why the issues have occurred and develop strategies to improve the performance of that particular Counselor. Also, follow-up is made to the client to correct the issues.

Training, as well as updated policy and procedures, have been implemented for staff to help address concerns and to help improve the overall quality of services. On-going training in areas identified as a result of the consumer satisfaction survey and overall case reviews assist us in addressing policy and procedure issues and selecting subject areas for on-going staff development. The DSU will also examine ways to improve the survey and accept the recommendation/suggestions regarding the rating scale, etc.

A consumer satisfaction survey is conducted four times per year to determine consumer satisfaction regarding closed cases during the year.

*(3) The designated State unit's explanations for rejecting any of the Council's input or recommendations.*

The DSU did not reject any of the Council's input or recommendations.

#### **B. REQUEST FOR WAIVER OF STATEWIDENESS**

**When requesting a waiver of the state wideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:**

*(1) A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;*

The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind is requesting will continue to develop targeted third-party services and program agreements with local agencies in Fiscal Years 2020-2023.

These agreements are written and carried out in compliance with 34 CFR 361.28. MDRS, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind requires each agreement describe the services to be provided, will contain written assurances signed by the local education agency that local agencies funds are provided with non-federal funds.

MDRS has on record that no federal funds are used by the LEAs to provide their share of the services.

*(2) The designated State unit will approve each proposed service before it is put into effect; and*

DSU approval will be obtained before each service is initiated. All services will be provided in accordance with the agency's approved State Plan.

*(3). Requirements of the VR services portion of the Unified or Combined state Plan will apply to the services approved under the waiver.*

All agreements approved under this waiver will comply with all requirements of the VR Services portion of the Combined State plan, including the state's Order of Selection for Services requirements and this assurance will be written in all agreements.

MDRS requests a waiver of state wideness on an annual basis in order to provide and expand services to a substantially larger number of individuals with significant disabilities, to individuals with disabilities with particular type of impairments, individuals with disabilities from particular ethnic populations that have traditionally been underserved, and other target populations identified in WIOA and federal regulations, such as students with disabilities needing Pre-Employment Transition Services. Due to the increase in the number of potentially eligible and eligible students with disabilities served, the anticipated number of students with disabilities as reported by the Department of Education and the Comprehensive Needs Assessment, MDRS is requesting a Waiver of State wideness for the following:

**1. VR TRANSITION CONTRACT EMPLOYEE (Ends June 30, 2022)** MDRS does not have sufficient budget authority to contract with every potential local educational agency in the state. Some local educational agencies have not chosen to enter into this agreement. For LEAs who have opted out, OVR/OVRB Counselors and/or the LEAs are providing the Pre-Employment Transition Services to these students with disabilities.

The VR Transition Contract Employee that MDRS sponsored and jointly funded. were designed to increase the availability and quality of Pre-Employment Transition Services and Transition services that assist potentially eligible students and eligible students with disabilities to transition from secondary education to postsecondary education or employment. MDRS entered into agreements with school districts during Federal Fiscal Year 2020. MDRS, OVR/OVRB will not enter into any additional agreements for the VR Transition Contract Employee during Program Year 2022 – 2023.

**Cooperative Agreements include the following required federal assurances:**

- Local educational agency funds used as match are certified as non-federal monies. All expenditures are made by the school district with 100% non-federal monies, and are certified by the district when MDRS is invoiced for reimbursement by the school district.

This position is provided for under an Interagency Agreement which provides for a 50% funding and 50% timespent on the work of each agency.

- MDRS reimburses the school district for one-half the cost of salary, fringe benefits, travel, staff development and other possible items that are necessary to achieve the goals of this agreement.
- The services provided are for VR eligible and potentially eligible students with disabilities and are new services that have a VR focus or an existing service that has been modified to have a VR focus.

The following 20 school districts currently have Interagency Agreements with MDRS for the jointly funded VR Transition Contract Employee: Corinth School District, Columbus Municipal School District, , Clinton Public School District, Columbia School District, Hattiesburg Public School District, Jackson County School District, Jackson Public School District, Madison County School District, North Tippah School District, Ocean Springs School District, Petal School District, Prentiss County School District, Quitman County School District, Rankin County School District, South Tippah School District, Tupelo Public School District, Wayne County School District, and Winona School District.

**2. PRE-EMPLOYMENT TRANSITION SERVICE: PEER MENTORING**

MDRS, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind currently has a cooperative agreement for Pre-Employment Transition Services (Pre-ETS): Peer Mentoring Program at Mississippi

State University (MSU), University of Southern Mississippi (USM), Northeast Mississippi Community College (NMCC) and East Mississippi Community College (EMCC), through their disability support services offices. OVR/OVRB. Other postsecondary students across the state are eligible to receive support services through their OVR/OVRB Counselor and/or through their college disability support offices.

VR may enter into new agreements with additional colleges and universities during Federal Fiscal Year 2022-2023.

- Using federal allocated Pre-ETS funds, MDRS reimburses MSU, USM, NMCC, EMCC and Hinds Community College for Peer Mentor Certification, Peer Mentoring Plan, Assignment, and Management, and Peer Mentoring Evaluations and Final reports.
- MDRS also reimburses the Mentor for hourly Peer Mentoring services. All services provided by the universities using federal monies and are certified by the district when MDRS is invoiced for reimbursement by the universities.

### **3. PROJECT SEARCH**

Mississippi Vocational Rehabilitation Agency is requesting a waiver of state wideness for Project SEARCH.

Project SEARCH is only offered in a subset of communities across Mississippi. The Project SEARCH Program is a unique, nine month, school-to-work program for young adults with developmental disabilities that occurs entirely at the workplace. This innovative, business-led model of school-to-work transition features total workplace immersion, which facilitates a seamless combination of classroom instruction; career exploration; and hands-on, worksite-based training and support. The goal for each student is Competitive Integrated Employment. Project SEARCH was developed at Cincinnati Children's Hospital Medical Center and has been implemented at several sites in Mississippi throughout statewide initiatives involving the collaborative effort of MDRS, area school districts, and several of Mississippi's leading employers. The LEA provides a classroom teacher to provide some academic instruction in the morning and

the students go to work stations the remainder of the day. Work stations may include patient escort, food service, instrument sterilization, and other settings in the hospital. MDRS approval will be obtained before services are initiated. All services will be provided in accordance with the agency's approved State Plan. The agency will approve services before they begin.

MDRS is working to add Project SEARCH partners across the state to create more opportunities for youth with significant disabilities in obtaining real-life work experience that leads to Competitive Integrated Employment.

The services provided are for VR eligible students with significant disabilities that are seeking Competitive Integrated Employment.

- Local educational agency funds used as match are certified as non-federal monies. All expenditures are made by the school district with 100% non-federal monies and are certified by the district when MDRS is invoiced for reimbursement by the school district.
- This position is provided under an Interagency Agreement which provides for 50% funding from each agency for the Project SEARCH Transition Contract Specialist position.
- MDRS reimburses the school for one-half the cost of salary, fringe benefits, travel, staff development and other possible items that are necessary to achieve the goals of this agreement.
- MDRS covers the cost of the licensing agreement for the current Project SEARCH sites.
- The services provided are for VR eligible students with significant disabilities that are seeking Competitive Integrated Employment.

The following school districts currently have Interagency Agreements with MDRS for Project SEARCH. New Summit School, Rankin County School District, Petal School District, Jones County School District, Tupelo School District, Brookhaven School District, Neshoba Central School District, Vicksburg School District, DeSoto County School District Ocean Springs School District and Lafayette County School District.

### C. Cooperative Agreements with Agencies not Carrying Out Activities Under the Statewide Workforce Development System

**Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:**

#### *(1) Federal, State, and local agencies and programs;*

The Mississippi Department of Rehabilitation Services (MDRS), Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind, has cooperative relationships with an extensive number of public and private agencies and programs, including local school districts, community mental health centers, community colleges, universities, human services agencies, and other agencies

The Office of Vocational Rehabilitation and the Office of Vocational Rehabilitation for the Blind has always strived to maximize and improve the level of services afforded to individuals with the most significant disabilities. The OVR/OVRB staff, integral members of many interagency teams, regularly collaborate with agencies and programs to facilitate the provision of services to its primary clients.

In all of the coordination activities throughout the State, the goal is to reduce the duplication of services and to maximize the VR client's opportunity to obtain an employment outcome.

The methods utilized by OVR/OVRB to expand and improve services to individuals with significant disabilities in our State will be enhanced and ongoing. These 'methods' entail several administrative and programmatic activities intended to facilitate and/or maintain expansion of services for individuals with significant disabilities.

A Memoranda of Understanding clarifies and drives the WIOA required partnership between OVR/OVRB and Mississippi's One-Stop system and each of the four local workforce development areas. Moving forward, MDRS' OVR/OVRB activities include a common intake process and coordinating data sharing between agencies. Data was not available on the implementation or progress on these activities. Additional exploration may be needed to provide further clarification on activities and opportunities for improvement.

### **COOPERATIVE AGREEMENTS:**

OVR and OVRB make a concerted effort to utilize all available resources to provide the highest quality and most cost-effective services to individuals with significant disabilities. Since several organizations provide various services to individuals with disabilities, those resources are tapped whenever and wherever possible.

In order to accomplish this, OVR/OVRB relies on many Cooperative Agreements, memorandums of agreements and contracts with various agencies, organizations and groups. These agreements govern cooperation with and use of agency and program services. These agreements include specific logistical agreements for processing interagency referrals, coordinating services and expenditures, cross training, and resolving disputes.

District and local VR/VRB District offices typically do not have formal cooperative agreements. Agreements made at the state level are intended to govern day to day operations in the local and district offices. **The entities that OVR is actively involved with include, but is not limited to:**

- **Department of Mental Health, Bureau of Mental Health** - OVR has implemented a statewide provision of services for individuals with severe mental illness. Beginning in 2018 to present, a formalized agreement between the Mississippi Department of Rehabilitation Services, Office of Vocational

Rehabilitation and the Mississippi Department of Mental Health, Bureau of Mental Health. This agreement was updated in 2021.

The purpose of this program is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. This program will result in increased integrated employment opportunities for these individuals.

A comprehensive program evaluation will be completed with mental health sites participating this year, including site visits to the mental health centers as well as discussions with VR Counselors about how the program is working, what is working well and improvements that might help the program.

Throughout the districts, VR offices work with the community mental health centers serving the area. VR Counselors and District Managers will provide orientation and training sessions for mental health center staff and their clients.

Where the community mental health centers have established vocational and Supported Employment programs, OVR often collaborates with these centers to meet the needs of our mutual clients;

- **Mississippi Department of Education** - for the coordination of transition services and local school districts to carry out transition and youth career services plus implement a Transition Contract Employee in participating local school districts;
- **Division of Medicaid** - to provide seamless, non-duplicated services to individuals who are eligible for both Medicaid and VR services and for maximum utilization of resources between the two agencies;
- **Department of Mental Health (DMH) Planning and Advisory Council** - as federally mandated for advice and support. DMH to cover the costs for therapeutic medical services offered at secondary alcohol and drug treatment centers that have been approved by DMH;
- **Department of Mental Health - Bureau of Intellectual and Developmental Disabilities** - to continue enhancing, expanding, and developing methods to support eligible persons with intellectual and developmental disabilities who express a desire for Competitive Integrated Employment; establish a state-level work group to address system, policy and funding issues that impede the continuous provision of employment services by MDRS and DMH; engage MDRS staff and DMH providers and stakeholders at the local level in collaboration and cooperation in the accomplishment of the vision and desired outcomes; identify and disseminate best practices including training and funding strategies; and, provide individuals with intellectual and developmental disabilities with quality employment services that lead to Competitive Integrated Employment in a non-duplicated and seamless manner;
- **Department of Human Services (DHS)-Division of Family and Children Services** - to assess foster care participants who are diagnosed as having physical and/or mental disabilities; **DHS-Division of Field Operations** to assist TANF recipients who are diagnosed with physical and/or mental disabilities;
- **Mississippi Band of Choctaw Indians** - for interagency referrals for vocational rehabilitation services, including transition planning to Choctaw Indians; Psychometric Services and Interpreting Services.
- **U. S. Department of Veterans Affairs** - to improve work opportunities for veterans with disabilities and coordinate a referral and service delivery process;
- **Warren-Yazoo Mental Health Service Program of Assertive Community Treatment (PACT)** - to facilitate the most effective and efficient process to assist PACT recipients gain access to vocational rehabilitation services;

- **Department of Transportation** - to coordinate transportation and related program resources and services at the state level wherever possible and promote maximum feasible coordination at the local level;
- **Mississippi State University, T.K. Martin Center** - to provide for evaluations pertaining to assistive technology, primarily related to seating, positioning and mobility; adaptive driving, including bioptic driving; vehicle modifications; and augmentative and alternative communication;
- **Mississippi State University, Student Support Services, and the University of Southern Mississippi / Institute for Disability Studies** operate the **Peer Mentoring Program** - to provide self- advocacy training as part of Pre-Employment Transition Services for post-secondary students with disabilities, and to assist with the transition of these students into post-secondary education in order to achieve degrees in higher education that allow for successful careers;
- **Department of Education, Office of Special Education** - continues the memorandum of agreement to support the seamless transition of students from school to adult life, facilitating the development and completion of their Individualized Education Program. The agreement addresses the Individuals with Disabilities Education Act and the Rehabilitation Act. It includes information about the purpose, authority and scope, foundations of the partnership, roles and responsibilities, confidentiality, student documentation, student eligibility, OVR/OVRB staff attendance at IEP meetings, coordination of resources, resolution of differences, data reporting, 504 students and termination and changes.

*(2) State programs carried out under section 4 of the Assistive Technology Act of 1998;*

MDRS administers Mississippi's Project START (Success through Assistive Rehabilitative Technology), the state program carried out under Section 4 of the Assistive Technology Act of 1998, for education awareness and access to Assistive Technology.

MDRS also operates an Assistive Technology Program to assure the adequate and appropriate utilization of rehabilitation engineering assistance is provided to individuals with disabilities. OVR/OVRB makes referrals to this program. The rehabilitation engineering assistance includes a range of services to assist individuals with physical and/or cognitive disabilities that can be addressed through modification, alteration or renovation via development or use of technological devices, or by way of other technology-related assistance.

To provide timely and quality rehabilitation engineering services, MDRS has Assistive Technology Specialists located throughout the state in MDRS offices.

*(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;*

OVR/OVRB has developed a relationship with the local office of the U.S. Department of Agriculture to gather information, build relationships, and develop cooperative efforts to provide services to Mississippians with a disability.

Although no written cooperative agreements have been developed, VR will continue to foster a relationship with the Mississippi Chapter of the USDA and initiate steps to invite USDA representatives to present to VR Counselors at their District meetings.

*(4) Non-educational agencies serving out-of-school youth; and*

OVR/OVRB, has developed a cooperative agreement with the University of Mississippi Online High School. This cooperative agreement will enable out of school youth to participate in the online program with the goal of obtaining their high school diploma. The University of Mississippi is an accredited program that is listed among the top 50 Best Online High School Diplomas in the country. OVR will provide accommodations necessary to obtain this credential such as interpreters and tutors that will instruct in the student's natural language. These students, who have struggled with standardized tests due to English being a second language, will have an avenue that will facilitate their educational credential attainment opening further educational opportunities.



Some additional non-educational agencies serving out of school youth in which VR has memorandums of understanding as follows:

- **Department of Mental Health, Bureau of Mental Health** - In 2018, a formalized agreement between the Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and the Mississippi Department of Mental Health, Bureau of Mental Health which serves out of school youth. In PY 2020, an MOU was amended to also service individuals with severe mental illness, including out of school youth. The purpose of this program is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. This program will result in increased integrated employment opportunities for these individuals.
- **Division of Medicaid** - to provide seamless, non-duplicated services to individuals who are eligible for both Medicaid and VR services and for maximum utilization of resources between the two agencies; that serves out of school youth.
- **Department of Mental Health - Bureau of Intellectual and Developmental Disabilities** - to continue enhancing, expanding, and developing methods to support eligible persons with intellectual and developmental disabilities who express a desire for Competitive Integrated Employment. There are specific services under this waiver program that serves out of school youth.
- **Department of Human Services (DHS)-Division of Family and Children Services** - to assess foster care participants who are diagnosed as having physical and/or mental disabilities;
- **Mississippi Band of Choctaw Indians** - for interagency referrals for vocational rehabilitation services, including transition planning to Choctaw Indians;
- **Warren-Yazoo Mental Health Service Program of Assertive Community Treatment (PACT)** - to facilitate the most effective and efficient process to assist PACT recipients gain access to vocational rehabilitation services.

*(5) State use contracting programs.*

Mississippi has no state use contracting programs.

**D. Coordination with Education Officials**

Describe:

*(1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students*

To comply with the partnership of WIOA (Workforce Innovation Opportunity Act), MDRS, OVR/OVRB staff collaborates with the Mississippi Department of Education and has updated the Memorandum of Agreement. This agreement explains how OVR/OVRB staff and MDE partner to provide a coordinated set of activities to facilitate a seamless transition of students with disabilities from school to Competitive Integrated Employment or education/training.

The updated Memorandum of Understanding, effective January 1, 2020 through June 30, 2022, focuses on mandates for transition services described in the Workforce Innovation Opportunity Act and the Individuals with Disabilities Education Act (2004). This includes how MDRS and MDE will collaborate to fulfill mandates on behalf of students with disabilities. Key elements of the partnership are stated in the agreement and include Authority; Purpose; Pre- Employment Transition Services Required Activities; Consultation and Technical

Assistance; Transition Planning; Outreach and Identification of Students with Disabilities; Section 511 Subminimum Wage; and Assurances.

At the state and local level, OVR/OVRB work with Education officials to coordinate complementary transition services for students with disabilities. At the state level, OVR continues to evaluate the options for the most effective coordination and delivery of services to students under IDEA. Additionally, OVR continues to work with local school officials to implement Pre-ETS. Prior to making services available, OVR counselors use school documents, health records, and other pertinent information as deemed appropriate for determining a student with a disability potentially eligible for Pre-ETS and/or the OVR Transition Program. OVR counselors then work with classroom teachers implementing Pre-ETS. VR/VRB, in collaboration with the local education agency, will provide Pre-ETS to assist the student in developing and successfully achieving their IPE goal.

OVR and MDE are working on other ways to increase opportunities for youth, such as with the Project SEARCH program. MDRS and MDE are well-positioned to continue evaluating and improving opportunities and services for youth with disabilities across the State.

### **Policies and procedure to facilitate the transition of students from school to receipt of VR services**

One of OVR/OVRB major goals is to emphasize the employment potential of students with disabilities and to improve the outreach and outcomes for students with disabilities. The MDRS-OVR/OVRB Program has updated the Transition policy to align with the Workforce Innovation Opportunity Act (WIOA) definition and provides guidance for the provision of Pre-Employment Transition Services.

The OVR/OVRB Program will continue to work with local school officials to implement Pre-Employment Transition Services (Pre-ETS). This approach provides a continuum of services directed toward additional post-secondary education or direct entry into the workforce.

Office of Vocational Rehabilitation for the Blind works closely with the education system through the VR Transition and Youth Career Services Program. There are approximately 17 VRB Counselors throughout the state who work in preparing students with blindness/vision loss for entry into the world of work. They serve as informational resources for teachers and other educational staff as well as provide resources and information about blindness for parents and transitioning students throughout development of the student's Individualized Plan for Employment (IPE).

VRB Counselors work closely with parents, education staff, and community service providers to promote development of skills needed for students to become as independent as possible and competitive in terms of employment. In addition to training parents and students about special education rights and responsibilities, VRB provides educational support by working with the VR Transition Team, school officials, and families to develop and implement the IPE. Goals developed in the Individualized Education Program (IEP) are included in the IPE to facilitate successful completion of those goals.

The IPE is completed during the transition process, so it is in place before students exit secondary education. Services prepare students to be confident and competent to maximize their potential to achieve success.

Office of Vocational Rehabilitation works closely with the education system throughout the state. There are approximately between 55 and 60 VR Counselors throughout the state who work in preparing students with disabilities for entry into the world of work.

The goal is to help the students with disabilities achieve a seamless transition from high school into the world of work, community, vocational or post-secondary education, and/or other planned outcomes. OVR administers the VR Transition and Youth Career Services Program as specified in Title I of the Rehabilitation Act of 1973, as amended.

District level VR offices and local education districts work together in maintaining local agreements between each VR district office and the local school districts as to *how to* execute the transition services.

Out of the 160 local education agencies in the state of Mississippi, OVR/OVRB has 158 agreements in place. Within these school districts, there are approximately 440 schools serving students between the ages of 14 – 21. . These agreements are shared with other state agencies, family members, and consumer groups to ensure the seamless transition of services for students. The agreements do not include any specified financial agreement other than the implied cost for serving students with disabilities.

Restructuring of the VR Transition and Youth Career Services Program has resulted in additional VR Counselors being assigned to designated high schools, who we refer to as Transition Counselors. These Counselors provide leadership, work with the students, parents, and school personnel.

We also have designated VR Program staff that consist of a Statewide Coordinator for Transition Services. Because of the continued growth in the Transition and Youth Career Services Program, we are anticipating adding additional Transition Coordinators.

VR Counselors are assigned to all public secondary schools, including Mississippi School for the Deaf and Blind.

The counselor and the District Manager establish linkages within each school with the following individuals:

1. Special Education Coordinator;
2. Principal;
3. Guidance Counselor for junior and seniors;
4. School health personnel; and
5. Other school-based staff determined appropriate by the counselor and the District Manager.
6. OVR/OVRB staff will provide the following information sharing activities, but not limited to other activities agreed upon:
  1. Provide information to students, parents and school staff about Vocational Rehabilitation policy and procedures as they relate to transition planning and VR outcomes;
  1. Work with the school district to appropriately identify students who may benefit from VR services;
  2. Participation in school-based transition activities, including conferences and meetings;
  3. Participating in information and formal presentations to parent groups;
  4. Providing consultation to local education staff regarding challenging or complex situations before or after referral;
  5. Contribute to the transition planning by communicating with school staff so that students, parents and school district staff can avail themselves of the counselor's expertise;
  6. Attending local educational transition fairs and community job fairs to promote employment;
  7. Participating on Transition teams;
  8. Participating in local meetings that provide services to students;
  9. Determine eligibility for VR services;
  10. Counsel transitioning students and their parents about vocational and career planning and employment outcomes related to the Individualized Education Program (IEP) by reviewing existing school records related to student;

11. Advise students, parents and school staff during the transition planning and service delivery process regarding current labor market information and community resources, including community-based services and the need for involvement by other state agencies.

Along with the VR Transition Counselors, these staff take a leading role in ensuring that Transition Services are provided to potentially eligible and eligible students with disabilities.

To help facilitate the transition of students with disabilities from school to VR services to assist the student in transitioning into training and/or employment, OVR/OVRB will:

1. Maintain the Memorandum of Understanding with the Department of Education and local school districts. This will be used as the tool to help facilitate and guide how VR will work with students during their transition;
2. OVR/OVRB Counselors and Rehabilitation Counselors for the Deaf will continue to be assigned to designated school districts as identified by the Transition Survey that is coordinated by the Transition Coordinator and local school districts;
3. The VR Transition Counselor will work with the school district each year prior to the beginning of school to provide outreach and information training to the school he/she is assigned;
4. Continue to update Resource Guide and technical information for staff and contract providers to help deliver and coordinate VR services during the transition process
5. VR policy indicates that the IPE will be completed before the student exits high school. This will help ensure that the student on an education/employment track upon exiting high school.
6. Each year, information is obtained from the Department of Education to provide update Special Education staff contact information.
7. Statewide, VR will designate VR staff who are assigned high school transition to provide leadership, information and referral, advocacy and technical assistance, and to promote collaboration among consumers, parents, adult service providers and other service agencies. Designated VR Transition staff include the Statewide Transition Coordinator and the staff designated to be a part of the Transition Team.
8. Develop a Transition Team that will include a VR representative from each District. Transition Team members will be responsible for sharing transition-related policy and practices with staff in their District. This responsibility also includes coordinating activities and training with other VR staff.

Transition planning between MDRS and MDE ultimately helps with the successful development and implementation of both the IEP and the IPE.

MDRS, through the Office of Vocational Rehabilitation and Office Vocational Rehabilitation for the Blind, has recently sent Qualifications Requests for third party providers to provide Pre-ETS activities in accordance with the Workforce Innovation & Opportunity Act (WIOA). At this time, three proposals have been awarded contracts and ten Requests for Proposals have been renewed.

Transition and Youth Career Services include, but are not limited to, job search skills, work evaluation, development of an IPE, basic money management, social skills, and job readiness training along with continuous counseling and guidance. These services may be performed solely by the VR Counselor, in collaboration with other service providers, or in coordination with an education teaching professional.

The OVR/OVRB Counselor also works with the classroom teacher implementing Pre-ETS services. The VR Counselor is prepared to teach the Pre-ETS curriculum in conjunction with providing the classroom teacher with information, technical assistance, and/or curriculum materials as needed. The VR Counselor supervises the student in this program, documents the student's progress, and shares information with the classroom teacher on a regular basis.

VR continues to emphasize *best practices* in providing services to students with disabilities in order to provide a seamless transition to subsequent work or other environments. This emphasis on *best practices*, in part, is achieved by continuous training of staff working with students with disabilities.

VR assures that, with respect to students with disabilities, the state has developed and implemented strategies to address the needs identified in the FFY 2021

Comprehensive Statewide Assessment of Rehabilitation Needs; strategies to achieve the goals and priorities identified by the state to improve and expand VR services for students with disabilities on a statewide basis; and has developed and will implement strategies to provide Pre-Employment Transition Services.

MDRS, OVR/OVRB also assures that, with respect to students, the needs identified in the state have been developed and will implement new strategies to address the needs identified in the FFY 2021 Comprehensive Statewide Assessment.

*(2) Information on the formal interagency agreement with the State educational agency with respect to:*

a. Consultation and technical ASSISTANCE TO assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

Mississippi has both a state level agreement, Memorandum of Agreement for Transition Planning for Secondary Students with Disabilities between the Mississippi Department of Rehabilitation Services (MDRS) and the Mississippi Department of Education (MDE) and a local level Agreement of Cooperation with each of our education agencies.

The scope of services between OVR/OVRB and MDE are described in (d) 2, between OVR/OVRB and the local education agencies are intended to serve as a mechanism for OVR/OVRB and the local school districts to clearly specify the plans, policies and procedures for coordinating services to facilitate the transition of students with disabilities, including:

- Responsibilities of OVR and OVRB;
- Responsibilities of Local Education Agency;
- Referral Process;
- Joint Development of IEPs and IPEs; and
- Coordination necessary and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by WIOA, with regard to students with disabilities who are seeking subminimum wage employment.

This Memorandum of Agreement for Transition Planning for Secondary Students with Disabilities is made and entered into by and between the Mississippi Department of Rehabilitation Services, hereafter referred to as ‘MDRS’, for and on behalf of its Offices of Vocational Rehabilitation and Vocational Rehabilitation for the Blind, hereafter referred to as ‘OVR/OVRB’, and the Mississippi Department of Education, for and on behalf of its Office of Special Education, hereafter referred to as ‘MDE OSE’.

Both the Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act of 1973 (the Rehabilitation Act), as amended by The Workforce Innovation and Opportunity Act (WIOA), require State Educational Agencies (SEA) and Vocational Rehabilitation (VR) agencies to plan and coordinate transition services, as well as Pre-Employment Transition Services for students with disabilities through a formal Interagency Agreement (Section 612(a)(12) of the IDEA and Section 101(a)(11)(D) of the Rehabilitation Act)

A formal Interagency Agreement is mandated under the Individuals with Disabilities Education Act (IDEA) 34 CFR 300.154, and section 101(a) (11) (D) of the Rehabilitation Act and its implementing regulations at 34 CFR 361.22 (b). Additional references used in this document include Sections 113 and 511 of the Rehabilitation Act, and the

Final Regulations: State Vocational Rehabilitation Services Program; State Supported Employment Services Program; Limitations on Use of Subminimum Wage. This Agreement is designed to improve the cooperative and collaborative efforts between OVR/OVRB and MDE/OSE to coordinate the receipt of Pre-Employment Transition Services, Transition Services and other Vocational Rehabilitation (VR) Services to students with disabilities who are eligible for special education services under the Individuals with Disabilities Education Act (IDEA), students who have a 504 plan, and other students with disabilities who are eligible or potentially eligible for services through OVR/OVRB in order to facilitate their smooth transition from school to post-school employment-related activities and Competitive Integrated Employment.

It is also the intent of this agreement to serve as a mechanism for OVR/OVRB and MDE OSE to clearly specify the plans, policies, and procedures for coordinating services to facilitate the transition of students with disabilities, including:

- Consultation and technical assistance in the planning for the transition of students with disabilities;
- Transition planning by OVR/OVRB and educational personnel that facilitates the development and implementation of a student's Individualized Education Plan (IEP);
- Roles and responsibilities, including financial and programmatic responsibilities of each agency;
- Procedures for outreach to and identification of students with disabilities;
- Assessment of students' potential need for transition services and Pre-Employment Transition Services;
- Coordination necessary and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by WIOA, with regard to students with disabilities who are seeking subminimum wage employment;
- Assurance that the MDE OSE will not enter into 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; and
- Additional considerations include grievance procedure to resolve disputes between OVR/OVRB and the MDE OSE, as appropriate, as well as procedures to resolve disputes between an individual with a disability and the entities specified above, and information about the Client Assistance Program.

The Cooperative Agreement between the Office of Vocational Rehabilitation and the Office of Vocational Rehabilitation for Blind and the Mississippi School for the Deaf and Blind was implemented to ensure that students who are Blind and Deaf receive effective seamless services as they make the transition from high school to post-high school education and/or training. This agreement includes Pre-Employment Transition services and other VR services. This agreement follows the same guidelines for all cooperative agreements with the Mississippi Department of Education and the local education agency in terms coordination, consultation, and technical assistance.

b. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

It is understood by all OVR/OVRB staff working with the school and transition age youth that it is their responsibility to work with students and the school in the school's efforts to develop and implement an IEP so that the student and VR will be able to develop and implement an IPE before the student exits high school. The school system is responsible for inviting the student, his or her parents or guardians, and if appropriate, representatives of participating agencies to meetings when transition is being discussed and decisions made about transition services. The VR Transition Counselor attend IEP meetings and provide school districts with assistance, strategies and ideas to help identify students' post-school employment goals, needs for VR Services, and concerns to be addressed in achieving the goals when invited. A VR Counselor is assigned to each public high school in Mississippi. The VR Transition

Counselor(s) assigned to each school is responsible for connecting with the special education staff at each school to outreach to students with disabilities interested in competitive integrated employment. This is achieved by setting up regular office hours in the school setting. VR Counselors participate in job fairs, parent teacher conferences, teacher conferences/meetings and attend IEP meetings when invited. VR recommends that students are referred for VR services two (2) years before exiting high school. When a high school student is enrolled in VR, their IPE and IEP are complimentary to each other. VR provides services both during school, after school and during the summer. The goal is for both the IPE and IEP to include Pre-Employment Transition Services provided by the school and VR in a way that best promotes the success of the student through their transition from high school to post-secondary education or employment.

c. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Often times when working with students while in school, there may be an overlap between their educational goal (IEP) and employment goals and services (IPE). When this happens, VR/VRB works with the school to either share the cost or determine how the service will be paid. Staff are provided guidelines to help determine how and who will be responsible for the services. Some questions are asked to help guide the decision, such as:

1. Is the service required to help achieve the education goal? If yes, the school has the primary responsibility for payment.
2. Will the service help to achieve the IPE employment goal? If yes, VR has the primary responsibility for payment.
3. If the service is planned on the IEP and IPE, the school and VR are responsible for negotiating a cost sharing agreement. Conflicts between the school and VR are resolved utilizing the process outlined in the Memorandum of Understanding
4. If the student is over 18 and eligible for services through the Department of Mental Health, Bureau for Individuals with Intellectual Disabilities, the school, VR and Mental Health will be responsible for negotiating a cost sharing agreement.

**VR/VRB staff are trained to work with the school and other agencies that have a Memorandum of Understanding or Cooperative Agreement to use this decision making strategy to resolve and ensure the student receives the services needed.**

d. Procedures for outreach to and identification of students with disabilities who need transition services. Outreach to students with disabilities 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. The interagency agreement between VR and the Department of Education provides information about VR and the local education agency's responsibilities to provide Pre-Employment Transition Services to students with disabilities from age 14-21. The VR/VRB Resource Guide includes information and other details on how VR provides Pre-Employment Transition Services, include the VR staff requirement to document and code these services for federal reporting and the student's IPE.

As the student moves from school to post school life, there should be no gap in services between the education and the vocational rehabilitation systems. While local school districts are responsible for providing education and transition services to students with disabilities who are still in the secondary school system, VR can provide transition services that involve planning and preparing for the student's future employment.

District Managers and Counselors are responsible for developing cooperative working relationships with the local education agency staff in the districts, and other agencies working with students. In 2020, our Transition Navigators will assist districts with developing relationships, providing services, and increasing student referrals.

The Counselor will actively work in collaboration with their local school district to identify students with disabilities who can benefit from vocational rehabilitation services. Schools usually provide a list of names to the counselor during the first semester of the current school year. Schools may also provide the information to the counselor prior to the end of a school year or during the summer break, which helps with preparation for the upcoming school year. When referring a student to VR, it is recommended that the school district:

1. Understands VR's eligibility requirements and the purpose of VR services;
2. Makes referrals based on student needs;
3. Obtains consent for release of information from the parent, legal guardian or from the student (a student age 18 or older can independently sign the release form unless he/she has a designated legal guardian);
4. Provides documentation that describes the student's disability, needs, preferences, interests, and skills (e.g., interpersonal, work, academic, independent living) which are relevant to vocational rehabilitation and achieving employment. Preferred information includes descriptions of the student's current abilities, work-related capacities and limitations, functional limitations and service needs, if available.

A referral packet which includes a referral letter, the Referral Information Form (MDRS-VR-05), Transition and Youth Referral Form Addendum (MDRS-TY-01) and transition brochure will be sent to individuals the school identifies as someone who may benefit from VR services. Contact will then be made with these referrals and their parents to introduce the vocational rehabilitation program and determine their potential interest in services. When the counselor sends letters to the client, a copy will be sent to the parent/guardian.

Students who express interest in services by returning the appropriate referral paperwork will be scheduled for a meeting with the counselor at school during school hours. The parents of the students must be notified of the meeting and invited to attend. When requested by the parent, other arrangements can be made to begin the application process. During the meeting, the counselor will explain the vocational rehabilitation program and answer questions posed by the student and/or his/her parents/guardians.

The counselor is required to enter the referral information in AACE (the VR/VRB Module in the AACE caseload management system) to allow each referral to be successfully tracked. The counselor will also use the referral module to document the services provided to students.

#### E. Cooperative Agreements with Private Nonprofit Organizations

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Cooperative Agreements with private non-profit organizations are established based on identified needs and expectations. Agreements may vary from the establishments of information and referral needs to the structuring of a new service or program.

As an ongoing process, MDRS, OVR/OVRB district staff develop and reinforce relationships with community partners structured to meet customer needs and informed choice.

Vocational and service needs of customers within the geographic area as identified through resources such as:

- the Comprehensive Statewide Needs Assessment;
- information from the State Rehabilitation Council; and



- other sources of State and local data to inform decision-making.
- other sources of State and local data to inform decision-making
- networking with other community partners that service individuals with disabilities

MDRS develops a formal fee for service contracts with private non-profit vocational rehabilitation service providers. The contract contains all necessary clauses and each contract is approved by the state's Assistant Attorney General assigned to MDRS. The contracts are executed by the MDRS Executive Director and the principal of the private non-profit vocational rehabilitation service provider.

MDRS-OVR/OVRB has the authority to enter into contracts with for-profit organizations for the purpose of providing vocational rehabilitation services for individuals with disabilities when it is determined that the for-profit organization is better qualified to provide the VR services than non-profit agencies and organizations.

In order to enter into a cooperative agreement as a VR Service provider, community rehabilitation program providers request to become a vendor for Vocational Rehabilitation Services, a provider/information request form and checklist is completed. This checklist contains some of the same information that providers submit that answer request for proposals. The provider is asked to provide valid W-9 information, evidence of incorporation with the MS Secretary of State, Scope of Services and the professional licensures, certification, credential, qualifications, resumes and job descriptions of key leadership positions. The vendor is also asked to provide information concerning their status as a supplier, grantee, and business structure.

The number of providers for Pre-Employment Transition Services in the state was very limited. To expand the delivery of Pre-Employment Transition Services, and obtain providers for Pre-Employment Transition Services, the Competitive Sealed Proposal process was used to request and obtain proposals from competing sources in response to advertised competitive specifications, through the issuance of a Request for Qualifications (RFQ), by which an award is made to the provider or who receives the highest score based on weighted evaluation criteria outlined in the RFP and includes discussions and negotiations with providers. The RFQ was posted on MDRS external website and in the legalnotice section of the newspaper and the Mississippi Contract/Procurement Opportunity Search Portal to allow service providers access to the document, guidance, and policy. Emails were also sent to community partners and agencies notifying them that MDRS was accepting Request for Proposals, and the proposals could be found on the MDRS' external website. In 2022-2023, MDRS-OVR/OVRB will also begin utilizing a Vendor Registration Process for Pre- ETS Providers. Providers will complete the Community Rehabilitation Program Certification and Vendor Application or Individual Service Provider Application.

#### F. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

*Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.*

OVR administers the Supported Employment (SE) Program as specified in Title VI of the Rehabilitation Act and amended in WIOA. VR works extensively with other state agencies, private non-profit entities, employers, family members, and consumer groups to ensure quality SE services are provided to all eligible individuals throughout all phases of the SE service delivery system.

When individuals apply for VR Services, the VR Counselor determines eligibility for VR and for Supported Employment. If it is determined that the individual will also require SE services to obtain employment and long-term support to maintain employment, the individual's case is staffed with the SE Counselor. The SE Program is not separate from the general VR program. It simply offers additional services to individuals that meet the criteria for eligibility for SE services. SE clients are eligible for any of the traditional VR services available to any other VR client. Any traditional VR services the SE client needs is paid for with regular VR (Title I) funds.

OVR has entered into formal Cooperative Agreements with the Mississippi Division of Medicaid (Medicaid) and Department of Mental Health, Bureau for Intellectual and Developmental Disabilities, with respect to delivery of VR services, including extended services, for individuals with the most significant disabilities eligible for home and community-based services.

The collaboration with DMH has resulted in a formalized referral process between the two agencies to ensure VR services are provided to individuals with the *most significant disabilities*, including those with serious mental illness.

A formal referral process has been developed for individuals referred from the Department Mental Health to VR Supported Employment. The MDRS Supported Employment Program Coordinator receives the referral from the DMH Mental Health Support Coordinator/Target Case Manager. After review, the SE Program Coordinator then forwards the referral to the SE Counselor in the appropriate MDRS District Office for application for VR services.

Upon completion of the time-limited Supported Employment services, the ongoing job skills training assistance and other necessary long-term support is transitioned to a third party, group, or individual through a Cooperative Agreement or Extended Services Support Plan Agreement. The primary provider of extended services is the DMH-Bureau of Intellectual and Developmental Disabilities through its network of local community service programs.

However, an increasing number of individuals and other community organizations are accepting this role. Employers are often willing to take on this responsibility and are encouraged to do so since it is the most natural arrangement for the client.

VR has entered into 40 new Extended Service Support Plan Agreements from January 1, 2020 through June 30, 2021. These 40 new agreements are in addition to the agreements previously established and still ongoing.

Providers of long term support are required to document twice monthly contact with each consumer successfully working in the community, and to maintain this documentation in case files for the duration of that consumer's job. This information is reported monthly to the VR Supported Employment Coordinator for tracking purposes.

WIOA increased the maximum amount of time for SE staff to provide time-limited Supported Employment services to 24 months. However, the rate of transitioning a client to extended services is dependent upon the needs of the individual, his/her family, the employer, the third party agency, and other involved individuals. Since SE staff members and the Extended Service provider will have been collaborating in the provision of SE services throughout an individual's Vocational Rehabilitation Program, such transitions are normally seamless and do not cause job disruptions.

Individuals with chronic mental illness who need special support services, but not job skills training services provided either at the work site or away from the work site in order to obtain employment, perform work skills and maintain employment are provided VR employment services. These services are coordinated with the DMH Case Manager to ensure the individual receives the support and is able to maintain employment.

In VR practice, when stabilization occurs, the client is ready to transition from VR-funded SE services to the appropriate source of ongoing support from the *Extended Service* provider.

Transition to *Extended Services* must take place no later than 24 months after the initial job placement. If there are exceptional circumstances that require ongoing support services to be provided longer than 24 months, the Counselor should justify this in a case note.

VR may provide extended service support to youth who have a most significant disability and are eligible for SE services. Extended support services provided to youth with the most significant disabilities can continue for a period of time not to exceed four (4) years or until the youth reaches the age of 25 and no longer meets the definition of a youth with a disability (or whichever comes first). VR can begin providing extended support services once initial job stabilization is achieved.

The use of Job Trainers at the worksite is an integral part of SE services. This individual is responsible for learning the job prior to the client coming to work, then teach the job to the client. The trainer not only teaches the work skills needed at the job site but will help the client become adjusted to the new work environment. The job trainer will help the client develop relationships with coworkers and supervisory staff. If the client cannot meet the job standards, the trainer is there to assure the employer that he work will be done to the business' quality and quantity levels. As the client becomes more independent at the worksite and is able to perform most of the job tasks with minimum intervention by the trainer, the trainer will fade assistance until the case can be closed and the extended service provider assumes the extended long-term support.

The following are possible resources for *Extended Services the counselor coordinates with to provide Extended Services*:

- **Natural Supports:** Support from supervisors and co-workers occurring in the workplace to assist employees with disabilities to perform their jobs, including support already provided by an employer for all employees. These natural supports may be both formal and/or informal, and include mentoring, supervision (ongoing feedback on job performance), training (learning a new job skill with a co-worker), and co-workers socializing with employees with disabilities at breaks or after work. Support provided by family, friends, or significant others are also included within this definition.
- **Medicaid Funded Employment Supports:** ID/DD Waiver-Intellectual and Developmental Disability Waiver Program for individuals who are approved for the ID/DD Waiver program.

**Some New Programs and Services designed to support the provision of Supported Employment Services are as follows:**

• **Job Coach Training Manual**

The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation, and the Mississippi Department of Mental Health Division of Home and Community Based Services serve as the two primary providers of job coaching services. In 2018, both agencies along with other community partners worked together to ultimately create a Job Coach Training Manual.

This manual was designed to review best practices in job coach training to develop a specific Mississippi job skills trainer curriculum. The new curriculum is competency-based and the intent is for it to become a required training regime for all persons in any job coach or related position in Mississippi. Prior to this project, training for job coaches ranged from none to out of State correspondence programs to agency training so specific it did not translate to general use. The goal of the job trainer manual project is to increase the level of competency for job coaches in the state and have a mutually agreed on curriculum in the state .

This curriculum targeted audience of all job coaches in the state is a collaborative effort between The Arc of Mississippi, Mississippi Department of Rehabilitation Services, Mississippi Department of Mental Health, Institute for Disability Studies, and self-advocates.

• **Project SEARCH**

The Project SEARCH Program is a unique, business-led, nine-month employment preparation program that takes place entirely at the workplace. Up to 12 students with disabilities experience total workplace immersion, classroom instruction, career exploration, and hands-on training through three different worksite rotations. The goal for each participant is competitive employment. To reach that goal, the program provides real-life work experience combined with training in employability and independent-living skills to help young people with significant disabilities make successful transitions to productive adults.

• **Shelby Residential and Vocational Services**

A Cooperative Agreement was entered into by MDRS, Office of Vocational Rehabilitation, with Shelby Residential and Vocational Services to provide services to individuals eligible for traditional VR employment services and Supported Employment. These outcome based VR and SE services include:

1. **Exploration-** This is a time-limited and targeted service designed to help a person make an informed choice about whether s/he wishes to pursue individualized integrated employment.
2. **Discovery** activities include observation of person in familiar places and activities, interviews with family, friends and other who know the person well, observation of the person in an unfamiliar place and activity, identification of the person's strong interests and existing strengths and skills that are transferable to individualized integrated employment. Discovery also involves identification of conditions for success based on experience shared by the person and others who know the person well, and observation during the Discovery process.
3. **Job Development Plan-**This is a time-limited and targeted service designed to create a clear and detailed plan for Job Development. This service includes a planning meeting involving the individual and other key people who will be instrumental in supporting the individual to become employed in individualized integrated employment.
4. **Job Development-**This is support to obtain an individualized competitive or customized job in an integrated employment setting in the general workforce, for which an individual is compensated at or above the minimum wage, but ideally not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals without disabilities.
5. **Job Skills Training-**Job skills training for individualized, integrated employment includes identifying, through job analysis, and providing services and supports that assist the individual in maintaining individualized integrated employment that pays at least minimum wage but ideally not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals without disabilities. Job skills training includes supports provided to the individual and his/her supervisor and/or co-workers, either remotely (via technology) or face-to-face.
6. **Customized Employment-**Service is described herein that will place individuals in settings that meet the definition of Competitive Integrated Employment. Services should be provided in a continuous process leading to obtaining a Competitive Integrated Employment outcome.

OVR continues to utilize Shelby Residential and Vocational Services (SRVS) as a provider for services. However, the number of consumers referred to SRVS was greatly impacted in 2019-2020 by the COVID-19 pandemic.

#### G. Coordination with Employers

*Describe how the designated State unit will work with employers to identify Competitive Integrated Employment and career exploration opportunities in order to facilitate the provision of:*

##### *(1) VR Services; and*

WIOA specifically directs the VR program to work with employers to identify Competitive Integrated Employment opportunities and career exploration opportunities in order to facilitate the provision of VR services, and transition services for youth with disabilities such as Pre-Employment Transition Services. MDRS will handle this coordination with employers through its Office of Business Development.

The Office of Business Development (OBD) is comprised of 16 individuals spread across the 82 county area that makes up the state of Mississippi. We have 12 "Business Development Representatives" who are located in and across our 10 district area. Their duties are to be in the community learning their communities' workforce needs, meeting

employers. located in their districts, learning those employer's human capital needs, and helping the VR arm of MDRS connect the need of those businesses with the clients that we serve. Our 12 representatives are located in Oxford, Tupelo, Greenwood, Starkville, Jackson, Pearl, Meridian, McComb, Laurel, and Gulfport.

Supporting those 12 individuals are three managers and one office assistant. (2 Regional Managers and 1 Office Director). Their purpose is to support, train, and provide direction to the 12 development representatives. They also are charged with assisting in the creation of large scale programs with employers who want to hire on a mass scale.

In 2020, MDRS job fair efforts were hindered due to COVID-19. In fiscal year 2022, the goal was set to implement 3 job fairs independent from the Governor's Job Fair Network. The first independent job fair was held in October 2021 in Oxford, Mississippi. It was held in conjunction with the University of Mississippi and was targeted towards college students with disabilities. Twenty-eight businesses attend the job fair. While student attendance was less than hoped for, the feedback from our business partners was positive. The most common feedback received was that the students were job seeking and also qualified for the positions that were being offered. We are currently planning two more fairs before the end of FY22. We will continue to target the college age individuals with disabilities who are exiting post-secondary and looking for employment. The current plan is to geographically target the central and southern parts of the state, potentially with the University of Southern Mississippi and Jackson State University.

### **Sales-Minded / Business First Approach**

The goal of the OBD representatives is to provide multiple services and an on-going relationship to the businesses they enter into relationship with. This mindset is directly correlated with the sales approach that the office bases its strategy on. The OBD units' goal is to understand the workforce area that each representative is located in, understand who the employers are in those areas, the needs of the employers, and finally how to use the resources of VR and MDRS (AbilityWorks, Training, etc.) to meet the needs of those employers.

We use a face-first approach to delivering our product. Our goal is to keep the OBD reps in the community interacting with businesses as much as possible. We want them to be in person with the businesses and building relationships. We want them to take tours of facilities, have meetings about how a business operates, etc. The purpose of this is to put a face to MDRS. This means a lot to businesses in Mississippi who come from a very relational culture. Ultimately, by building this relationship and understanding the business we can specifically pinpoint the needs of the business. Once we understand the needs of the business, the next step is to use the training we provide, the services we offer, and individuals we represent to meet the needs of that business.

### **Services to Business**

OBD's goal is to provide a package of services that meets a businesses' needs for education, support, and human capital. These needs are met through a bundle of services that our Business Development Reps are trained to provide. Our BD unit is equipped to provide training such as Disability Awareness, Customer Service, Assistive Technology, ABLE Act, etc. The goal of our business training is to educate the business about the disability community and to establish a level of comfort about working with the disability community that may not exist beforehand.

Placement has been prioritized for a long period of time. The OBD reps carry a caseload of "job-ready" clients who are willing and ready to return to work. When approaching businesses, the first step for the BD rep is exploration and fact-finding. The goal is to understand the business model and to understand the business' human capital needs. Once we have a grasp on those topics, then the BD rep moves to try meet those needs of the business with the job-ready client that we are serving through VR. The BD reps primary function is relationship building, understanding their client's needs, finding opportunities, and connecting our clients to those opportunities. Their performance is graded on their ability to connect their clients to employment, internships, community-based opportunities, and other services that we provide.

Lastly, OBD has entered into relationships with businesses who want to hire individuals with disabilities on a mass scale. These companies understand the value of diversity and the value that our clients bring to their workforce and want to incorporate this deep within their corporate model. Our office will meet with the businesses and determine

how to best achieve this for them. The assessment usually determines how many individuals they are looking for, the specific jobs and areas they need our individuals to work, training existing staff to prepare for individuals with disabilities to work there, and developing training to prepare our individuals for success when entering the workplace.

In 2019 a total of 11,245 contacts were made to businesses, 6,279 in 2020 and 9,857 in 2021. In 2020, the number of businesses contacted was impacted by COVID-19.

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

### **Career Exploration Services**

The Office of Business Development (OBD) help facilitate Pre-Employment Transition services by assisting students and youth, explore different career opportunities. . OBD make business connections when providing their services, especially direct services such as recruitment assistance for internships, community based work experiences, job shadowing, on the job training and business sponsored training programs. OBD plays an integral role in assisting students and youth with disabilities in obtaining high quality employment.

The Summer Internship program has recently been expanded from a summer program geared toward students to a service designed to be provided anytime an individuals need and requires this service during the year.

In 2020, 54 students received summer internships and 73 received summer internships in 2021. The number of students that could participate was impacted by COVID-19.

The internship program is used to provide the individual with a disability to to be trained by the business, gain vital skill sets, and allow the business to see the person for who they are and how they fit within their organization while OVR/OVRB covers the cost and allows the business to experience the person without having to make the commitment to hiring them in the case that the opportunity is not a good fit for the business, the client, or both.

OVR/OVRB can cover up to 320 hours to allow the person to train at no cost to the client or business.

The community-based training program is used to provide students and adults, who already have skill sets needed by a partner business, to go into the business, work, and prove themselves and their abilities to the business. The program is used on a shorter term basis to help the client to see if this is an opportunity they'd like to pursue or to allow the business to become sure that this client is a good fit for them. OVR/OVRB usually covers between 40 and 80 hours of the cost to the business.

Job Shadowing is a service designed so that the individual can to into a business to see how the business operates. We have clients who have a mental perspective of how a job would be that isn't realistic to the actual operation of that job. This program aims to allow the person to watch without actually working for that partner business. We believe this provides clarity to the job exploration process and saves valuable time on the back side of the employment process when the client isn't pleased with their career goal they aren't suited for. The job shadowing experience usually last up to 40 hours for the client and partner business.

On-the-job training is a very similar program to the internship program except in the fact that the business hires the person first and is then reimbursed for a certain number of salaried hours. This program is mainly utilized by companies who are completely sold on the disabled population and are willing and equipped to work through any issues that may arise making sure the fit is correct in the employment process.

Project SEARCH is a program that is geared towards youth. This program partners a school, a business, and a VR agency to create a 10 month internship program. The school provides a teacher and up to 12 students, while the business provides a classroom location and the internship sites. The VR agency provides overarching management, the cost, job placement, and the counseling to the program. The students rotate through three 10 week internship rotations during their regular school year. The goal of the program is to gain valuable specific career skillsets, learn what it means to work, and work through employment hurdles all while still in school. Many of our sites have aimed to hire the students that they work with. While this is nice it is not required and much of the training and career

development is geared toward being able to be used elsewhere in the community upon exit. In 2020-2021, 42 Interns participated in Project SEARCH sites at: University MS Medical Center, Baptist Jackson, Baptist Attala, Merit Health-Vicksburg, South Central Regional Medical Center, North MS Medical Center and Forrest General Hospital.

## **MDRS Community Rehabilitation Program Services to**

### **Business Office of Vocational Rehabilitation**

#### **AbilityWorks, Inc.**

AbilityWorks, Inc., a network of Community Rehabilitation Programs (CRP), provides vocational assessment, actual work experience and work adjustment training for individuals with disabilities. This is possible through a wide array of contracts, and subcontract services provided to local business and industry. It is a division of MDRS with 15 AbilityWorks locations throughout the state:

**Harrison County Service Areas:** Hancock, Harrison, Jackson, Pearl River, Stone, George

**Olive Branch Service Areas:** Desoto, Marshall, Tate, Tunica

**Tupelo Service Areas:** Lee, Pontotoc, Itawamba, Union,

**Laurel Service Areas:** Covington, Jasper, Jones, Smith, Wayne

**Meridian Service Areas:** Clark, Kemper, Lauderdale, Neshoba, Newton, Winston

**Jackson Service Areas:** Hinds, Madison, Rankin, Scott, Simpson, Warren

**Corinth Service Areas:** Alcorn, Benton, Prentiss, Tippah, Tishomingo

**Starkville Service Areas:** Clay, Oktibbeha, Chickasaw, Choctaw, Webster, Montgomery

**Kosciusko Service Areas:** Attala, Leake, Neshoba, Rankin

**Columbus Service Areas:** Lowndes, Clay, Monroe

**Brookhaven Service Areas:** Adams, Amite, Copiah, Claiborne, Franklin, Jefferson, Jefferson Davis, Lawrence, Lincoln, Marion, Pike, Walthall, Wilkerson

**Greenwood Service Areas:** Leflore, Carroll, Holmes, Grenada, Bolivar, Sunflower, Humphreys, Tallahatchie, Yazoo

**Washington County Service Areas:** Washington, Sunflower, Bolivar, Issaquena, Sharkey

**Hattiesburg Service Areas:** Forrest, Greene, Lamar, Perry

**Oxford Service Areas:** Calhoun, Coahoma, Panola, Lafayette, Quitman, Yalobusha

AbilityWork's mission to clients is *"to improve the quality of life, employment opportunities, and integration of people with disabilities into the community"*. The mission to business and industry through the subcontracting program is to provide fast turnaround times, high-quality workmanship, competitive rates, credit rates, credit terms and speedy delivery. Some of the services and products AbilityWorks offers include collating and sorting, packaging and handling, assembly work, product reworking, product reclamation, grounds maintenance, housekeeping and quality reviews.

AbilityWorks enables the VR program staff and employers to work together to identify career exploration opportunities and Competitive Integrated Employment opportunities for clients. Both activities are conducted mainly through Community Based Services connecting the client's abilities with employer opportunities.

AW considers career exploration as a comprehensive process that systematically utilizes work, either real or simulated, as the focal point for evaluation and vocational exploration, the purpose of which is to assist an individual with vocational development.

When a client has an interest in a career but AW cannot provide the client with similar tasks or experiences related to that career, then the AW staff establishes a work-based learning opportunity in the community for the client.

The client gains exposure and experience in the type of career in which he/she is interested, thereby either helping the client realize the career is not the correct choice or reaffirming the client's interest in the career.

The work-based learning experience may additionally help the client and the VR Counselor understand what additional training is required as well as the skills and/or abilities that must be acquired to be successful in the selected career.

Through its AbilityWorks program, MDRS-VR partnered with Sephora to provide training for individuals with disabilities in a warehouse distribution setting. This program began at Sephora's Olive Branch location August 2017 and has continued throughout 2021.

## **Office of Vocational Rehabilitation for the Blind**

### **The Addie McBryde Center for the Blind**

The Addie McBryde Center is the state comprehensive center for the Blind and Visually Impaired. This center is a place where people who are Blind can reside temporarily while they learn to lead productive, self-sufficient lives. The program incorporates instruction in a variety of independence skills as well as case management including home management, cooking, orientation and mobility, Braille, access to computer technology, college preparation, job-readiness, adaptation to blindness and many other skills that contribute to independence and the confidence to seek the highest level of employment possible. The center provides Pre-ETS in conjunction with the independent skills classes on a daily basis. The Summer Internship Program (for the Blind and Visually Impaired) is hosted by the Addie McBryde Center connecting clients with their first real-world work experience.

The Addie McBryde Rehabilitation Center is a comprehensive personal adjustment center for adults who are Blind, Visually Impaired or Deaf-Blind. Through a program of training offered to both residential and day clients, individuals participate in class learning skills that enable the client to successfully live and work independently. Established in 1972, the center is located on the campus of the University of Mississippi Medical Center in Jackson, Mississippi. The facility has a dormitory capacity for 28 clients, a gymnasium, a client library, and classrooms equipped with specialized technology for the Blind and Visually Impaired. Certified instructors individualize training to meet a client's needs during the class day from 8:00AM-3:00PM. Clients participate in additional activities in the 'Achieving Milestones' class focusing on adjustment to vision loss, confidence building, resume writing, interviewing, and utilizing resources in the community.

#### H. Interagency Cooperation

*Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for Competitive Integrated Employment, to the greatest extent practicable:*

*(1) The State Medicaid plan under title XIX of the Social Security Act;*



In January 2014, by the Governor's Executive Order (1335) Mississippi state agencies were directed to ensure employment in integrated settings as the first priority option to the extent feasible.

In July 2005, MS Legislation passed HB 836, and implemented an Employment First policy for working age citizens of Mississippi with disabilities. This Act required state agencies that provide services and support persons with disabilities to consider their option of competitive integrated employment and to collaborate and coordinate services.

MDRS has entered into formal Cooperative Agreements with the Mississippi Division of Medicaid (Medicaid) and Department of Mental Health (DMH) -Bureau of Intellectual and Developmental Disabilities, with respect to delivery of VR services, including extended services, for individuals with the most significant disabilities eligible for home and community-based services. The collaboration with DMH has resulted in a formalized referral process between the two agencies to ensure an array of services is provided to individuals with the *most significant disabilities* opening many new options for them.

In addition to the formal agreements with Medicaid and DMH, MDRS collaborates on a more informal basis with public and private entities to ensure a comprehensive program of services is provided to individuals eligible for Supported Employment services. Collaborative partners include local mental health facilities to help people move from qualified institutions to homes in the community, local school districts, businesses and industries, workforce development One-Stop Career Centers, advocacy groups, and other relevant third parties as well as parents of individuals with the most significant disabilities.

Whenever there is an overlap of goals and services, VR work with the agencies to arrange a cost sharing agreement in order to provide the services the individuals is in need of. The following guidelines are used to come to a final agreement regarding which agency is responsible for providing the service.

1. Will the service help the individual achieve the IEP educational goal?
2. Will the service help the individual achieve IPE employment goal?
3. If the service will help achieve the IEP goal and the IPE goal, the agency and VR negotiated how each party will participate in the cost of the service.
4. If the student is eligible for the IDD Waiver or State plan Medicaid SE Services, all agencies work together to negotiate which services will be provided in order to share in the cost of the services.

The partnership's intent is to build capacity across existing state systems to improve outcomes for youth and young adults with developmental disabilities, including intellectual disabilities, seeking competitive employment in integrated settings.

*(2) The State agency responsible for providing services for individuals with developmental disabilities; and*

**Mississippi's ID/DD Waiver** provides individualized support and services to assist individuals with intellectual and developmental disabilities live successfully at home and in the community and are an alternative to care in institutional settings. The ID/DD Waiver includes an array of services aimed at assisting people to live as independently as possible in their home and community. Services include Supported Employment, Home and Community Supports, Supervised Residential Habilitation, Day Services-Adult, In-Home Nursing Respite, Community Respite, ICF/MR Respite, Prevocational Services, Specialized Medical Supplies, Behavior Support/Intervention Services, and Speech, Occupational and Physical Therapy.

When the IDD Waiver case manager and the individual has determined that Competitive Integrated Employment is an option for the individual with appropriate services, referrals are made to Vocational Rehabilitation.

A formal referral process has been developed and coordinated with the IDD Waiver. The individual's information is submitted to the VR SE Program Coordinator with existing information to assist in expediting the eligibility process.

Upon receipt of referral and agreed upon referral information, the referral is assigned to an SE Counselor who initiates the application for VR Services.

The formal Memorandum of Understanding outlines the services each agency is responsible for, as well, as how service cost sharing will be resolved.

*(3) The State agency responsible for providing mental health services.*

In 2018, a formalized agreement between the Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and the Mississippi Department of Mental Health, Bureau of Mental Health. This agreement was renewed May 1, 2020 through April 30, 2024.

The purpose of this program is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery.

This program will result in increased integrated employment opportunities for these individuals. A comprehensive program evaluation will be completed with mental health sites participating this year, including site visits to the mental health centers as well as discussions with VR Counselors about how the program is working, what is working well and improvements that might help the program.

Throughout the districts, VR offices work with the community mental health centers serving the area. VR Counselors and District Managers will provide orientation and training sessions for mental health center staff and their clients.

Where the community mental health centers have established vocational and Supported Employment programs, OVR often collaborates with these centers to meet the needs of our mutual clients as referrals are made to VR for services for those who have been determined to need and want to obtain Competitive Integrated Employment.

*1. Comprehensive System of Personnel Development; Data System Personnel and Personnel Development*

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

*(1) System on Personnel and Personnel Development*

*a. Qualified Personnel Needs*

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

*i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;*

The Mississippi Department of Rehabilitation Services (MDRS) has implemented procedures and activities within the Office of Human Resource Development which assures the full implementation of a Comprehensive System of Personnel Development.

*Data System on Personnel and Personnel Development*

Assurance of an adequate supply of qualified Rehabilitation professionals and paraprofessionals and personnel to provide vocational rehabilitation services is the major driving force of the Office of Human Resource

Development. Data from numerous sources is used to determine current and projected needs, as well as Vocational Rehabilitation and Vocational Rehabilitation for the Blind progress toward meeting them.

OHRD maintains a database which includes information on the number of vocational rehabilitation personnel providing vocational rehabilitation services, types of positions, and the ratio of the number of personnel needed to provide vocational rehabilitation services to individuals served by the Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind.

The current staffing ratio is 138 counselors; 67 counselors assistants, 8 interpreters, 3 psychometrists, 20 evaluators, 36work adjustment instructors, and 9 instructors at the Center for the Blind to 13,671 applicants and eligible individuals served. MDRS, along with all State agencies, received a budget cut the previous fiscal year and absorbed most of the cut through attrition. This year, MDRS is working to rebuild the OVR/OVRB workforce by filling vacancies and adding positions where needed throughout the state. Currently, MDRS is experiencing vacancies in all of the personnelcategories mentioned above, but is actively advertising vacancies to maintain the needed ratios.

The table below displays current VR and VRB personnel.

<b>Job Title</b>	<b>OVR Filled Positions</b>	<b>OVRB Filled Positions</b>
Counselor	117	21
Counselor Assistant	57	10
Interpreter	8	
Psychometrist	3	
Evaluator	20	
Work Adjustment Instructor	36	
Instructors at the Center for the Blind		9

*ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and*

The table below displays current VR and VRB needed positions, broken down by category.

<b>Job Title</b>	<b>OVR Vacancies</b>	<b>OVRB Vacancies</b>	<b>Current Total Staff Needs</b>
Counselor	13	3	154
Counselor Assistant	17	0	84
Interpreter	3		11
Psychometrist	3		6
Evaluator	7		27
Work Adjustment Instructor	4		40

<b>Job Title</b>	<b>OVR Vacancies</b>	<b>OVRB Vacancies</b>	<b>Current Total Staff Needs</b>
Instructors at the Center for the Blind		2	11

The current staffing ratio, if all positions are filled, equates to a counselor to client ratio of 89 clients per counselor. Although caseload sizes vary depending on the type of services provided, the ideal client to counselor ratio is 75 clients per counselor.

*iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.*

MDRS predicts the number of clients who will receive services to grow by 66% in five years. MDRS projects that 13,855 clients will be served in FY 2020; 16,345 clients to be served in FY2021; 19,282 clients to be served in FY 2022; and 22,747 clients to be served in FY 2023. Based on these projections, MDRS is anticipating a need for a 66% increase in counselors to maintain current staffing ratios (102 additional counselors), and then an additional 47 counselors to meet the desired client to counselor ratio of 75 clients per counselor. In order to properly assist counselors with caseloads, a ratio of 2 counselors to 1 counselor assistant is ideal. An additional 68 counselor assistants are needed in five years to meet the desired ratio. An added increase of one staff interpreter will also be needed to ensure quality services are provided in a timely manner.

The table below displays the projections of the number of personnel, broken down by personnel category, needed to provide VR services in five years based on projects of the number of individuals served.

<b>Job Title</b>	<b>Projected Additional Staffing Needs over the Next 5 Years</b>	<b>Total Staff Needed in 5 Years</b>
Counselor	149	303
Counselor Assistant	68	152
Interpreter	0	11
Psychometrist	3	9
Evaluator	12	39
Work Adjustment Instructor	0	40
Instructors at the Center for the Blind	6	17

The number of Counselors that provide Transition and Youth Career Services remains consistent with overall Counselor staffing projections. The projected five year staffing needs noted above for counselors and counselor assistants would require that VR be provided with additional FTEs, allocated by the State legislature.

With the turnover within OVRB over the last few years, the rate of change in the next few years is expected to be lower. It can be anticipated that OVRB staffing needs could include approximately six new staff positions within the

next five years. The table above highlights the current vacancies within OVRB. These vacancies are within the same regional office and are currently being covered by existing staff. The chart also depicts anticipated staffing needs for the next five years due to expected vacancies from retirements.

On average, OVRB and OVRB loses approximately 66 employees each year due to separation, transfer to another state agency for career advancement, or retirement. Of the predicted 66 separations per year, 11 are due to retirement and 51 due to resignation/transfer. MDRS predicts an average of 28 counselors to separate per year and 12 counselor assistants to separate per year, determined by reviewing a two year average rate of separation in these two classifications. Due to this predicted turnover, vacancies are a contributing factor in our ability to maintain desired client to counselor ratios; however, all positions are advertised for recruitment quickly upon departure of the separated employee.

**b. Personnel Development**

*Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:*

*i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;*

An annual survey of the state’s two university graduate programs in Rehabilitation Counseling determines the number of students enrolled, projected graduation dates, and the total number expected to complete the requirements for national certification in Rehabilitation Counseling. These two graduate programs accredited by the Council on Rehabilitation Education (CORE), one at Mississippi State University and the other at Jackson State University (a Historically Black College or University), are the only graduate programs in Rehabilitation Counseling in Mississippi. Jackson State currently has 39 students enrolled in its program and seven students earned a master’s degree in Rehabilitation Counseling during the calendar year 2018. Mississippi State currently has nine students enrolled in its master’s Program in Rehabilitation Counseling and four students earned a master’s degree in this program in 2018.

Described in the table below is information from institutions of higher education in Mississippi that prepare vocational rehabilitation professionals, categorized by institution and type of program.

**Program Data for Institutions of Higher Education**

<b>Institutions</b>	<b>Students Enrolled</b>	<b>Employees sponsored by agency and/or RSA</b>	<b>Graduates sponsored by agency and/or RSA</b>	<b>Graduates from the previous year</b>
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Jackson State University	39	29	5	7
Mississippi State University	9	2	7	4

ii. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

*Described in the table below is information from institutions of higher education in Mississippi that prepare vocational rehabilitation professionals, categorized by institution and type of program.*

**Program Data for Institutions of Higher Education**

<b>Institutions</b>	<b>Students Enrolled</b>	<b>Employees sponsored by agency and/or RSA</b>	<b>Graduates sponsored by agency and/or RSA</b>	<b>Graduates from the previous year</b>
Jackson State University	39	29	5	7
Mississippi State University	9	2	7	4

iii. *The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

An annual survey of the state’s two university graduate programs in Rehabilitation Counseling determines the number of students enrolled, projected graduation dates, and the total number expected to complete the requirements for national certification in Rehabilitation Counseling. These two graduate programs accredited by the Council on Rehabilitation Education (CORE), one at Mississippi State University and the other at Jackson State University (a Historically Black College or University), are the only graduate programs in Rehabilitation Counseling in Mississippi. Jackson State currently has 39 students enrolled in its program and seven students

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Jackson State University	39	29	5	7
Mississippi State University	9	2	7	4

*(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel*

*Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.*

The VR Services Portion of the Combined State Plan continues to address the need to recruit and retain qualified staff, including those staff with minority backgrounds and individuals with disabilities.

OHRD encourages managers seeking to hire new counselors to hire only those individuals who meet the requirements of Comprehensive System of Personnel Development (CSPD). If a manager determines that there is not a qualified rehabilitation professional available to fill a vacancy, the vacancy may be filled by an individual with lesser qualifications as long as the individual meets the national standards for a Vocational Rehabilitation Counselor.

VR maintains close relationships with universities including minority institutions such as historically black colleges and universities, and disability specific organizations. VR employees collaborate with universities in securing grant funding; invite university employees to help with training and education activities; and provide practicum and internship slots for students. VR acknowledges that it is not able to easily recruit an adequate number of qualified rehabilitation counselors to replace those retiring and departing for other reasons. VR is currently engaged in the activities indicated below to address recruitment preparation and retention of counselors.

MDRS staff works closely with the graduate programs in Rehabilitation Counseling at both Mississippi State University and Jackson State University by establishing placement opportunities for intern and practicum students, and actively participating in university career development activities, including participation in Career Days and Job Fairs.

Representatives from MDRS meet with the graduate students from each program annually to explain career opportunities and the state employment application process.

VR staff is requested by the university to serve on each program's Advisory Council. VR also designates a Program Coordinator to serve on each program's Advisory Council. Working with Jackson State University provides significant opportunities for recruitment of minorities, and MDRS works closely with university support services on both campuses to recruit graduates with disabilities.

### **OVR/OVRB Student Practicum/Internship Programs**

MDRS has an ongoing working relationship with the Institutions of Higher Learning to provide practicum and internship training to college students. Practicum and Internship trainings are coordinated through the OVR/OVRB district or regional manager and the designated OVR program coordinator. A list of all practicum and internship students will be provided to the MDRS Office of Human Resources (HRD) by the OVR Program Coordinator.

In 2020, , VR and VRB had 11 interns who were receiving their Masters degree in Rehabilitation Counseling. The following procedures are used when arranging student practicum or internship training:

1. Students requesting to participate in a practicum or internship placement with OVR/OVRB must be referred by their college or university's department advisor.
2. The department advisor must contact the designated program coordinator to request for student placement at an OVR/OVRB site.
3. The program coordinator will provide the department advisor with a Practicum/Intern Application form for the student to complete. The application will be emailed to department advisor within 1-3 business days of initial contact.
4. Once the application is reviewed by the program coordinator, the district or regional manager at the appropriate site will be notified by the program coordinator.
5. Students who are seeking a practicum/internship in rehabilitation counseling or a related field must be assigned to work with a vocational rehabilitation counselor senior or a certified rehabilitation counselor.
6. The district or regional manager will determine the appropriate MDRS student supervisor for their office.
7. The program coordinator and designated MDRS student supervisor will schedule a date and time for an initial interview with the student.
8. Upon a contingent internship offer, a background report will be conducted for all potential interns. Intern Students must comply with the agency's policies pertaining to these issues outlined in Section 8.7 Background Reports on New Employees, of the MDRS Policy and Procedures Manual.
9. Once approval has been given, the department advisor and student will be informed of the start date by the program coordinator.
10. The student will be required to complete the MDRS Confidentiality Certification Statement form and the Computer Rules and Policy Agreement on the first day they report for training. This form will be returned to the program coordinator and a copy of the MDRS Confidentiality document will be given to the student.
11. Upon completion of the practicum/internship training, the MDRS student supervisor will complete the Exit Evaluation for Practicum and Intern Student form. The form shall be submitted to the designated program coordinator. The program coordinator will forward the Exit Evaluation form to the HRD training department.



### *(3) Personnel Standards*

*Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:*

a. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

There is not a state approved or recognized certification, licensure, or registration of Vocational Rehabilitation Counselors. VR in conjunction with the State Rehabilitation Council establish the Certified Rehabilitation Counselor (CRC) educational eligibility requirement as its highest standard. Efforts are made to recruit those who meet the CRC educational eligibility status.

However, if MDRS is unsuccessful in finding enough applicants who meet the highest standards, MDRS will accept and consider qualified those who meet the minimum initial standard for providing Counseling and Guidance services, with an understanding of the needs of individuals with disabilities and a 21st century understanding of the evolving labor market and the attainment of:

- A bachelor's degree from an accredited university and one year of experience counseling individuals with disabilities, with an understanding of the needs of individuals with disabilities and a 21st century understanding of the evolving labor market. Alternative majors may be considered such as vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, economics, or another field that reasonably prepares individuals to work with consumers and employers, or attainment of:
- A Master's degree or doctoral degree in a field of student such as vocational rehabilitation counseling, law, social work, psychology, disability studies, business administration, human resources, special education, management, public administration, or another field that reasonably provides competence in the employment sector, in a disability field, or in both business-related and rehabilitation-related fields and from an accredited university in a Social, Behavioral or Rehabilitative Science may substitute for the year of required experience.

Policies and activities to ensure that all professional and paraprofessional personnel receive appropriate and adequate training in terms of a system of staff development as follows:

MDRS is committed to assuring that its personnel are qualified to provide the highest quality of service to its constituents. This commitment is demonstrated through a comprehensive training program which begins with orientation and continues throughout the career of the individual employee. A systematic program of skills-based training provides all programmatic and support personnel with the abilities and tools necessary to deliver quality services. Training activities range from providing staff with information about correct and/or better methods of carrying out assigned jobs to providing staff with new and challenging ideas pertinent to the programs in MDRS.

The Division of Training within the Office of Human Resource Development serves as a centralized unit to plan, implement, and coordinate training activities for all VR and VRB staff.

Educational Assistance - MDRS, within the limits of available funds, is authorized, pursuant to Section 37-101-293 of the Mississippi Code of 1972 Annotated, to grant educational assistance to its employees. Educational assistance may consist of any combination of paid educational leave (full-time or part-time) at a maximum salary to be established by the Mississippi State Personnel Board and/or reimbursement for tuition, books, and related fees for undergraduate or graduate level courses. The purpose of the educational assistance program is to encourage employees to develop job-related skills and to develop employees for higher level professional and management positions. Priorities for awarding educational assistance will be based on the established need within MDRS for staff

with the educational credentials being sought and the availability of individuals with those credentials in the relevant applicant pool.

*b. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.*

OVR/OVRB performance development is an on-going, day-to-day process of communication and feedback between the supervisor and employee. The employee assists the supervisor in determining job duties and associated competencies and behavioral anchors during the annual Planning Phase. The supervisor shall provide information to the employee on his/her progress throughout the performance development period (Review and Feedback Phase). The employee is assigned a formal PDS Rating at the end of the appraisal period.

Ensuring that personnel have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities means that personnel have specialized training and experience that enables them to work effectively with individuals with disabilities to assist them to achieve Competitive Integrated Employment and with employers who hire such individuals. Relevant personnel skills include, but are not limited to:

- Understanding the functional limitations of various disabilities and the vocational implications of functional limitations on employment, especially with regard to individuals whose disabilities may require specialized services or groups of individuals with disabilities who comprise an increasing proportion of the State VR caseloads, such as individuals with traumatic brain injury, post-traumatic stress syndrome, mental illnesses, autism, blindness or deaf-blindness;
- Vocational assessment tools and strategies and the interpretation of vocational assessment results, including, when appropriate, situational and work-based assessments and analysis of transferrable work skills;
- Counseling and guidance skills, including individual and group counseling and career guidance;
- Effective use of practices leading to Competitive Integrated Employment, such as supported employment, customized employment, internships, apprenticeships, paid work experiences, etc.;
- Case management and employment services planning, including familiarity and use of the broad range of disability, employment, and social services programs in the state and local area, such as independent living programs, Social Security work incentives, and the Social Security Administration's Ticket-to-Work program;
- Caseload management, including familiarity with effective caseload management practices and the use of any available automated or information technology resources;
- In-depth knowledge of labor market trends, occupational requirements, and other labor market information that provides information about employers, business practices, and employer personnel needs, such as data provided by the Bureau of Labor Statistics and the Department of Labor's O\*NET occupational system;
- The use of labor market information for vocational rehabilitation counseling, vocational planning, and the provision of information to consumers for the purposes of making informed choices, business engagement and business relationships, and job development and job placement;
- The use of labor market information to support building and maintaining relationships with employers and to inform delivery of job development and job placement activities that respond to today's labor market;
- Understanding the effective utilization of rehabilitation technology and job accommodations;
- Training in understanding the provisions of the Americans with Disabilities Act and other employment discrimination and employment-related laws;

- Advocacy skills to modify attitudinal and environmental barriers to employment for individuals with disabilities, including those with the most significant disabilities;
- Skills to address cultural diversity among consumers, particularly affecting workplace settings, including racial and ethnic diversity and generational differences; and
- Understanding confidentiality and ethical standards and practices, especially related to new challenges in use of social media, new partnerships, and data sharing.

## **Office of Vocational Rehabilitation for the Blind**

Current service delivery also includes 17 master level counselors that focus on transition and adults to assist with facilitating clients through the vocational process. VRB has four (4) Orientation and Mobility Specialists throughout the state that work with VRB clients. Three (3) are currently ACVREP certified and one is receiving training in Orientation and Mobility. All VRB Counselors are eligible to take the CRC exam and retain their CRC.

### *(4) Staff Development*

*Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:*

- a. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

In recent years, long-term strategies for retraining a Vocational Rehabilitation Counselor or Vocational Evaluator who are not a qualified rehabilitation professional and not currently in a program are to utilize accessible Rehabilitation Services Administration (RSA) - Comprehensive System of Personnel Development (CSPD) funded stipend programsto the extent possible, since it represents a significant savings to VR. VR has implemented this more aggressive approach in meeting the CSPD standards.

The previous in-service grant was allocated solely to VR CSPD activities. These training grant funds were used to pay tuition and fees to individuals who could not get the coursework through the RSA stipend program, such as those whodid not live near the public university or who otherwise could not use the RSA Stipend program. The elimination of the in-service training grant to states has severely reduced VRs ability to continue support for these activities. It is notcurrently clear how much of the Basic VR grant will be available for this support. The HRD department has implemented a system to track academic classes taken and progress toward certification eligibility.

Those not funded under a stipend program as funded by RSA CSPD will be sponsored by MDRS at available distance education or web-based Master's Programs in Rehabilitation Counseling such as those available through Auburn University, the University of Kentucky, the University of Wisconsin, Southern University, and the Georgia State University Consortium. Employees who live within commuting distance of Jackson State University and Mississippi State University can access these universities' campus-based programs.

Employees sponsored by the agency in graduate training are eligible for reimbursement of tuition, book costs, and approved educational leave. State statute requires that the employee enter a contractual agreement with MDRS for service repayment. MDRS requires three years of continued employment in return for expense reimbursement and educational leave. Additionally, MDRS has created a job classification for Rehabilitation Counselors which require certification as a professional Rehabilitation Counselor plus two years of Rehabilitation Counseling experience. Promotion to this highest of four counselor salary levels provides an additional incentive for personnel to obtain a master's degree and to attain certification. Upon attainment of the master's degree in Rehabilitation Counseling or

certification in Rehabilitation Counseling, the employee may also be eligible for an educational salary benchmark of five percent.

The current salary for Vocational Rehabilitation Counselors in Mississippi remains below that of other southeastern states. In State Fiscal Year 1999, MDRS was successful in its efforts to gain approval by the Mississippi State Legislature and the Mississippi State Personnel Board to raise the entry-level salary for counselors and evaluators to successfully attract *qualified* personnel.

In January 2003, July 2006, July 2007, and July 2019, the salaries of Vocational Rehabilitation Counselors and Vocational Evaluators were realigned. Following a survey of the southeastern average, the salaries remain lower than that of neighboring states. In December 2015, MDRS was successful in its efforts to gain approval by the Mississippi State Personnel Board to include a new classification for Counselors and Evaluators possessing a CRC or CVE. This new classification increased the salary for qualified employees.

MDRS has established educational requirements of a master's degree in Rehabilitation Counseling with a continuing education component to address these issues.

### **Core Curriculum**

In order to ensure that staff maintain a 21st century knowledge for working with individuals with disabilities, the Core Curriculum series will be provided annually for all Vocational Rehabilitation Counselors and Vocational Evaluators. This training program provides a structured introduction to the Mississippi Vocational Rehabilitation Program presented at the State Office and/or via webinar in two to three day training sessions conducted over the course of a year.

Core Curriculum includes modules on the history and law affecting rehabilitation; program policies; medical and psychological aspects of disability; Accessible Automated Case Environment (the Agency's computerized case management system); counseling theories; job development and job placement; assistive technology; vocational assessment and various commercial evaluation systems utilized by the Agency's CRPs (for Vocational Evaluators); and training on disability-specific issues such as autism, blindness, deafness, etc.

### **Annual Ongoing Staff Development Training Sessions**

Although there has been an emphasis on assisting counselors meet the CSPD standards and developing the technical, managerial and leadership skills of supervisors and managers, VR provides ongoing staff development training to employees at every level.

Ongoing staff development training can include a variety of topics but, generally, include the following:

- Disability-Specific Topics
- Case Management
- Eligibility
- Individualized Plan for Employment (IPE) Development
- Various Types of Caseloads including Supported Employment and Transition
- Issues Regarding Work with Minority Populations, including Cultural Diversity
- WIOA Pre-Employment Transition Services - Customized Integrated Employment
- Other Areas Identified during Case Reviews conducted by MDRS Program Evaluation Staff

### **Additional Training Based on Need**

VR offers individual training allocations for staff members. This allocation can be used for job related professional development activities such as attending conferences, purchasing books, CDs, DVDs or other materials, taking on-line short courses or any other approved professional development activity. Supervisory approval is required for these professional development activities to ensure that employees participate in activities consistent with their individual needs and job responsibilities and requirements. Our HR Department provides consultation and technical assistance to VR employees as needed. Training sessions are held at the district level and in formal statewide training as needed.

In order to address the increasing percentage of retirement eligible employees and the need for knowledgeable managers and supervisors, the MDRS Executive Team established a formal leadership development program. This program, known as Leadership, Education, and Development for Rehabilitation Services (LEADRS), addresses the future loss of institutional memory and the transfer of accumulated wisdom through its development of employee management skills and technical competencies. LEADRS' mission is, *"To educate, develop, and empower current and future leaders of MDRS to sustain and enhance the Department's holistic approach in meeting the needs of Mississippians with disabilities"*.

MDRS also promotes capacity building and leadership development through supervisory staff's participation in a Basic Supervisory Course and the Certified Public Manager Program available through the Mississippi State Personnel Board, and In-service Supervisor Training available through MDRS. In addition, staff members have participated in the National Executive Leadership Program at the University of Oklahoma; the National Rehabilitation Leadership Institute at San Diego State University; the Community Rehabilitation Program Leadership Development Program and the Institute for New Supervisors through Georgia State University; the John C. Stennis State Executive Development Institute at Mississippi State University; and, the South Central Public Health Leadership Institute at the Tulane School of Public Health and Tropical Medicine. The staff development plan is based upon the assessed needs of the staff.

The Performance Development System (PDS) was developed by the Mississippi State Personnel Board in November 2010 to replace the previous Performance Appraisal System and is applicable to all state service employees to evaluate employee performance.

Also incorporated into the employee evaluation process is the employee's Individual Development Plan (IDP), which serves as an employee training needs assessment. IDPs are developed by the employee and evaluated by the supervisor to assure that the employee receives work-related training and training in other areas that the employee and supervisor agree will benefit the employee's performance.

The system of employee performance evaluation does not impede the accomplishment of specific mandates contained in Title I of the Rehabilitation Act. The system facilitates accomplishment by means of including in performance standards the responsibilities of MDRS and its employees under the Rehabilitation Act.

Information from case reviews conducted by the MDRS Program Evaluation Unit is analyzed to evaluate the knowledge and skill of employees as they relate to the policy of serving individuals with the most severe disabilities. Results of such evaluations are included in the development of objectives for the annual VR training plan. Information from annual client surveys is also used in determining training objectives and is incorporated into the VR training plan.

*b. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.*

MDRS continues to identify current information from research, rehabilitation trends and professional resources. This information is provided to agency staff through a variety of methods, including training at the state, regional, and district levels. Most recently this training has been focused on Autism and Customized Employment. Additionally, this information is posted and available to staff on MDRS Connect, the agency intranet.

Information is provided to staff via email and posted on the MDRS agency intranet (Connect). Information regarding current trends, disabilities, and tools to use to assist the Counselors and staff in performing their duties and providing quality services to individuals with disabilities is disseminated via Connect.

VR program staff is required to provide staff with and post current information regarding their program areas for staffusage.

#### *(5) Personnel to Address Individual Communication Needs*

*Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.*

VR staff works with Mississippi's diverse populations. One-way VR does this is to actively recruit and support employees who have diverse backgrounds. When a counselor is unable to communicate directly with a customer in his/her preferred language, the agency has qualified interpreters or translators on staff.

Due to the increasing Hispanic population, qualified interpreters are contracted on an as needed basis for individuals who are Spanish speakers. VR has established fees for foreign language interpreters which may be authorized and paid by counselors when the need for their services occurs to provide rehabilitation services to non-English speaking individuals.

American Sign Language interpretation needs who are Deaf or Deaf-Blind are met using a combination of employee positions and arrangement with qualified local interpreter service providers. MDRS employs eight qualified sign language interpreters for the 10 districts that comprise the Office of Vocational Rehabilitation. The Office on Deaf and Hard of Hearing also employs one qualified sign language interpreter who is available to provide interpreter services.

VR has assisted listening devices in most offices for MDRS employees to communicate with individuals who are hard of hearing or late deafened and do not know sign language. VR complies with the Americans with Disabilities Act by providing materials in braille or large print, through having qualified sign language interpreters, and offering text-based communication access. VR arranges for Foreign Language Translators when needed.

VRB Counselors participate in specialized in-service quarterly training and in-service training provided through the MDRS Assistive Technology Division which includes training on communication skills for individuals who are Blind orDeaf-Blind. Materials are available in Braille and other accessible formats, as requested by consumers.

MDRS-VR requires that all VR Counselors for the Deaf achieve and maintain basic proficiency in American Sign Language. VR coordinates with post-secondary educational consortiums to provide proficiency testing of manual communication skills. Specialized training in deafness-related areas is provided for new counselors in the Deaf Program as well as quarterly training for all VR Counselors for the Deaf and Sign Language Interpreters.

#### *(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act*

*As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.*

Mississippi VR and VRB program has an established partnership with the Mississippi Department of Education/Office of Special Education including an executed Interagency Agreement (IA). A new IA has been developed to comply with required content elements of WIOA.

VR and VRB have operationalized the transition and youth services program and has continued to work on improving the quality of those services. To support this, additional staff will be hired to help coordinate, plan and provide services to students with disabilities, coordinate and plan with local education agencies, and to work with district staff.

#### **J. Statewide Assessment**

*(1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:*

a. With the most significant disabilities, including their need for supported employment services;

MDRS – OVR/OVRB and the Mississippi State Rehabilitation Council completed the *2018 Comprehensive Needs Assessment*. The 2018 assessment was completed in February 2019. The information obtained from the assessment is used to assist in determining the needs of individuals with disabilities who reside in the state of Mississippi. MDRS – OVR/OVRB contracted with Public Consulting Group and conducted a comprehensive statewide assessment in 2020. The results of the 2020 assessment was completed in June of 2021. The results of both assessments are used to provide an overall assessment of the rehabilitation needs of individuals residing in the state for the State Plan Year 2020 - 2023.

The CSNA seeks to effectively assess OVR and OVRB consumer needs in order to inform OVR and OVRB of future policy and decision-making so they can best serve their consumers and meet their rehabilitation needs. During the COVID-19 crisis, many individuals and their families continue to rely on these important services being provided by OVR/OVRB through phone calls, emails and letters in order to limit person-to-person contact to best protect both employees and individuals receiving services.

During 2020, as a result of the numerous confirmed cases of the COVID-19 in Mississippi, OVR/OVRB made the decision to restrict and/or provide limited public access to all OVR/OVRB offices across the state. OVR/OVRB continued to provide the same individualized services, just in a different way. OVR/OVRB maintains a web page at <https://www.mdrs.ms.gov/Pages/COVID-19-MDRS-Update.aspx> to provide relevant updates, resources and web links.

While OVR/OVRB took measures to support the safety of both staff and supported individuals, the work continued. During this time, OVR/OVRB:

- Received 7,604 applications
- Determined eligibility for 6,127 individuals
- Developed 5,533 IPE's

Throughout the CSNA, OVR and OVRB have the opportunity to continue momentum forward to leverage forward thinking and continue improving services and outcomes for individuals with disabilities.

Publicly available data sources were available to make population level estimates and statements about the population of Mississippi and the population of individuals with disabilities. Multiple data sources were utilized to develop the analysis and recommendations. Information was collected from various data sources many of which were existing data sources.

In addition, data was captured and utilized from the 2018 U.S. Census Bureau/ACS reporting and the AACE Case Management System.

Based on the results of this assessment and information generated from our AACE Case Management system, it is projected that number of individuals with significant disabilities and the number of individuals that need supported employment services will increase in FY 2020 – 2023.

## **Population Demographics –**

### **Disability by Age Compared to Mississippi Disabled Population (ACS, 2019)**

**OVR/OVRB Potential Service Population** represents individuals with disabilities who could be, but are not currently, served by OVR. Individuals are considered part of the service population if they are:

1. Currently unemployed (in the labor force, but do not have a job)
2. Not receiving OVR services

To calculate the potential service population, individuals currently using OVR are removed from the population of unemployed individuals with a disability:

**Unemployed individuals with a disability – Current OVR Cases Not Employed = potentially unserved individuals**

**OVR Potential Service Population:** Number of unemployed individuals with a disability 13,028 (from the 2019 ACS one-year estimates) and subtracts the OVR currently opened OVR caseload of 6,793 to arrive at a total of 6,235 number of an additional potentially unserved individuals. (REF CSNA Table 11).

To calculate the potential service population, individuals currently using OVRB are removed from the population of unemployed individuals with a disability:

**Unemployed individuals with a disability – Current OVRB Cases Not Employed = potentially unserved individuals**

**OVRB Potential Service Population:** Number of unemployed individuals with a visual disability 4,526 (from the 2019 ACS one-year estimates) and subtracts the OVRB currently opened caseload not employed of 1,070 to arrive at a total of 3,456 number of potentially unserved individuals (REF CSNA Table 12).

The 2018 Comprehensive Needs Assessment and the 2021 Comprehensive Needs Assessment both identified the following service needs that continue to recur across both assessments related to the needs of individuals with the most significant disabilities, including the need for supported employment.

**Based on the results of this assessment, it is projected that in FY 2020 – 2023, the specific service needs identified are:**

- Provide VR staff training in multicultural awareness and develop awareness of staff of socio-economic issues that may interfere with a person’s ability to stay engaged in the VR process
- Vocational Rehabilitation Counseling and Guidance
- College/vocational training, work experience training, On-the-job training and social skills training
- Job Search/Placement Services
- Vocational Assessment/Evaluation
- Transportation
- Develop resources and tools to be able to communicate with individuals who a Spanish speaking
- Increase outreach and availability of VR Services in areas of the state with the largest populations of African American, Hispanic populations and Asian population
- VR and VRB collaborate with minority businesses and service providers that are located in the community in order to develop relationships that lead to employment
- MDRS and the Mississippi Band of Choctaw Indians work together to help ensure that eligible Choctaw Indians’ services are coordinated in order to provide comprehensive VR services that will lead to employment outcomes
- Additional staff training and service provider training needed to serve the increasing number of individuals with significant mental health impairments



- Work adjustment training for individuals who have Autism and other impairments who need social skills training
- Since the number of individuals in the state working in subminimum wage employment continues to decrease, OVR/OVRB and its network of providers need to ensure ongoing capacity to meet the demand by further developing capacity to provide supported and customized employment services
- Structured Discovery Training for individuals with blindness and other visual impairments
- OVR consumers, staff, and community partners all cited additional benefits, resources for individuals with disabilities, education and training funding, more money/higher income and potential loss of benefits as some of the highest financial needs

**b. WHO ARE MINORITIES;**

In comparison to population estimates, OVR reaches a proportionate number of individuals with disabilities who are minorities. According to OVR staff, the greatest needs of unserved/underserved minority individuals were outreach on the availability of services followed by more services focused on their communities.

**Population Demographics –Ethnicity Statistics**

OVR: statistical data displays the OVR population by ethnicity. The data show that the two largest ethnic groups represented in this sample are White (representing 60.3%) and Black or African American representing 37.1%. Multiple races accounted for 1.6% of the population, followed by American Indian or Alaska Native and Asian ethnic groups representing less than one percent each of the sample.

**OVR PARTICIPANT POPULATION BY RACE**

Race/Ethnicity	ACS % of Total - 2019
American Indian or Alaska Native	0.5%
Asian	0.4%
Black or African American	37.1%
Native Hawaiian or Pacific Islander	-
White	60.3%
Multiple Races/Other	1.6%

Statistical data shows a breakdown of the OVR population compared to ACS totals for 2019. Non-Hispanic ethnic groups have a slightly higher representation (2.9%) than the ACS totals, and Hispanic or Latino groups have a slightly lower representation (at 0.1%) than the ACS average of 3.5%.

**OVR PARTICIPANT POPULATION COMPARED TO MS POPULATION BY ETHNICITY**

Ethnicity	ACS % of Total - 2019
Hispanic or Latino	3.5%

Non-Hispanic	96.5%
Unsure	-

OVRB Statistical data displays the OVRB population by ethnicity. The data show that the two largest ethnic groups represented in this sample are Black or African American (representing 51.7%) followed by White (representing 46.9%). The ethnic group Asian represents 0.6% of the population. When compared to ACS 2019 totals, the ethnic groups African American and Asian are overrepresented, and White, Multiple races/other, and American Indian or Alaska Native are underrepresented.

**OVRB PARTICIPANT POPULATION BY RACE**

Race/Ethnicity	ACS % of Total - 2019
American Indian or Alaska Native	0.5%
Asian	0.4%
Black or African American	37.1%
Native Hawaiian or Pacific Islander	-
White	60.3%
Multiple Races/Other	1.6%

The statistical data displays a breakdown of the OVRB population by ethnicity compared to *ACS totals for 2019*. The Non-Hispanic ethnic group has a slightly higher representation (3%) compared to ACS totals. The Hispanic or Latino group is not represented in VRB totals vs. the ACS average of 3.5% percent.

**OVRB PARTICIPANT POPULATION BY ETHNICITY**

Ethnicity	ACS % of Total - 2019
Hispanic or Latino	3.5%
Non-Hispanic	96.5%
Unsure	-

OVRB could consider expanding outreach to American Indian or Alaska Native, Native Hawaiian or Pacific Islander, multiple races, and Hispanic and Latino groups to educate different cultures about available OVRB services, focusing more services on these communities, and increasing community access to OVRB offices.

**Based on AACE Case Management and RSA Data dashboard information for 2019 – 2020 and 2020 – 2021, VR/VRB Participant Population by Race and Ethnicity is as follows:**

<b>2020</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>
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American Indian/Alaska Native	64	67	60	55
Asian	41	45	49	51
Black/African American	3,374	3,089	3,169	3,129
Native Hawaiian/Pacific Islander	10	12	13	12
White	4,216	4,095	4,180	4,009
Hispanic/Latino	102	93	99	103
Multiple Races	176	76	75	70

<b>2019</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>
American Indian/Alaska Native	1.1%	83	80	70
Asian	0.5%	37	39	42
Black/African American	43.4%	3,299	3,477	3,327
Native Hawaiian/Pacific Islander	0.2%	13	9	8
White	55.8%	4,312	4,523	4,235
Hispanic/Latino	1.2%	97	105	100
Multiple Races	2.5%	190	195	179

**According to AACE Case Management System, the following age groups with disabilities were served by VR/VRB for 2019–2020 and 2020–2021.**

<b>Age (2020)</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>
0 – 15	11	12	14	13
16 – 18	1,480	1,139	1,274	1,323
19 – 24	1,249	1,255	1,259	1,263
25 – 44	1,857	1,783	1,789	1,708
45 – 54	1,158	1,151	1,134	1,104
55 – 59	684	700	702	682
60+	1,192	1,197	1,230	1,103

Age (2019)	Q1	Q2	Q3	Q4
0 – 15	0.1%	6	8	10
16 – 18	17.5%	1,344	1,420	1,485
19 – 24	14.9%	1,138	1,202	1,188
25 – 44	27.6%	2,080	2,127	1,871
45 – 54	15.3%	1,173	1,223	1,134
55 – 59	8.8%	695	751	692
60+	15.5%	1,214	1,303	1,218

**Specific service needs identified for FFY 2020 – 2023 include:**

- Increased the outreach activities to assist in creating awareness of available services to meet their needs of individuals in the African American, Asian, Hispanic and Latino communities;
- Transition aged - Youth need to have work experience to put on job applications and to assist in learning soft skills;
- Students as they enter post high school need peer mentors to encourage them (a mentor they can relate to and feel comfortable with);
- Outreach to 504 students and those with physical disabilities;
- Although data indicates that individuals with Mental Illness, Deaf, Intellectual Disabilities and Visual Impairments apply for VR/VRB Services, data supports that individuals with these impairments are less likely to obtain Competitive Integrated Employment and earn living wages;
- A better understanding of available VR services;
- Increase collaboration with the Choctaw Indian Vocational Rehabilitation entity to target services that are not provided by Choctaw VR to assist in increasing employment in the community; and
- VR Counseling and Guidance to assist Career Exploration to obtain access to services that will provide support in employment with competitive wages.
- Continue outreach activities, Career Counseling, and Information Services to combine the needs of students with intellectual and developmental disabilities and those that might have been previously referred from schools to subminimum wage facilities /segregated facilities, rather than VR for career and employment services.
- Transition Students – increased awareness of VR services to transition students with disabilities. Often times, transition students and their families do not recognize the importance of early VR involvement. This need is based on the difficulties VR staff has had in obtaining parental response to services. Because of this, some

students continue to exit high school without VR services and have little success in enrolling in training and education opportunities.

- Assist in providing training to staff on the service delivery for Students with Autism Spectrum Disorders. VR Program has a dedicated to working with staff to enhance the delivery of VR Services that will ultimately improve the employment outcome for individuals with Autism Spectrum Disorder.
- Individual with Mental Illness - Because of the lack of long-term success VR has had with individuals with Serious Mental Illness, VR has entered into a Cooperative Agreement with the Department of Mental Health to provide VR Services to individuals that have been determined to need VR employment services, including Supported Employment.
- OVR/OVRB will conduct a separate needs assessment for the Hispanic/Latino population in Mississippi with disabilities to help gather more information regarding their vocational rehabilitation service needs.
- OVR/OVRB will continue to monitor the ACS survey for the most recent data regarding the race and ethnicity per county to remain informed of target areas in which information should be disseminated. OVR/OVRB will also continue to provide outreach to other minority populations to ensure they have information regarding the VR program.
- Benefits Planning and Counseling
- VR and VRB will continue to monitor the ratio of minority service rate to non-minority service rate to ensure that we are meeting the needs of individuals with disabilities in the state that are underserved and unserved.
- Vocational Rehabilitation Counseling and Guidance
- Transportation
- VR and VRB collaborate with minority businesses and service providers that are located in the community in order to develop relationships that lead to employment
- OVR/OVRB and the Mississippi Band of Choctaw Indians work together to help ensure that eligible Choctaw Indians' services are coordinated in order to provide comprehensive VR services that will lead to employment outcomes
- Additional staff training and service provider training needed to serve the increasing number of individuals with significant mental health impairments
- Alternative training for individuals with blindness and other visual impairments such as Structured Discovery Training
- Explore opportunities to reduce overall successful closures and employment wage income racial groups that have been identified in the CSNA as underserved.

*c. Who have been unserved or underserved by the VR program;*

The CSNA results indicate that there may be several underserved groups. We identified disparities in outcomes for individuals with most significant disabilities and individuals who are racial and ethnic minorities. These populations African American or Black, American Indian and Alaskan Native experience lower rates of success in services and earn lower hourly wages compared to their peers in other groups.

OVR/OVRB will explore opportunities to reduce overall successful closure and employment wage income by:

- Learning more about the causes of disparities for individuals who are minorities and those who are most significantly disabled.

- Realigning resources and support to address the needs of these priority populations.
- Exploring additional resources that may be needed to address barriers, increase work skills, and provide support.
- Developing performance measures to monitor outcomes of priority populations.

Specific disabilities that were identified as being underserved are:

- Individuals with autism
- Individuals with intellectual and developmental disabilities
- Individuals with mental health disabilities
- Individuals with vision loss

d. Who have been served through other components of the statewide workforce development system; and As part of the *2018 Comprehensive Needs Assessment*, a survey question asked participants if they have utilized the state’s Workforce Investment Network (WIN) for assistance with finding a job or for receiving job training services. The Workforce Investment Network (WIN) Job Centers are service centers that offer programs and resources geared toward job seeking and are partners in the American Job Center Network. WIN is an innovative strategy designed to provide convenient, One-Stop employment and training services to employers and individuals searching for a job. Combining federal, state, and community workforce programs and services, it is WIN’s goal to create a system that is both convenient and user-friendly.

Survey results indicated 45% of respondents used the WIN Job Center for job search assistance, job training information and interview tips. However, only 73% of clients who used the service felt comfortable with the assistance they received and indicated they believed services could be better.

VR will increase partnerships with the statewide Workforce Investment Network system to develop innovative programs to serve common customers. With our collaboration and integration efforts thus far we have been successful in implementing a common intake process, anticipating having a Hub where our workforce partners can access information for common clients and all VR clients have the Workforce ID which is consistent throughout all programs.

All partner agencies completed their separate intake forms with new customers. In each of these separate forms, however, there are six diagnostic questions that are the same on all forms and multiple demographic fields that are shared between partners (Intake). These data elements are automatically uploaded into the Hub - or auto filled - if the unique identifier matches a profile that already exists in the Hub.

The WIOA Hub software development was released and launched into the production environment on May 23, 2017. The other partners came on board between January 2018 and June 2018. Once other partners went live in the Hub,

MDRS began receiving ad hoc referrals from them through the Hub directly into MDRS’ case management system. Ad hoc referrals are referrals from workforce partner agency consumers who answered yes to question two of the six diagnostic questions, which is “Do you have difficulty with seeing, hearing, talking, using your hands, getting around (mobility), interacting with others, learning, or thinking that make it difficult for you to get or keep a job?”

In the future, the PIRL for the State of Mississippi will be created through the Hub. If data in these areas is different from the information that was previously in the profile, this information will be updated with that from the most recent entry. The initial version of the Hub was completed in June 2017. MDRS has been sending data to the Hub since that time and was the first partner to go live.

MDRS and other state partners are now all live in the Hub. Referrals can be made by any one of the partner agencies and based on how the individual answers the questions, ad hoc referrals will be sent to other partner agencies through

the Hub. MDRS’s case management system pulls ad hoc referrals in from the Hub each night and they are marked as Workforce Referrals. July 1, 2020 – 12/31/2021, MDRS received 14, 734 ad hoc referrals from Workforce Partners. They are then worked on by OVR/OVRB staff where the individual is contacted to determine if they are potential candidates for services provided by OVR/OVRB.

In 2019, OVR/OVRB received Technical Assistance and worked with WINTAC on strategies to help improve service integration with Core Partners. Work teams were held in Greenville and Belden Workforce offices. Efforts were made and are still being made to improve co-enrollment and service integration. The challenge – although connection was made with the two work teams in both Belden and Greenville and information was gained on what they are currently doing in the areas of career pathways, front end services and business engagement the process was stymied by an inability to connect with local leadership with reduced travel due to COVID – 19.

VR will continue to participate and assist in providing ongoing training of job center staff on disability sensitivity issues. Efforts to coordinate various government agencies with very different rules and expectations for participation continue. An individual facing parenting responsibilities, poverty, and disability issues needs to work with agencies that can coordinate their efforts.

*e. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.*

OVR/OVRB has committed considerable time and resources into developing services for youth and students with disabilities. Significant progress has been made in the last two (2) years. The COVID 19 pandemic played a significant role in OVR/OVRB’s ability to access and provide services to students at the same rate prior to COVID 19. Steps are being made and are continuing to be made in increasing the methods used to deliver services virtually. Also, due to the effects that COVID-19 had on accessing students with disabilities, OVR/OVRB will continue to incorporate the results of the 2018 *Comprehensive Needs Assessment* of students and youth with disabilities, ages 14-24, to determine the rehabilitation needs, including the need for Pre-Employment Transition Services (Pre-ETS).

**During PY 2019 – 2021, OVR/OVRB was impacted significantly in our ability to access and provide services students with disabilities due the impact of COVID-19.**

**Youth and Students with Disabilities**

According to the 2017 American Community Survey, 36,422 or 7.6% youth in the state have a disability and 442,700 or 92.4%, youth in the state do not have a disability.

According to the 2017 *American Community Survey*, the *Distribution of Disabled Youth in Mississippi by Disability Type* are: any disability 36,422/100.0; cognitive difficulty only 12,595 or 34.6; ambulatory difficulty only 856 or 2.4%; independent living difficulty only 2,114 or 5.8%; self-care difficulty only 759 or 2.1%; vision difficulty only 5,284 or 14.5%; hearing difficulty only 1,575 or 4.3%; and two or more disabilities 13,239 or 36.3%.

The Mississippi Department of Education reports over 21,000 students with disabilities.

*According to the 2017 American Community Survey, the characteristics of Mississippi Youth and Students by Disability Status:*

	Disabled		Non-Disabled	
Characteristic	N	%	N	%
Average Age	19.1	---	18.9	---
Gender				
Male	22,865	62.8	225,926	51.0

Female	13,557	37.2	216,774	49.0
<b>Race</b>				
White	16,665	45.8	230,365	52.0
Black	17,868	49.1	192,331	43.4
American Indian/Alaskan Native	278	0.8	1,475	0.3
Asian/Pacific Islander	594	1.6	4,299	1.0
From Multiple Races	950	2.6	6,223	1.4
Other	67	0.2	8,007	1.8
<b>Hispanic Status</b>				
Hispanic	1,907	5.2	19,392	4.4
Not Hispanic	34,515	94.8	423,308	95.6
<b>Educational-Workforce Status (Age 16-24)</b>				
Enrolled in school	11,953	39.5	227,113	62.3
Not enrolled in school, employed	4,979	16.5	86,125	23.6
Not enrolled in school, unemployed	1,821	6.0	14,932	4.1
Not enrolled in school, not in labor force	11,506	38.0	36,467	10.0

**2019 Comprehensive Needs Assessment for Students and Youth with Disabilities**

In 2019, OVR/OVRB conducted a *Comprehensive Needs Assessment* of students and youth with disabilities, ages 14-24, to determine the rehabilitation needs, including the need for Pre-Employment Transition Services (Pre-ETS).

**Results are as follows:**

**Age Range**

- 13.64% - age 22-24
- 42.42% - age 19-21



- 43.94% - age 16-18
- There were no responses from individuals 14-15 years old.

**Gender**

- 56% - male
- 44% - female

**Race/Ethnicity**

- 2.27% - American Indian or Native Alaskan
- .76% - Asian
- 76.52% - Black or African American
- 18.94% - White
- 3.03% - Multiple races
- 1.52% - Other

**Education Level**

- 60.61% of respondents were in the 11<sup>th</sup>-12<sup>th</sup> grade. The table below provides a breakdown of the educational level of all respondents.

*Based on the 2018 Comprehensive Statewide Assessment Survey, the current level of education responses are:*

**Current**

<b>Level of education:</b>	<b>%</b>
7-8 <sup>th</sup> Grade	1.52%
9 <sup>th</sup> -10 <sup>th</sup> Grade	5.30%
11 <sup>th</sup> -12 <sup>th</sup> Grade	60.61%
College or Training Prog.	22.73%
Not in School	12.88%

**Based on the AACE Case Management information and RSA information, the following student received Pre-Employment Transition Services:**

**Provision of Pre-Employment Transition Services Pre-Employment Transition Services:**

<b>2020</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>

Job Exploration Counseling	263	0	560	1,198
Work Based Learning Experiences	106	173	277	774
Counseling and Enrollment Opportunities	56	62	379	717
Work Readiness Training	192	282	589	1,505
Instruction in SelfAdvocacy	222	362	641	1,651

<b>2019</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>
Job Exploration Counseling	1,049	1,600	2,141	860
Work Based Learning Experiences	382	668	739	198
Counseling and Enrollment Opportunities	574	842	1,136	537
Work Readiness Training	789	1,273	1,695	713
Instruction in Self Advocacy	814	1,548	1,918	903

**The following data shows the number of students who received Pre-ETS per quarter. Students with Disabilities Receiving Pre-ETS:**

<b>2020</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>
Number of Students with Disabilities Reported	1,234	1,300	1,684	2,160
Number receiving Pre-ETS	389	491	1,075	1,445

Number receiving Pre-ETS who are Potentially Eligible	257	358	634	782
Number receiving Pre-ETS who applied	132	133	441	663

2019	Q1	Q2	Q3	Q4
Number of Students with Disabilities Reported	2,271	2,784	3,180	2,114
Number receiving Pre-ETS	1,488	2,130	2,559	1,218
Number receiving Pre-ETS who are Potentially Eligible	634	1,239	1,517	640
Number receiving Pre-ETS who applied	854	891	1,042	578

### **Pre-Employment Transition Services (Pre-ETS)**

In July 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law. WIOA requires a vocational rehabilitation (VR) agency to reserve at least fifteen percent (15%) of their federal funds to make available, in coordination with local education agencies, the provision of Pre-Employment Transition Services (Pre-ETS) to students with disabilities statewide who are eligible or potentially eligible in accordance with Section 361.48 of the federal regulations and 113 of the Rehabilitation Act of 1973, as amended.

Pre-ETS are specific services that are only available to students with disabilities to ensure they have meaningful opportunities to receive training and other services necessary to achieve employment outcomes in Competitive Integrated Employment. These services are designed to help students with disabilities begin to identify career interests that can be explored further through additional OVR/OVRB transition services.

Based on the *Comprehensive Needs Assessment* for Disabled Youth in Mississippi, 54.5% of respondents were enrolled in aschool or college at the time of the survey. At the time of the survey, 10% were in Grades 7-11, 25.5% were in Grade 12, 7.3% were enrolled in a vocational or certification program, 33.6% were enrolled in a community college, and 23.6% were enrolled in a four-year university. By far the most common level of education, accounting for 59.3% of all respondents, was to have a high school diploma but no additional education. Relatively sizable shares of respondents also completed the 12<sup>th</sup> grade without earning a diploma (17.6%) and gained some college experience but no college degree (8.8%).

For the remainder of this State Plan in year 2022 – 2023, OVR/OVRB will continue to address the rehabilitation needs of students and youth with disabilities to ensure that students received Pre-ETS.

Transportation is a major barrier for students and their ability to access work opportunities. The following have been identified as major needs for students with disabilities:

- Work-based learning experiences
- Training in self-advocacy
- Additional classes for people interested in work
- Career exploration

Pre-ETS services are made available by the counselor and Pre-ETS Providers to all eligible and potentially eligible students with disabilities. This survey assessed the need for the provision of Pre-ETS for students with disabilities in the state of Mississippi. Results are as follows:

*(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and*

Community Rehabilitation Programs (CRP) in Mississippi provide an array of services to adults, students and youth that will assist them in achieving Competitive Integrated Employment.

According to the CSNA 2021, when considering the number and capacity of Pre-ETS providers, it is important to recognize that providers are one component of OVR Pre-ETS delivery. Given the successes reported by some Pre-ETS providers, they can be part of the solution to addressing unmet needs of youth with disabilities. OVR acknowledges that third party vendors continue to be part of the solution as they evaluate opportunities to enhance and advance opportunities for students with disabilities.

CSNA results indicate that there is a need for continued expansion of Pre-ETS, with an emphasis in work-based learning and self-advocacy. Research indicates that participation in work-based learning experiences prior to exiting high school are 4.5 times more likely to be employed after high school.

In 2017, VR recognized the need to establish and develop more relationships with providers/Community Rehabilitation Programs to assist in providing Pre-Employment Transition Services. In 2017 and early 2018, Request for Proposals were advertised. In 2018, the agency is hoping to have developed more Community Rehabilitation Programs to provide such services.

In 2021 – 2023, a total of thirteen (13) new Pre-ETS providers have cooperative agreements to provide these services to potentially eligible and eligible students with disabilities. They are: Wesson-Monroe, LLC, Public Consultant Group, Inc., Mississippi Prison Industries Corporation, University of Southern Mississippi-Total, National Federation for the Blind – Peer Mentoring, LIFE of Mississippi, Vocational & Rehabilitation Consultants, LLC, T.K. Martin at Mississippi State University, The ARC of Mississippi, Jobs for Mississippi Graduates, Inc, Career Development & Training Institute, Transition Workforce, Inc., and Mississippi State University/Disability Support Services .

**AbilityWorks, Inc.**

The Mississippi Department of Rehabilitation Services, through the Office of Vocational Rehabilitation, operates 15 transitional rehabilitation community facilities referred to as AbilityWorks.

AbilityWorks, Inc., a network of Community Rehabilitation Programs (CRP), provides vocational assessment, work evaluation, work adjustment training, and community based work experience for VR consumers. This is possible through a wide array of contract and subcontract services provided to local businesses and industry. It is a division of MDRS and with 15 locations statewide. AbilityWork’s mission to clients is *“to improve the quality of life, employment opportunities, and integration of people with disabilities into the community”*. The mission to business and industry through the subcontracting program is to provide fast turnaround times, high-quality workmanship, competitive rates, credit rates, credit terms and speedy delivery. Some of the services and products AbilityWorks offers include collating and sorting, packaging and handling, assembly work, product reworking, product reclamation, grounds maintenance, housekeeping and quality reviews. AbilityWorks, of Olive Branch, provides job specific training for work at the Distribution Center Sephora in Olive Branch, Mississippi.

**AbilityWorks locations throughout the state:**

**Harrison County Service Areas:** Hancock, Harrison, Jackson, Pearl River, Stone, George

**Olive Branch Service Areas:** Desoto, Marshall, Tate, Tunica **Tupelo Service Areas:** Lee, Pontotoc,

Itawamba, Union,

**Laurel Service Areas:** Covington, Jasper, Jones, Smith, Wayne

**Meridian Service Areas:** Clark, Kemper, Lauderdale, Neshoba, Newton, Winston **Jackson Service Areas:**

Hinds, Madison, Rankin, Scott, Simpson, Warren

**Corinth Service Areas:** Alcorn, Benton, Prentiss, Tippah, Tishomingo

**Starkville Service Areas:** Clay, Oktibbeha, Chickasaw, Choctaw, Webster, Montgomery

**Kosciusko Service Areas:** Attala, Leake, Neshoba, Rankin

**Columbus Service Areas:** Lowndes, Clay, Monroe

**Brookhaven Service Areas:** Adams, Amite, Copiah, Claiborne, Franklin, Jefferson, Jefferson Davis, Lawrence, Lincoln, Marion, Pike, Walthall, Wilkerson

**Greenwood Service Areas:** Leflore, Carroll, Holmes, Grenada, Bolivar, Sunflower, Humphreys, Tallahatchie, Yazoo

**Washington County Service Areas:** Washington, Sunflower, Bolivar, Issaquena, Sharkey

**Hattiesburg Service Areas:** Forrest, Greene, Lamar, Perry

**Oxford Service Areas:** Calhoun, Coahoma, Panola, Lafayette, Quitman, Yalobusha

### **The Addie McBryde Center**

Addie McBryde also provides services for consumers who are Blind or Visually Impaired through either a residential or day program where individuals participate in classes such as orientation and mobility, techniques of daily living and personal management. The *2018 Comprehensive Needs Assessment* asked respondents if they were aware of these CRPs.

68.94% were aware of our CRPs. Yet only 45.45% stated they actually participated at AbilityWorks or Addie McBryde. Of those that participated, 30.30% reported that the services provided by the CRP were helpful in preparing them for employment.

The Addie McBryde Rehabilitation Center is a comprehensive personal adjustment center for adults who are Blind, Visually Impaired or Deaf-Blind. Through a program of training offered to both residential and day clients, individuals participate in class learning skills which enable the client to successfully live and work independently. Established in 1972, the center is located on the campus of the University of Mississippi Medical Center in Jackson, Mississippi. The facility has a dormitory capacity for 28 clients, a gymnasium, a client library and classrooms equipped with specialized technology for the Blind and Visually Impaired. Certified Instructors individualize training to meet a client's needs during the class day from 8:00 AM to 3:00 PM. Clients participate in additional activities in the 'Achieving Milestones' class focusing on adjustment to vision loss, confidence building, resume writing, interviewing, and utilizing resources in the community.

These facilities provide a variety of services including Vocational Evaluation, Work Adjustment Training, Community- Based Work Experiences, counseling and transportation. All services are individualized to meet the needs of the individual served in preparation for Competitive Integrated Employment.

### **Community Rehabilitation Programs to provide structured Discovery Training**

NEED: Currently, there is only one personal adjustment training program that provides “services to groups” who are blind, deafblind, and visually impaired who are seeking competitive integrated employment and independence in communities of their choice.

The Mississippi’s Comprehensive Statewide Needs Assessment (CSNA) indicated that due to the physical location of the Addie McBryde Center, it may not be accessible for all eligible Mississippians who experience blindness or visual impairment.

These responses could be attributed to limitations in locality or district, in comparison to the location of the Addie McBryde Program. Results from the Gemini Research and Training, LLC’s survey indicate that a minority of individual have received training in a comprehensive independent training center, but almost half (46%) indicated thatthey would attend in state if available.

Study results also indicated that those who completed residential training at a center were more likely to be currently employed (23%) than those who did not receive training (14%) to vision loss.

CSNA feedback on service challenges suggests that OVR/OVRB should explore expanding Community Resource Providers (CRPs) and other resources to best meet consumers’ employment related service needs. Some services currently delivered by CRPs do not conform to what is considered to be Evidence Based Practice (EBP) employment.

Over the last several years, OVRB has invested in, and worked to evaluate, whether the services offered through the Addie McBryde Center meet the needs of individual with blindness and visual impairments, or if the Mississippi should consider expanding the capacity of CRPs to meet the needs of this population. OVRB works closely with the Addie McBryde Center to connect consumers with services that help them gain and maintain employment. While this resource is available, assessment results indicate that access to and knowledge of these services are limited. The Center has limited capacity and is not centrally located, hampering its ability to serve all Mississippians. In addition, OVRB’sprior survey research indicates that individuals who receive services through the Addie McBryde Center were more likely to be employed than other survey respondents.

When considering available service expansion, OVRB should explore how to increase its capacity to provide successful and effective services. The following recommendations may help OVRB increase efficacy of services:

Expanding services for traditional and non-traditional training. Expanding the locations of the Addie McBryde Center would allow access for consumers across the state and expand Center capacity for traditional training for consumers to obtain competitive integrated employment. Additionally, services should be expanded in capacity and access for non- traditional training including structured discovery methodology.

## **COMMUNITY REHABILITATION PROGRAMS (CRP):**

### **Community Rehabilitation Programs to better serve individuals with Autism Spectrum Disorder and other individuals with Social Skills Disorders**

- Unemployment among individuals with Autism Spectrum Disorder (ASD) is approximately 85%. This means that roughly two-thirds of people with autism are not working. Currently, there is no community rehabilitation program that specifically addresses the extended support needs of individuals with Autism Spectrum Disorder despite research suggesting the need for more comprehensive services to improve employment outcomes. A community rehabilitation program that provides multiple services and support for clients in a central location. Services needed would include Enhance the possibility of successful employment opportunities through individualized services to meet workforce demands and improve the lives of individuals with ASD;
- Create a more comprehensive service program through the provision of multiple services such as soft skills training, functional living skills, interviewing skills, etc. across multiple settings
- Provide direct instruction in social interaction in multiple settings in order to increase the ability of individuals with ASD to obtain and maintain employment;

- Increase employment outcomes for individuals with ASD, and
- Ultimately increase the number of tax paying citizens in the state.
- OVR AbilityWorks' providers offer a limited number of services that may not meet the diverse needs of individuals with different disabilities. In addition, facility- based training does not align with evidence-based practices for successful case closures.

*(3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act*

The respondents consisted of potentially eligible students with a disability, VR eligible transition secondary and post-secondary students, transition out of school youth, and parents of transition students from four regions of the state.

It is important that individuals receive services to meet their individualized needs to ensure they have the greatest opportunity to achieve Competitive Integrated Employment. Respondents indicated the following are the most needed services in helping achieve employment:

- 45.45% - Job Search/Placement Services
- 40.91% - Vocational Rehabilitation Counseling and Guidance
- 33.33% - Transportation
- 26.52% - Job Coaching
- 22.73% - No Other Services Required

To effectively meet the needs of students, MDRS collaborates with education and workforce programs to assist students with disabilities in making the transition from school to post-secondary education and/or to Competitive Integrated Employment. MDRS, through its Offices of Vocational Rehabilitation (OVR) and Vocational Rehabilitation for the Blind (OVRB), maintains a Memorandum of Understanding (MOU) with the Mississippi Department of Education (MDE).

In addition to the MOU with MDE, the Agency maintains individualized agreements between the local school districts and vocational rehabilitation offices. These agreements define referral procedures and the roles of the school and OVR/OVRB staff in the provision of transition services that are specific and tailored to the unique situation of each school and the OVR/OVRB district. Each counselor is responsible for developing and maintaining an agreement between the Agency and local school district. A copy of the form to be used for this agreement may be obtained from the State Coordinator for Transition Services. The form includes instructions and has been designed to assist in the development of the agreements locally.

A counselor is assigned to work with a specific school district to provide transition services in accordance with the Rehabilitation Act of 1973, as amended, the Carl D. Perkins Vocational and Applied Technology Act, as amended and the Individuals with Disabilities Education Act (IDEA), as amended.

VR assures that the Individualized Plan for Employment (IPE) is also coordinated with the employment goal in the school's individualized educational plan (IEP) and, where appropriate, the Individualized Service Plans (ISP) of the long term care providers.

The VR Counselor servicing local school districts as well as the VR Supported Employment Counselors work together with school districts to ensure that students with disabilities that previously entered subminimum wage employment are provided information and services to assist in diverting these individuals into Competitive Integrated Employment.

Pre-Employment Transition Services are provided to students with disabilities as early as age 14. If these individuals require VR Transition services as early as age 14, VR facilities this need by opening a VR case. This service provision will help strengthen VR's efforts to reach more students and strengthen the opportunity for successful employment outcomes.

In accordance with the Rehabilitation Act of 1973, as amended, the inclusion of transition services is not intended to shift the responsibility from school districts to Vocational Rehabilitation (VR) but enforces the need for coordinated efforts between education and workforce programs such as VR.

MDRS, through OVR/OVRB, is the state agency that delivers transition services to secondary school students with disabilities. These counselors work with students, families, and educators during the transition process to inform them of available VR services, including Pre-Employment Transition Services (Pre-ETS), and identify students who might benefit from or need VR services and career services designed to assist in obtaining a post school employment outcome.

While local school districts are responsible for providing education and transition services to students with disabilities who are still in the secondary school system, under WIOA, VR is the state unit that is mandated to make available Pre-ETS begin at age fourteen (14) for all eligible and potentially eligible students with disabilities with parental consent.

District Managers and Counselors are responsible for developing cooperative working relationships with the local education agency staff in the districts and other agencies working with youth. Letters were sent by the State Transition Program Coordinator to the Special Education Directors and 504 Coordinators for each school district to discuss VR services for students with IEPs and 504 plans. The counselor is to follow-up with their Special Education Directors and 504 Coordinators at least annually to discuss the provision of outreach services for students with disabilities and to determine the need for potential referrals.

Counselors are assigned to all public secondary schools. The counselor and the District Manager establish linkages within each school with the following individuals:

- Special Education Coordinator;
- 504 Coordinator;
- Transition Coordinator
- Principal
- Guidance Counselors for grades 8<sup>th</sup> through 12<sup>th</sup>;
- School health personnel; and
- Other school-based staff are determined appropriate by the counselor and the District Manager.

The Counselor works with the school district's Transition Coordinator, Transition Assistants when applicable, and Special Education Teachers to implement Pre-Employment Transition Services (Pre-ETS) for eligible and potentially eligible students with disabilities. The required activities of Pre-ETS will mostly take place at the local school during a prearranged time that the counselor and school personnel have agreed to.

The Counselor will be prepared to teach the Pre-ETS curriculum and will do so as agreed upon with school personnel. In addition to being prepared to teach the curriculum, the counselor will provide the classroom teacher with technical assistance and/or curriculum materials as needed. The counselor should be working in his/her assigned schools two to three days per week while rotating schools to ensure services are made available to both eligible and potentially eligible students within each school serviced.



The Counselor documents the student's progress in Pre-ETS activity for eligible students in the participant's AACE Case note page and for potentially eligible (PE) students in the AACE PE Case Type page and provide an update to the classroom teacher with a report of the student's participation and progress in Pre-ETS on a regular basis.

MDRS and the local school district may enter into a Cooperative Agreement to jointly fund a Transition Assistant position to ensure a smoother transition of services between the school and OVR/OVRB. The Transition Assistant will provide services to selected secondary students with disabilities who are:

- between the ages of fourteen (14) and twenty-one (21);
- in transition from school to work and community; and
- eligible for vocational rehabilitation services.

The addition of school-based transition services is intended to add a component to the overall school and rehabilitation service continuum, not supplant existing employment-related or other services which are potentially appropriate for a particular student (any service the school is already responsible for providing). The Transition Assistant will not serve students who, with or without modifications, can benefit from existing school programs (career/technical and educational training programs etc.).

Once the student leaves the school system, it becomes the full responsibility of the agency Counselor to continue to provide services necessary to further prepare the individual for a successful post-school outcome by enrolling in a post-secondary education program or obtaining Competitive Integrated Employment.

K. [Annual Estimates](#) Describe:

*(1) The number of individuals in the State who are eligible for services*

The results of the CSNA found that according to Mississippi employment statuses of individuals with a disability (2019 ACS), only 2.7% (13,028) of individuals are classified as unemployed. In comparison to the current OVR open caseload, there are a total of 6,793 open OVR cases, leaving 6,235 potentially unserved individuals. Furthermore, an additional 369,387 individuals with disabilities were classified as 'Not in labor force'. This suggests potential for educational and outreach opportunities.

When reviewing overall demographic information it is important to highlight:

- Of the 2.7% unemployed Mississippians with a disability, OVR is already serving approximately 1.9% of that 2.7%.
- There are 6,235 potentially unserved individuals with disability that could require additional capacity to outreach and serve.
- There are 369,387 individuals with disabilities who are not in the labor force that could benefit from education and outreach.

When comparing OVR age groups to the Mississippi ACS 2019 population, age groups 14 to 44 are represented in higher percentages compared to the ACS.

Age group 65 or older is represented at a much lower percentage. The age group 14 to 25 is represented more than five times the state average;

Age group 25 to 34 almost two times the state average, and;

Age group 35 to 44 approximately one and a half times the state average. The age group 65 and older is 29.3% less than the state average.

When reviewing age group representation across priority levels, ages 14-24 are represented highest in the ‘unknown’ priority at 43% which potentially eligible consumers participating in Pre-ETS activities most likely account for the majority this group. Ages 14-24, 25-34 and 35-44 are represented highest in MSD, and ages 45-54, 55-64 and 65 and older are all represented highest in NSD. This suggests the younger age group participants have more functional limitations, which lack of work skills and experience may be contributed to this.

When reviewing overall age information, it is important to highlight:

- The age group 14 to 24 represents more than five times the ACS state average of individuals with disabilities. This may be contributed to OVR/OVRB focus on extending services to potentially eligible participants, for example, OVR/OVRB’ emphasis on coordination with education system to serve this population.
- Age group 25 to 34 are almost two times what would be expected.
- MSD priority levels are represented highest in ages 25-34, followed by 14-24 and 35-44. This may be due to more functional limitations and resulting from lack of work experience and skills
- NSD is represented highest in age group 65 or older.

Analyzing population by disability status, OVR data shows participants with physical disabilities are represented highest (30.6%) followed by mental health (22.2%), deaf and hard of hearing (21.4%) and intellectual disabilities (20.6%). Regarding overall significance of disability, individuals most significantly disabled represent the highest population (28.1%). However, between priority levels, this difference is very small, approximately 1-4%.

## OVRB

Looking at ACS 2019 population totals of participants in MS with a vision disability by district, the Northern District population with a vision disability is 52,606 compared to 1,272 currently being served by OVRB. The Southern District population with a vision disability is 59,824 compared to 1,431 being served by VRB. According to ACS 2019, almost 60% of the MS population with a vision disability are aged 55 or older, while 5.6% are aged 13 or younger.

Overall, district distribution is almost evenly spread between the Northern and Southern Districts compared to the MS percentage population distribution. The overall population count of MS individuals with a vision disability in the ACS2019 are substantially higher, suggesting opportunities for outreach to expand services to more individuals with vision disabilities.

Analysis of OVRB population by age indicates the highest age group represented is aged 55 to 64 at 37%. When comparing age group percentages to the ACS 2019, ages 25 through 64 are represented in higher percentages. This means the majority of services provided to those with a vision impairment are focused on working age individuals. The age group 14 to 24 is slightly more represented than the state average percentage of individuals with a vision disability, a difference of less than +1.83%. However, the age group 65 and older is represented 28.6% less than the state average.

Analysis of age groups by disability priority levels reveals that participants aged 14-24 represent the highest percentage of most significantly disabled (MSD) and significantly disabled (SD). Ages 25-34 represents the second highest percentage of MSD and SD. Ages 65 and older and 55-64 had the highest percentage of individuals with No significant disability (NSD). Overall, age groups 14-34 represent the highest percentage for MSD and SD; it is possible that fewer work skill experiences result in more functional limitations. Continued pre-employment services with this population, including work skill development, may help address some of these limitations.

*(2) The number of eligible individuals who will receive services under:*

a. The VR Program;

**Vocational Rehabilitation and Vocational Rehabilitation for the Blind**

Based on the current trend analysis for individuals determined eligible for VR services, MDRS observed an 11.9% increase in the number of individuals eligible for VR services between FY 2018 and 2019. This increase in numbers began to shift because of the impact of Covid-19. In fact, in 2020, OVR/OVRB served 14,003.

In 2019 (10/01/2018 – 09/30/19), Vocational Rehabilitation and Vocational Rehabilitation for the Blind served a total of 11,745 eligible individuals with disabilities. These percentages of increase were used to estimate the number of eligible individuals who will receive services in FFY 2020 – FFY 2023.

In 2021, OVR/OVRB saw a 4% drop in the numbers served due to the impact of Covid-19. However, with the steps being made to prevent the spread of Covid-19, we have to see at least a 2% increase in numbers served in 2022-2023.

**Estimated Total Number who applied for services and\or were determined eligible for services.**

<b>FFY</b>	<b>Number of Clients who will receive services</b>
2020	14003
2021	13743
2022	14,018
2023	14,298
2024	

b. The Supported Employment Program; and

In FFY 2019, Mississippi VR provided Supported Employment services to 422 individuals at a total cost of \$1,213,666.64. In FFY 2020, 423 individuals at a total cost of \$1,513,768.50. In 2021, 384 individuals received SE services at a cost of \$1741430.47. The decrease in individuals receiving services in 2020 and 2021 is due to the effectsof the national pandemic COVID-19. Many businesses/employers were closed or hiring was slow due to the fear of the spread of COVID-19. In 2022–2023, with the steps being made to prevent the spread of COVID-19, we are in hopes that we have more individuals in need of SE services.

c. Each priority category, if under an order of selection.

Mississippi OVR/OVRB anticipate sufficient resources to provide the full range of VR services to all eligible individuals without implementing the Order of Selection.

*(3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and*

Mississippi has not closed any Priority Categories. All individuals eligible to receive services will receive services.

*(4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.*

The estimated cost to serve the estimated number of eligible individuals in each Priority Category are as follows: Projections are based on the number of individuals served in each Priority Category and the average cost of the clients served in each Priority Category.

Based on the current trend analysis if the VR Program continues to see the growth in the numbers served and costs of services, we will have to close a priority category. At this time all priority categories are open.

<b>FFY</b>	<b>PC 1 Served</b>	<b>PC1 Cost</b>
2020	4567	22,161,087.01
<b>FFY</b>	<b>PC 1 Served</b>	<b>PC1 Cost</b>
2021	4439	27,944,912.29
2022	4528	28,503,810.54
2023	4619	29,073,886.75
<b>FFY</b>	<b>PC 2 Served</b>	<b>PC 2 Cost</b>
2020	4489	23,080,277.62
2021	4609	27,944,912.29
2022	4,701	28,503,810.54
2023	4,795	29,073,886.75
<b>FFY</b>	<b>PC 3 Served</b>	<b>PC 3 Cost</b>
2020	4233	15,288,433.75
2021	4026	15,132,695.93
2022	4,107	15,435,349.85
2023	4,189	15,744,056.85
<b>FFY</b>	<b>Total Served</b>	<b>Total Cost</b>
2020	13289	60,529,798.38
2021	13074	69,810,040.57
2022	13,335	71,206,241.38
2023	13,602	72,630,366.21

**Title I Funds**

For FFY 2020 budget beginning October 1, 2018 through September 30, 2019, VR received \$44,680,926 funding from RSA. MDRS expects to receive the same funding for FFY 2021.

### **Social Security Reimbursements**

During Program Year 2020, VR collected \$ \$1,645,442.20 in Social Security Reimbursements. In Program Year 2021, MDRS collected \$2,346,233.84 in reimbursement will remain around the same amounts for FY 2022 through 2023.

### **Supported Employment**

MDRS received \$300,000 in 2019 for the SE Program. SE funds are supplemented with Title I funds to pay for the cost of clients receiving services and fund SE VR staff positions. 50% of the SE funds were earmarked and set aside for youth with significant disabilities.

### **Reallotment**

In 2021 and 2022, VR did not request additional federal funds and does not anticipate requesting additional federal funds through the reallotment process for FY 2022-2023.

### **Pre-Employment Transition Services**

MDRS set aside \$6,702,139 which is the 15% earmarked for Pre-Employment Transition Services.

#### **L. State Goals and Priorities**

The designated State unit must:

*(1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions*

The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind, value enabling individuals with disabilities to increase their level of self-sufficiency through employment and education.

MDRS values competent employees who are knowledgeable in vocational rehabilitation and committed to serving individuals with disabilities to increase their level of self-sufficiency through employment and education;

MDRS values VR and VRB leaders and managers who demonstrate the commitment, knowledge, and experience to lead the program, value sound fiscal and administrative practices that support all VR and VRB personnel, individuals with disabilities and community partners.

To align with the requirements and performance standards of the Rehabilitation Act and its implementing regulations, MDRS, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind, and the State Rehabilitation Council (SRC) have developed these goals and priorities.

*(2) Identify the goals and priorities in carrying out the VR and Supported Employment programs*

#### **VR goals and priorities regarding the distribution of Title VI-Part B funds are to:**

- continue the referral process between MDRS and DMH to identify ‘youth with the *most significant disabilities*’ who will require SE services;
- continue the referral process between the VR Transition/Youth Counselor and the VR Supported Employment (SE) Counselor for students with disabilities, ages 14-21, who have been determined to need long-term ongoing support services;
- ensure equitable distribution of the funds;

- provide technical assistance to district staff about the appropriate use of the funds;
- monitor to ensure that the funds are being correctly utilized;
- obtain service providers for Customized Employment;
- train all VR Counselors, including those who work with General VR consumers, in Supported Employment; and
- increase the number of individuals closed rehabilitated with a Supported Employment Outcome.

Through outreach, education and marketing efforts targeted to individuals with disabilities, OVR/OVRB will continue to broaden the population of individuals with disabilities being served which includes minorities with disabilities and unserved and underserved and identified by the Comprehensive Needs Assessment.

OVR/OVRB will continue to target individuals with disabilities who are already working to retain or progress in employment; previous OVR/OVRB consumers who may have lost employment to become reemployed; college students nearing completion of their academic programs; and,

- high school transition age youth with disabilities
- individual with blindness and visual impairments
- individuals with deafness and hearing impairments
- youth and adults with most significant disabilities

**GOAL I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

**Strategies (Plan of Action):**

- Develop a job placement culture by providing ongoing training in the job development and placement process.
- Develop and implement on-campus work experience training for students who reside in rural communities when community-based work experience is not available.
- Refer those consumers receiving SSI/SSDI cash benefits who are interested in earnings that will eliminate their reliance on SSA cash benefits for work incentives Benefits Analysis and Counseling.
- Coordinate and conduct the Annual Governor’s Job Fair for individuals with disabilities.
- Summer Internship Program for high school students with disabilities including those who have blindness and visual impairments, deafness and hard of hearing.

**GOAL II: Improve the VR Service Delivery System to Individuals with disabilities.Strategies (Plan of Action):**

- Designate staff in MDRS districts to be responsible for conducting outreach and orientation sessions on a regular basis.
- Provide input to assure appropriate inclusion of vocational rehabilitation activities in, public service announcements, and agency website and publications.
- Update and distribute vocational rehabilitation brochures to appropriate referral sources.

- Designate and train specific staff members in each district to handle referrals and provide information to the public.
- Assure that all geographic areas of the state are covered with appropriate service delivery staff.
- Develop and implement a consumer satisfaction survey to be completed while the consumer's case is open with VR.
- Develop a consumer satisfaction survey to be completed by the consumer regarding services received from vendors/providers of VR services.

**GOAL III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.**

**Strategies (Plan of Action):**

- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are** in special education.
- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are not** in special education.
- Co-develop a formal Interagency Cooperative Agreement with officials from the Department of Education, local school districts and local high schools.
- Plan and coordinate with the Mississippi Department of Education-Special Education Director and Director 504 Services of to plan and conduct at least annual training and semi-annual work groups for the purpose of cross-training in understanding the services offered by Vocational Rehabilitation.
- Develop and implement the use of an OVR Transition Manual designed to assist staff in the delivery of transition services. This manual will be used as a technical assistance tool for transition planning purposes.
- Annually identify 504 Coordinators and special education staff for each school.
- Co-develop and implement self-identification tool identifying youth with disabilities who could possibly benefit from transition services.
- Establish relationships with parent training and information groups, advocacy groups and other service providers to encourage referral and parental participation in the development and provision of transition services.
- Establish comprehensive guidelines and indicators for assessing the individual transition needs of students.
- Work with other core partners in the workforce system to provide employment related services to prevent duplicative services.
- Contract with additional Community Rehabilitation Programs to provide Pre-Employment Transition Services.

**GOAL IV: Implement identified improvements to increase statewide consistency and quality of consumer services.**

## **Strategies (Plan of Action):**

- Use results of the annual case review to determine where additional guidance and training are required.
- Utilize the new counselor training process for mentoring, training, and leadership development for all VR Counselors.
- Utilize and continue to develop consistent training process for key VR staff that deliver direct client services.
- Conduct annual statewide case record reviews of case service practices to determine consistency and adherence with federal/state requirements. Use case review results to identify and implement improvements in quality and consistency of services.
- Survey OVR staff on practices and provide refresher training to assure consistent and quality service delivery.
- Deliver high quality training and support to provide staff with the knowledge and skills needed to perform effectively.
- Recognize and appreciate staff throughout the division for their contributions to VR's success.
- Continue to update and deliver advanced best practices training to field staff statewide to provide ongoing skill development in key service delivery operations and practices, including a strong focus on customer service, cultural sensitivity, and better addressing each consumer's impediments to employment.
- Increase collaboration within the workforce system to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs.
- Play stronger roles on state and local Workforce Boards to assure that VR consumers and other individuals with disabilities are better served by the One-Stop system.
- Increase collaboration with community colleges to improve coordination of VR services with community college programs and Adult Basic Education programs.
- Implement written agreements with providers for individuals with intellectual and development disabilities to affirm their roles and responsibilities for serving VR consumers, including their capacity for providing long-term employment supports to individuals after the VR case is rehabilitated.

## **Goals Specific to the Service Delivery for Individuals who require Supported Employment Services:**

### **GOAL 1: Strategies:**

- Continue the referral process between MDRS and DMH to identify 'youth with the *most significant disabilities*' who will require SE services;
- Continue the referral process between the VR Transition/Youth Counselor and the VR Supported Employment (SE) Counselor for students with disabilities, ages 14-21, who have been determined to need long-term ongoing support services;
- Ensure equitable distribution of the funds;
- Provide technical assistance to district staff about the appropriate use of the funds;
- Monitor to ensure that the funds are being correctly utilized;
- Obtain service providers for Customized Employment;



- Train all VR Counselors, including those who work with General VR consumers, in Supported Employment
- Increase the number of individuals closed rehabilitated with a Supported Employment Outcome

*(3) Ensure that the goals and priorities are based on an analysis of the following areas:*

a. The most recent comprehensive statewide assessment, including any updates;

The FFY 2020 – 2023 goals and priorities are based on the 2019 Comprehensive Statewide Needs Assessment, and the 2019 Transition Needs Assessment.

The listed goals and strategies were discussed with some goals being recommended by and developed in collaboration with the SRC.

The goals and strategies were discussed with, some goals recommended by and developed in collaboration with the SRC.

b. The State’s performance under the performance accountability measures of section 116 of WIOA; and

Over the last year, VR and VRB had met and in some areas exceeded its performance goals based on the performance data provided by RSA, Data Dashboard.

Our Counselor’s performance development system has changed as a result of the new Common Performance Measures and RSA 911. We continue to monitor to ensure that we are continuing to serve individuals with significant disabilities.

With the added focus on documenting skill gain and credentials, we feel that we continue to move forward and be successful in assisting eligible individuals with disabilities obtain employment, retain employment, and participate in education and training opportunities. We feel that in FY 2020 – 2023, we will continue to increase our number of individuals with disabilities that obtain measurable skill gains and ultimately Competitive Integrated Employment.

c. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

No additional recommendations or reports were received from the SRC.

M. Order of Selection Describe:

*(1) Whether the designated State unit will implement and order of selection. If so, describe:*

a. The order to be followed in selecting eligible individuals to be provided VR services

The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind, implemented an Order of Selection in May 2001. Since July 13, 2009, all Priority Categories have been open.

Based on an assessment for determining eligibility and an assessment in each of the seven functional capacity areas, an individual with a *significant disability* means an individual with a disability (i) who has a severe physical or mental impairment which seriously limits one (1) or more functional capacity (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; (ii) whose vocational rehabilitation can be expected to require multiple services over an extended period of time; and (iii) who has one (1) or more physical or mental disability or combination of disabilities resulting from amputation, arthritis, autism, blindness,

burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, intellectual disability, mental illness, multiple sclerosis, muscular dystrophy, Musculo-skeletal disorders, neurological disorders (including paraplegia and quadriplegia), sickle cell anemia, specific learning disability, end-stage renal disease or other disability or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitation.

### **MDRS - OVR/OVRB Policy on Order of Selection**

At any time that MDRS resources do not permit all eligible consumers to be served, an Order of Selection for services shall be implemented.

In 2015, the Order of Selection process was updated and approved by the State Rehabilitation Council (SRC) and approved as part of the updated 2018 State Plan.

First Priority will be given to consumers with the *most significant disabilities*. The OOS allows for individuals with *most significant disabilities* to receive services before all other individuals with disabilities. Second Priority shall be given to consumers with significant disabilities. Third Priority will be given to other eligible consumers. The Order of Selection was implemented in May 2001. Since July 13, 2009, all Priority Categories have been open.

In 2015, VR updated its Order of Selection which was approved by the State Rehabilitation Council.

**Priority Category 1:** An individual has a *Most Significant Disability* if a mental or physical impairment exists that seriously limits three (3) or more functional capacity areas in terms of an employment outcome and whose vocational rehabilitation will require multiple VR services over an extended period of time.

**Priority Category 2:** An individual has a *Significant Disability* if a mental or physical impairment exists that seriously limits one (1) or two (2) functional capacity areas in terms of an employment outcome and whose vocational rehabilitation will require multiple VR services over an extended period of time.

**Priority Category 3:** An individual has a *Non-Significant Disability* if a mental or physical impairment exists that seriously limits one (1) functional capacity area in terms of an employment outcome and whose vocational rehabilitation will not require multiple VR services over an extended period of time.

MDRS, in consultation with the SRC, will close the Priority Categories designated to be *closed*. Any individual currently under an approved IPE at the time his/her Priority Category is closed will continue to receive with his/her IPE, including the provision of Pre-Employment Transition Services and Post-Employment Services.

Individuals placed in delayed status will be notified of their Priority Category, process for reclassification, their right to appeal, and the availability of the Client Assistance Program (CAP).

If an OOS is implemented, MDRS will provide the following information:

- Show the order to be followed in selecting eligible individuals to be provided VR services
- Provide justification for the order
- Identify the services and outcome goals
- Identify the time within which these goals may be achieved for individuals in each Priority Category within the order

When an OOS is in effect, individuals meeting eligibility requirements but are in a *closed* Priority Category have access to information and referral services. VR will provide all eligible individuals with disabilities who do not meet the OOS

criteria with information about, and referral to, other Federal or State programs (including to Workforce Investment Network Job Centers for training and placement) that can assist them with obtaining or retaining employment.

MDRS will elect to provide services, regardless of any established Order of Selection, to eligible individuals who require specific services or equipment to maintain employment.

#### **b. The justification for the order**

MDRS has determined that sufficient resources are currently available to provide VR services to all individuals with disabilities that apply, those determined eligible in all Priority Categories and those under an IPE. Due to the increase in service needs and the staff resources in 2017 and 2018 to provide the services, if the projected resources for funds and personnel changes before the next state plan modification, MDRS will make a determination whether it may need to close one or more of its Priority Categories.

MDRS will conduct reviews periodically during the year to help validate the order and assess the impact of unforeseen circumstances.

When it is determined that MDRS does not have the staff or fiscal resources to serve all eligible individuals in all Priority Categories, MDRS administration will make the decision to begin closing Priority Categories, first beginning with Priority Category 3, *Non-Significant Disability*.

#### **c. The service and outcome goals**

Since 2009, MDRS – OVR/OVRB has been able to keep all Priority Categories open and not maintain a waiting list.

During FFY 2021, OVR/OVRB all Priority Categories have remained open. MDRS has also had sufficient funds to service all individuals with apply for services. For FFY 2022-2023, MDRS anticipates that all priority categories will remain open and there will be no wait list.

#### **d. Time within which these goals may be achieved for individuals in each priority category within the order; and**

All Priority Categories are currently open for consumers who are eligible and under an IPE. In addition, the average time it takes to serve individuals in each priority category is as follows:

1. Priority Category 1 - 18 months to serve;
2. Priority Category 2 - 14 months to serve;
3. Priority Category 3 - 6 months to serve.

#### **e. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities**

At any time that MDRS resources do not permit all eligible consumers to be served, an Order of Selection for services shall be implemented. When an OOS is in effect, MDRS continues to accept applications and make determinations of eligibility while notifying all eligible individuals of the Priority Category they are assigned.

When an individual is assigned to a category that is *closed*, the individual will be moved to *delayed* status and placed on a waiting list to be served in the chronological order in which he/she applied. Individuals having an active Individualized Plan for Employment (IPE) prior to the implementation of the OOS will continue to receive services uninterrupted.

#### **In 2015, the following Order of Selection was updated and approved:**

**Priority 1. Most Significant Disability:** Individual With a *Most Significant Disability*: An individual —

- who has a severe physical or mental impairment that seriously limits three (3) or more functional capacities in the areas of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one (1) or more physical or mental disability(ies) resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, intellectual disability, mental illness, multiple sclerosis, muscular dystrophy, Musculo-skeletal disorders, neurological disorders (including stroke and epilepsy), spinal cord conditions (including paraplegia and quadriplegia), sickle cell anemia, specific learning disability, end-stage renal disease or other disability or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitations.

**Priority 2. Significant Disability:** Individual With a *Significant Disability*: An individual -

- who has a severe physical or mental impairment that seriously limits one (1) or two (2) functional capacities in the areas of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one (1) or more physical or mental disability(ies) resulting (See List under *Most Significant Disability*)

**Priority 3. Non-Significant Disability:** Individual with a *Non-Significant Disability*: An individual -

- who has a physical or mental impairment that seriously limits one (1) or more functional capacity(ies) in the area of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation is *not* expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one (1) or more physical disability(ies) or combination of disabilities (See list under *Most Significant Disability*)

Individuals having an active plan prior to the implementation of the Order of Selection will continue to receive services uninterrupted.

*(2) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment*

MDRS-OVR/OVRB will elect to provide services, regardless of any established Order of Selection, to eligible individuals who require specific services or equipment to maintain employment. Specific services or equipment include Assistive Technology Services.

If an Order of Selection is implemented, consumers placed on a waitlist will have the ability to have their current Priority Category reviewed and if functional limitations in the functional capacity areas cause them to be categorized into a higher category, OVR/OVRB will make the adjustment. No consumer will be moved to a lower Priority Category.

## N. Goals and Plans for Distribution of Title VI Funds

### *(1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services*

For PY 2020 – 2023, MDRS will continue to invest all Title VI allocations to fund the purchase of job training services, especially job trainers. MDRS expects to continue supplementing Title VI funds as supplemental funds are available and, if possible, continue the level of Title I monies committed to the SE Program. MDRS occasionally supplements Title VI funds with Social Security Reimbursement funds as there is a need for additional funds for program expenditures. MDRS plans to continue this process if Title I funds are not available.

When the Title VI-B funds are awarded, they are distributed to the SE Counselors to fund job coach services for SE clients.

Additionally, MDRS will continue its efforts to increase the funds available for use by the SE program by development and submission of proposals for grants that may become available.

MDRS will also explore ways to utilize available funds more efficiently by entering into Cooperative Agreements with other entities who may participate in the cost of providing services to SE clients.

VR goals and priorities regarding the distribution of Title VI-Part B funds are to:

- Allocate 50 percent of the federal Supported Employment allotment for eligible youth with the most significant disabilities.
- Because based on current case data and referral information, it is anticipated that more individuals will require SE services to obtain and maintain Competitive Integrated Employment, SE Funds will also be used by VR Counselors to purchase SE services from community rehabilitation programs with Cooperative Agreements with the agency as providers become available in the state
- In PY 2020 – 2023, VR staff will continue to collaborate with community partners to add additional providers for SE Services. VR (Title I) Funds will be used to purchase traditional VR employment services and SE Services from Shelby Residential and Vocational Services (SVRS), which is the only third party provider in the state.

### *(2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:*

a. The provision of extended services for a period not to exceed 4 years; and

VR has updated its policy manual to include guidance for the provision of Extended Services for youth populations with the *most significant disabilities*, under the age of 25. These youth populations may receive extended services (i.e., ongoing support to maintain an individual in Supported Employment) for up to four (4) years. In addition, Customized Employment is clarified in the policy. VR also works with extended service providers, when feasible, as a means to provide additional resources and services to individuals needing and choosing these specialized services as an interim step to the rehabilitation process of achieving a successful employment outcome. SE Counselors will continue to primarily focus on successful employment outcomes in Competitive Integrated work settings.

b. *How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.*

Cooperative arrangements will continue to be developed with other provider agencies and organizations, both public and private, to expand the SE Program to unserved and underserved populations. The focus of these arrangements is on promoting and enabling SE Counselors and service provider personnel from other agencies to work as teams to share expertise, provide technical support in specific disability areas, and conduct joint training.

With the Interagency Agreement and referral process that has been developed with the Department of Mental Health and the Division of Intellectual and Developmental Disabilities, we will continue to work with this agency in serving individuals who are eligible for the waiver as extended service providers.

SE staff also participates in *best practices* in coordinating services for SE clients in the education system throughout the state. These practices have proven to be successful for clients because of the enhanced teamwork with other agencies. Under WIOA Customized Employment is included in the definition of Supported Employment and VR is included as a VR service that the SE client can choose to include in his/her IPE. Therefore, VR is expanding Customized Employment training to the majority of its direct service staff. These service approaches will continue to be made available to clients during the intake process and will be utilized when deemed appropriate and when chosen by the client.

In obtaining extended service providers, Supported Employment Counselors will continue to work with individuals that may be eligible for the IDD Waiver Program to be the extended service provider. This will assist in providing the services necessary to assist in maintaining an individual with a significant disability in employment. MDRS currently has a referral process in place with the Department of Mental Health for individuals who are eligible for the IDD Waiver but seek Competitive Integrated Employment.

#### O. State's Strategies

*Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):*

*(1) The methods to be used to expand and improve services to individuals with disabilities*

The following methods will be used to expand and improve the services to individuals with disabilities.

- Designate staff in each MDRS district to be responsible for conducting Vocational Rehabilitation outreach and orientation sessions on a regular basis.
- Continue to work with local education agencies to identify and provide Pre-Employment Transition Services and Transition Services to students with disabilities.
- Expand Project SEARCH sites to be used as a tool to provide Pre-Employment Transition Services to students with disabilities.
- Utilize relationships with workforce partners at the state and local levels to have more options and resources available for job placement and training.
- Share specific agency expertise to facilitate interagency knowledge to improve services to all participants with disabilities served by any agency within the workforce system.
- Annually evaluate physical location of VR staff to assure that all geographic areas of the state are covered with appropriate service delivery staff.
- Continue to administer a consumer satisfactory survey while the consumer's case is open with VR.
- Develop a consumer satisfaction survey with the consumer regarding services received from vendors/providers of VR services.
- Use case review results to identify and implement improvements and quality consistency of service.

- Increase collaboration within the state's workforce system to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs.

*(2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis*

VR Counselors evaluate the need for Assistive Technology (AT) services throughout the rehabilitation process. At initial interview, consumers are routinely provided information on accommodations and information in their mode of communication. At *eligibility determination*, the need for AT is assessed and when determined needed, provided as part of the individuals' Individualized Plan for Employment. At employment, the need for additional AT is assessed.

Through the MDRS Assistive Technology (AT) Program, nine Rehabilitation Technologists and two Rehabilitation Engineers are strategically located throughout the state to provide consultation on AT referrals as well as perform initial evaluations and assessments; procure and set up AT equipment; provide follow-up evaluations; design and fabricate original items; and provide specifications and final inspections for AT services.

*(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program*

Mississippi's most underserved populations continue to be American Indian and Alaska Native, Asian, and Hispanic or Latino.

Based on the *Comprehensive Statewide Needs Assessment* and other data received from the VR Case Management System, individuals with mental illness, cognitive disabilities and Autism Spectrum Disorders are the primary emerging population that are reported as underserved and who staff has requested the most assistance in understanding the disability in terms of employment. VR will seek to provide more training and resources to assist staff in serving this population.

MDRS continues to utilize RL Brown Group Inc. to translate documents used in routine casework from English into Spanish. MDRS is currently in the process of having all necessary documents and brochures that are made available to the public translated into Spanish. These documents are being uploaded into the case management system and brochures are being made available for those constituents and stakeholders whose natural language is Spanish. District Outreach teams will provide outreach activities in their local communities in efforts to obtain referrals for individuals from diverse populations.

MDRS will continue to monitor the ACS survey data for the most recent race and ethnicity statistics per county to be aware of areas where the information should be disseminated.

MDRS will also continue to provide outreach to other minority populations to ensure they have information regarding the VR program.

*(4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)*

- Engage with key partners such as MDE, the SRC, local school districts, community colleges, and other training and education programs in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students with disabilities.
- Continue to accept proposals from Community Rehabilitation Programs to provide Pre-Employment Transition Services to students with disabilities.

- Community outreach and orientation will establish relationships with parent training and information groups, advocacy groups, and other service providers to encourage referral and parental participation in the development and provision of transition services.
- Increase collaboration with community colleges to improve coordination of VR services with community college programs and Adult Basic Education programs to facilitate transition from secondary to post-secondary activities.
- Summer Internship Program for high school students with blindness and visual impairments, deafness and hard of hearing.
- Engage with key partners such as MDE, SRC, high schools, community colleges, and other training and education programs in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who are in special education.
- Engage with key partners such as MDE, SRC, high schools, community colleges, and other training and education programs in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who are not in special education.
- Plan and coordinate with the MDE Special Education Director to conduct at least annual training and semi-annual work groups for the purpose of cross training in understanding the services offered by VR.
- When developing the Youth Transition Handbook, the design should be complementary to the MDE Special Education Transition Handbook.
- Continue to partner with the MDE Transition Team

MDRS signed contracts with over 20 more Community Rehabilitation Programs to be able to provide Pre-Employment Transition Services to students with disabilities across the state.

*(5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State*

MDRS, OVR/OVRB will continue to request proposals (RFP) from Community Rehabilitation Programs (private and agency-supported) in order to provide Pre-ETS, Customized Employment Services, services to individuals who have autism, services for individuals who have severe mental illness and Supported Employment Services, which will facilitate the agency's ability to achieve the changes in WIOA.

In PY 2019, MDRS was able to secure its first third party contract to provide Supported Employment Services. Prior to this contract, MDRS did not have any community rehabilitation programs that provided Supported Employment Services. SE services were strictly provided in – house by VR staff. As a result of this contact with Shelby Residential and Vocational Services, the following services can now be provided by and outside provider: Exploration, Discovery, Job Development, Job Skills Training and Customized Employment. Through collaboration with other core partners and collaborating with community providers MDRS will continue to seek other providers of services. Through the Request for Proposal process, MDRS was able to secure thirteen (13) new providers for Pre-Employment Transition Services.

Mississippi has been limited in the number of community rehabilitation programs that provide SE Services, Pre-Employment Transition Services, and employment services with a Vocational Rehabilitation outcome of Competitive Integrated Employment.

In PY 2020 – 2023, MDRS will continue to advertise for Request for Proposals for community rehabilitation programs.

*(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA*



The Workforce Partners in Mississippi are working together to create a Shared Data Warehouse that will link our separate case management and data systems. We refer to this as ‘the Hub’, and are working with a vendor, *NSPARC*, to create this data warehouse and bridge. The National Strategic Planning & Analysis Research Center (nSPARC) designed and wrote *the Hub*. Founded in 1998, NSPARC is a university research center with more than 100 diverse employees, ranging from data scientists to software architects and security experts. NSPARC supports Mississippi State University’s overarching goals of research, learning, and service by collaborating within the university, through local, state, and federal agencies, and across the private sector to help society grow by discovering solutions to societal problems by using data science. They pursue entrepreneurial and collaborative initiatives to develop and maintain a pipeline of intellectual property and innovative technologies that positively impact real-world problems. NSPARC is headquartered in Starkville, Mississippi, adjacent to Mississippi State University’s campus.

MDRS entered into an agreement with NSPARC to develop a proof of concept in regard to how MDRS would capture the required data into the Hub. The proof of concept was tested and completed in March of 2016. NSPARC was able to use MDRS’ proof of concept in order to move forward with developing the Hub for all partners.

MDRS entered into another Agreement with NSPARC and Alliance (MDRS’ software vendor) in July of 2016. This agreement was for MDRS to provide the necessary data needed for the Hub from our current case management system and to update our Referral Module with the new process of our getting and receiving referrals from our partners. From July of 2016 until June of 2017, Alliance, MDRS, and NSPARC met to work through the process of how the data would be exchanged between the Hub and the Case management system.

All partner agencies will complete their separate intake forms with new customers. In each of these separate forms, however, there are **six diagnostic questions** that will be the same on all **forms and multiple demographic fields that are shared between partners (Intake)**. These data elements will automatically be uploaded into the Hub - or autofill - if the unique identifier matches a profile that already exists in the Hub. If data in these areas is different than the information that was previously in the profile, this information will be updated with that from the most recent entry. The initial version of the Hub was completed in June 2017. MDRS has been sending data to the Hub since that time.

The WIOA Hub software development was released and launched into the production environment on May 23, 2017. The other partners have been phasing in sending their data between January 2018 and June 2018. Once other partners went live in the Hub, MDRS began receiving referrals from them through the Hub directly into MDRS’ case management system. In the future, the PIRL for the State of Mississippi will be created through the Hub.

Alliance is the vendor that provides the Case Management system (Aware) for the Mississippi Department of Rehabilitation Services (MDRS) and for the OVR/OVRB programs in at least 35 other states. MDRS has been working with Alliance to ensure that the performance measures are included in Aware. Alliance has multiple user

groups across 35+ states that meet to discuss Aware with Aware users. The WIOA/RSA-911 and the Aware VR User Groups are two that are involved in ensuring that all federal reports and WIOA requirements are met.

- WIOA/RSA-911 User Group meets periodically throughout the year.
- Aware VR User Group meets monthly.
- There are two major releases of Aware each year. There are other minor releases that address items related to WIOA/RSA-911.
- MDRS continues to submit multiple quarters of RSA 911 data and the Annual Performance Report (RSA 9169).
- MDRS has a data sharing agreement in place to procure the data to report state wage data for adults and youth.

*(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities*

The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind, partnership within Mississippi's One-Stop system is clarified through Memoranda of Understanding with the State and each of the four local workforce development areas. MDRS is a part of the Workforce Development Board and takes an active role in assisting Workforce partners in serving individuals with disabilities. The MDRS Executive Director is a member of the Workforce Development Board.

MDRS-OVR/OVRB will continue to work with workforce partners to provide staff training and technical assistance on the eligibility for VR Services, provision of reasonable accommodations, auxiliary aids and services and assistive technology.

MDRS has been an active partner and has provided expertise on the use of computers and websites for individuals with disabilities including website accessibility. Assistive Technology staff provide expertise to Workforce Partners on building accessibility issues, etc.

MDRS will continue to participate in staff training with the four local workforce development areas that include Mississippi Partnership, Delta, Twin Districts, and South Central Mississippi Works.

Designated staff are assigned to each of the workforce area boards and attend quarterly meetings. This information is shared and communicated with VR staff and assist the local areas and the District offices to work together in providing employment services for common clients.

As part of the Intensive Technical Assistance with the Workforce Innovation Network Technical Assistance Center (WINTAC), we have received assistance and training on service integration, which is referred to as Integration Continuum. The initial meeting was held in August 24, 2017 at the Madison State office, Madison,

Mississippi. Representatives from each of WIOA Core Partner agencies were in attendance: Department of Human Services – Temporary Assistance for Needy Families, State Workforce Investment Board, Adult Basic Education, Mississippi Department of Employment Security,

To further assist in moving VR services more toward integration as we have defined it, on-site state meetings were held in March 2019 with the Delta Workforce Area (Greenville), Three Rivers Workforce (Belden) and VR and VRB staff in District 3 and VR and VRB Staff in District 2. In collaboration with the Workforce areas and OVR/OVRB programs, we recognize the importance of service integration as part of the Combined State Plan and ultimately, to provide the highest level of service to individuals with disabilities that are served by all workforce program. Aligning systems assist in providing quality customer service and quality competitive employment outcomes.

WINTAC continued to work with both areas to update and provide guidance for the integration plans that were developed as a result of the March 2019 meetings. A second on-site meeting was being scheduled for April 2020; however, this was postponed due to COVID-19.

*(8) How the agency's strategies will be used to:*

- a. *Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;*

*The following strategies will be required to achieve the goals and priorities as listed in (l) State Goals and Priorities and (n) Goals and Plans for Distribution of title I Funds:*

**GOAL 1 : Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

**Strategies (Plan of Action):**

- Develop a job placement culture by providing ongoing training in the job development and placement process.
- Develop and implement on-campus work experience training for students who reside in rural communities when community-based work experience is not available.
- Refer those consumers receiving SSI/SSDI cash benefits who are interested in earnings that will eliminate their reliance on SSA cash benefits for work incentives Benefits Analysis and Counseling.
- Coordinate and conduct the Annual Governor's Job Fair for individuals with disabilities.
- Summer Internship Program for high school students with disabilities including those who have blindness and visual impairments, deafness and hard of hearing.

**GOAL II: Improve the VR Service Delivery System to Individuals with disabilities.Strategies (Plan of Action):**

- Designate staff in MDRS districts to be responsible for conducting outreach and orientation sessions on a regular basis.
- Provide input to assure appropriate inclusion of vocational rehabilitation activities in, public service announcements, and agency website and publications.
- Update and distribute vocational rehabilitation brochures to appropriate referral sources.
- Designate and train specific staff members in each district to handle referrals and provide information to the public.
- Assure that all geographic areas of the state are covered with appropriate service delivery staff.
- Develop and implement a consumer satisfaction survey to be completed while the consumer's case is open with VR.
- Develop a consumer satisfaction survey to be completed by the consumer regarding services received from vendors/providers of VR services.

**GOAL III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.**

**Strategies (Plan of Action):**

- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are** in special education.
- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are not** in special education.
- Co-develop a formal Interagency Cooperative Agreement with officials from the Department of Education, local school districts and local high schools.

- Plan and coordinate with the Mississippi Department of Education-Special Education Director and Director 504 Services of to plan and conduct at least annual training and semi-annual work groups for the purpose of cross-training in understanding the services offered by Vocational Rehabilitation.
- Develop and implement the use of an OVR Transition Manual designed to assist staff in the delivery of transition services. This manual will be used as a technical assistance tool for transition planning purposes.
- Annually identify 504 Coordinators and special education staff for each school.
- Co-develop and implement self-identification tool identifying youth with disabilities who could possibly benefit from transition services.
- Establish relationships with parent training and information groups, advocacy groups and other service providers to encourage referral and parental participation in the development and provision of transition services.
- Establish comprehensive guidelines and indicators for assessing the individual transition needs of students.
- Work with other core partners in the workforce system to provide employment related services to prevent duplicative services.
- Contract with additional Community Rehabilitation Programs to provide Pre-Employment Transition Services.

**GOAL IV: Implement identified improvements to increase statewide consistency and quality of consumer services.**

**Strategies (Plan of Action):**

- Use results of the annual case review to determine where additional guidance and training are required.
- Utilize the new counselor training process for mentoring, training, and leadership development for all VR Counselors.
- Utilize and continue to develop consistent training process for key VR staff that deliver direct client services.
- Conduct annual statewide case record reviews of case service practices to determine consistency and adherence with federal/state requirements. Use case review results to identify and implement improvements in quality and consistency of services.
- Survey OVR staff on practices and provide refresher training to assure consistent and quality service delivery.
- Deliver high quality training and support to provide staff with the knowledge and skills needed to perform effectively.
- Recognize and appreciate staff throughout the division for their contributions to VR's success.
- Continue to update and deliver advanced best practices training to field staff statewide to provide ongoing skill development in key service delivery operations and practices, including a strong focus on customer service, cultural sensitivity, and better addressing each consumer's impediments to employment.
- Increase collaboration within the workforce system to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs.

- Play stronger roles on state and local Workforce Boards to assure that VR consumers and other individuals with disabilities are better served by the One-Stop system.
- Increase collaboration with community colleges to improve coordination of VR services with community college programs and Adult Basic Education programs.
- Implement written agreements with providers for individuals with intellectual and development disabilities to affirm their roles and responsibilities for serving VR consumers, including their capacity for providing long-term employment supports to individuals after the VR case is rehabilitated.

#### b. Support innovation and expansion activities; and

In an effort to expand and improve services to all individuals with disabilities, MDRS, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind will:

Continue to develop a job placement culture with OVR/OVRB Counselors by continuing to develop services and provide tools and resources for job preparation services for clients that have reached this point in their IPEs. The VR Career Counselors will continue to assist clients in getting prepared for job interviews, completing applications and being job ready.

OVR/OVRB Counselors will ensure that at the application process Counselors are providing VR Counseling and Guidance regarding the overall purpose of VR Services which is Competitive Integrated Employment. The Office of Business Development Representatives will continue working to bring to the table labor market information so that Counselors will be aware of career opportunities and sector strategies in the state.

Paid Internship opportunities and paid work based learning opportunities will continue to be developed with employers in the community so that consumers can receive training in the competitive labor market. This training will also assist with career exploration, the selection of employment goals and ultimately clients obtaining skills so that they will qualify for Competitive Integrated Employment opportunities.

MDRS engages in numerous programs and activities designed to inform and make available VR and Supported Employment services to individuals with disabilities including individuals with Significant Disabilities. MDRS will continue outreach activities and provide information to community partners, community program, high schools and colleges and universities.

Continuing to implement the strategies and goals to serve more students with disabilities, such as engaging key partners, participating in training opportunities and outreach meetings to ensure that school staff understand the importance of VR Services for students prior to them exiting high school will increase the success of those students that exit school and transition to post high-school training programs and employment.

MDRS will continue to support the work of the Statewide Rehabilitation Council. The SRCs input has been very important in impacting change in the delivery of VR Services as well as the implementation of the Consumer Satisfaction Survey and other policy changes.

#### c. *Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.*

The strategies and goals to innovate and expand Vocational Rehabilitation Services, including Supported Employment Services will help increase individuals with disabilities access to VR Services in the state, bring awareness of VR Services in the state and increase the number of individuals with disabilities not just obtain employment but maintain employment. The goals and strategies will assist in ensuring that the individuals are provided services to in which they can overcome lack of skills to compete but have middle and higher skills to compete and qualify for employment opportunities.

The strategies and goals will also help ensure that OVR/OVRB Counselors are qualified and have the skills needed to work with individuals with various type of disabilities, including Autism and Mental Illness. Having skilled and qualified staff will help provide quality VR Services to the individuals we serve.

The strategies and goals will help to ensure that individuals with disabilities have a selection of community rehabilitation programs to assist in providing VR services that will enable them to obtain Competitive Integrated Employment. This has been a huge barrier to overcome in the state of Mississippi.

Continuing to work with other Workforce partners will help individuals receive the wrap around services they need in order to be willing to accept employment opportunities and be able to receive the services they need while they are preparing for employment.

**P. Evaluation and Reports of Progress: VR and Supported Employment Goals Describe:**

*(1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:*

a. Identify the strategies that contributed to the achievement of the goals

**GOAL I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

**Report of Progress:**

- 28.2% increase in VR consumers that obtained and employment outcome from 2018 to 2019. Due to the impact of COVID-19 OVR saw a 12% decrease in the number of individuals that obtained employment, however 2710 individuals achieved competitive integrated employment in 2020 and 2375 achieved competitive integrated employment in 2021. 50% increase in VRB consumers that obtained an employment outcome from 2018 to 2019. Due to the impact of COVID-19 OVRB saw a 32% decrease in the number of individuals that obtained employment in 2020, however 352 individuals obtained competitive integrated employment and in 2021 239 obtained competitive integrated employment.
- In 2019, the Measurable Skill Gain (MSG) rate was 59.8% and in 2020 MSG for consumers served was 72.4%
- The median hourly wage for individuals exiting the VR/VRB program with an employment outcome has increased. In 2018 median wage was \$11.54 and the median hours worked per week was 40 hours. In 2019 the median wage increased to \$12.00 per hour and in 2020 the median wage increased to \$13.00.
- In 2018-2019, 5, 182 new IPE were signed, in 2019 -2020, 4,960 IPEs were signed, 2020 – 2021, 4, 564 IPEs were signed.
- Three Youth Pre-Employment Transition Conferences were held in Vicksburg on April 26, 2018, Greenwood on May 22, 2018, and Biloxi on April 28, 2018. Due to COVID-19, Transition Conferences were postponed in 2019 – 2021.
- VR Career Counselors in 2019, assisted 267 clients received Job Prep and Job Ready Services. VR Career Counselors continue to assist clients become ‘Job Ready’. In 2020, 729 consumers received job prep services, 442 received job search and 225 clients received job placement. In 2021, 363 received job prep and 284 received job search services and 130 received job placement.
- The 7<sup>th</sup> Annual Summer Internship for Students with Blindness was completed in 2019. Fourteen (14) students participated.

- In 2021, 8<sup>th</sup> Annual Summer Internship for Students with Blindness was completed and eight (8) students participated. The 2020 Annual Summer Internship was postponed due to COVID-19. Four (4) consumers were hired into competitive integrated employment after completing their internship.
- 626 clients received Benefits Counseling from our Community Work Incentive Partners in 2019 490 VR consumers received Benefits Counseling and 487 VR consumers in 2021. The number that received Benefits Counseling were impacted by COVID-19
- 10,346 individual contacts to business in the state of Mississippi were made by Business Development staff in 2018 11,245 individual contacts to business in the state of Mississippi was made in 2019.
- 6276 individual contacts to business in the state of Mississippi were made in 2020. COVID 19 had an impact on the number of businesses contacted.
- 9857 individual contacts to business in the state of Mississippi were made in 2021
- Five job fairs (three major, two minor in size) were held in Tupelo, Jackson, Gulfport, Greenwood, and Cleveland in 2018.
- Three job fairs were held in Southaven, Jackson, and Gulfport in 2019. 130 businesses attended. Due to COVID-19, Job Fairs in 2020 were cancelled.
- In October 2021, Job Fair held in conjunction with the University of Mississippi that targeted college students with disabilities. Twenty-eight businesses attended
- Seventy students (72) with disabilities participated in the Student Summer Internship Program (SIP) in 2019. Fifty-four (54) students participated in 2020 and seventy-three (73) participated in 2021.
- Eleven students with disabilities participated in Project SEARCH in 2018 - 2019. This partnership was created with the University Medical Center, the Rankin County School District, the Mississippi Council for Developmental Disability and MDRS/VR. Nine graduated the program with a 100% placement percentage.
- Project SEARCH was expanded by 4 more locations: North Mississippi Medical Center (Tupelo), Forest General Hospital (Hattiesburg), Baptist Medical Center (Jackson), and Southcentral Regional Medical Center (Laurel in 2019).
- In 2020 -2021, Forty-two (42) individuals with disabilities participated in Project SEARCH and existing and new partnerships were created with the University MS Medical Center, Baptist Jackson, Baptist Attala, MeritHealth-Vicksburg, South Central Regional Medical Center, North MS Medical Center and Forrest General Hospital.
- 104 individuals with disabilities have been placed into employment at Sephora Distribution facility in Olive Branch, MS as of October 2019, Sephora has committed to hiring another 50-75 more individuals through 2020. In July of 2019, Sephora had an attrition rate of 2-3% compared to 20-30% of the able-bodied population. Employees with disabilities had less than 1% absenteeism in the program. This partnership started in October 2017.
- In 2020, thirty-one (31) individuals with disabilities received Distribution Center Training and fifteen (15) were hired. In 2021, twenty-five (25) received training and ten (10) were hired.
- In 2018, the Business Enterprise Program (Randolph Sheppard) five (5) new vendors opened their businesses
- In Summer 2021, the first Summer Pre –ETS Work-Based Learning Program was implemented. One Hundred-three (103) participated in the program. These students were placed with employers throughout the state in their local communities.

**GOAL II: Improve the VR Service Delivery System to Individuals with Disabilities Report of Progress:**

- MDRS contracted with RL Brown Group Inc. to translate client service forms and documents from English into Spanish.
- In 2021, RL Brown Group began translating brochures in Spanish beginning with our Transition and Youth Services Brochure
- VR has sixty seven (67) individuals whose primary language is Spanish as a result of the outreach and translation of forms and brochures
- 189 individuals signed and developed a Career Pathway IPE in 2019, 152 in 2020 and 2021 in 136. This process was designed to provide expedited VR services to clients with *Significant Disabilities* by allowing the counselor to establish an employment goal with a consumer within a specific Career Pathway and provide Vocational/Career Counseling and other designated VR services more quickly after a determination of eligibility has been made. For students with disabilities, a Career Pathway (Fast Track) IPE supports the provision of Pre-Employment Transition Services needed to ensure that the student's specific employment goal is consistent with their strengths, abilities, capabilities, concerns, priorities, interest and informed choice.
- VR updated its Supported Employment Policy and Procedures to increase the focus on clients that need SE services. This process helped increase the number of individuals served in the SE program. In 2020, 548 individuals received SE services
- VR staff work in partnership with other agencies such as the Department of Mental Health, Bureau of Intellectual and Developmental Disabilities. The Memorandum of Understanding with the Department of Mental Health was renewed for May 1, 2021 through April 30, 2024.
- Autism Spectrum Disorders - Two new providers entered into contracts to provide evaluation and assessment services to individuals with Autism and other significant disabilities. These provider contracts have been renewed.
- In 2018, 311 individuals with autism were provided VR Services. In 2019, the number of individuals with autism increased to 449, 2020 the number served increased to 604 and in 2020 the number served increased to 628.
- In 2021 and new Interagency Agreement was established with TEAAM that provides services to individuals with autism spectrum disorders, attention deficit disorder, specific learning disability and other intellectual and development disorders.
- The 3<sup>rd</sup> Annual VR Deaf Pre-ETS Summer Program was held by the Deaf Services Program at Eagle Ridge in July 2019. The DEAF Pre-ETS Summer Program was postponed in 2020 and 2021 due to COVID-19.
- In July 2019, the 4<sup>th</sup> Annual Pre-Employment Transition Camp for Students with Deafness was held. 2020 and 2021 Pre-ETS Transition Camp was cancelled due to COVID-19.
- VR developed the Outreach and Orientation Program to be utilized by district staff to conduct outreach with other organizations and service providers. Continuing in 2018 and 2019, progress on this has been slow due to other major responsibilities. VR will continue to move toward implementing the Outreach and Orientation Program. Progress on implementing has been delayed in 2020 and 2021 due to COVID-19 and staff shortages.



- Supported Employment Job Skills Manual and training provided in three locations throughout the state to VR and VRB staff, IDD Waiver providers and other agencies and organizations that provide Employment Services.
- The Interagency Cooperative Agreement with the Department of Education has been renewed for January 1, 2020 through June 30, 2022. In 2020 -2021, all Memorandum of Agreements with local education agencies were updated.
- In 2019, OVR/OVRB launched the first Peer Mentoring Pilot Program at the University of Southern Mississippi and Mississippi State University. The guidance and support of the WINTAC Pre-ETS team played a vital role with the implementation of these projects in Mississippi. Given the support of WINTAC and the Pre-ETS team, Mississippi is proud to be one of the first states in the nation to implement a Peer Mentoring project.
- In 2020 through 2021, Interagency Agreements for Peer Mentoring have been executed with East Mississippi Community College/Student Support Services, August 1, 2020 – July 31, 2023; Northwest Mississippi Community College/Success Center – September 1, 2020 – July 31, 2023; Mississippi State University/Disability Resource Center – June 1, 2021 – June 30, 2023 and the University of Southern Mississippi – June 1, 2021 – June 30, 2023.
- VR and VRB staff participated in the process with the assistance of WINTAC to work with pilot areas in the Belden/Tupelo and Greenville areas to improve service alignment among VR Core Partners, required partners and other stake holders in these areas. WINTAC facilitated the Integration Continuum Self-Assessment. In both locations the partners selected priority areas to make strategic improvements. Each area established Action Teams to oversee the implementation with WINTAC of the strategic plans that includes a cross-section of partners with VR staff in leadership roles. Due to COVID -19 further work on the Integration Continuum was halted.

**GOAL III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.**

**Report of Progress:**

- The 3<sup>rd</sup> Annual VR Deaf Pre-ETS Summer Program was held by the Deaf Services Program at Eagle Ridge in July 2019. In July 2019, the 4<sup>th</sup> Annual Pre-Employment Transition Camp for Students with Deafness was held.
- 14 Students with Blindness participated in the OVRB 6<sup>th</sup> Summer Internship Program.
- VR served 3,609 students with disabilities and VRB served 676 students with disabilities for a total of 4,285. This is an increase of 486 students from 2018.
- In 2020, OVR served 3595 eligible and potentially eligible students with disabilities. This is a decrease from 2019 due to COVID-19 and the limited access to students.
- In 2020, OVRB served 301 eligible students with disabilities. This is a decrease from 2019 due to COVID-19 and the limited access to students.
- In 2021, OVR/OVRB served 2605 eligible students with disabilities and 1,292 potentially eligible students with disabilities.
- OVR/OVRB successfully completed the first pilot year of Peer Mentoring with two of universities in the state: Mississippi State University and the University of Southern Mississippi. In 2020 through 2021, Peer

Mentoring will be provided at East Mississippi Community College and Northwest Mississippi Community College/Success Center –Pre-Employment Transition Services were provided through OVR’s partnership with the Mississippi State University - T.K. Martin Center through on-campus internships. COVID-19 impacted this partnership in 2019 – 2020. The contracts were renewed and as steps are being made to prevent the spread of COVID-19 we look forward to this partnership.

- Pre-Employment Transition Services were provided through OVR’s partnership with the ARC of Mississippi through after school Pre-ETS classes in a rural part of the state. This contract will continue from 2021 – 2022.
- Pre-Employment Transition Services were provided through VRB’s partnership with the National Federation of the Blind through two Transition conferences. This contract will continue from 2020 – 2022.
- Pre-Employment Transition Services were provided through OVR’s partnership with Life of MS through twodifferent one-day transition conferences across the state. This contract will continue in 2020 - 2022
- Pre-Employment Transition Services were provided through OVR’s partnership with Vocational & Rehabilitation Consultants, LLC through one three-day conference. This contract was impacted by COVID – 19.
- Pre-Employment Transition Services were provided through OVR’s partnership with the University of Southern Mississippi through on-campus weeklong Transition Boot Camps and in-school Pre-ETS activities. This contract will continue in 2020 – 2022 and many of the activities they provide are virtual.

**GOAL IV: Implement identified improvements to increase statewide consistency and quality of consumer services.**

**Report of Progress:**

- The Consumer Satisfaction Survey was implemented in 2018 for open OVR/OVRB cases by the Program Evaluation Unit.

*b. Describe the factors that impeded the achievement of the goals and priorities*

Due to the ongoing changes with federal reporting, MDRS continues to work with staff to understand and incorporate new rules and processes. VR and VRB is still working to achieve the goals and implement the strategies outlined in this state plan.

VR and VRB is still working to achieve the goals and implement the strategies outlined in this state plan. Although allof the strategies were not achieved to meet the goal, significant progress was made to increase the goals.

Some of the factors that impeded the achievement of the goals and priorities were:

- High staff turnover experiences over the last few years affected the VRs ability to provide consistent, high-quality services to consumers as referenced in the CSNA
- The effects of COVIS-19 affected our ability to provide access to needed services due to the nation and statewide shutdown of schools and businesses
- Increasing number of referrals for Pre-Employment Transition Services and Transition Services
- Extensive training on new policy and procedures due to the changes in WIOA and the RSA 911.

*(2) AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATIONMUST:*

*a. Identify the strategies that contributed to the achievement of the goals*

In review of the Comprehensive Needs assessment, the Transition Needs assessment, unserved and underserved populations and minority populations, the following goals are reported as a result of the strategies identified:

**Report of Progress for the Supported Employment (SE) program for 2020:**

**GOAL I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

**Report of Progress:**

- 29 referrals were received from the IDD Waiver Program
- 92 referrals for individuals with serious mental illness were received from the Department of Mental Health.
- 583 individuals received CCIR referrals that were in Subminimum Wage Employment facilities

**GOAL II: Improve the VR Service Delivery System to Individuals with Disabilities**

Continue the referral process between the VR Transition Counselor and the VR Supported Employment (SE) Counselor for students with disabilities, ages 14-21, who have been determined to need long-term ongoing support services.

**Report of Progress:**

- 59 Job Coaches hired and trained and hired to provide job training services.
- 55 Individuals placed in employment
- 51 individuals reached a competitive employment outcome (Closed Rehabilitated)
- SE Counselors and Transition Counselors worked together to identify students and provide orientation regarding VR services to school districts throughout the state.
- In 2020 – 2021, Seven (7) new Project SEARCH sites were added
- Job Skills Training Manual Training was held in the North, South and Central part of Mississippi in which staff from MDRS and the Department of Mental Health attended. Due to the COVID-19 pandemic, this joint training was placed on hold.

When the school year begins, the Transition Counselor should contact each school district and schedule a meeting with the Special Education teachers to discuss possible referrals. If the school reports having any students identified with hearing and/or vision loss, the RCD and/or VRB Counselor should be invited to attend the meeting as well. The Counselors will work together to actively elicit referrals on all students with disabilities age 14-21, regardless of their classroom assignment. They will meet with potential referrals and review the school's supporting documentation. It can be assumed, students who have been identified by the school as requiring additional support to be successful in the educational setting, will require long-term supports to gain and maintain employment. After the Transition Counselor has established that the client is eligible for VR services and will require Supported Employment, the case can then be referred to the SE Counselor to provide any Pre-Employment Transition Services (Pre-ETS).

SE Counselors have a separate Supported Employment and Supported Employment Transition caseload. This assists with monitoring the SE services provided to Adults and Students/Youth.

**GOAL III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.**

## Report of Progress:

- Training was provided to all Transition Counselors and SE Counselors on procedures for making referrals and changes due to new federal regulations. Discovery Training was provided by Shelby Residential and Vocational Services (SRVS);
- New provider, Shelby Residential and Vocational Services (SRVS), entered into a contract to provide Customized Employment Services to individuals with the *most significant disabilities*. Discovery is available through the IDD Waiver Program that certify providers for SE services.
- In 2021 – 2022, Three (3) new contracted Navigator positions will be filled to generate referrals and manage potentially eligible caseloads;
- Monthly Transition Meetings that include Training topics will continue through 2022. These are held virtually.
- Transition and Youth Services Resource Guide was updated
- OVR was approved to add ten (10) new VR Counselor positions. They positions were not available for recruitment until after July 2021.

### *b. Describe the factors that impeded the achievement of the goals and priorities*

OVR/OVRB will continuously work to implement new policies and procedures regulated by WIOA. In the SE program, some of the factors that impede the achievement of the goals and priorities are:

- SE Counselor and/or VTI vacancies which cause a delay in service and sometimes the quality of service provided is impacted.
- The number of referrals received from cooperative partners and Transition counselors decreased since the start of the pandemic, therefore, decreasing the caseload size, workload and/or services provided.
- SE Counselors understanding cooperative agreements with other programs and the services other programs provided such as the IDD Waiver and Severe Mental Illness.
- The lack of trained and reliable job skills trainers throughout the state.
- Vocational Training Instructors are limited in training and skills.
- The current tracking system for SE referrals is insufficient.
- The lack of training for SE Counselors.
- High staff turnover experiences over the last few years affected the VRs ability to provide consistent, high-quality services to consumers as referenced in the CSNA
- The effect COVID-19 which caused a national pandemic which affected our ability to provide services due to school and business closures

### *(3) The VR program's performance on the performance accountability indicators under section 116 of WIOA*

The Workforce Partners in Mississippi worked together to create a Shared Data Warehouse that will link our separate case management and data systems. We refer to this as 'The Hub', and worked with a vendor, NSPARC, to create this data warehouse and bridge. National Strategic Planning & Analysis Research Center (NSPARC) designed and wrote *the Hub*. Founded in 1998, NSPARC is a university research center with more than 100 diverse employees ranging from data scientists to software architects and security experts. NSPARC supports Mississippi State

University's overarching goals of research, learning, and service by collaborating within the university, through local, state, and federal agencies, and across the private sector to help society grow by discovering solutions to societal problems by using data science.

They pursue entrepreneurial and collaborative initiatives to develop and maintain a pipeline of intellectual property and innovative technologies that positively impact real-world problems. NSPARC is headquartered in Starkville, Mississippi, adjacent to Mississippi State University's campus.

MDRS entered into an agreement with NSPARC to develop a proof of concept in regard to how MDRS would capture the required data into the Hub. The proof of concept was tested and completed in March of 2016. NSPARC was able to use MDRS' proof of concept in order to move forward with developing the Hub for all partners.

MDRS entered into another agreement with NSPARC and our software vendor Alliance in July of 2016. This agreement was for MDRS to provide the necessary data needed for the Hub from our current case management system and to update our Referral Module with the new process of our getting and receiving referrals from our partners. From July of 2016 until June of 2017, Alliance, MDRS, and NSPARC met to work through the process of how the data would be exchanged between the Hub and our case management system.

All partner agencies completed their separate intake forms with new customers. In each of these separate forms, however, there are **six diagnostic questions** that are the same on all **forms and multiple demographic fields that are shared between partners (Intake)**. These data elements are automatically uploaded into the Hub - or auto filled - if the unique identifier matches a profile that already exists in the Hub. If data in these areas is different from the information that was previously in the profile, this information will be updated with that from the most recent entry. The initial version of the Hub was completed in June 2017. MDRS has been sending data to the Hub since that time and was the first partner to go live.

The WIOA Hub software development was released and launched into the production environment on May 23, 2017. The other partners came on board between January 2018 and June 2018. Once other partners went live in the Hub, MDRS began receiving referrals from them through the Hub directly into MDRS' case management system. In the future, the PIRL for the State of Mississippi will be created through the Hub.

MDRS and other state partners are now all live in the Hub. Referrals can be taken by any one of the partner agencies and based on how the individual answers the questions, referrals will be sent to other partner agencies through the Hub. MDRS's case management system pulls referrals in from the Hub each night and they are marked as Workforce Referrals. They are then worked on by MDRS staff where the individual is contacted to determine if they are potential candidates for services provided by MDRS.

MDRS submits requests and receives multiple quarters of wage data from MS Department of Employment Services (MDES) each quarter. MDRS then imports that data into our case management system which is then used in the RSA-911 performance measures that we submit each quarter.

Alliance is the vendor that provides the case management system (Aware) for the Mississippi Department of Rehabilitation Services (MDRS) and for the OVR/OVRB `programs in at least 35 other states. MDRS has been working with Alliance to ensure that the performance measures are included in Aware. Alliance has multiple user groups across 35+ states that meet to discuss Aware with Aware users. The WIOA/RSA-911 and the Aware VR User Groups are two that are involved in ensuring that all federal reports and WIOA requirements are met.

- The Workforce Partners meet periodically to discuss how to enhance the Hub to better serve individuals.
- WIOA/RSA-911 User Group meets periodically throughout the year.
- Aware VR User Group monthly.

- There is an Aware Community of Practice User Group made up of Rehabilitation Services agencies all over the United States that meet periodically throughout the year.
- There are two major releases of Aware each year. There are other minor releases that address items related to WIOA/RSA-911.
- MDRS continues to submit multiple quarters of RSA 911 data and the Annual Performance Report (ETA-9169).
- MDRS continues to request and receive multiple quarters of wage data from MDES for the RSA-911 performance measures.

*(4) How the funds reserved for innovation and expansion (I&E) activities were utilized [Mississippi State Rehabilitation Council](#)*

MDRS continues to use Innovation and Expansion funds to assist in carrying out the duties of the State Rehabilitation Council. The I&E funds specifically provide for the following:

- Support staff to assist the SRC in carrying out its duties;
- Operational costs which include travel and office supplies
- Any cost involved in having members attend meetings and trainings
- The cost associated with the quarterly Annual Consumer Satisfaction Survey

**Pre-Employment Transition Services Providers and Services**

Funds will be used to expand pre-employment and transition providers and services to students with disabilities by creating contract Transition Navigators. Additional contract transition staff will help expand services and assist

OVR/OVRB provide access to these needed services. Based on information from the Mississippi Department of Education, there are over 22,000 students in the state with disabilities.

**Social Skills Classes for Individuals with Autism and other related disabilities with social challenges.**

Consumers with Autism Spectrum Disorder are having difficulty getting and keeping employment due the deficits in social skills and communication skills. Some can perform job tasks, but they do not have appropriate social and soft skills necessary to be successfully employed. Once they have completed high school, many feel isolated due their lack of structured social interactions like they had in school. Plans are to create a group-based social skills class for students

/youth who have autism spectrum disorder (ASD) or related disabilities with social challenges. These classes will assist these individuals in making a smoother transition from adolescents to adulthood, increase peer relations and increase the likelihood of gaining and maintaining employment.

**Project SEARCH**

Efforts will continue to be made and funds will be expended to support Project SEARCH sites. Project SEARCH is expanding and has been proven nationally to be a vital program to train and assist individuals with significant disabilities prepare for and obtain employment.

**Customized Training Programs**

Funds will be used to expand working with employers on Customized Training Programs. The first Customized Training program with Sephora was very successful and to date over 100 individuals with disabilities obtained full-

time employment with benefits. Collaboration will continue with other employers/industries to train and hire individuals with disabilities. Toyota and Fastenal have started initial conversation and collaboration.

**Q. Quality, Scope, and Extent of Supported Employment Services** Include the following:

*(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities*

MDRS, Office of Vocational Rehabilitation, offers statewide Supported Employment services, including Customized Employment, for individuals and youth with the *most significant disabilities* reach Competitive Integrated Employment outcomes. OVR has updated its policy manual to align with WIOA mandates.

Established a Memorandum of Agreement with the Mississippi Department of Mental Health, Bureau of Intellectual and Developmental Disabilities to ensure individuals who are duly eligible for both agencies' programs have collaborative supports and services toward Competitive Integrated Employment outcomes. The Memorandum of Agreement outlines the coordination of services, including Extended Services, Supported Employment, and Customized Employment.

The SE Program provides services to individuals with the most significant disabilities who require intensive support to prepare for, secure, retain, or regain employment. The services are designed to meet the current and future needs of these individuals whose disabilities are of such nature that they need continuous, ongoing support and extended services in order to engage in and maintain gainful employment. VR services include evaluation, assessment, job matching, job development, and job placement and brokering for natural supports for extended services. The specific SE services are job coaching and training.

OVR allocates fifty percent of the federal Supported Employment funding on Supported Employment services for eligible youth with the *most significant disabilities*. Youth under the age of 25 may receive extended services (i.e., ongoing support to maintain an individual in Supported Employment) for up to four (4) years. MDRS will invest all Title VI allocations to fund the purchase of job training services and other allowable vocational rehabilitation services as needed

by clients served in the SE Program. Additionally, the Coordinator for the SE Program and the Coordinator for Transition and Youth Career Services will work together to ensure new policies are in place and the appropriate amount of funding is utilized for youth with the most significant disabilities.

Eligible individuals are those who are determined to be *most significantly* disabled, which means they meet the following criteria:

- *individual has a most 'significant disability'- \*individual's physical or mental impairments seriously limit three (3) or more functional capacities in terms of an employment outcome. Individual will require vocational rehabilitation services in order to prepare for, secure, retain, or regain employment*

MDRS employs a unique strategy for delivery of SE services. The SE Program's structure and service delivery mechanism are integrated into that of the general agency service delivery system. The services are authorized, coordinated and, in most instances, delivered by staff of the state unit. Counselors who specialize in SE perform the functions of case management, job development, and supervision of overall SE service delivery in their respective districts. They are assisted by Vocational Training Instructors (VTIs) who perform a variety of functions including assessment, job development and placement, job training, job coach supervision, and facilitation of natural supports. Job Coaches are employed on an "as needed" basis. Counselors are assigned to serve SE eligible individuals in each of the ten districts to ensure statewide coverage. The SE staff includes 14 Counselors, 11 VTIs, and a pool of available Job Skills Trainers who are assigned to work with a Supported Employment (SE) client *as needed*. Additionally, this staff works with the statewide Community Rehabilitation Program, AbilityWorks, Inc., a division of MDRS.

MDRS, Office of Vocational Rehabilitation, contends that its responsibility regarding SE is the same as its responsibility for the general program. The SE Programs for both VR and VRB have been combined into one program serving all eligible individuals. VR Counselors, assigned to SE caseloads, have the same duties and responsibilities as those in the VR and VRB programs. However, the caseloads of the VR Counselors assigned to SE caseloads consists of only those clients who meet Title VI eligibility criteria. Therefore, in addition to general agency policy and procedures, VR Counselors must be knowledgeable about Title VI regulations and the unique requirements for SE eligibility.

SE personnel are trained in general VR case management techniques and VR federal regulations and are held to the same procedures and standards of performance as all other VR Counselors.

MDRS, Office of Vocational Rehabilitation, designates a statewide Supported Employment (SE) Program Coordinator whose duties include the following:

- monitor issues developing in the field of SE;
- monitor staff performance and make recommendations and assist in implementing procedures to improve performance;
- serve as a resource person to staff;
- serve as an advisor to administrative staff in implementing programmatic policies in accordance with federal dictates;
- develop effective programmatic procedures;
- recommend training of SE staff;
- provide training for SE staff; and
- other typical functions of a coordinating and liaison nature.

MDRS, Office of Vocational Rehabilitation, maintains formal agreements with the Mississippi Department of Education and the Department of Mental Health as well as other public and private entities, which identify areas of collaboration to ensure a comprehensive program of services to SE eligible individuals. Staff members collaborate intensively with local mental health centers, school districts, businesses and industries, the DD Council, parents, advocacy groups and other relevant third party providers and resources.

The service approach for SE eligible clients emulates the nationally accepted ‘best practices’ models of SE service delivery which include individual job placement, enclaves, and temporary employment placement (TEP) for individuals with chronic mental illness. Central to each of these approaches is an emphasis on Person-Centered Planning and facilitation of natural supports. Individualized job development is conducted by SE staff based on job matching assessment information and client’s informed choice. SE clients are assisted with employment planning and placement by VTIs and job skills training is provided at the job site either by Job Skills Trainers or through natural support.

### *(2) The timing of transition to extended services*

Upon completion of time-limited SE services, the ongoing job skills training assistance and other necessary long-term support is transitioned to a third party, group or individual through a Cooperative Agreement or Extended Services Support Plan Agreement. WIOA increased the maximum amount of time for SE staff to provide time-limited Supported Employment services to 24 months. However, the rate of transitioning a client to extended services is dependent upon the needs of the individual, his/her family, the employer, the third party agency, and other involved individuals. Since SE staff members and the extended service provider will have been collaborating in the provision



of SE services throughout an individual's VR program, such transitions are normally smooth and do not cause job disruptions.

MDRS, Office of Vocational Rehabilitation, will continue to cooperate in the networking of services with entities that have Supported Employment facets or other applicable and/or similar resources, such as the state's Workforce Development One-Stop System. Such collaborative efforts are essential for effective planning, development, implementation and continuation of SE arrangements. Service networking will involve developing and identifying appropriate job sites, tapping existing or future job training resources, utilizing concurrent staffing opportunities, and other occasions for programmatic and budgetary interfacing.

Expansion of the SE Program is expected as a result of extensive outreach, staff development, interagency training, dissemination of information, identification, and dissemination of information about best practices, technical assistance, and an emphasis on interagency collaboration for identification of potentially eligible individuals and service delivery to clients. MDRS continues to emphasize Person-Centered Planning by partnering with the Mississippi Council on Developmental Disabilities, Mississippi Department of Education, and other entities in promotion of this service provision.

## *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.*

*For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit);*
- *Credential Attainment Rate; and*
- *Measurable Skill Gains*

*The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

*The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.*

*For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:*

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

*VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.*

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

*Wagner-Peyser Program Performance Indicators*

Performance Indicators	PY 2021	PY 2021	PY 2022	PY 2022
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	66.0	66.0	71.0	71.0
Employment (Fourth Quarter After Exit)	65.0	66.0	69.2	69.2
Median Earnings (Second Quarter After Exit)	4,000	4,050	4,386	4,386
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not applicable	Not Applicable	Not applicable	Not applicable

*Adult Program Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2021</b>	<b>PY 2021</b>	<b>PY 2022</b>	<b>PY 2022</b>
	<b>Expected Level</b>	<b>Negotiated Level</b>	<b>Expected Level</b>	<b>Negotiated Level</b>
Employment (Second Quarter After Exit)	82.0	21.0	84.4	84.4
Employment (Fourth Quarter After Exit)	77.0	78.0	80.9	80.9
Median Earnings (Second Quarter After Exit)	5,800.0	5,600.0	6,475	6,475
Credential Attainment Rate	54.0	55.0	65.5	65.5
Measurable Skill Gains	Baseline	51.0	Baseline	55.6
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*Dislocated Worker Program Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2021 Expected Level</b>	<b>PY 2021 Negotiated Level</b>	<b>PY 2022 Expected Level</b>	<b>PY 2022 Negotiated Level</b>
Employment (Second Quarter After Exit)	75.0	75.0	74.5	74.5
Employment (Fourth Quarter After Exit)	67.0	67.5	73.7	73.7
Median Earnings (Second Quarter After Exit)	5,200.0	5,400.0	5,763	5,763
Credential Attainment Rate	52.0	53.0	70.0	70.0
Measurable Skill Gains	Baseline	4546.0	Baseline	55.5
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*Youth Program Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2021</b>	<b>PY 2021</b>	<b>PY 2022</b>	<b>PY 2022</b>
	<b>Expected Level</b>	<b>Negotiated Level</b>	<b>Expected Level</b>	<b>Negotiated Level</b>
Employment (Second Quarter After Exit)	75.0	76.0	80.2	80.3
Employment (Fourth Quarter After Exit)	72.0	73.0	80.1	80.1
<i>Median Earnings (Second Quarter After Exit)</i>	<i>Baseline</i>	<i>2,700.0</i>	<i>Baseline</i>	<i>2,958</i>
Credential Attainment Rate	72.0	72.0	71.2	71.2
Measurable Skill Gains	Baseline	48.0	Baseline	57.6
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> “Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.

*Adult Education Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2020</b>	<b>PY 2020</b>	<b>PY 2021</b>	<b>PY 2021</b>
	<b>Expected Level</b>	<b>Negotiated Level</b>	<b>Expected Level</b>	<b>Negotiated Level</b>
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	13.0	20.0	13.0	21.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

# Program-Specific Requirements for Combined State Plan Partner Programs

## Temporary Assistance for Needy Families (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

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 gain necessary skills and credentials required to obtain living wage employment and leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).

For the period beginning July 1, 2020, Mississippi will conduct a program designed to provide access to allowable work activities that will serve all political subdivisions (counties) in the State with emphasis on providing assistance to needy families with children and providing parents with job preparation, work, and support services to enable them to leave the program and become self-sufficient to the degree that State and local resources allow.

### Program Administration

The TANF Program is administered by the Mississippi Department of Human Services (MDHS), the single State agency designated by State law for eligibility determination and spending authority. The organization is State administered with at least one full-service office for intake and client service delivery located in each county with structured supervisory and regional administrative levels.

Mississippi will operate a statewide work program mandated by State law and TANF to provide work activities and supportiveservices (childcare, work stipend, and work-related expense payments) focused on enabling families to achieve and maintain self-sufficiency. In Mississippi, TANF monthly benefits and supportive service payments provided to individuals participating in allowable work activities or transitional programs are provided to the family by means of a Mississippi Debit MasterCard® card account. TANF supportive service payments issued to providers are paid by check, direct deposit, or by vouchers redeemable for services.

Mississippi will continue to provide financial assistance to needy families determined eligible under the established policies and the Standard of Need and maximum payment level for that size family. Needy Families are identified according to ongoing income, resources, and deprivation criteria. The monthly TANF grant described in Mississippi Code 1972 Annotated at 43-17-5(1), is \$200 for the first person, \$36 for the second person and \$24 for additional persons, except as restricted by the FamilyBenefit Cap. A needy family is defined as a family with a dependent child(ren) and an average annual income at or below 185 percent of the need standard. TANF funds may be used to provide non-financial assistance/services to families with income at or below 350 percent of the Federal Poverty Level.

### Evaluation of Resources

Mississippi adopted Broad-Based Categorical Eligibility (BBCE) in June 2010 which exempted TANF families from being tested for resources, with certain exceptions, and provided TANF-funded services through Families First Resource Centers, thus conferring BBCE to certain applicant/recipient households.

In 2017, the Mississippi Legislature passed House Bill 1090, The Medicaid and Human Services Transparency and Fraud Prevention Act, or “Hope” (“Act to Restore Hope Opportunity and Prosperity for Everyone”) Act. The Hope Act required a significant change in the consideration of resources for applicants and recipients of Temporary Assistance for Needy Families(TANF) benefits. Under the requirements of the Hope Act, conferring BBCE status to most benefit households is no longer permitted. Effective July 1, 2019, all families applying for TANF (new applications and redeterminations) will be subject to an evaluation of all household resources. The resource limit is \$2000 for all TANF households.

Under Change Reporting rules, families subject to an evaluation of resources must self-report if the total amount of resources exceeds the resource limit for the family. This self-reporting requirement is included in the Rights and Responsibilities (MDHS-

EA-300) provided to the family. The Change Reporting Form (MDHS-EA-946) provides households the opportunity to self-report changes in liquid resources, such as cash, stocks, bonds, and bank accounts.

A child or children under 18 years of age and their parent(s) or other caretaker relative must meet all technical and financial eligibility requirements in order to qualify for a TANF benefit.

The child or children must be deprived of one or both parents due to:

1. Incapacity.
2. Death.
3. Continued absence which includes, but is not limited to, absences by reason of:
  - a. Divorce.
  - b. Desertion or non-support of legal parent.
  - c. Illegitimacy.
  - d. Hospitalization for more than a temporary period.
  - e. Imprisonment.
  - f. Court sentence to perform unpaid public work or service while living at home.
  - g. Removal of the child from the home by court order.
  - h. Legal adoption by a single parent.
4. Unemployment of the principal wage earner (PWE)

### **TANF UP Program**

Mississippi operates a separate state program to serve needy two-parent families. State funds are used for cash assistance payments (TANF grant and transportation stipends). This program will not count toward the state's MOE requirements. Although two able-bodied parents are in the home, a dependent child is considered deprived of parental care or support when the natural or adoptive parent is unemployed. Two-parent families are only eligible if the parent is designated as the "principal wage earner."

- Meets the state's definition of "unemployed," which means that he or she is not currently working or has not worked full-time for at least thirty (30) days prior to receipt of TANF benefits,
- Works less than 100 hours per month,
- Has not refused a bona fide offer of employment or training, without good cause, within
- Is not on strike.

All other eligibility requirements for the two-parent family are the same as the TANF (Basic) case. To encourage the formation and maintenance of two-parent families:

- When the TANF recipient marries, the new spouse's income and resources will be disregarded for six months. This will allow the single parent who marries an employed person the opportunity to continue receiving TANF cash assistance and work preparation activities without immediately losing benefits because of the spouse's income. (One-time disregard for the first marriage of the PI on or after October 1, 1999)

Recent work history requirements will be waived for two-parent families when both parents are under 21 years of age to allow these young families to qualify for the TANF Unemployed Parent program.

### **Deny TANF Assistance**

- a. According to the TANF prohibitions/requirements outlined in federal regulations and state statute, Mississippi will, except for individuals and families specifically exempt or excluded for good cause, deny TANF assistance to:
  - o Families without a minor child residing with the parent or adult caretaker relative;
  - o Families including an adult head-of-household or spouse of the head-of-household, pregnant minor head-of-household or spouse of such head-of-household, a minor parent head-of-household or spouse of such minor parent head-of-household who has received assistance under TANF for 60 months (cumulative but not necessarily consecutive);
  - o Families not assigning certain support rights to the State;
  - o Families who fail to cooperate in establishing paternity or obtaining child support;
  - o Teenage parents without a high school diploma or a high school equivalency (HSE) diploma, who are not employed and do not attend school or an equivalent training program;
  - o Minor parents not living in an adult-supervised setting;
  - o Minor children who are absent from the home for a significant period (30 days or more). NOTE: A relative who fails to report the absence of a child within five days will be disqualified;
  - o Fleeing felons and parole violators; and
  - o Ineligible aliens
- b. Mississippi will also deny TANF assistance to families if the adult(s), age 18 or older, included in the assistance unit fails to engage in TANF applicant job search activities, fails to comply with the Employability Development Plan signed by the individual, fails to cooperate with the TWP, fails to participate satisfactorily in the assigned work activity, or after receiving TANF assistance for twenty-four (24) months, whichever is earlier.
- c. Mississippi will deny TANF assistance to families if the adult(s), age 18 or older, included in the assistance unit fails to submit to a written substance abuse screening questionnaire.
- d. Mississippi shall deny TANF assistance to a convicted fleeing felon.
- e. Mississippi will also deny assistance for ten years to an individual convicted in Federal or State court of having made a fraudulent statement or representation, with respect to the individual's place of residence in order to receive TANF assistance simultaneously from two or more states.
- f. Recipients of SSI are excluded from the TANF assistance Unit.
- g. In accordance with agency policy, adults and minor children who fail to comply with enumeration requirements will be excluded from the TANF assistance unit.

Mississippi will coordinate services, where available, with public and private entities (i.e., Mississippi Departments of Rehabilitation Services, Employment Security and Mental Health, and the Mississippi Community College Board, etc.) to allow TANF families with barriers (i.e., little or no work experience, domestic violence, limited English proficiency, learning disabilities, mental, physical disabilities and/or substance abuse) an opportunity to gain access to services and resources needed to obtain the highest level of self-sufficiency within the constraints of the TANF time-limits. Special screening and referral procedures will be used to identify and refer the individual for the appropriate service. Mississippi will deny benefits to individuals who fail to comply with the activities provided by these entities.



Mississippi will not deny assistance to a minor parent with a child under the age of 12 weeks for failure to attend school but will permit the minor parent to voluntarily participate in educational activities as medically appropriate.

Mississippi will deny benefits to all adult TANF applicants who do not meet an exemption from work requirements and fail to comply with TANF Work Registration requirements or vocational rehabilitation activities during the 30-day TANF application processing period.

Mississippi will deny benefits to all adult TANF applicants age 18 and older who fail to submit to a written drug screening questionnaire. State law provides for an individual sanction of TANF until compliance for an adult recipient age 18 or older who fails, without good cause, to submit to a required drug test or declines to enter into required treatment for a substance abuse disorder or fails to meet the requirements of his/her treatment plan, including refusal to take or testing positive to a required drug test.

Mississippi will not issue assistance payments to a family that includes an adult head-of-household, minor head-of-household, minor parent head-of-household, spouse of such head-of-household or a non-recipient parent who has received TANF funding for 60 months (whether consecutive or not), except as allowed by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 in regard to the 20% exemption.

### **60-Month Extension**

Hardships will be assessed starting at forty (40) months and continued eligibility determined at the end of the individual's five

(5) year time limit. The following individuals, as approved, may continue to receive benefits beyond the five-year time limit so long as the State does not exceed the 20% exemption criteria:

- Adults who are determined to be temporarily or permanently incapacitated and the household income does not exceed the TANF Basic 100% Requirement.
- Parents who are required to provide full-time care for an ill or incapacitated child or adult in the home and the household income does not exceed the TANF Basic 100% Requirement.

A family will **not** be considered for a 60-month time limit extension when the only child remaining in the TANF case is a family cap child and is ineligible for monthly TANF benefits.

### **School Attendance Requirement**

Mississippi requires regular school attendance and regular immunizations for all dependent children served under TANF. This is in accordance with regulation described in Mississippi Code of 1972 Annotated at 43-17-5 (5). A 25% monthly benefit reduction is imposed for failure to comply without good cause.

### **Family Cap**

Mississippi will impose a family benefit cap to prevent increases in assistance for new children coming into the family after the initial ten months of benefits, with certain exceptions.

### **Earned Income Disregards**

Mississippi will provide a one-time total earned income disregard opportunity for six months to TANF adults who find a job working at least 35 hours per week, at or above the federal minimum wage either: within 30 days after authorization for new TANF approvals on or after July 1, 1997; or within 30 days after the initial start date of the job readiness/job search work activity. The six-month total disregard of earnings will be available only once for new TANF approvals and ongoing cases beginning July 1, 1997, and thereafter.

A three-month total earned income disregard will be available when the TANF case is subject to closure because of increased earnings and the individual is employed at least 25 hours per week at or above the federal minimum wage. The three-month disregard cannot be claimed in combination with the six-month disregard. The three-month disregard can be claimed again after a 12-month consecutive break in assistance.

## **Non-Discrimination**

The MDHS does not discriminate against any individual or group because of race, sex, religion, national origin, color, marital status, handicap, or political beliefs. Mississippi will follow the nondiscrimination provisions in Title IV, Section 408, for any program or activity receiving funds under Public Law 104 - 193, provision in State Law and Title IV of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act.

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)

The goal of the program is to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage. The work program emphasizes unsubsidized jobs with supportive services following employment and/or transitional services following termination of the TANF grant because of increased earnings or loss of earned income disregards. The family also receives supportive services while engaged in other allowable activities.

Mississippi will require work eligible individuals (adults or minor heads of household or a non-recipient parents) receiving assistance under the Program to engage in allowable work activities once the State determines parents or caretakers are work eligible. Work eligible individuals may not receive assistance under the program for more than 24 months (whether or not consecutive), unless they are engaged in allowable work program activities.

Upon referral to the work program, the client will be assessed within 30 days to identify and prioritize the individual's strengths and needs and translate these into realistic goals which will lead to employment and self-sufficiency. A uniform assessment should be utilized among all participants as a guide to conduct in-depth, interactive interview assessments to evaluate job skills, levels of work readiness and intermediate goals needed in order for individuals to reach their long-term career goals. An Employability Development Plan (EDP) is the client's plan of action for achieving these goals. The EDP describes the responsibilities of the client as well as entities performing case management. The plan also describes the supportive services available to the client, lists the assigned work activity, and reinforces the consequences for failure to participate.

MDHS may contract, using Federal TANF funds, with public, private or private non-profit entities to provide TANF Work Program services as needed statewide. Services may include but may not be limited to Case Management which is the process designed to coordinate work activities and supportive services for TANF Work Program participants. This involves monitoring the participants attendance and progress and amending the Employability Development Plan, component assignment, and supportive services, as necessary, to keep the participant on a path to achieving self-sufficiency. When appropriate, reasonable accommodations and language assistance may be provided to recipients to endure meaningful access and effective communication. All contractual services used will be competitively procured by non-state agencies. The subgrant will contain performance measures which will ensure TANF Work Program goals are achieved. The strategy for accomplishing the goals and objectives outlined for the work program must include utilizing the case management approach or working closely with MDHS Case Managers.

The adults in the TANF case will participate in one or more of the following work activities as defined below:

### **a. Job Search and Job Readiness**

Job readiness and job search activities are considered one activity by Federal law. These activities are defined as the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. Such treatment or therapy must be determined to be necessary and certified by a qualified medical, substance abuse or mental health professional. A qualified professional is defined as any individual who is licensed or certified.

Structured job search and job readiness assistance activities are supervised daily by the case manager, instructor or other responsible person.

The maximum number of hours that can be included in the State's participation rate calculation for each participant in any 12-month period is limited to:

- a maximum of 120 hours for a single custodial parent whose youngest child is under age six; and
- 180 hours for a single custodial parent whose youngest child is age six or older.

A maximum of four consecutive weeks may be counted and reported as participation. After four consecutive weeks are reported, there must be at least a one-week break (seven consecutive days) before additional participation can be included in the participation rate calculation process.

#### **b. Unsubsidized Employment**

Unsubsidized employment is full or part-time employment in the public or private sector for which the state does not furnish aid or support to the employer for wages paid to the TANF recipient. Types may include:

- Regular and/or contractual employment in the public or private sector for which a person receives unsubsidized wages on an hourly, weekly, or monthly basis.
- Self-employment is work for which a person earns income directly from one's own business, trade or profession rather than a specified salary or wages from an employer. Income may be verified by a 1099/W2 form, check stubs or written statements from customers.

#### **c. Subsidized Employment**

Subsidized employment is defined as employment in the private or public sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a TANF recipient. Subsidized employment includes the following employment models:

- Work supplementation where TANF funds that would otherwise be paid as assistance are paid to the employer;
- A third-party contractor, like a temporary staffing agency, serves as employer of record and is paid a fee to cover salary, expenses, and success in placing employees;
- Work study programs which involve paid employment provided by an educational institution if the student's earnings are subsidized by the educational institution; and
- Supported work for individuals with disabilities in an integrated setting, e.g., Vocational Rehabilitation Ability Works. Workers with disabilities may receive individualized services such as, but not limited to, transportation, family support or additional supervision.

Employers participating in a subsidy program must submit monthly documentation to verify participant attendance data. Agency staff will monitor and review employer reports to determine whether sufficient documentation exists to substantiate reported time and to warrant a subsidy payment. This auditing process will ensure the agency only pays for and reports actual and allowable hours of participation.

##### **Work Study**

Work study is also defined as subsidized employment. Work study is an approved employment plan at an accredited college, frequently granted in addition to other student financial aid. Various public funding sources may be utilized to pay earnings for hours worked. Earnings may be paid directly to the student or applied toward the student's tuition fees.

##### **Temporary Employment with the U.S. Census**

Certain temporary employment with the U.S. Census is defined as subsidized employment. This specifically refers to temporary census workers who are hired part-time during a census campaign. The

employment is not expected to last longer than three months and the income received is totally disregarded in establishing TANF eligibility and the TANF benefit amount. Employment will be verified, by the case manager, via employer wage verification forms or check stubs. Countable work hours must be based on employer reports (wage forms) or check stubs and will be projected forward up to three months.

**d. Work Experience**

Alternative Work Experience Program (AWEP) placements are only made with private non-profit or for-profit entities for no cash payment. These activities are intended to improve soft skills and build employability skills by offering training and experience for a better understanding of the work world so the individual may move more quickly into full-time employment. Individuals participating in these programs are subject to the Fair Labor Standards Act (FLSA) requirements and cannot be required to participate for more hours than the total benefits divided by the federal minimum wage (FMW). The maximum number of hours in any month that a participant may be required to participate in AWEP is based upon the family's combined value of TANF assistance (monthly grant and work stipend) and SNAP benefits divided by the federal minimum wage. The TANF benefit amount, net out child support, will be determined during the TANF application process and at each TANF redetermination appointment for all TANF cases that are subject to TANF Work Program requirements. TANF recipients assigned to this activity cannot displace regular workers. Based on certain criteria private, for-profit entities may be used for

AWEP placements. For example, a certain type of placement may be necessary for the participant to gain skills needed to successfully accomplish his/her career goals. Such entities must be approved in writing by the Director of the Division of Workforce Development and Program Management or designee.

**e. Community Service Programs**

Community Service placements are only made with public entities and are limited to projects that serve a useful public purpose in fields such as health, social service, environmental protection, education, urban and rural development and redevelopment, welfare, recreation, public facilities, and public safety. The main objective of assigning the TANF Work Program (TWP) participant to a community service activity is to improve soft skills and employability skills by offering training and experience for a better understanding of the work world so the individual may move more quickly into full-time employment. Individuals participating in these programs are subject to the Fair Labor Standards Act (FLSA) requirements and cannot be required to participate for more hours than the total benefits divided by the federal minimum wage (FMW). The maximum number of hours in any month that a participant may be required to participate in Community Services is based upon the family's combined value of TANF assistance (monthly grant and work stipend) and SNAP benefits divided by the federal minimum wage.

The TANF benefit amount, net out child support, will be determined during the TANF application process and at each TANF redetermination appointment for all TANF cases that are subject to TANF Work Program requirements. TANF recipients assigned to this activity cannot displace regular workers.

**AmeriCorps (NCCC) Volunteers**

AmeriCorps work activities are defined as community service. AmeriCorps NCCC is a 10-month, full-time, team-based residential program for individuals between the ages of 18-24 who are current TANF recipients or who have been included in a TANF case within the last six (6) years. AmeriCorps NCCC recruits and trains individuals who are willing to devote at least one year to serving their community to meet specific needs. In addition to gaining valuable skills, members are provided a living allowance during the ten (10) month program, housing, meals, limited medical benefits, uniforms, and up to \$400/monthly for childcare, if eligible.

**f. Vocational Educational Training**

Vocational education is defined as an organized educational program which offers a sequence of courses directly related to the preparation of individuals for employment in current or emerging occupations that do not require

an advanced degree. Such programs shall include competency-based applied learning which contributes in an individual's academic knowledge, higher-order reasoning, problem-solving skills, work attitudes, general employability skills, and the occupational-specific knowledge and skills that prepare participants for a specific trade, occupation, or vocation. Vocational education programs must be provided by education or training organizations, such as vocational-technical schools, community colleges, post-secondary institutions, proprietary schools, nonprofit organizations, and secondary schools that offer vocational education. Vocational educational training cannot be included in the work participation rate for more than 12 months for any individual. No more than 30% of the individuals counting toward the participation rate in a month may meet the work requirement by participating in vocational educational training. A teen parent head-of household attending secondary school or in an educational activity directly related to employment will be included in the 30%.

**g. Education Directly Related to Employment**

Education directly related to employment is defined as educational activities related to a specific occupation, job or job offer for individuals who have not received a high school diploma or an HSE diploma. This includes educational

courses designed to provide the knowledge and skills for specific occupations or work settings, but may also include adult education, English as a second language (ESL), literacy skills, HSE prep classes, and supervised study sessions.

**h. Secondary School Attendance**

Satisfactory attendance at secondary school or in a course of study leading to an HSE diploma is an allowable “non-core” activity for individuals age twenty and older who do not have a high school diploma or HSE diploma.

Participation in this activity is not restricted to individuals for whom obtaining an HSE diploma is a prerequisite for employment. Minor parents, under age twenty, who have not completed secondary school or received an HSE diploma will be encouraged to pursue a high school diploma or HSE diploma. Educational activities for individuals under the age of twenty are considered “core” activities and are countable in the participation rate calculation.

Educational activities for individuals age twenty and older are considered “non-core” activities and participation will only count in the work participation rate after the individual participates for an average of twenty (20) hours per week in a “core” activity.

**i. On-the-Job Training**

On-the-Job Training is defined as paid employment provided by a public or private employer through a contractual arrangement in which the employer provides training and skills essential to perform the job and the employer is reimbursed for the added costs associated with training. While engaged in productive work, the participant is provided additional daily supervision and training, which will provide the knowledge or skills essential to perform the job fully and adequately. The participant is compensated at a rate (including benefits) comparable to that of other employees performing the same or similar jobs. The state reimburses the employer up to 50 percent of the wages paid to the participant utilizing federal funds to offset the cost of training and supervision given to the participant.

The employer is expected to retain the participant as a permanent, unsubsidized employee at the end of the training period.

**j. Job Skills Training Directly Related to Employment**

Job skills training directly related to employment is training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. Job skills training can include customized training to meet the needs of a specific employer or training that prepares an individual for employment, including literacy and language instruction, if necessary, to enable the participant to perform a specific job or engage in a specific job training program.

If available, funds shall be used by the Mississippi Community College Board (MCCB) for the assessment, enrollment, certification, follow-up and performance standards as they relate to career-related training of TANF Work Program (TWP) participants. Training may be established based on employer needs in a particular area of the State. Training may also be established on an individual basis based on the individual's career goal(s)/objective(s) and training needs in conjunction with employer needs.

As described in the Mississippi Code of 1972 Annotated at 43-17-5(6)(g), MDHS policy prohibits the displacement of regular workers by TANF recipients. No adult in a work activity shall be employed or assigned when another individual is on layoff from the same or any substantially equivalent job within six months, before the date of the TANF recipient's employment or assignment; or if the employer has terminated the employment of any regular employee or otherwise caused an involuntary reduction of its workforce in order to fill the vacancy created with an adult receiving TANF assistance. The Mississippi Department of Employment Security will appoint one or more impartial hearing officers to hear and decide claims by employees of violations.

### *Federal or State Emergency Declarations*

In the event of a federal or state declared emergency, and placement opportunities and/or supportive services for work-eligible individuals are limited or not available, the state may, in specified counties, regions or statewide, temporarily place participants in "holding" until a suitable placement and/or supportive services can be arranged. Once a declared emergency period ends, the state will assess each family's current circumstances and require participation in allowable work activities on a case-by-case basis focusing on the safety, health and wellbeing of the family. The family's 60-month time limit counter will continue to increment but the 24-month time limit counter may be arrested during the emergency period. The 24-month counter will begin incrementing the month following the end of the declared emergency period, unless the participant is placed in an allowable work activity. Cases for participants placed in holding will be reviewed no less than every 30 days to determine if the family's circumstances have changed and if a placement and/or supportive services are available.

The state will permit participants the ability to claim good cause if they are unable to comply with TANF Work Program (TWP) requirements due to the emergency. TWP participants who are unable to participate in allowable work activities as a result of the emergency will be given good cause which will not affect the family's TANF benefits due to other reasons that prevent compliance and are outside the participant's control. TWP participants who can participate in the TWP but fail to comply could face conciliation and sanction. Participants will only have to provide evidence of good cause due to the emergency to avoid the timed penalty sanction if questionable.

### *State Agency Collaboration and Other Initiatives*

In deciding how to best use Federal TANF funds for low-income families, MDHS issues Request for Proposals (RFP) to engage businesses, faith-based groups, other state/local agencies as well as local community based organizations in developing strong collaborative relationships to serve as the vehicle for the delivery of services to 1) provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives, 2) , 3) prevent and reduce out-of-wedlock pregnancies, and 4) encourage the formation and maintenance of two-parent families. Continuation and/or expansion of these initiatives are subject to availability of funding and the justification of need. MDHS may contract with public and/or private entities to provide services under TANF initiatives to assist families, end welfare dependency, and become self-sufficient. In conjunction with the above-mentioned collaborations, initiatives include, but are not limited to:

#### **a. Child Care Enhancements**

To end the dependence of needy parents on government benefits by promoting job preparation, work and marriage, MDHS may provide quality, comprehensive childcare services for children in the Temporary Assistance for Needy Families (TANF) Program and income-eligible, working families at risk of going onto TANF who meet Child Care Development Fund (CCDF) eligibility.

#### **b. Responsible Parenthood Initiative**

To encourage the formation and maintenance of two-parent families and prevent and reduce out-of-wedlock pregnancies, MDHS may provide comprehensive services that support and educate parents on the importance of responsible parenthood. The program goals are to:

- increase public awareness concerning the impact of a parent's absence,
- assist parents in becoming "Team Parents" and to share the legal, financial and emotional responsibilities of parenthood with the custodial parent of their child(ren)
- improve the self-image of parents and their families,
- increase parents' parental involvement in their child(ren)'s education,
- improve academic performance and graduation rate and reduce the dropout rate of their children,
- decrease the teenage pregnancy rate,
- decrease juvenile crime,
- promote two-parent families and both parents' role in the family, and
- recruit parents and expectant parents to volunteer as mentors to other parents.

Financial eligibility determination is not required for the program.

**c. Post-Employment Assistance Programs**

To end the dependence of needy parents on government benefits by promoting job preparation and work, MDHS may provide or collaborate with partner agencies to provide post-employment assistance services to current and former TANF recipients who are employed. Where appropriate, case managers will work with employers to ensure reasonable accommodation is provided to employees with disabilities. Individuals with language barriers shall be referred to an English as a Second Language (ESL) activity prior to job placement. Case management will also work with potential employers to ensure reasonable accommodation and language assistance are available at the work site to ensure meaningful access and effective communication. The goals of the initiative are to increase job retention, job advancement, and self-sufficiency for former and current TANF recipients. Families eligible for this program are not required to be TANF eligible but must be at or below 200 percent of the Federal Poverty Level.

**d. TANF Prevention/Intervention Program**

To develop projects in community-based settings to prevent and reduce at-risk behaviors among youth and their families to prevent, or break the cycle of welfare dependence, MDHS may provide services/activities to:

- reduce and prevent out-of-wedlock pregnancies,
- prevent/reduce substance abuse (use of alcohol, drugs and tobacco products), and
- prevent/reduce other behaviors that prevent the attainment of a high school diploma or HSE diploma.

Financial eligibility determination is not required for the program.

**e. Afterschool or Summer Recess Program**

To reduce out-of-wedlock pregnancy through intensive supervision or afterschool/summer program for non-adjudicated and age appropriate youth during non-school hours when youth are unsupervised and vulnerable. By engaging in activities that create a positive future, youth are enabled to consider how the choices they make today affect their tomorrow. Program activities include but are not limited to:

- academic tutoring
- literacy

- remediation
- financial literacy
- science, technology, engineering, arts, or math (STEAM)
- career exploration
- life and soft skills
- leadership and personal development
- work-based learning
- teenage pregnancy prevention
- drug, alcohol, and violence prevention
- Additional goals include but are not limited to:
  - reducing criminal activity
  - reducing drug and alcohol abuse
  - reducing violence
  - promotion positive family outcomes
  - increase in school attendance
  - to improve self-esteem, motivation and performance of youth

Financial eligibility determination is not required for the program.

**f. Crisis Intervention Program**

To provide assistance, using Federal TANF funds, to low-income families in resolving barriers to self-sufficiency. The program may use TANF funds to:

- Meet a TANF family’s ongoing basic needs (i.e. food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses.)
- Provide assistance to families experiencing an emergent need (i.e. utility payments) That cannot be met with their own income and resources. This program is designed to deal with a specific situation or an episode of need and is not intended to meet recurrent or ongoing needs. These services will not extend for four (4) months.

Families are not required to be TANF eligible but must be below 185 percent of the Federal Poverty Level.

- g.** The Mississippi Department of Human Services may implement a TANF Up-Front Diversion Program to provide assistance, using Federal TANF funds, to families with Emergency circumstances. As an alternative to TANF cash assistance, a family with an emergency circumstance may be eligible for a one-time short-term cash assistance payment.

To receive the diversion program assistance:

- Family unit must include an adult and dependent child(ren) under 18 years of age.
- Family members must have lived in the designated disaster areas or state/federally declared emergency area at the time disaster or emergency occurred.



- Family members must currently live together in Mississippi.
- Family members must not be current recipients of regular TANF, including Transitional Transportation or Transitional Child care.
- Family's primary individual must sign an agreement restricting any member of their household from receiving TANF for a period of three (3) months.

Households will be required to pass the gross income limits standard (200% of Federal Poverty Level). The maximum amount of resources the family may retain to be eligible is \$3000. In addition to the above, the adult(s) in the family must:

- be employed an average of 25 or more hours per week at or above the federal minimum wage;
- have documentation of the promise of a job starting within 14 days from the application date, working an average of 25 or more hours per week at or above federal minimum wage; or
- be currently participating in a short-term, work-related training program.

A payment of up to \$1,000 will be issued directly to the family (parent/caretaker relative and child) to assist in resolving any short-term financial issues related to basic needs (i.e., childcare, transportation, rent and relocation expenses).

- h. TANF funds may be used to provide family preservation services to families, with dependent children, earning at or below 350 percent of the Federal Poverty Level. Social workers and homemakers provide supportive services to

promote the safety and well-being of children and their families, promote stability and permanency, and preserve family unity. The goal of the program is to provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.

- i. TANF funds may be used for temporary care (not to exceed 45 days) of children in foster care. The placements are through emergency shelter facilities and normally do not exceed 45 days. TANF funds will not be used to duplicate Federal foster care payments. Families eligible for this program are not required to be TANF eligible but must be below 350 percent of the Federal Poverty Level. The goal of the program is to provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.
- j. In efforts to provide a continuum of service and prevent gaps of opportunity for youth and adults ages 16-59 and to reduce the overall incidence of poverty, TANF funds may be used for workforce, training and education to provide assistance to needy families and to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage.

Program activities include but are not limited to:

- adult basic education
- high school equivalency
- work based learning
- internships
- apprenticeships
- industry recognized credentials
- life and soft skills

Families that are eligible for this program must be at or below 350% of the federal poverty guidelines.

### 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)

Mississippi will ensure that work eligible individuals (adult heads of household, needy caretaker relatives and non-recipient parents) receiving assistance under the Program will engage in work activities in accordance with regulation described in Section 407, Title IV of the Social Security Act. Mississippi will comply with the mandatory work requirements and strive to meet the 50% participation rate required under current TANF regulations. Participation rate requirements may be adjusted based on reduction in the caseload.

Work requirements and activities are defined in the Combined State Plan, TANF section (b) above. This document will be open for public review and comment according to the Administrative Procedures Act. The work requirements and activities are tracked through the MDHS eligibility and case management systems interface throughout the period of assistance to ensure compliance is met, appropriate penalties imposed, and time limits not exceeded.

### Exemptions

TANF mandates participation in approved work activities for all adult recipients who do not meet specific exemption criteria. All adults who are not specifically exempt will be referred for work activities. When appropriate, reasonable accommodations and language assistance will be provided to recipients to ensure meaningful access and effective communication. An adult included in the TANF grant assistance unit may be exempt from the mandatory work requirements for one of the following reasons:

- Incapacitated and not eligible for vocational rehabilitation services
- Temporary illness or injury
- Pregnancy in third trimester if there is a verified complication with the pregnancy
- Caretaker of a child under 12 months old (up to 12 months)
- Caretaker of an ill or incapacitated person
- Age (over 60 and under 18)
- Domestic violence victim (up to 12 months)
- Caretaker in two-parent family of a child who is mentally retarded or physically handicapped

The State may exempt a TANF recipient from work requirements while receiving treatment for substance abuse as long as the recipient is in compliance with the treatment plan. If certain criteria are met, the recipient's treatment plan may be defined and countable under the TWP job readiness activity.

### Sanctions

MDHS Policy provides for a full benefit sanction of TANF and comparable SNAP sanctions until compliance for families in which the non-exempt individual refuses, without good cause, to participate. If any adult in a household refuses, without good cause, to participate in work as required under TANF, the following full benefit sanction will apply. When appropriate, reasonable accommodations and language assistance will be provided to recipients to ensure meaningful access and effective communication to assist them in the conciliation process. If necessary and appropriate, the need for disability and language related accommodations are bases for good cause.

*Table 25: Violations and Corresponding Penalties for Adults Receiving TANF Who Refuse to Participate in Work as Required by TANF*

<b>Violation</b>	<b>Penalty</b>
1 <sup>st</sup> Violation	3 Months Minimum or Until Compliance
2 <sup>nd</sup> Violation	Permanent Disqualification

NOTE: For a two-parent family, the parent who was meeting work requirements, but lost TANF benefits due to the other parent’s non-cooperation, may open his/her own case with the dependent children after six months.

Beginning October 1, 2001, State funds were used for cash assistance payments (TANF grant and transportation stipends) for two-parent families. The State does not claim these expenditures against the Maintenance of Effort requirement. Two-parent family cases are not included in the state’s federal work participation rate calculation; however, federal work requirements apply to two-parent families.

The State will not reduce or terminate assistance to a single custodial parent caring for a child under age six (6) for refusing to engage in work, if the parent demonstrates an inability to obtain appropriate, quality childcare. The parent’s demonstrated inability must be for one of the following reasons:

- a. Appropriate childcare is unavailable and/or unaffordable. Appropriate childcare is defined as a licensed childcare center, or a family day care (home or an individual) chosen by the parent/caretaker relative to care for the child. The childcare provider must be 18 years old or older.
  - o Appropriate childcare must be within a reasonable distance (within a 20-mile radius) of the parent/caretaker relative’s home or worksite.
  - o Appropriate childcare must be affordable. Affordable formal childcare is childcare that is equal to or less than the established rates for the type of care according to the Division of Early Childhood Care and Development (DECCD).
- b. Informal childcare by a relative or under other arrangements is unavailable or unsuitable. Unavailable or unsuitable childcare shall be defined as a situation involving child abuse, neglect or an unsafe environment. If the parent/caretaker relative refuses to take the child to a particular day care center, he/she must inform the case manager of the reason for the refusal. The case manager must investigate to verify and substantiate the parent’s claim of unsuitable childcare. Complaints involving child abuse, neglect or an unsafe environment will be reported to the MS State Health Department, Division of Child Care Facilities Licensure. The case manager must contact the DECCD representative to discuss the problem and determine what other childcare services are available in the area. The case manager will determine good cause for non-participation based on the investigation and information gathered. Parental complaints regarding a breakdown in receiving childcare services or against a DECCD representative must be submitted in writing to the Director, Division of Early Childhood Care and Development, Mississippi Department of Human Services, Post Office Box 352, Jackson, MS 39205. The parent/caretaker relative may also contact the DECCD Resource and Referral telephone line (1-800-877-7882).

**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)**

Mississippi will take reasonable and necessary steps 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. MDHS restricts disclosure of recipient information pursuant to federal regulations and to laws regarding use of electronically exchanged data with a Confidential Information Agreement. MDHS also provides staff training upon entry and annually thereafter with an Awareness/Security Training form. These documents set forth policy

and penalties for safeguarding information in accordance with requirements for the exchange of information received from the Social Security Administration and Internal Revenue Service.

**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)**

MDHS will utilize partnerships with community-based organizations and agencies to impact the whole family by taking a multi-generational approach. This approach seeks to provide the basic needs of the family and the skills that will enable the family to become self-sufficient and ensure future well-being. The Sexual Risk Avoidance Education (SRAE) Program will promote sexual risk avoidance education as defined by Section 510 of the Social Security Act (42 U.S.C. 710) for youth 10-19 years of age and their families. The SRAE Program, known as The Healthy Teens for a Better Mississippi initiative, provides educational and innovative programs on healthy choices, youth development and sexual risk avoidance to aid in the continued reduction in teen pregnancies and out-of-wedlock births. Through this initiative CHAT (Choosing Healthy Alternatives for Teens) was created to engage teens in conversation surrounding teen pregnancy, making healthy choices, sexual risk avoidance and participating in peer leadership. These programs allow teens and parents alike to engage in a variety of activities/programs designed to address the challenges many teens face each day.

**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)**

- a. Any person seventeen (17) years of age or older has sexual intercourse with a child who:
  - (i) Is at least fourteen (14) but under sixteen (16) years of age;
  - (ii) Is thirty-six (36) or more months younger than the person; and
  - (iii) Is not the person's spouse; or
- b. A person of any age has sexual intercourse with a child who:
  - (i) Is under the age of fourteen (14) years/
  - (ii) Is twenty-four (24) or more months younger than the person; and
  - (iii) Is not the person's spouse.

MDHS will provide county offices with material, both printed and digital, about statutory rape for display where partner agencies, local schools, law enforcement, relevant counseling service agencies and the general public, including men who may have committed the crime, may view.

MDHS will use social media platforms to educate the general public on the problem of statutory rape.

In addition, if funding is available, MDHS will continue to award TANF funding on a competitive basis to subgrantees that incorporate education and training about statutory rape within their teen pregnancy prevention programs or parenthood initiatives to include educators, law enforcement, relevant counseling services and other vital service providers to include programs expanded to include men.

MDHS staff is required to report suspected abuse or neglect to the appropriate entity.

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)

Mississippi delivers TANF benefits via the Mississippi Debit MasterCard Program ePayment/EPPICard. Mississippi also delivers other benefits via the EPPICard including child support, adoption subsidy and foster board payments.

TANF assistance may be accessed worldwide at any commercial point-of-sale (POS) machine using the recipient's signature and PIN number. Cash may be accessed at any automated teller machine (ATM) that displays the MasterCard logo or teller-assisted withdrawals in a bank or credit union location that displays the MasterCard logo. Recipients may also receive cash back with a purchase at their favorite merchant locations that accept MasterCard. TANF recipients experiencing a problem accessing their TANF benefits can contact their local county office or call customer services toll free. The State will work one-on-one with TANF recipients reporting inadequate access to their cash benefit.

Pursuant to regulations described in Section 4004 of Public Law 112-96, Mississippi's policies outline procedures to prevent access to TANF assistance through electronic fund transactions at casinos, liquor stores, and establishments providing adult-oriented entertainment. This section also explains how the state ensures that recipients have adequate access to their TANF assistance and can withdraw the TANF assistance with minimal fees or charges, including the opportunity to access the TANF assistance with no fee or charge and how information on fees are communicated to recipients.

Mississippi law follows the Federal Statutes to prohibit the use or acceptance of an electronic benefit transfer card at the following locations:

- Liquor or package stores that sell intoxicating liquor, either exclusively or primarily;
- Gambling establishments that offer, as its primary services, casino, gambling or gaming activities; and
- All retail establishments that provide adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

State law prohibits TANF benefits from being accessed from an Automated Teller Machine (ATM) or Point-of-Sale (POS) device physically located in:

- |                                       |                                         |
|---------------------------------------|-----------------------------------------|
| • Liquor Stores                       | • Gambling Establishments               |
| • Strip Clubs                         | • Jewelry Stores                        |
| • Tattoo and Body Piercing Parlors    | • Tobacco Paraphernalia Stores          |
| • Spas                                | • Nail Salons                           |
| • Lingerie Shops                      | • Massage Parlors                       |
| • Vapor Cigarette Stores              | • Psychic or Fortune Telling Businesses |
| • Bail Bond Companies                 | • Dog or Horse Racing Facilities        |
| • Movie Theaters                      | • Cruise Ships                          |
| • Theme Parks                         | • Video Arcade                          |
| • Pari-mutuel Facilities              | • Sexually Oriented Businesses          |
| • Businesses or Retail Establishments |                                         |

Where Minors under 18 are not Permitted

State law also prohibits TANF benefits from being used to purchase the following items:

- Alcohol
- Liquor or Imitation Liquor
- Bail
- Lottery tickets
- Tobacco Products
- Travel Services Provided by a Travel Agent
- Money Transmission to Locations Agent Abroad
- Cigarettes
- Sexually Oriented Adult Materials
- Gambling Activities
- Tattoos
- Concert Tickets
- Professional or Collegiate Sporting
- Tickets for Other Entertainment Events Intended for the General Public

In order for Mississippi to prevent prohibited transactions and purchases as defined above, agency staff will discuss with TANF applicants/recipients the proper use of their TANF benefits at initial application and redetermination. All county offices are required to display a poster with the TANF restrictions and penalties in a prominent location.

Methods for reporting fraud include the Fraud Tip Hotline toll free number 1-800-299- 6905 and the Fraud Tip Email [fraud@mdhs.ms.gov](mailto:fraud@mdhs.ms.gov). To expand the pathway of communication regarding programmatic fraud, fraud tips can now also be submitted to the Division of Investigations through the Fraud Tip PowerForm located on the MDHS website. This form can be accessed by clicking on the “Report Fraud” button located on the MDHS homepage, or by direct link at <https://www.mdhs.ms.gov/report-fraud/>.

The assistance unit will be denied TANF benefits when the MS Debit MasterCard is used at prohibited locations or prohibited items are purchased as outlined below:

Violation	Penalty
1 <sup>st</sup> Violation	3 Months
2 <sup>nd</sup> Violation	Permanent Disqualification

H. Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

The cardholder can use their EPPICard at vendor and bank locations worldwide wherever MasterCard is accepted. EPPICard transactions performed at some POS machine vendors are subject to surcharges by the financial institution or owner.

Form MDHS-EA-303A, Mississippi Debit MasterCard Program ePayment/EPPICard Customer Information Sheet, is provided to and discussed with the TANF recipient during the interview at application and redetermination. The MDHS-EA- 303A also informs the recipient of merchant and bank locations where cash benefits may be redeemed. The card carrier mailed with the EPPICard also provides this information, as well as EPPICard account access, card use and customer service information. Recipients may also access this information via the internet at <https://www.eppicard.com/>.

*Fees:*

Purchase - No fee

- Cash-back or Bank Teller Window - No fee
- In-Network ATM Cash Withdrawal - \$1.75 after 3 withdrawals (each withdrawal, each calendar month)
- Out-of-Network ATM Cash Withdrawal - \$1.75
- In-Network ATM Balance Inquiry - \$0.75 after 3 inquiries (each inquiry, each calendar month)
- Out-of-Network ATM Balance Inquiry - \$0.75
- Card Replacement - \$5.00
- Expedited Card Delivery - \$16.00
- In-Network ATM Denial for Insufficient Funds - \$0.50 after 3 denials (each denial, each calendar month)
- Out-of-Network ATM Denial for Insufficient Funds - \$0.50
- Monthly Account Access by Calling Customer Service - \$0.50 after 5 calls (each call, each calendar month)

*ATM Surcharges:*

A surcharge is an additional fee that may be charged for using a card at an ATM, or for withdrawing cash only at some point-of-sale machines in retail stores. The surcharge is charged by the owner of the equipment or financial institution supporting the ATM.

Banks and other retailers may have varying surcharges. Recipients may avoid the surcharge by accessing benefits at any Hancock, Trustmark or Regions Bank ATM.

TANF recipients are informed of benefit prohibitions by use of posters displayed in all MDHS county offices. In addition to the MDHS-EA-303A noted above, benefit use prohibitions are provided to all TANF households via the MDHS-EA-300, TANF Rights and Responsibilities, and the MDHS-EA-312, Personal Responsibility Contract. Benefit use prohibitions are also included in the TANF Approval Notice, the MDHS website, the EPPICard website, and through the recipient's online account "My MDHS Account". In addition, County and Regional Directors randomly observe TANF client interviews to ensure that eligibility workers are complying with requirements to explain benefit use and restrictions with TANF households.

**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)**

Mississippi will not treat families moving into the State differently than other families under the TANF program. To treat families differently would create an unfair advantage to person moving into the State with higher benefits.

**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)**

Mississippi will provide assistance to individuals who are not citizens of the United States only in accordance with the provisions outlined in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Mississippi Code of 1972 Annotated 43-17-5 and subsequent amendments to the Social Security Act.

The following qualified aliens are eligible:

- For five years after obtaining the designated alien status:

- An alien admitted as a refugee defined under Section 207 of the Immigration and Nationality Act (INA);
  - An alien who is granted asylum defined under Section 208 of the INA;
  - An alien whose deportation is being withheld defined under Section 243 of the INA, or whose removal is being withheld under Section 241 of the INA; or
  - An alien lawfully admitted for permanent residence, if the alien entered the U.S. within the last five (5) years as a refugee, an asylee, or deportation was withheld.
- For an unlimited period, the following qualified aliens lawfully admitted for permanent residence:
    - Aliens who are veterans of the U.S. Armed Forces (honorably discharged for reasons other than alienage); active duty personnel of the U.S. Armed Forces (other than active duty for training), and their spouses and unmarried dependent children; and
    - Aliens who are lawfully admitted for permanent residence and have worked for 40 qualifying quarters of coverage or can be credited with such quarters, not including quarters beginning January 1, 1997 in which the alien received any Federal means-tested public benefit.

NOTE: Unlimited Period does not mean there are no time limits applicable to the TANF case; only that the qualified alien may receive benefits, if otherwise eligible, under the same time limit maximums as all other TANF assistance cases.

Mississippi may provide assistance to victims of severe forms of trafficking to the same extent as aliens.

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)

Mississippi has established objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including the opportunity for recipients who have been adversely affected to be heard in a State administrative or appeal process. The State will administer the due process notification of adverse action with an opportunity for a fair hearing handled independently of the county office eligibility and/or benefit level decision to resolve any recipient benefit decreases, terminations, or related issues. Basic assistance program eligibility criteria and benefit levels are the same statewide.

### Criteria or Basis for a Hearing

An applicant or recipient has a right to appeal decisions regarding eligibility for assistance including the following issues:

1. Decisions regarding eligibility and/or amount of TANF benefits
2. Conditions of payment or repayment
3. Denial of opportunity to make application or reapplication of benefits
4. Undue delay in determining eligibility for TANF and in making TANF benefits available
5. Suspension or discontinuance of TANF benefits in whole or in part
6. Assignment or participation issues in the TANF Work Program, including work exemptions, supportive services, good cause, etc.
7. Decisions regarding cooperation with the Division of Child Support Enforcement and good cause claims
8. Application of penalties which results in rejection of application, case closure, or reduction of benefits



NOTE: Some issues that are established by law are not subject to the fair hearing process, such as the maximum TANF benefit level.

### Requesting a Hearing

TANF applicants or recipients have the choice of either an agency conference or a state hearing to appeal any decision made on their cases. Individuals may bypass the agency conference and request a state hearing, or if they choose to request an agency conference and are dissatisfied with the result, a state hearing may then be requested. The individual must make the request for a hearing in writing and sign the request. The claimant may be represented by any one designated; however, the designation must be made in writing.

The request for a hearing may be made by:

1. Checking in the space provided on any of the notification forms
2. Writing a letter indicating a request for a hearing
3. Completing form MDHS-EA-305, Request for a Hearing

The individual may make the request orally, but this must be followed by a formal written request. The worker will assist the individual by explaining how to request a hearing, sending the form MDHS-EA-305 (Request for a Hearing) to the individual who does not wish to write a letter and lacks a notification form, or helping to fill out a request form when the individual comes to the office of the Department of Human Services and requests a hearing. The request for a hearing may be sent to the county office or to the Administrative Hearings Unit. The worker may give the individual an addressed envelope when the individual prefers to mail the request himself.

### State Hearing Request After Local Hearing

When the individual has had a local hearing and is not satisfied with the outcome, he must request a state hearing within 90 days, following the expiration of the advance notice of case change or closure.

NOTE: To prevent the action or to request continued benefits, the hearing request must be made within 10 days from the date of the change/closure notice. If the 10th day falls on a weekend or holiday, the individual must always be given until the first working day following the weekend or holiday.

1. 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.

If TANF funding is available, Mississippi will assist TANF Work Program participants to train for, seek, and maintain employment:

- providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or
- in other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel.

Mississippi's four local Workforce Development Areas have identified Healthcare in their Sector Strategy Plans to help align the state's resources with needs of business and industry, career goals of workers and the economic goals of the state. The Mississippi Department of Human Services (MDHS), Division of Workforce Development (DWD) will partner with the

Mississippi Community College Board (MCCB) and/or community colleges, Mississippi Department of Employment Security (MDES) and/or other entities to provide short-term training (e.g., Certified Nurses Assistance (CNA) training for placement in a nursing home, etc.) for TANF Work Program (TWP) participants who seek employment in the

eldercare workforce. Training may be established on an individual basis based on the individual's career goal(s)/objective(s) and training needs in conjunction with employer needs.

M. Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

The State shall maintain a Segregated State program for the following state-funded programs. These programs shall count towards the State's MOE:

- State funded scholarship programs for needy families with dependent children that began after 1995. [Mississippi Code of 1972 Sections 37-106-29, 37-106-31, and 37-157-1 amended by Senate Bill 2231(1997) and House Bill 1273(1998)]

Eligible population: A needy family is defined as a family with a dependent child(ren) and an average annual income at or below 350 percent of the Federal Poverty Level. The eligible child is defined as anyone who has not yet attained their 24th birthday, continuously enrolled in a program of post-secondary education [Attorney General's Opinion (September 6, 2002)]. The eligible child is not a veteran, not a graduate or professional student, not married, not an orphan or ward of the court, and does not have legal dependents. The eligible child is living in the home; however, he/she may be absent from the home for periods while attending the post-secondary program.

The cost of a scholarship provided to the head of household and/or his/her spouse in an income eligible family shall also count toward the State's MOE requirement.

- State funded programs to increase the likelihood of school success of preschool and school age children in needy families. Eligible population: Preschool and school age children from families with an income at or below 185 percent of the Federal Poverty Level. Mississippi established new programs to assist needy families with educational opportunities. The Mississippi Department of Education developed state funded programs for 3 and 4-year-olds whose families are at or below 200 percent of the federal poverty level. However, the Reading and Intervention Program was established for school age children who have scored low on state tests and this program does not have a financial eligibility criteria. Pamphlets, brochures, and posters are provided to local MDHS offices ensuring the public is aware of all available services funded by the Mississippi Department of Education. The TANF goals of these programs/activities are to:
  - Provide assistance to needy families so that the children may be cared for in their homes or in the homes of relatives;
  - End the dependence of needy parents on government benefits by promoting job preparation and work. These programs provide safe and stable environments which help children succeed and allow their parents to work;
  - Prevent and reduce the incidence of out-of-wedlock pregnancies; and
  - Encourage the formation and maintenance of two-parent families

State funds may be used for the following programs/expenditures. The eligibility criteria, if applicable, is 185 percent of the Federal Poverty Level:

- State funded programs to assist TANF Work Program participants with out-of-pocket expenditures for work-related items and/or services required by the employer in order to accept or maintain employment;
- State funded expenditures to provide basic assistance and transportation assistance as applicable;

- Mandatory State funded expenditures for early care and education for children whose parent(s) are employed or required to participate in TANF Work Program activities;
- State funded administrative expenditures for frontline caseworkers and state level staff which includes salaries, office supplies, and commodities as defined in MDHS' subgrantee manual; and
- State funded expenditures to maintain and enhance the eligibility and case management systems required to support the TANF Work Program.

State funded expenditures include the cost related to providing case management services.

### TANF Certifications

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes
6.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.	Yes

## Jobs for Veterans State Grants

- a. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;
- b. 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.
- c. 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:
  1. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

Mississippi Department of Employment Security (MDES) will assign and utilize DVOP Specialists and other agency employees trained in case management to metropolitan WIN Job Centers throughout the state where the needs of individualized career services are greatest. Services will be provided in person and remotely as needed. JVSG staff will travel to other WIN Job Centers to serve veterans as needed. DVOP Specialists will conduct relationship building, outreach and recruitment activities with other service providers in the local area to enroll eligible veterans in the JVSG program. With the approval of this plan, JVSG will operate on a four-year plan.

MDES will assign and utilize LVER staff and other agency employees to promote the advantages of hiring veterans to employers, employer associations, and business groups. LVER staff will advocate for all veterans served by the WIN Job Center with business, industry, and other community-based organizations. LVER staff will be assigned to a multi-county area and will be housed in WIN Job Centers throughout the area.

MDES will fill grant-funded vacancies expeditiously despite State budget problems, hiring freezes, and furloughs. MDES plans to identify projected losses and retirements early when possible. Applicants will be given the following order of priority: qualified service-connected disabled veterans, qualified eligible veterans, and qualified eligible persons.

To ensure vacancies are filled timely, veteran (non-JVSG) staff in the agency may be considered for assignment to the program if no eligible veteran is available to fill the position.

d. 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;

In accordance with Veterans' Program Letter 03-14, including changes 1 and 2, or most recent policies, Disabled Veterans' Outreach Program (DVOP) Specialists provide individualized career services to veterans experiencing significant barriers (SBE) to employment, with an emphasis on assisting veterans who are economically or educationally disadvantaged.

The WIN Job Center staff identify eligible veterans or eligible persons at the point of entry using the intake (attestation) form and complete initial assessments. Those identified (self-attest) as having SBE will be referred to the DVOP Specialists or, in instances where a DVOP Specialist is not available or has reached the predetermined caseload, another WIN Job Center staff will provide services, including individualized career services. To better serve this target group, DVOP Specialists will continue to be oriented in all WIN Job Center programs, i.e., WIOA qualifications.

The Disabled Veterans' Outreach Program (DVOP) Specialist works directly with veterans and eligible persons who have significant barriers to employment. The services provided by a DVOP Specialist are referred to as individualized career services. These services include, but are not limited to:

- Comprehensive and specialized assessments.
- Career planning.
- Individual Employment Plans (IEPs).
- Individual counseling.

The DVOP Specialists conduct the following outreach activities to locate and assist eligible veterans and eligible persons:

- Veterans Rehabilitation & Employment Centers.
- Vet Centers, VA Medical Centers and Outpatient Clinics.
- Homeless Veterans Reintegration Program (HVRP) Projects and Homeless Shelters.
- Community-based and Civic Organizations.
- Veterans' Service Organizations.
- Mississippi Department of Rehabilitation Offices.
- Workforce Partners and Service Providers.
- Veterans Affairs Coordinators at colleges.
- Faith-Based Organizations.
- Reserve and National Guard units.
- Military Base Family Service/Support Centers.
- Military Treatment Facilities and Warrior Transition Units.
- Other venues and locations where veterans congregate.

In the event that a DVOP Specialist does not have a full caseload of eligible veterans and eligible persons, the DVOP Specialist may perform additional activities, in the order specified below:

- Review all open case files of current participants who have significant barriers to employment and perform casemanagement duties.
- Conduct relationship building, outreach, and recruitment activities with other service providers in the local area to enroll eligible veterans and eligible persons who have SBE in the WIN Job Centers employment system.

### **LVER Staff**

In accordance with Veterans' Program Letter 03-14, including changes 1 and 2, or most recent policies, Local Veterans' Employment Representatives (LVER) staff conducts outreach to employers in the area to assist veterans in gaining employment. LVER staff will conduct outreach to businesses and industries by email, text, phone, mail, employer forums, and face to face office visits.

LVER staff will advocate for all veterans served by the WIN Job Centers with business, industry, and other community-based organizations by participating in appropriate activities such as:

- Planning and participating in job and career fairs.
- Conducting employer outreach.
- Educating all WIN Job Center staff and partners with current employment initiatives and programs for veterans.
- Conducting job searches and workshops, and establishing job search groups, in conjunction with employers.
- Coordinating with unions, apprenticeship programs, and businesses or business organizations to promote and secure employment and training programs for veterans.
- Informing Federal contractors of the process to recruit qualified veterans.
- Promoting credentialing and licensing opportunities for veterans.
- Coordinating and participating with other business outreach efforts.

Local Veterans' Employment Representative (LVER) staff and WIN Job Center staff will work with the U.S. Small Business Administration to provide information to veterans on opportunities in federal contracting. This will assist service-disabled business owners to receive information on sole-source and set-aside procurement opportunities and benefits. LVER staff will continue outreach efforts to federal contractors. LVER staff members are active members of the Business Services Team. They conduct outreach in conjunction with WIOA Title I, WIOA Title III, TANF, Reemployment Services and other programs. All Business Services Team members, including the LVER staff, share a joint employer visit case management system.

The expected outcomes are enhanced employability and placement of veterans who seek employment, increased employers' awareness of the benefits to hiring veterans, and increased knowledge of services offered by WIN Job Centers.

e. [The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or American Job Center;](#)

### **Program Integration and Leveraging Resources**

DVOP Specialists and LVER staff are an essential part of and fully integrated into the WIN Job Center network; which consists of all staff employed by programs or activities operated by job center partners that provide job-driven online and/or in-person workforce development or related support services as part of the workforce development system. Other WIN Job Center partner staff members include the staff of the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP), and other network partner programs.

LVER staff will continue to be viable and effective in the WIN Job Center delivery system, e.g., facilitating and participating in employer marketing services, employer job fairs, etc. LVER staff will continue to be considered key players and team participants in business development activities and employer marketing efforts, developing jobs for WIN Job Centers, marketing veteran services to employers, assisting employers at job fairs, and facilitating employer recruitments. Veterans who have significant barriers to employment are referred to the DVOP Specialist after initial basic services. All of these activities translate into a fully integrated system with positive benefits and productivity for the WIN Job Centers and also subsequently result in the development of seamless employment opportunities for veterans.

DVOP Specialist and WIN Job Center staff will continue to identify service providers in the state and establish linkages to leverage and enhance employability and placement of veterans. LVER staff and WIN Job Center staff will continue to seek out and partner with other economic stakeholders regarding the employment of veterans, i.e., Chambers of Commerce, economic development units, human resource associations, professional organizations, educational institutions, training providers, and others by attending meetings and through outreach.

LVER staff will conduct outreach to other organizations that provide employment services to veterans. MDES will negotiate future Memorandums of Understanding with service providers as appropriate to bring additional services as part of the overall service delivery strategy.

The MDES website provides information about available employment and training-related services. MDES plans to use service brochures to convey information on employment and training opportunities to veterans during the initial basic services. Information may also be provided by phone, mail, or electronically through the agency workforce technology system.

To better meet the needs of employers wishing to hire veterans, a coordinated approach to marketing and service delivery will include the LVER staff and other WIN Job Center staff. Chambers of Commerce, economic development units, veterans' organizations, and colleges/community colleges will be invited to play a key role in marketing a job-driven campaign to help veterans make decisions based on their individual employment needs coupled with the projected labor market. MDES plans to continue using marketing brochures and tools to target veterans and employers resulting in increased job opportunities for veterans.

f. The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

### **Performance Incentive Awards**

MDES intends to use up to one percent of the annual JVSG allocation for Performance Incentive Awards. In accordance with Veterans' Program Letter 04-19, MDES has established a performance incentive awards program to recognize individuals for quality employment outreach, placement services to veterans, promotion of Hire Veterans Medallion Program, promotion of entry into federal employment, outstanding case management, and efforts to assist hard-to-place populations. Individuals must provide a cognizable service that exceeds their ordinary job duties and demonstrates extraordinary and commendable efforts on behalf of eligible veterans and eligible persons. It includes outstanding outreach and placement efforts on behalf of veterans, or extraordinary community relations efforts to increase the awareness of veterans' issues.

The incentive awards program was established to (a) encourage the improvement and modernization of employment, training, and placement services for veterans and (b) recognize eligible employees and WIN Job Centers for excellence in the provision of such services, or for having made demonstrable improvements in the provision of services to veterans.

MDES expects an increase in services to veterans by our partners, innovative approaches to servicing veterans, expanded program integration, an increase in performance outcomes and increased advocacy within the employer community. MDES also expects that staff will:

- Improve the employment status of veterans who have significant barriers to employment.
- Improve policies and procedures related to veterans' services.
- Improve the promotion of services to veterans by rewarding innovative outreach strategies, supportive services, case management and job development.
- Improve procedures that will increase collaboration and improve performance outcomes.

The incentive program will bring attention to veterans as a group with special employment needs and will reinforce the special federal regulations that support priority of services to veterans.

Eligible recipients of incentive awards are DVOP specialists, LVER staff, and any other individual who provides employment, training, and placement services to veterans under the WIOA, including labor exchanges funded by the Wagner-Peyser Act or staff of the WIN Job Centers. WIN Job Centers may receive the incentive award as an entire office. Awards to WIN Job Centers will be reserved for instances where most, if not all, employees in an office contribute to improving employment or training services offered and provided to veterans. The incentive award will be inclusive of the full spectrum of Department of Labor employment and training-related programs and non-Federal partners.

The selection criteria for award recipients will be based on performance standards and activities accomplished during the fiscal year for which the award is given. Consideration for employees and offices that demonstrate outstanding outreach on behalf of veterans who have barriers to employment, especially homeless, incarcerated, disabled, and recently separated veterans. Attitude, motivation, program improvement, positive feedback, and other indicators of outstanding performance will be given consideration in addition to numerical data.

Awards are administered by the Director of the Office of Job Connections and the Employment Manager of Workforce Services, with input from local management. The incentive program award will be one percent of the initial grant allocation. Disbursement of incentive award funds will be in non-cash award items representing the total amount of designated funding. Awards options include membership dues, personal services, and travel expenses for conferences, award ceremonies, training, and other items.

The costs of these individual trips or alternative awards, will not exceed \$3,000.00. All trips and other awards provided will not exceed 1% of the incentive award amount of \$16,875.00 or subsequent incentive award amount totals.

Each award winner (3-4 per year, depending on the budget) will be provided official travel to include flight, mileage, hotel and government per-diem. Award travel expenses for conferences may include, but not limited to, the National Association of State Workforce Agencies National Veterans Conference. The monetary amount of each award will be adjusted accordingly to stay within the allocated budget.

Selection of recipients and presentation of incentives will be made by the end of the fourth quarter of each year. Incentive award funds will be obligated by September 30th of each year and liquidated by December 31st of the same year. An Incentive Award Report will be submitted with the quarterly report due mid-November.

g. 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);

### **Targeting Services to Veterans with Significant Barriers to Employments (SBE)**

In accordance with 38 U.S.C. 4103A, Veterans' Program Letter 03-14, including changes 1 and 2, or most recent policies, the DVOP Specialists will provide individualized career services to eligible veterans and eligible persons who have significant barriers to employment (SBE) through the case management approach. An eligible veteran or eligible person is determined to have SBE if he or she attests to belonging to at least one of the six criteria below:

- A special disabled or disabled veteran, who is entitled to VA compensation or released from active duty because of a service-connected disability.
- Homeless.
- A recently separated service member who at any point in the previous 12 months has been unemployed for 27 or more nonconsecutive weeks.
- Offender.
- Lacking a high school diploma or equivalent certificate.
- Low-income, as defined by WIOA.

In accordance with , DVOP Specialist will target services to other special populations of veterans who have SBE in accordance with VPL 03-19 or most recent policies:

- Veterans aged 18-24.
- Vietnam-era veterans.
- Eligible transitioning service members.
- Receiving treatment at a military treatment facility or warrior transition unit.



- Spouse, or other family caregiver or a caregiver of an eligible veteran.
- Most recent populations as designated by the Secretary of Labor.

At the local level, WIN Job Centers' management will utilize the manager's report on services to veterans, the DVOP Specialist's outreach and recruitment activity report, and the DVOP Specialist's case management log to monitor and assess the productivity and quality of services provided to veterans.

At the state level, the State Veterans Coordinator (lead LVER) will continue to conduct WIN Job Center assistance visits to ensure guidelines set forth in Veterans' Program Letters, State Plan, Special Grant Provisions for Jobs for Veterans Grants, 38

U.S.C. Chapters 41 and 42, and other applicable compliance requirements are followed. Performance reports will be analyzed quarterly.

#### h. How the State implements and monitors the administration of priority of service to covered persons;

##### Priority of Service

To ensure veterans receive consideration for all opportunities for which they qualify, MDES ensures covered persons are aware of their entitlement to priority of service. Also, the full array of employment, training, and placement services available through the WIN Job Centers service points and that all applicable eligibility requirements for these programs are understood and applied.

MDES will also utilize the following as means of providing priority of service:

- Referral of qualified veterans to new job openings, especially Federal Contractor job orders, prior to all non-veteran job referral activity.
- Veterans placed at the top of WIOA waiting lists (Individual Training Accounts and On-the-Job Training) for limited training funds.

MDES management will monitor priority of service by reviewing quarterly performance reports, manager's report on services to veterans, and MS Works reports. MDES management will monitor priority of service in covered programs at two levels. At the local level, WIN Job Centers will continue to use established protocol of identifying targeted groups. At the state level, management will continue to analyze quarterly performance reports, manager's report on services to veterans, and MS Works reports.

WIN Job Center services are made available and provided to eligible veterans, transitioning service members, VA Vocational Rehabilitation & Employment program veterans, and veterans who have significant barriers to employment through outreach activities performed by DVOP Specialists. MDES will continue to encourage non-DOL program partners to focus on providing priority of service to targeted groups for special consideration.

#### i. How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff:

##### g. 1. Job and job training individualized career services,

DVOP Specialists provide and measure:

(1) **Individualized career services** - DVOP Specialists identify the appropriate career services needed by individual veterans, by using the case management process. They assess the job or job training needs of the veterans referred to them that have been identified by WIN Job Center staff as having significant barriers to employment. If training is needed, DVOP Specialists refer veterans to the appropriate WIN Job Center staff.

##### g. 2. Employment placement services, and

(2) Employment placement services - DVOP Specialists refer veterans to jobs based on job orders within the MS Works system. If no job orders are available for the skill-set desired by the veterans, the DVOP Specialist works with the LVER staff and WIN Job Center staff to locate employers in the community.

g. 3. Job-driven training and subsequent placement service program for eligible veterans and eligible persons;

(3) **Job-driven training** - DVOP Specialists refer those veterans with significant barriers to employment to the appropriate program within the WIN Job Center for job-driven training and placement services.

DVOP Specialist job services, career services, and placement services are measured through the MS Works system and manualtools, i.e., manager’s report on services to veterans, DVOP Specialist’s outreach and recruitment activity report, and the DVOP Specialist’s case management log.

h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and

Hire date and training information is provided in the “Addendum for Mandatory Training Requirements” form is included below:

<b>Employee Name</b>	<b>Program</b>	<b>"Date Assigned"</b>	<b>Completed all Required Training</b>
Anderson, Chasity	SVC	1-Mar-19	Yes
Amos, Stanford	DVOP	16-Jan-19	Yes
Bradley, Latricia	LVER	3-Apr-17	Yes
Brown, Calvin	LVER	17-Jul-17	Yes
Cannon, Gloria	LVER	1-Jan-03	Yes
Davis, Demetria	DVOP	1-Jun-18	Yes
Fair, William	DVOP	17-Apr-17	Yes
Fett, Edward	DVOP	4-Sep-18	Yes
Forrest, Riley	DVOP	16-Dec-19	No
Holifield, Jerry	DVOP	16-Jan-19	Yes
Ivory, Thessaiol	DVOP	1-Aug-19	No
Mann, David	LVER	19-Feb-02	Yes
Mays, Bianca	DVOP	18-Aug-14	Yes
Olson, John	DVOP	7-Nov-11	Yes
Petro, Marvin	DVOP	3-Apr-17	Yes
Robinson, Lawrence	DVOP	16-Jun-14	Yes
Smith, Johnny	LVER	1-Nov-01	Yes

i. Such additional information as the Secretary may require.

At the time of plan submission, no additional information was requested by the Secretary.

## Unemployment Insurance (UI)

### *A. Contents of a Complete UI SQSP Package*

#### a.1. Transmittal Letter

Mississippi's complete SCSP package is provided in Appendix I7. The requisite transmittal letter for the SQSP is presented in Appendix I7A.

#### a.2. Budget Worksheets/Forms

Worksheet UI-1 is provided in Appendix I7B. Worksheet SF 424 is provided in Appendix I7F. Worksheet SF 424A is provided in Appendix I7G.

#### a.3. The State Plan Narrative

The State's SQSP Narrative is provided in Appendix I7C.

#### a.4. Corrective Action Plans (CAPs)

The State's SQSP CAPS and Quarterly Report are provided in Appendix I7D. The State's SQSP Assurances are provided in Appendix I7E.

#### a.5. UI Program Integrity Action Plan (UI IAP)

The State's UI IAP is provided in Appendix I7J.

#### a.6. Organizational Chart

The organizational chart indicating the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery, including details on each organizational unit is presented in Appendix I7H.

#### a.7. SQSP Signature Page

The SQSP Signature Page is provided in Appendix I7I.

### *B. Requirements for States electing to include UI in the Combined State Plan*

1. Submit an SQSP in the following manner depending on their timing in the SQSP cycle:

b. 1. A. If a State is in the first year of their 2-year cycle, the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

The SQSP for FY 2020 was submitted to the U.S. Department of Labor/ETA on August 21, 2019.

b. 1. B. If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

N/A

b. 2. Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year

The required off-year components will be submitted as a modification to the Combined State Plan by October 31 each year.

## Senior Community Service Employment Program (SCSEP)

A1. 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.)

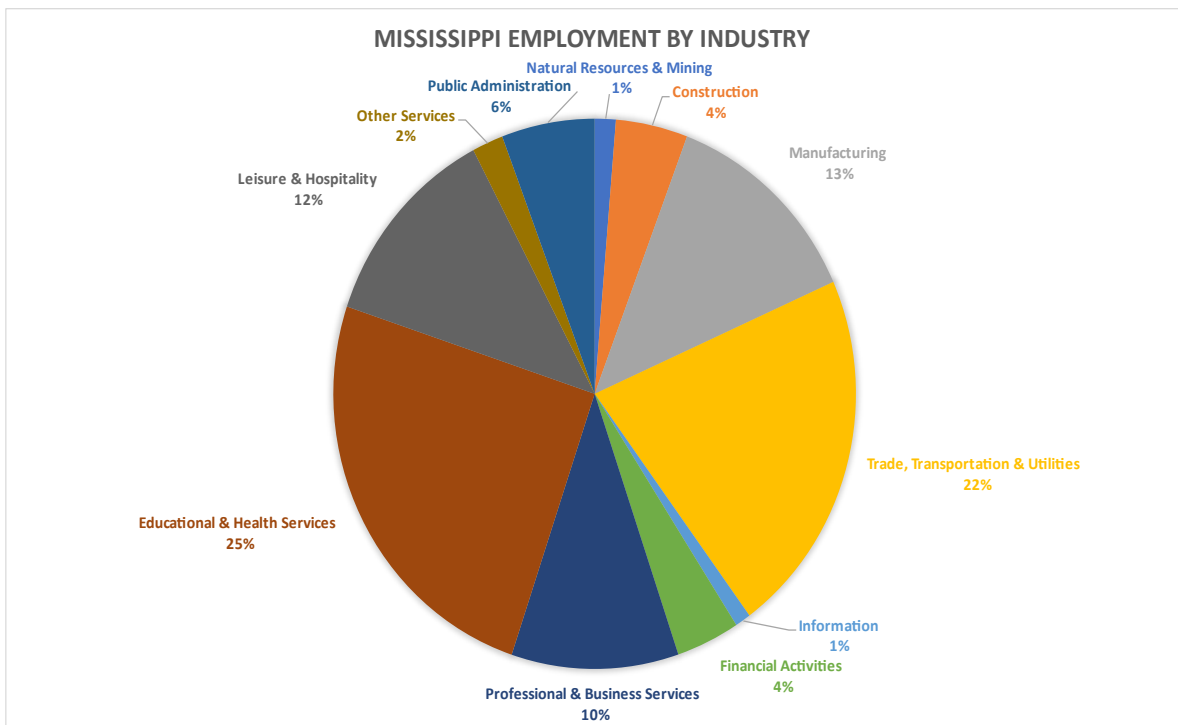
Due to the similar projections and information, we will discuss this question in the economic analysis section of the strategic plan.

a. 2. Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))

Mississippi is a predominantly rural state with only three metropolitan areas and a population of 2,958,846. From 2010 to 2022, Mississippi's overall population fell by 11,769. The state has a large potential workforce, as Mississippi's population over 18 years old is 2,267,770 or 76.6% of the total state population. According to the Census American Community Survey 5-year estimates, the 2022 population over 55 years of age was 866,686 or 29.3% of the total state population.

According to data from the Bureau of Labor Statistics, Mississippi's unemployment rate has dropped from 6.6 percent in June 2019 to 4.0 percent in June 2023. Mississippi employers have added 24,745 jobs (an increase of 2.2%) since June 2019. The largest job gains have been seen in Professional & Business Services (8,978 jobs or 8.1%); Trade, Transportation & Utilities (14,431 jobs or 6.1%); and Construction (2,756 jobs or 5.6%). The robust growth in professional and business services creates employment potential for senior workers.

Figure 20: Mississippi Nonfarm Employment, July 2023



Source: MS Department of Employment Security, Labor Market Information, QCEW, June 2023

As the chart above indicates, Mississippi’s economy is dominated by six sectors. The largest sector as of June 2023 was Educational & Health Services; followed by Trade, Transportation, & Utilities; Manufacturing; and Leisure & Hospitality.

The data below compare Mississippi’s employment by industry sector as of June 2019, to employment as of June 2023. Professional and Business Services show robust growth and is an area that has significant employment potential for senior workers.

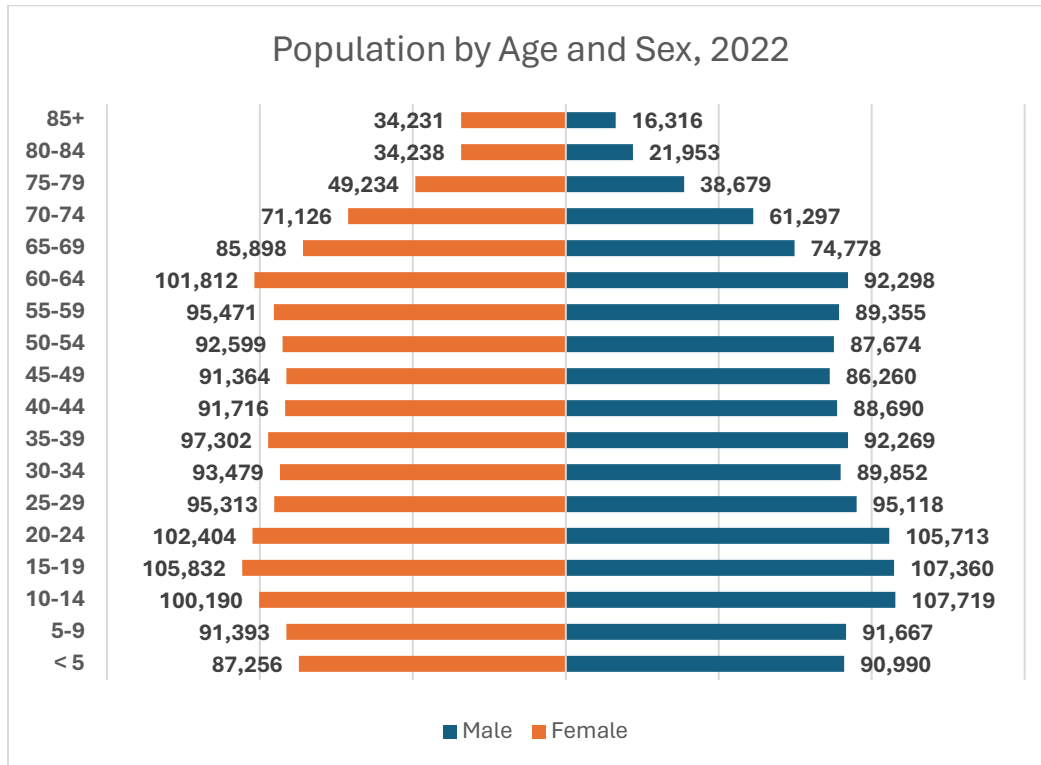
*Table 27: Employment By Industry*

Industry Sector	June 2019	June 2023	Difference	Percent Change
Professional & Business Services	111,012	119,990	8,978	8.1%
Trade, Transportation & Utilities	236,116	250,547	14,431	6.1%
Construction	48,952	51,708	2,756	5.6%
Other Services	21,567	22,405	838	3.9%
Financial Services	44,206	45,635	1,429	3.2%
Educational & Health Services	287,792	290,169	2,377	0.8%
Leisure & Hospitality	142,519	141,334	-1,185	-0.8%
Manufacturing	147,553	145,993	-1,560	-1.1%
Public Administration	68,274	66,811	-1,463	-2.1%
Natural Resources & Mining	16,072	15,101	-971	-6.0%
Information	12,112	11,227	-885	-7.3%
<b>Total</b>	<b>1,136,175</b>	<b>1,160,920</b>	<b>24,745</b>	<b>2.2%</b>

*Source: MS Department of Employment Security, Labor Market Information, QCEW*

The charts below indicate that Mississippi is losing certain population groups while the population of those over 55 years of age is growing. The total population over 55 from the 2022 American Community Survey was 866,686 and will increase to 926,313 by 2030.

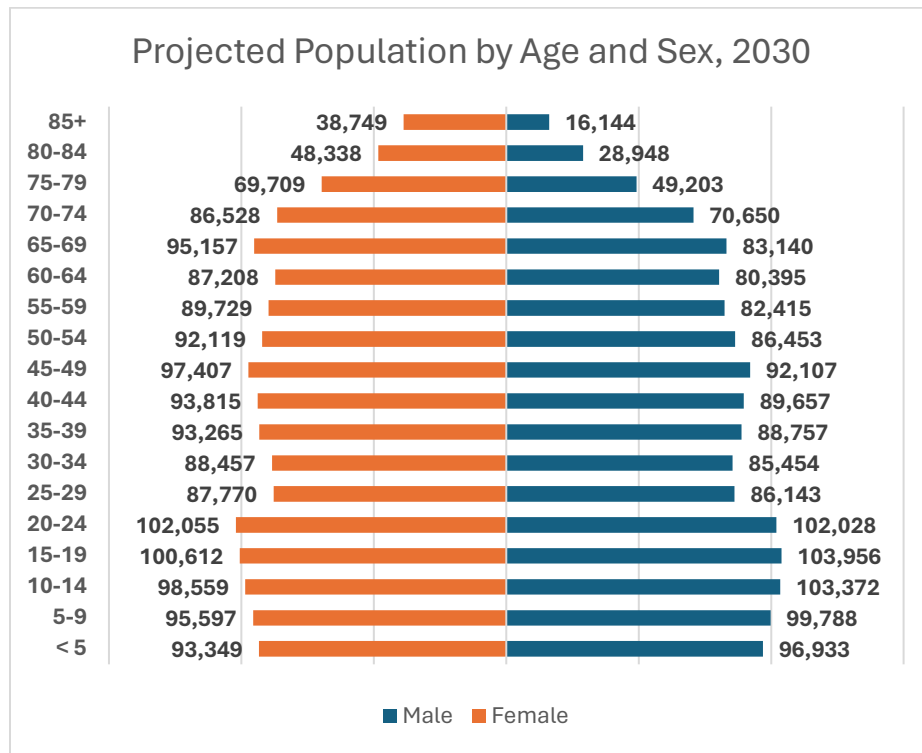
Figure 21: Population by Age and Sex, 2022



Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-Year Estimates



Population by Age and Sex, 2030



Source: University of Virginia Weldon Cooper Center, Demographics Research Group. (2018). National Populations Projections. Retrieved from <https://demographics.coopercenter.org/national-population-projections>.

## Disability Status of Civilian Noninstitutional Population

	Total	With a disability	Percent with a disability
Civilian Noninstitutionalized Population	2,891,879	496,079	17.2%
Under 18 years	690,228	38,843	5.6%
18 to 64 years	1,730,080	265,138	15.3%
65 years and over	471,571	192,098	40.7%

Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-Year Estimates

Individuals with Disabilities make up the following percentages in Mississippi:

Table 28: Disability Status of The Civilian Noninstitutionalized Population

Data from the 2022 5-Year American Community Survey also indicate the following:

- Among Mississippians aged 55 and older, 11.9 percent are veterans.

- 52.5 percent of the overall population of Mississippi live in non-metropolitan counties.
- 1.6 percent of Mississippians speak English less than “very well.”
- Of the total population in Mississippi
  - White: 57.1 percent
  - Black or African American number: 37.1 percent
  - American Indian and Alaska Native number: 0.4 percent
  - Asian number: 1.0 percent
  - Native Hawaiian or Pacific Islander number: less than 0.1 percent
  - Some other race number: 1.4 percent
  - Two or more races number: 2.9 percent

2022 educational attainment statistics from Census are only available for the total population over 25, not specifically for those over 55, but show the following:

*Table 29: Educational Attainment Statistics*

### **Educational Attainment Statistics**

	<b>Total</b>	<b>Percent</b>
Population 25 years and over	1,968,322	
No high school diploma	271,099	13.8%
High school graduate (includes equivalency)	586,782	29.8%
Some college, no degree	431,253	21.9%
Associate’s degree	209,117	10.6%
Bachelor's degree	286,132	14.5%
Graduate or professional degree	183,939	9.3%
High school graduate or higher	1,697,223	86.2%
Bachelor's degree or higher	470,071	23.9%

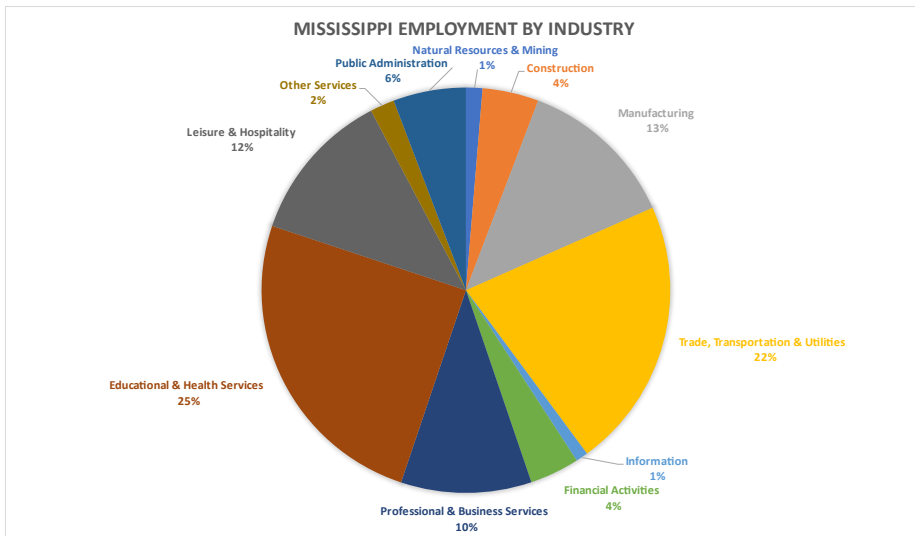
Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-Year Estimates

a. 3. Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c)).

Mississippi is a predominantly rural state with only three metropolitan areas and a population of 2,958,846. From 2010 to 2022, Mississippi's overall population fell by 11,769. The state has a large potential workforce, as Mississippi's population over 18 years old is 2,267,770 or 76.6% of the total state population. According to the Census American Community Survey 5-year estimates, the 2022 population over 55 years of age was 866,686 or 29.3% of the total state population.

According to data from the Bureau of Labor Statistics, Mississippi's unemployment rate has dropped from 6.6 percent in June 2019 to 4.0 percent in June 2023. Mississippi employers have added 24,745 jobs (an increase of 2.2%) since June 2019. The largest job gains have been seen in Professional & Business Services (8,978 jobs or 8.1%); Trade, Transportation & Utilities (14,431 jobs or 6.1%); and Construction (2,756 jobs or 5.6%). The robust growth in professional and business services creates employment potential for senior workers.

Figure 26: Mississippi Nonfarm Employment, July 2023



Source: MS Department of Employment Security, Labor Market Information, QCEW, June 2023

As the chart above indicates, Mississippi's economy is dominated by six sectors. The largest sector as of June 2023 was Educational & Health Services; followed by Trade, Transportation, & Utilities; Manufacturing; and Leisure & Hospitality.

The data below compare Mississippi's employment by industry sector as of June 2019, to employment as of June 2023. Professional and Business Services show robust growth and is an area that has significant employment potential for senior workers.

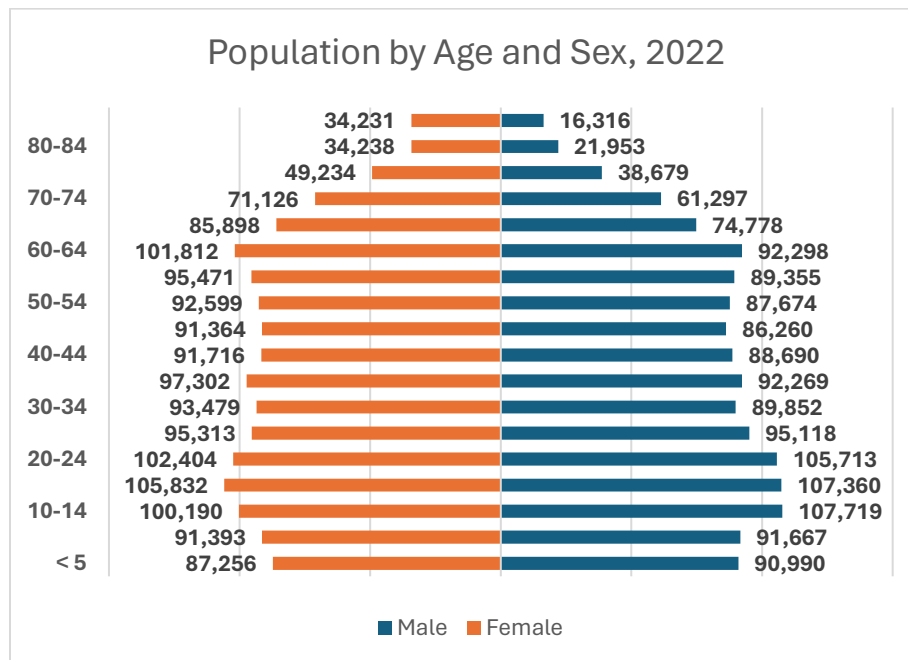
Table 33: Employment By Industry

Industry Sector	June 2019	June 2023	Difference	Percent Change
Professional & Business Services	111,012	119,990	8,978	8.1%
Trade, Transportation & Utilities	236,116	250,547	14,431	6.1%
Construction	48,952	51,708	2,756	5.6%
Other Services	21,567	22,405	838	3.9%
Financial Services	44,206	45,635	1,429	3.2%
Educational & Health Services	287,792	290,169	2,377	0.8%
Leisure & Hospitality	142,519	141,334	-1,185	-0.8%
Manufacturing	147,553	145,993	-1,560	-1.1%
Public Administration	68,274	66,811	-1,463	-2.1%
Natural Resources & Mining	16,072	15,101	-971	-6.0%
Information	12,112	11,227	-885	-7.3%
<b>Total</b>	<b>1,136,175</b>	<b>1,160,920</b>	<b>24,745</b>	<b>2.2%</b>

Source: MS Department of Employment Security, Labor Market Information, QCEW

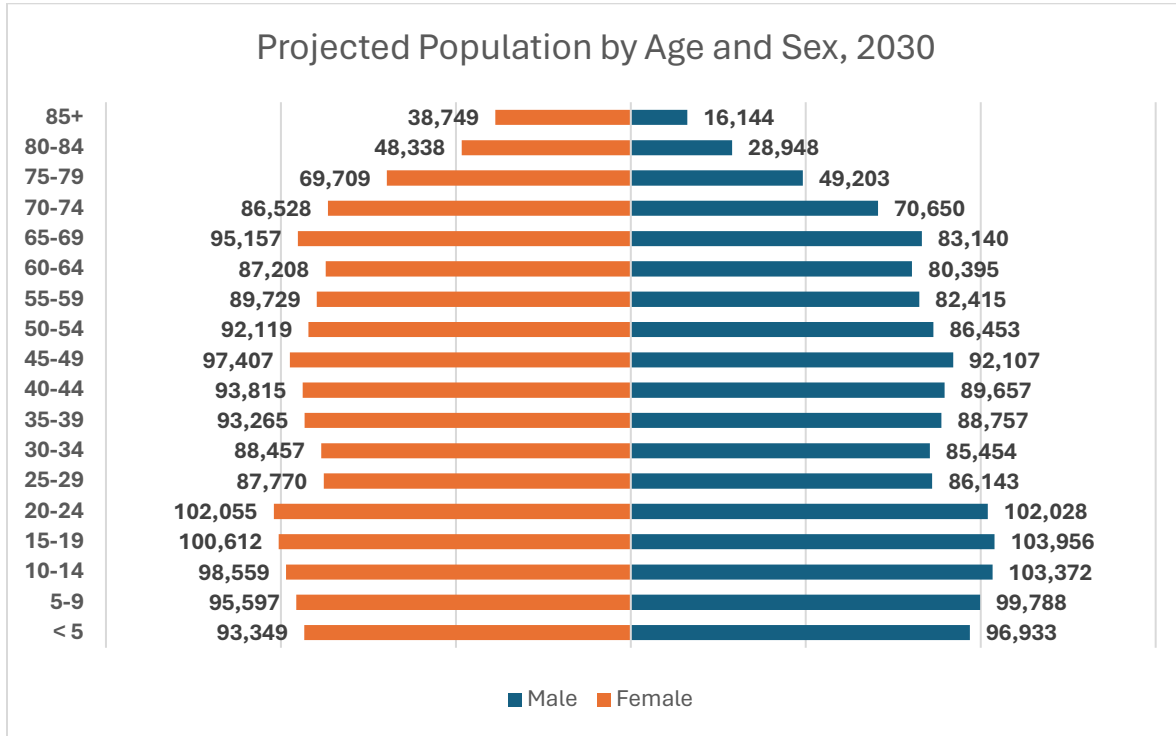
The charts below indicate that Mississippi is losing certain population groups while the population of those over 55 years of age is growing. The total population over 55 from the 2022 American Community Survey was 866,686 and will increase to 926,313 by 2030.

Figure 27: Population by Age and Sex, 2022



Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-Year Estimates

Figure 28: Projected Population by Age and Sex, 2030



Source: University of Virginia Weldon Cooper Center, Demographics Research Group. (2018). National Populations Projections. Retrieved from <https://demographics.coopercenter.org/national-population-projections>.

Individuals with Disabilities make up the following percentages in Mississippi:

Table 34: Disability Status of The Civilian Noninstitutionalized Population

### Disability Status of Civilian Noninstitutionalized Population

	Total	With a disability	Percent with a disability
Civilian Noninstitutionalized Population	2,891,879	496,079	17.2%
Under 18 years	690,228	38,843	5.6%
18 to 64 years	1,730,080	265,138	15.3%
65 years and over	471,571	192,098	40.7%

Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-Year Estimates

Data from the 2022 5-Year American Community Survey also indicate the following:

- Among Mississippians aged 55 and older, 11.9 percent are veterans.

- 52.5 percent of the overall population of Mississippi live in non-metropolitan counties.
- 1.6 percent of Mississippians speak English less than “very well.”
- Of the total population in Mississippi
  - White: 57.1 percent
  - Black or African American number: 37.1 percent
  - American Indian and Alaska Native number: 0.4 percent
  - Asian number: 1.0 percent
  - Native Hawaiian or Pacific Islander number: less than 0.1 percent
  - Some other race number: 1.4 percent
  - Two or more races number: 2.9 percent

2022 educational attainment statistics from Census are only available for the total population over 25, not specifically for those over 55, but show the following:

*Table 35: Educational Attainment Statistics*

### **Educational Attainment Statistics**

	Total	Percent
Population 25 years and over	1,968,322	
No high school diploma	271,099	13.8%
High school graduate (includes equivalency)	586,782	29.8%
Some college, no degree	431,253	21.9%
Associate’s degree	209,117	10.6%
Bachelor's degree	286,132	14.5%
Graduate or professional degree	183,939	9.3%
High school graduate or higher	1,697,223	86.2%
Bachelor's degree or higher	470,071	23.9%

Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-Year Estimates

## B. Service Delivery and Coordination

1. A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

A. Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA one-stop delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e)).

On July 1, 2012, the Mississippi Department of Employment Security (MDES) was designated as the SCSEP State Grantee. Since MDES is the state agency that operates the state workforce system, coordination of SCSEP with other workforce programs in the state should increase greatly.

### **Coordination with State's Title I Workforce Innovation and Opportunity Act (WIOA) Activities.**

MDES is the agency that oversees WIOA in Mississippi. MDES staff members are liaisons to the Local Workforce Development Areas and track the use of WIOA funding. WIOA in Mississippi and the LWDA's are important partners to SCSEP. The SCSEP Managers rely on MDES and the LWDA's for labor market information, training, and job search assistance.

SCSEP participants register with the WIN Job Centers (American Job Centers) to research the available jobs in their area and jobs of interest to them. Participant training plans are based on the employment opportunities for which they are interested. Employment specific training is usually coordinated through the WIOA course offerings.

Coordination with Title I WIOA is further enhanced through the WIN Job Centers' option to participate as host agencies. Placing participants in the WIN Job Centers serves many purposes such as:

- having a senior on site provides a more comfortable setting, thereby attracting other seniors;
- provides an opportunity for the older worker to network with potential businesses and locate unsubsidized employment;
- provides an opportunity for the older work to recruit eligible individuals into the SCSEP program; and,
- provides an opportunity to research jobs regularly.

B. Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))

The U.S. Department of Labor provides funds to operate SCSEP to States and other national sponsor organizations. Governor Reeves has designated the Mississippi Department of Employment Security as the State SCSEP Grantee. Currently, MDES subgrants funds to the nine Planning and Development Areas for the administration of the SCSEP. In Mississippi, the Area Agencies on Aging are subordinate agencies within the nonprofit economic development organizations known as Planning and Development Districts. The Area Agencies on Aging are experienced providers of services for the senior population. Currently, the AAAs operate SCSEP in 8 of the 9 PDDs and the Workforce Division operates SCSEP in Southern MS PDD.

Activities Carried out Under Other Titles of the Older Americans Act:

- **Transportation.**

Transportation is offered to older adults as an option to assist in continuing their independence. SCSEP participants that cannot drive may take advantage of the local Area Agency on Aging transportation services. The state and National Grantees target transportation providers with a goal of benefiting SCSEP participants interested in training with the transportation providers acting in a host agency capacity.

- **Nutrition.**

The Nutrition Program serves a dual purpose; it provides a well-balanced meal for SCSEP Participants, and it provides host agencies that train participants at their congregate meal sites. Training at the Nutrition Program congregate meal sites offers skills training in food handling and preparation management skills, and recreation development. SCSEP Managers' goals are to continue partnering with the Nutrition Program congregate meal sites as hot agency sites.

- **Aging and Disability Resource Center.**

The state and National Grantees plan to partner with the Aging and Disability Resource Center (ADRC), an online database of resources. The Aging and Disability Resource Center Program (ADRC), a collaborative effort of AoA and the Centers for Medicare & Medicaid Services (CMS), is designed to streamline access to long-term care. The ADRC program provides states with an opportunity to effectively integrate the full range of long-term support and services into a single, coordinated system. The ADRC provides a single entry-point for resources that can assist SCSEP participants to meet their personal and family needs. Additionally, the ADRC will identify eligible participants for SCSEP.

- **Adult Day Care.**

The adult Day Care program is beneficial for the SCSEP Participants that are also caregivers. The Adult Day Care program allows participants to continue training at host agencies with the reassurance their family member is taken care of. The state and National Grantees also benefit from the Adult Day Care Program in a host agency capacity. Certified Nursing Assistants (CNAs) are needed in Adult Day Care centers; CNA Training is an opportunity for participants interested in furthering their careers or entering the medical field.

- **Family Caregiver Support Program.**

The Family Caregiver Support Program provides information about services, assistance in gaining access to services, counseling, respite care, and supplemental services to complement the care provided by the caregivers. The program can support the needs of SCSEP Participants that are caregivers needing to be trained for unsubsidized employment.

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)).

#### National Sponsors

Mississippi has three (3) national sponsor organizations operating SCSEP. The following is a list of the national sponsors and the contact person for each of those agencies.

National Caucus and Council on Black Aged, Inc.

Chester A. Johnson, Program Manager

Post Office Box 545

Cleveland, MS 38732

(662) 846-6992

Email: [cjohnson@myncba.com](mailto:cjohnson@myncba.com)

Center for Workforce Inclusion

Joshua Wadsworth, National SCSEP Director

8403 Colesville Road, Suite 200

Silver Spring, MD 20910



[jwadsworth@workforceinclusion.org](mailto:jwadsworth@workforceinclusion.org)

[www.centerforworkforceinclusion.org](http://www.centerforworkforceinclusion.org)

Institute for Indian Development, Inc.

Garilyn Ward, SCSEP National Program Director

991 Grand Caillou Road

Houma, Louisiana 70363-5705

(985) 851-5408 Phone/Fax

[gward@itcla.com](mailto:gward@itcla.com)

### **Service Organizations and Community Based Organizations**

The state's subgrantees, the PDDs, through the AAAs, utilize the services of or directly contract with the service organizations that serve the aging population, such as elder abuse prevention services, legal services, and transportation services. Many of these services are provided by community-based organizations. Due to these relationships, AAA and PDD staff members remain in constant contact with the service provider staff from which participant and host agency referrals are made. SCSEP managers, through the AAAs, work with homemakers, transportation, nutrition providers, and community action organizations. Service providers and community action agencies are invited to the public hearings held annually to discuss aging programs, including SCSEP.

Collaboration with Other Public and Private Entities and Programs that Provide Services to Older Americans

#### **Community Based Organizations.**

The state subgrants SCSEP to the 9 PDDs in the state; the PDDs/AAAs have a direct contractual relationship with community-based organizations as service providers. Local community action agencies work closely with the state grantee to collaborate on SCSEP.

#### **Transportation Programs.**

Transportation providers are generally non-profit organizations that partner with AAAs. The rural nature of the state is compounded by the lack of an entity with mandated responsibility for providing transportation assistance to citizens in need.

To combat transportation problems:

- the Mississippi Department of Transportation is actively involved in leading the United We Ride campaign in the state;
- the Planning and Development Districts either sponsor or closely partner with the Regional Transportation Councils.

*b. 1. D. Planned actions to coordinate SCSEP with other labor markets and job training initiatives. (20 CFR 641.302(j))*

#### **Labor Market Effects on Employment Opportunities and Host Agencies.**

Employment opportunities for SCSEP participants vary greatly based on the jobs available in the local labor market.

Data on the local jobs, such as type, availability, and potential growth should determine the types of host agencies and how many are needed to support SCSEP participant training. Also, each SCSEP participant's Individual Employment

Plan is developed based on the skills needed for the available jobs in the region and should guide the training he or she receives. The labor market data needed to drive these decisions comes from the MDES Labor Market Information unit and is provided in partnership with the LWDBs through board meetings, conferences, the Workforce Innovation and Opportunity Act State Plan, and local WIN Job Centers.

### **Collaboration with Other Labor Market and Job Training Initiatives.**

MDES is the State Grantee for SCSEP and developed the 5-Year SCSEP State Plan. MDES is also the designated state workforce agency, and as such, provided Governor Tate Reeves' WIOA Combined State Plan to the US Department of Labor for WIOA, Wagner-Peyser, and other DOL-funded workforce programs. The combined plan is centered on an effective and efficient state workforce development system that meets the demands of Mississippi's businesses and job seekers by creating a Work-Ready Mississippi. This system will integrate state and local resources to create a seamless system to serve the business community and the individuals who use the system. The SCSEP plan will coordinate with, support, and benefit from the WIOA Combined State Plan and the Governor's workforce initiatives.

The Combined State Plan will guide the strategic and operational workforce planning for state agencies. The priorities include providing an attractive economic climate for current and emerging industries that foster economic opportunity, job creation, capital investment and infrastructure development by developing a well-trained, educated, and productive workforce. The initial emphasis will be placed on growth sectors, Healthcare,

Advanced Manufacturing, and Energy, which were the focus of important pieces of legislation passed in the 2012 legislative session. Mississippi passed the Mississippi Health Care Industry Zone Act that expands the healthcare industry. This law advocates centralizing health care and encouraging healthcare-related businesses to create high-paying jobs and to locate within qualified Health Care Zones. Businesses that create jobs in the research, development, manufacturing or processing of pharmaceuticals, biologics, biotechnology, medical supplies and medical equipment, diagnostic imaging and other shared services would be eligible for incentives.

As Mississippi's population ages, the need for quality, accessible medical care will increase. This increase in need for medical care will require an increase in the number of healthcare jobs, as evidenced by the national growth in this sector. Mississippi jobs in healthcare pay 40 percent more than the statewide average. This is an area in which older Mississippians can be placed in unsubsidized employment after SCSEP job training.

At the heart of Mississippi's economy are our existing businesses and industries. Developing a workforce for the growth and sustainability of Mississippi businesses large and small - from tourism on the Mississippi Blues Trail to the high tech and advanced manufacturing of military drones - must remain a priority. The vision is simple: to help our state attract, keep, and grow businesses that create good jobs.

Mississippi understands that our economic growth is dependent on a comprehensive statewide workforce system that integrates education, industry, employment, and economic development into a unified enterprise with a shared vision and common goal. This system is employer-focused and demand-driven. The growth of high wage employment is dependent upon Mississippi having a trained workforce, a continued supply of skilled Mississippians who are ready, willing, and able to fill jobs, regardless of their age.

Mississippi has identified five keys to meet the shortage a high-quality workforce:

- A high-quality education for all citizens is a key tenet of competitiveness that makes Mississippi an attractive place to create, locate and grow a business;
- High wage jobs must be filled by highly skilled workers possessing the appropriate skills to do the job and further business growth. Unfilled job positions are wasted opportunities in the short- and long-term causing employers to look outside Mississippi for talent;
- An information system that supports data-driven planning and decision making for state and local Workforce stakeholders;

- An increase in post-secondary credentials and certifications that help jobseekers access the high skill, high-growth jobs of the future; and
- A pipeline for workforce development must be advanced through strategic partnerships with a common vision among K-12, community colleges, universities, state agencies and other stakeholders devoted to workforce training and retraining.

Each of these five keys is as critical in helping seniors fill a part of the shortage in skilled workforce as they are for other workers.

### **Leveraging Resources from Key Partners to Support SCSEP.**

PDDs work with community colleges to provide training to SCSEP participants at a reduced cost; many provide tuition waivers for SCSEP participants. Community colleges are an integral component of the WIOA programs offered through the WIN Job Centers. SCSEP participants are encouraged to dual enroll in WIOA with the WIN Job Centers for job search assistance and training classes.

*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).*

### **Infrastructure Funding Agreements.**

Each PDD is required in their subgrant with the state to negotiate with a local WIN Job Center (WJC) to ensure SCSEP's required partner presence in the center. Each PDD entered into a Memorandum of Understanding (MOU) with the WJC and negotiated payment for space used and provided a copy of the MOU and the basis for the cost to MDES. Funds in the amount of that cost basis are included in the PY23 SCSEP allocations for estimated cost for the space, and the PDDs include these costs in their budget narratives submitted to MDES.

### **Collaboration with State Vocational Rehabilitation.**

The Mississippi Department of Rehabilitation Services, like SCSEP, is a required partner in the WIOA programs. SCSEP and Vocational Rehabilitation will collaborate with the WIN Job Centers for employment assistance for older individuals with disabilities.

### **Collaboration with Adult Education and Literacy Providers.**

SCSEP participants complete an initial assessment upon entrance into the program to determine their employment plan. For participants that are interested in completing their High School Equivalency Diploma (HSE), SCSEP partners with the Adult Education program administered by the Mississippi Community College Board. The Adult Education program is designed to offer opportunities to enhance the skills and abilities of individuals preparing for the workforce. SCSEP participants are encouraged to prepare themselves in the areas of math, reading, writing, communication, and computer skills to become employment ready. The Adult Education program aids in developing these skills based on the individual's skill level and learning capacity.

The Adult Education program is available statewide through community colleges, public schools, and other resources. SCSEP participants can test at any of the available high school equivalency sites across the state.

### **Collaboration with Education and Training Providers.**

The SCSEP program collaborates with the WIN System to offer SCSEP participants access to training using Individual Training Accounts (ITAs) through the state's Eligible Training Provider System. Available courses include, but are not limited to:

- Accounting;
- Administrative Services;
- Animal Husbandry;
- Auto Mechanics;

- Banking and Finance;
- Building Maintenance;
- Clerical;
- Computer;
- Data Word Processing;
- Forestry;
- Health Services;
- Industrial;
- Landscaping;
- Manicuring;
- Medical Coding;
- Pharmacy Tech;
- Retail Sales;
- Teacher Assistant; and,
- Welding.

*F. Efforts to work with local economic development offices in rural locations.*

**Local Governments.**

PDDs are also directly linked to the economic development of the region and receive funds from local cities, counties, and local governments. PDDs have direct relationships with cities, counties, and local governments; many are host agencies for SCSEP participants. The following are government agencies that SCSEP works with on an ongoing basis:

- Board of Supervisors;
- Cities;
- Towns;
- Libraries;
- Local Chambers of Commerce; and,
- State Chamber of Commerce.

SCSEP staff from all grantees and subgrantees will continue to foster these relationships to increase their participation as host agencies. These entities may potentially hire participants into unsubsidized employment.

**Business Organizations.**

State subgrantees and their SCSEP managers work with business organizations such as the Mississippi Manufacturers Association and local chambers of commerce to develop job opportunities. They collaborate with Medicaid and regional transportation and economic assistance providers to access services to SCSEP participants in need. They also solicit advice and recommendations from support service organizations through public hearings and joint conferences.

**Mississippi Chambers of Commerce.**

The mission of a Chamber of Commerce is to provide leadership in economic development activities, support existing businesses, attract new businesses, and promote civic, cultural, and recreational activities that improve the quality of life for businesses and residents. There are about one hundred (100) Chambers of Commerce in Mississippi.

#### **Strategy for Collaborating with Chambers of Commerce.**

SCSEP Managers will contact the chambers to educate them on the benefits of hiring older workers. The mission of the chambers supports the goals of SCSEP; working together will strengthen the case for targeting older workers when meeting new and existing businesses. Additionally, the chambers will be avenues that SCSEP Managers can use to identify industry appropriate training opportunities for SCSEP participants interested in the local labor market opportunities.

#### **Strategy for Seeking Advice and Recommendations.**

The state and national grantees will meet with the Chambers of Commerce at Workforce Development Board meetings, conferences, and individually to seek their advice and recommendation on improving SCSEP. The chambers can provide important information on the local economy and ensure that SCSEP Managers meet with and partner with existing and new businesses interested in hiring and/or training older workers. Partnering with chambers as host agencies and providing a SCSEP participant to train onsite brings recognition to SCSEP while providing valuable training to participants. Chambers of Commerce that are host agency sites provide skills training in clerical, phone skills, record keeping, etc.

#### **Economic Development Agencies.**

Economic development is a focus on the state level as well as at the local community level. SCSEP grantees and subgrantees in the state will target economic development agencies for partnership opportunities.

#### **Strategy for Collaborating with Economic Development Agencies.**

The state and national grantees will work with economic development agencies at the state and local level to network and educate on employment training opportunities for older workers that new and existing businesses can utilize to hire skilled older workers. Collaboration with the economic development agencies through the Mississippi Economic Development Council allows SCSEP a single point of entry to providing education on older workers to the more than 3,100 manufacturing entities that drive the state's economy. The Mississippi Economic Development Council organizes two conferences a year. SCSEP Managers will attend the conferences to network with businesses.

#### **Strategy for Seeking Advice and Recommendations.**

The state and national grantees will network with the economic development agencies and attend their meetings and conferences. SCSEP Managers will present the benefits of hiring older workers at Local Workforce Development Board meetings and conferences, such as the Governor's Conference on Workforce Development, to increase the entered employment rate for SCSEP participants. The state and national grantees will glean information from the economic development agencies on ways to improve participant's individual employment plans to ensure that participants are receiving the training needed to be job ready in the industries that support our economy.

#### **Labor Organizations.**

Labor unions for business organizations in Mississippi can assist SCSEP Managers by providing information for the design of individual employment plans for participants, as they best know the skills needed for worker safety and career advancement.

*b. 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.)*

#### **Strategy for Collaborating with Major Employers.**

The state and national grantees will target the major employers with an educational campaign to raise awareness of the benefits of hiring older workers. The goals are to increase the rate of entered employment of exited SCSEP participants and increase the number of higher paying jobs (with benefits) for SCSEP participants.

- **Strategy for Seeking Advice and Recommendations**

Seeking advice and recommendations from local businesses is beneficial to SCSEP. Businesses can provide information on the skills needed for employment to assist in the development of the SCSEP participant's individual employment plan. Another possibility is to increase the number of On-the-Job Training contracts that SCSEP managers can enter into with businesses to ensure that SCSEP participants receive the training needed for hiring by the business. SCSEP managers will attend job fairs and will require all participants to attend as part of their training.

- **Engaging and Developing Partnerships with Businesses.**

The state and national grantee SCSEP managers will coordinate with the LWDBs to show businesses the benefits of hiring older workers. Older workers in general have low turnover rates, are flexible and open to change, are interested in learning new skills, have low absentee rates, have experience and knowledge, and are willing to work. Therefore, hiring older workers is a solution to the shortage of workers in the state.

SCSEP managers will work with the LWDAs to develop partnerships with businesses by utilizing recruitment efforts such as sending brochures and fact sheets on the older workers, sending letters to businesses outlining the benefits of older workers and following up with a presentation to the Human Resources Director and/or President, and where applicable recruit them to become a host agency. Developing partnerships with businesses creates the opportunity to share success stories from other businesses that hire older workers.

To increase partnerships with businesses, SCSEP managers are encouraged to:

- increase contacts with local businesses;
- promote On-the-Job Training contracts with businesses;
- make presentations to businesses; and,
- assist local businesses with training needs.

### **Retention Activities for Participants in Unsubsidized Employment.**

Once a SCSEP participant is trained and placed in unsubsidized employment, the SCSEP manager continues to follow the participant for one year to ensure he/she has the support needed to remain employed. SCSEP

participants in unsubsidized employment may need additional training and support to keep up with the demands of the changing workforce. Support will be provided in the form of tracking, counseling, and job development.

SCSEP managers will work with the LWDAs to educate businesses on how to retain older workers. Once businesses see the value older workers bring to their businesses, they will be looking for ideas to retain their older workers. SCSEP assists in restructuring jobs that help employees to maintain or advance their careers.

Managers can educate businesses on the following strategies for creating a positive environment for older workers:

- **Flextime:** employees can begin and end their workday at varying times;
- **Job Sharing:** use two employees for one job position;
- **Part-time Position:** older workers may be looking for 20-30 hours a week;
- **Consulting:** older workers may prefer to work in a consultant role;
- **Compressed Work Week:** work longer hours, but fewer days; and,

- **Telecommuting:** working from home.

*b. 3. The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c)).*

The State subgrants to the Planning and Development Districts since their AAAs are the primary provider of other services to the aging community and have established contacts and rapport in the community. The PDDs should collaborate with the WIN Job Centers and other workforce system partners to provide outreach services to minority populations.

MDES provides the required Equitable Distribution (ED) report and Minority Report to USDOL annually. MDES will continue to use both the ED and the Minority Report to guide the PDDs as they provide SCSEP services and to advise the national grantees that operate the program in the state.

*b. 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)*

### **Process Implemented to Identify Community Service Needs.**

MDES will work with the national grantees and the 9 PDDs to collect information on the participants, services, and skills needs of the businesses in the area that each serve. Identifying gaps between the participants, the skill requirements, and the services provided will guide decisions on targeted recruitment, training, host agency assignments, and recruitment of businesses willing to hire seniors into unsubsidized training.

The industry makeup of the state varies by region. The Delta region of the state is predominately agricultural with a secondary gaming and tourism emphasis; the northeastern region is industrial; the west-central region is mixed with agriculture, manufacturing, and professional, with a recent growth in oil production; and the southern region is agricultural, gaming and tourism, and industrial. Due to the variety of industries in the state, SCSEP managers will continue to work with the local WIN Job Centers and other stakeholders to identify local community service needs and obtain recommendations on how SCSEP participants can bridge those gaps. Individual Employment Plans will be tailored to meet the needs of the participants and the community service assignments.

### **Timeline for Identifying and Recruiting Host Agencies to Meet Community Service Needs.**

State and national grantees, with the assistance of the LWDAs, will identify non-profits and government organizations as potential host agencies for a resource list. The resource list will guide the SCSEP managers in their attempts to recruit host agencies to train SCSEP participants. The USDOL data collection system will assist SCSEP managers to track the types of host agencies using the host agency management reports. The state and national grantees will increase the number of host agencies every program year to meet the needs of participants.

*b. 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 CFR641.302(k)).*

Since the Mississippi Department of Employment Security (MDES) was designated as the State Grantee as of July 1, 2012, coordination with other workforce programs in the state has greatly increased. The division of MDES that has direct oversight of the SCSEP also provides direct fiscal and programmatic support for WIOA to the state's four Local Workforce Development Areas.

Improving SCSEP Services.

### **Long-Term Strategy to Improve SCSEP Services.**

The State has implemented a WIOA Common Intake and Reporting System, known as the Hub”, that captures common participant information for the four core programs. The system aligns resources and generates automatic referrals among the core programs and partner programs such as SCSEP.

Using a no wrong door policy, all participants will develop an individualized success plan that coordinates the optimum blend of services and funding to achieve their goals for success. This success plan also indicates which of the pathways in the Smart Start Pathways Model to which the participant will be assigned. A connection to a career pathway must be included as part of an older worker's individual service strategy or MS Smart Start Success plan. This model is an integrated compilation of programs and services intended to develop basic, technical and employability skills; provide continuous education and training; and work support that leads to high-demand jobs in targeted sectors.

#### **Planned Changes in the Utilization of SCSEP Grantees and Program Operators.**

In PY2015, the State Grantee's largest subgrantee, Southern Mississippi Planning and Development District, moved its SCSEP staff from the Area Agency on Aging division to the Workforce Division. This puts SCSEP in this district under the direction of the Twin Districts Workforce Development Area. SMPDD is the SCSEP subgrantee of both the State subgrant and The Center for Workforce Inclusion (CWI), operating a total of 125 slots. SMPDD will use the Smart Start Pathways Model throughout its service area. CWI intends for all of its subgrantees to follow the lead of SMPDD and use Smart Start as the service model.

#### **Increased Frequency of Formal Collaboration Activities Among SCSEP Grantees.**

The state grantee will conduct training annually and provide ongoing Technical Assistance. The state is dedicated to increasing the number of collaborative activities and efforts in the state regarding the benefit of older workers. MDES will work collaboratively with its national grantees, 9 PDDs, and other partners to connect older workers with various programs.

#### **Development of Criteria for Selection of Subrecipients.**

The state grantee, in collaboration with USDOL, will develop more stringent criteria for the selection of sub-recipients. Subgrantees will be selected based on their ability to run SCSEP effectively, measured by performance measure results. The program is designed to develop economic self-sufficiency and promote useful opportunities in community service activities to increase the number of persons who may enjoy the benefits of unsubsidized employment in both the public and private sectors. A performance-driven selection process for subgranting SCSEP will ensure the program meets its performance measures.

#### **Opportunities to Share Best Practices Statewide.**

The state grantee will work with National Grantees to share best practices through regular contact including the annual Equitable Distribution Meeting. Working together statewide will ensure that SCSEP is serving the eligible and the target population effectively.

MDES will also coordinate with the National Council on Black Aging (NCBA) to assist and provide the following:

- Work together in collecting and sharing labor market information in any specific area to identify the skills area businesses require so that we can develop targeted recruitment of both the participants and host agencies.
- Remain in compliance with DOL equitable distribution of positions in the state. NCBA will work closely with the state to ensure that the distribution always remains equitable.
- As a national administrator of the SCSEP program in Mississippi, NCBA has recognized and experienced the many challenges presented by the rural nature of the state. NCBA will continue to work with the state to develop and implement plans to meet these challenges and help the participants gain unsubsidized employment.

*b. 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 CFR641.302(f)).*

#### **State's Plan for Ensuring Goals are Achieved.**



SCSEP managers receive performance measures from the USDOL prior to the start of the Program Year. The 2006 amendments to the Older Americans Act section 513(a) mandates that SCSEP managers are given the opportunity to negotiate their performance measures based on state-specific data. Acceptable sources of data include but are not limited to: TANF; state unemployment rate; labor market information, and past performance.

The USDOL provides the SCSEP managers with management reports via the data collection system known as GPMS (Grantee Performance Management System). Management reports are produced quarterly to gauge progress towards performance measures. The following management reports will be used by the state, national grantees, and SCSEP managers:

**Applicant**

- Pending
- Ineligible
- Eligible, Not Assigned or on Waiting List
- Waiting List Participants

**Current/Exited**

- Started Employment but Not Yet Achieved Entered Employment
- Achieved Entered Employment but Not Yet Achieved Retention
- Waiver of Durational Limit
- Participants Who Have Reached Durational Limit
- Participants With Approved Break(s)

**Follow-Ups**

- Pending
- Pending, Displayed by Month

**Actions**

- Most In Need/Waiver Factor Actions

**Host Agencies**

- Host Agencies
- Assignments by Host Agency

**Employers**

- Unsubsidized Employers
- Placements by Employer

**Meetings, training, and conference calls.**

Meetings among the state, national grantees, and subgrantees will be held on a regular basis, either in person or using electronic means such as conference calls and webinars. As issues warrant, MDES will meet with subgrantees on an individual basis by phone or during site visits, monitoring visits, or data validation visits.

Topics may include:

- Data entry review prior to close date for reports
- Quarterly reports

- Reports reviewed
- Reports discussed by SCSEP Managers.

### *C. Location and Population Served, including Equitable Distribution*

*1. A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d)).*

#### **Current and Projected Employment Opportunities in the State.**

There has been a shift in the last two decades in the nation as a whole from an industrial to a service and knowledge-based economy. According to the U.S. Bureau of Labor Statistics, Mississippi has followed the national industrial trend with 80.3 percent of the workforce employed in service-oriented jobs. In the service industry, the largest sub-sectors include healthcare and social assistance followed by administrative and support services.

The economic priorities for Mississippi over the next four years and guidance from the SWIB will guide the strategic and operational workforce planning for state agencies. The priorities include providing an attractive economic climate for current and emerging industries that foster economic opportunity, job creation, capital investment and infrastructure development by developing a well-trained, educated, and productive workforce.

The initial emphasis will be placed on the three sectors in the Combined State Plan; Advanced Manufacturing, Healthcare and Energy, which were the focus of important pieces of legislation passed in the 2012 legislative session. Of equal importance is the retention and expansion of existing industries such as transportation and logistics, agribusiness, tourism; and defense and homeland security.

#### **Employment Projections for High Growth Industries and Occupations.**

The state relies on labor market information disseminated by the MDES Labor Market Information division to ensure that SCSEP meets the local labor market demands. Labor market information shows that all industry sectors need skilled workers, especially those that require the application of technology and knowledge such as automotive and health care professionals.

The SCSEP managers must emphasize the need to obtain skills through training at host agencies in order to generate quality job placements in high growth industries. Mississippi projects that over 148,000 jobs are expected to be available annually from 2020 to 2030. Increasing SCSEP job placements in the high growth areas will move Mississippi ahead.

#### **Industries and Occupations with Employment Opportunities for SCSEP participants.**

Participants are encouraged to design their employment plan around the following industries most in need of skilled workers:

- service sector;
- healthcare;
- retail;
- food service;
- social assistance; and,
- education.

#### **Employment Histories and Skills Possessed by Eligible Individuals in the State.**

Generally, SCSEP participants in Mississippi have very limited skills and work history; many are displaced homemakers or widows with limited work experience. Therefore, the state and national grantees must ensure that the SCSEP participant's Individual Employment Plan includes the skills training needed to locate unsubsidized

employment upon exiting the program. Training may be attained at the host agency, the WIN Job Centers, community colleges, and at participant educational meetings.

Mississippi ranks last in educational attainment in the adult population, particularly older females. In the state, 12.33 percent of SCSEP participants have no high school degree, 47.85 percent have a high school degree or equivalent, and only 11.39 percent have a bachelor's degree or higher.

A snapshot of the Mississippi SCSEP participant education, age, and wages from the GPMS database follows:

*Table 36: Participant Education, Age, and Wages by Mississippi Grantee – PY 2022 Final*

	IID	NCBA	CWI	MS	All Mississippi SCSEP	
<b>Total</b>	37	155	242	101	535	100%
Educational Attainment						
<b>8th grade &amp; under</b>	9	4	0	3	16	2.99%
<b>9th grade - 11th grade</b>	8	31	25	2	66	12.33%
<b>High School diploma or equivalent</b>	18	100	89	45	252	47.10%
<b>1 - 3 years college</b>	2	62	80	26	170	31.77%
<b>Post-secondary Certificate</b>	0	2	4	1	7	1.30%
<b>Associate's degree</b>	0	5	20	4	29	5.42%
<b>Bachelor's degree or equivalent</b>	1	24	24	5	54	10.09%
<b>Some graduate school</b>	0	0	0	0	0	0.00%
<b>Master's degree</b>	0	0	7	1	8	1.49%
<b>Doctoral degree</b>	0	0	0	0	0	0.00%
Age						
<b>55-64</b>	5	32	105	56	198	37.00%
<b>65+</b>	2	37	144	45	228	42.61%

Source: SCSEP Quarterly Progress Report, ETA 5140, PY22 Final

*c. 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.*

This data is listed in the Program Year 2023 Equitable Distribution List by National and State Grantee with Counties (Provided in Appendix I8A).

*c. 3. Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.*

The US Department of Labor has redistributed positions among The Center for Workforce Inclusion, National Caucus on Black Aged, the Institute for Indian Development, and the Department of Employment Security in order to serve the eligible population more equitably as indicated by the 2020 Census through the USDOL distribution process. In Mississippi, the state and national grantees agree that the distribution is currently equitable.

*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.*

The U.S. Department of Labor implemented revisions to the required Equitable Distribution Report. The four grantees provided their Grantee Reports to the USDOL and MDES compiled the information from the four into a Statewide Grant Report, which was also submitted to DOL on March 22, 2022. The state grantee will monitor distribution and service of the slots to ensure that all grantees are working to implement the action plans stated in the reports. We will also continue to monitor distribution of slots relative to demographic changes and will address any potential issues as they arise through communication with DOL.

**B. Equitably serves rural and urban areas.**

See answer above at c.4.A.

**C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)**

See answer above at c.4.A.

**c. 5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))**

See answer above at c.4.A.

**6. The relative distribution of eligible individuals who:**

**A. Reside in urban and rural areas within the State.**

The State of Mississippi is a predominately rural state, with a large percentage of Mississippians living in rural counties. Access to transportation and limited numbers of host agencies in the most rural counties will continue to be a challenge that all SCSEP grantees must work together to overcome.

**Inadequate Resources.**

The state and national grantees strive to serve both rural and urban areas of Mississippi equitably. In order to accomplish this, state and National Grantees must work together to overcome inadequate resources (limited employment prospects, few host agencies, lack of transportation, etc.).

**Employment.**

The rural nature of the state combined with an agrarian-based economy makes it difficult to provide adequate unsubsidized placement opportunities. The number of jobs available is few and because public and mass transportation are not available, access to many of the existing jobs or employment opportunities can be problematic. In some instances, the cost of transportation and other job maintenance factors exceed the benefits of employment.

**Host Agencies.**

The rural nature of the state also creates a shortage of host agencies. The state and national grantees operating in the state know the challenge of developing enough host agencies to rotate participants appropriately according to their individual employment plan. SCSEP managers will continue to partner with the LWDBs to assist in developing new business opportunities and to partner with new and existing non-profit organizations located in the state.

**Transportation.**

Access to transportation continues to be a problem in areas outside of the metropolitan area of Jackson. To alleviate transportation concerns, the state grantees may reimburse participants for transportation costs only when travel is necessary for training, physical exams, or enrollee meetings. If there is no public transportation available, and there are no other options, and if the participant could not otherwise participate in the program, transportation to and from host agency assignment may be reimbursed until another option is identified.

The state grantee will attempt to collaborate with other local agencies and resources to provide participant transportation at no cost or reduced cost whenever possible.

Additionally, flexible scheduling is encouraged to help participants reduce travel costs by training more hours on fewer days, providing the same community service assignment hours.

### *C. Specific Populations Groups.*

*The state and national grantees offer various recruitment and selection techniques in order to address Older Americans Act Section 518(b) as detailed below:*

*OAA Section 518(b) defines priority individuals as those who qualify based on one or more of the following criteria:*

- Are aged 65 years or older;
- Have a disability;
- Have limited English proficiency or low literacy skills;
- Reside in a rural area;
- Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act, 38 U.S.C. sec. 4215(a)(1);
- Have low employment prospects;
- Have failed to find employment after utilizing services provided under Title 1 of WIOA; or,
- Are homeless or at risk of homelessness.

Other populations identified in the statute are defined in OAA Section 503(a)(4)(C)(i)-(iv) as:

- Eligible individuals with the “greatest economic need” (as defined in 20 CFR 641.140);
- Eligible individuals who are minority individuals; and,
- Eligible individuals who are individuals with “greatest social need” (as defined in 20 CFR 641.140).

The LWDBs that oversee the workforce system in the state are key partners for both the state and national grantees in the state as they provide labor market information and economic data to assist grantees in developing new host agencies, educating employers on the benefits of hiring older workers, and providing job search assistance for SCSEP participants.

The workforce system provides an additional avenue to recruit eligible individuals to participate in the SCSEP.

Additional recruitment activities include, but are not limited to, the following:

- attending job fairs;
- advertising in local newspapers and newsletters;
- referrals from exited participants, host agencies, faith-based organizations, and local officials;
- running public service announcements;
- visiting local senior centers;
- partnering with organizations that serve aging and/or disabled adults;
- distributing brochures, flyers, posters, and fact sheets throughout the state; and,
- partnering with the local WIN Job Centers.

B. Have the greatest economic need.

See response included at c.6.A.

C. Are minorities.

See response included at c.6.A.

D. Are Limited English Proficient.

See response included at c.6.A.

E. Have the greatest social need. (20 CFR 641.325(b))

*See response included at c.6.A.*

*c. 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)).*

The state and national grantees are dedicated to the avoidance of disruptions in the service to SCSEP participants. Mississippi's state and national SCSEP grantees will follow the recommendation of the USDOL that when there is over-enrollment, for any reason, there will be a gradual shift that encourages current participants to move into unsubsidized employment to make positions available for eligible individuals in the areas that are underserved. Grantees understand that participants are not entitled to remain in a subsidized community service assignment indefinitely and will adhere to the time limits on a SCSEP community service assignment as detailed in the Older Americans Act.

SCSEP standards define the program requirements that state subgrantees must adhere to. Issued in March 2006, the standards address Designation of Service, slot movement, and time in training assignment.

#### *d. 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;*

#### A. Organizational Structure

The Office of Grant management at MDES has day-to-day responsibilities for the administration and operation of the Workforce Innovation and Opportunity Act (WIOA) Title I and SCSEP in Mississippi. The SCSEP funds will be subgranted to 9 Planning and Development Districts. The AAAs, which are housed with the PDDs, currently operate the SCSEP and are experienced in all aspects of the program.

The Grants and Contracts Department (GCD) within OGM is staffed with a Benefit Program Supervisor and five (5) staff, one (1) of whom is tasked 63% of her time to SCSEP. The GCD is listed on the MDES Organizational Chart as a subunit of the Office of Grant Management, which answers directly to the agency's COO/Deputy Executive Director of External Relations. This office of six (6) staff serves as fiscal and programmatic liaisons to the four Local Workforce Development Areas and to other WIOA subgrantees. As liaisons, they provide technical assistance on all financial, programmatic, and performance issues.

The OGM Director, who also has twelve (12) years' experience implementing SCSEP, will spend approximately five percent (2%) of his time; the Benefit Program Supervisor, approximately ten percent (5%) of her time; the Benefit Program Specialist III will devote approximately ninety percent (63%) of her time to the grant. The OGM Data

Validation / Program Oversight staff will assign approximately ten percent (5%) of her time to the grant, and the fiscal oversight staff person, approximately ten percent (5%) of his time.

*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;*

Subgrantees/Area Agencies on Aging (AAAs) at the PDDs have administered the Senior Community Service Employment Program (SCSEP) since its inception in Mississippi. The AAAs are assigned chief responsibility for planning, coordinating, developing, and pooling resources to assure the availability and provision of a comprehensive range of services at the substate level to enhance project administration and overall accountability. The names and locations of the nine PDDs, the counties they serve, and the number of authorized positions for which they are responsible, are shown in the 2023 County Slots by PDD Chart.

The attached Mississippi AAA Map & Contacts document includes the locations of the 9 subgrantees (Appendix I8B).

*C. describe training that will be provided to local staff;*

Meetings among the state, national grantees, and subgrantees will be held on a regular basis, either in person or using electronic means such as conference calls and webinars. As issues warrant, MDES will meet with subgrantees on an individual basis by phone or during site visits, monitoring visits, or data validation visits.

Topics may include:

- Data entry review prior to close date for reports
  
- Quarterly reports
- Reports reviewed
  
- Reports discussed by SCSEP managers

*D. describe how projects will be monitored for program and financial compliance, including audit plans; and*

MDES complies with the monitoring requirements of the Uniform Administrative Requirements for Federal Grants at 2 CFR 200.327 - 332 and the audit requirements at 2 CFR 200.500 - 520. MDES monitors its subrecipients annually through a contract with an independent monitoring firm and requires audits from those who meet the \$750,000 threshold for annual federal expenses. We also follow our agency's WIOA Programmatic and Fiscal Monitoring policy - Policy #8, Revision 3, and require the PDDs to monitor their host agencies and subcontractors. (Appendix I1C).

*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.*

The state manages our providers by monthly review of expenditures and quarterly review of SCSEP Reports as well as through monitoring, technical assistance, and training. The state currently does not plan to identify new providers to serve the state since the AAAs are the primary provider of other services to the aging community and have established contacts and rapport in the community. If the need arises to defund or replace a local provider, the state will do so in consultation with our Federal Project Officer and other USDOL SCSEP staff.

*2. Recruitment: describe how the grantee will recruit and the selection of participants will be achieved. The eligibility of participants is described under 20 CFR 641.500 and 641.525.*

Recruitment and selection of participants is performed by the Area Agency on Aging staff at the PDDs or by their subcontractors. MDES monitors the local projects' ability to meet their staffing needs and avoid vacancies by monthly review of the expense reports, and quarterly through the GPMS performance reports. MDES also reviews eligibility determination in its annual monitoring of the PDDs/AAAs.

*3. Income Eligibility: describe how participant income will be recertified each year, including where eligibility records will be maintained.*

The PDDs/AAAs are required to recertify each participant annually to verify income eligibility. This process is verified by the State through annual monitoring and data validation. Eligibility records are kept in the participant records at the PDD offices.

*4. Orientation: describe the orientation procedures for:*

*A. Participants*

Before a participant begins the community service assignment, the host agency must provide an assignment related orientation including but not limited to the host agency background and purpose, the community service(s) it provides, agency personnel policies and procedures related to work hours, time and attendance, and work performance expectations.

A Safety Procedures Consultation must also be included in the orientation if it has not already been done with the participant, including: the location(s) and use of fire extinguishers and alarms; the posted designated route(s) of escape in event of a fire; the participant's role, if any, in an emergency; and a review of all other disaster action plans for the agency.

The participant signs a Certification of Orientation stating that they have completed orientation with the host agency. This document is retained in the participant file.

*B. Host Agencies*

Host agencies are provided orientation by the PDD and sign an acknowledgement of Orientation. The most recent modification to the Host Agency Handbook includes a host agency acknowledgement in which the host agency supervisor states that he has received, read, understood, and agreed to follow the program requirements stated in the SCSEP host agency handbook.

This agreement reinforces the supervisor's understanding of the SCSEP as a training program as well as the supervisor's responsibility to cooperate with all job development efforts made on the participant's behalf.

*1. 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.*

MDES has chosen to adhere to the program-required Duration Limit of 48 months as provided in 20 CFR 641.570 (a) and not to allow waiver of the limit as allowed in 641.570 (b). The Mississippi Individual Durational Limit Policy is attached as Appendix I8E.

*2. 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).*

**Mississippi Works and Skill Gap Analysis.**

Mississippi Works is a smartphone app and web-based job resource provided by MDES where employers and job seekers connect. The connection is driven by the ability of job seekers to match experience and qualifications to employer needs. Mississippi Works can be a valuable tool for seniors and SCSEP staff to identify participant skill gaps and training needs.

Labor market studies show that the largest share of future employment opportunities will be middle-skill jobs. Middle-skill jobs account for 69 percent of Mississippi's labor market but only 37 percent of the state's workers are trained to a middle skill level, thus creating a gap. In program year 2013, Mississippi Works added a gap analysis tool to help workers make informed decisions on career choices and training needs. The Mississippi Works is easy to use. The user simply creates a profile and begins the job search; this launches the gap analysis tool.

After clicking on a recommended job, a question arises for the job seeker: "How do I measure up?" The user needs some means of figuring out how his or her credentials measure up to the job's requirements. Here is where real-time gap analysis comes into play. If the job originated in Mississippi Works, the system asks employers explicitly what



skills, what level of education, and what kinds of experience are required for the candidate to have the best chance to be hired. The system then compares the job seeker's credentials against the credentials required by the employer. In the case of jobs that might be taken from an external labor exchange or other sources, Mississippi Works has a statistical library of career requirements enabling it to give best estimates to the job seeker based on a survey of job seekers in the particular career area.

Mississippi Works and its skill gap analysis abilities can provide SCSEP participants and counselors with a powerful tool that can guide the participants' individual training decisions and improve their IEPs. MDES will inform our subgrantees and the national grantees about this new system and provide training for it, as needed.

*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;*

*B. the extent to which participants will be placed in the administration of the project itself;*

*C. the types of host agencies used and the procedures and criteria for selecting the assignments;*

*D. the average number of hours in a participant's training week;*

*E. the fringe benefits offered (if any); and*

*F. procedures for ensuring adequate supervision.*

#### **Training Positions Available at Host Agencies.**

- Telephone Operator
- Janitorial
- Administrative Assistant
- Landscaping
- Homemaker
- Food Preparation
- Maintenance
- Outreach/Referral
- Recreation/Senior Center
- Nutrition Program
- Education, Training, and Library
- Healthcare
- Retail and Sales
- Transportation

#### **Skill Training Offerings.**

- Computer Training
- Heavy Equipment Training
- Custodial
- Clerical
- Telephone skills
- Adult Basic Education
- Record Keeping

#### **Training Linkages Negotiated with the One-Stop.**

- Resume writing classes
- Interviewing Skills

- Word Processing Instruction
- Typing Classes
- Conflict Resolution
- Job Search Assistance
- Labor Market Information

### **Ensuring Community Services Assignments Provide Skill Training that Meets the Needs of Participants and Employers: A Collaborative Effort.**

The state and national grantees will follow the SCSEP regulations that require participants to be assessed to determine the most suitable employment and community service assignment. They will also require that case managers conduct reassessments every six months to develop and amend IEPs and to ensure that the training the participants receive at the host agency provides the skills training necessary to secure unsubsidized employment in the fields that support the local economy. Additionally, the state will host a collaborative meeting with the national grantees, LWIBs, and host agencies to ensure that community service assignments are truly providing skill training that meets the needs of both participants and employers.

The USDOL Grantee Performance Management System (GPMS) data collection system generates management reports that allow grantees to track performance. The GPMS reporting system generates reports on the types of host agencies that allow SCSEP managers to track the types of host agencies used to provide training to participants to ensure that the training participants receive meets the needs of the participant and the employers.

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.

#### **Classroom Training.**

Older workers are willing and sometimes eager to update their skills. However, structured training can cause anxiety and fear of failure in older workers. To reduce anxiety, SCSEP managers provide participants with studying tips, shorter hours of training, and assurance that the training is hands-on. Training will be coordinated with WIN Job Centers, local community colleges, SCSEP education meetings and libraries.

#### **Other Training Opportunities.**

SCSEP participants will also be prepared for unsubsidized employment through training that is in addition to their community service assignments. SCSEP Managers assist participants to identify other training opportunities based on their Individual Employment Plans.

Other training opportunities may include:

- lectures;
- seminars;
- classroom instruction;
- individual instruction;
- private sector on-the-job experiences; and,
- work experience.

#### **Strategies for Improving Training Opportunities.**

Stressing the need for participant training to all levels of the SCSEP service delivery system – grantees, sub-grantees, host agencies, and participants – will keep this vitally important aspect of the program at the forefront of SCSEP in Mississippi. To this end, we will work with our partners to provide information on free, reduced price, and partner-funded training resources that can be utilized by our service providers, host agencies, and our participants to further

the skills and abilities of our participants. Utilizing Mississippi Works and its skill gap analysis tool can help simplify this process.

Mississippi's network of WIN Job Centers is the centerpiece of the Mississippi workforce system. These centers provide easy access to employment services such as education and training for workers, human resource assistance for businesses and information for economic developers. MDES will provide information to the national grantees and to our sub-grantees regarding which WIN Job Centers offer onsite training classes. MDES will also coordinate the development of computer training classes geared specifically to the needs of our seniors, many of whom may be computer illiterate and fearful of learning new technologies.

MDES continues to encourage training to address literacy skills among participants when needed. For participants that are interested in completing their high school equivalency, SCSEP partners with the Adult Education program administered by the Mississippi Community College Board (MCCB). The Adult Education program is designed to offer opportunities to enhance the skills and abilities of individuals preparing for the workforce. A link to Adult Education information at the MCCB website will be provided on our website.

MDES has redesigned our agency website and added a section providing information on SCSEP in Mississippi for participants, our SCSEP partners, and the public. Included on the site is information on what SCSEP offers to the senior population, who qualifies for the program, and the benefits of being a host agency in the program. Future upgrades to the website would include information on the training options for our participants to inform our host agencies and partners about what classes and programs are offered, where and when the trainings are offered, and which entities are providing the classes.

**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).**

Supportive services are available to participants and may include but are not limited to counseling in areas such as health, nutrition, and Medicare benefits, etc.; supportive services may also include work shoes, badges, or eyeglasses; in addition, transportation to training or the worksite may be paid for if no other source of payment is available.

All participant supportive services are dependent upon funding and must be pre-approved by the SCSEP staff. The need for supportive services will be identified in the original IEP if possible or the plan will be updated once the need for a specific supportive service is identified. Requests for supportive services must be made in writing or by email and must include the approximate cost of the service. Written approval (letter or fax) or an email approving the supportive service will be sent prior to the service being provided.

**10. Termination: describe procedures for terminating a participant, including IEP terminations. Please provide a copy of the current termination procedures.**

The SCSEP Termination Policy sets forth the state's procedures for termination of participants in the SCSEP based on the guidance set forth in the Older Americans Act Amendments of 2006 and the SCSEP Final Rule. The policy is provided in Appendix I8C.

**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.**

The SCSEP Programmatic Grievances Policy and the SCSEP Equal Opportunity Discrimination Policy set forth the state's procedures for grievances or complaints alleging violations of the requirements of the Older Americans Act of 1965 (OAA) from participants and other interested or affected parties based on the guidance set forth at OAA sections 306(a)(1) and 307(a)(5)(b) and 20 CFR, 641.910. These policies are provided in Appendix I8D.

**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.**

The processes described at c.4.A. regarding equitable distribution are used by the state and national grantees to balance slot imbalances statewide. The state grant staff also interact at least monthly with the nine PDDs to ensure

that vacant slots are filled timely and that over-enrollments are limited. This proactive management helps maximize service to area seniors, expenditures, and performance requirements.

*Employment By Industry*

Industry Sector	July 2017	June 2021	Number Change	Percent Change
Professional and business services	97,956	104,144	6,188	6.3%
Construction	43,630	44,872	1,242	2.8%
Trade, transportation, and utilities	225,678	228,557	2,879	1.3%
Education and health services	278,041	277,151	-890	-0.3%
Other services	32,449	32,323	-126	-0.4%
Manufacturing	143,904	142,628	-1,276	-0.9%
Utilities	9,601	9,374	-227	-2.4%
Public Administration	72,534	70,378	-2,156	-3.0%
Financial Activities	44,000	42,343	-1,657	-3.8%
Leisure and hospitality	140,486	130,256	-10,230	-7.3%
Natural Resources	16,583	14,614	-1,969	-11.9%
Information	12,913	10,500	-2,413	-18.7%
<b>Totals</b>	<b>1,117,775</b>	<b>1,107,140</b>	<b>-10,635</b>	<b>-1.0%</b>

Source: U.S. Bureau of Labor Statistics, 2021.

The charts below indicate that Mississippi is losing certain population groups while the population of those over 55 years of age is growing. The total population over 55 from the 2019 American Community Survey was 843,912 and will increase to 926,313 by 2030.

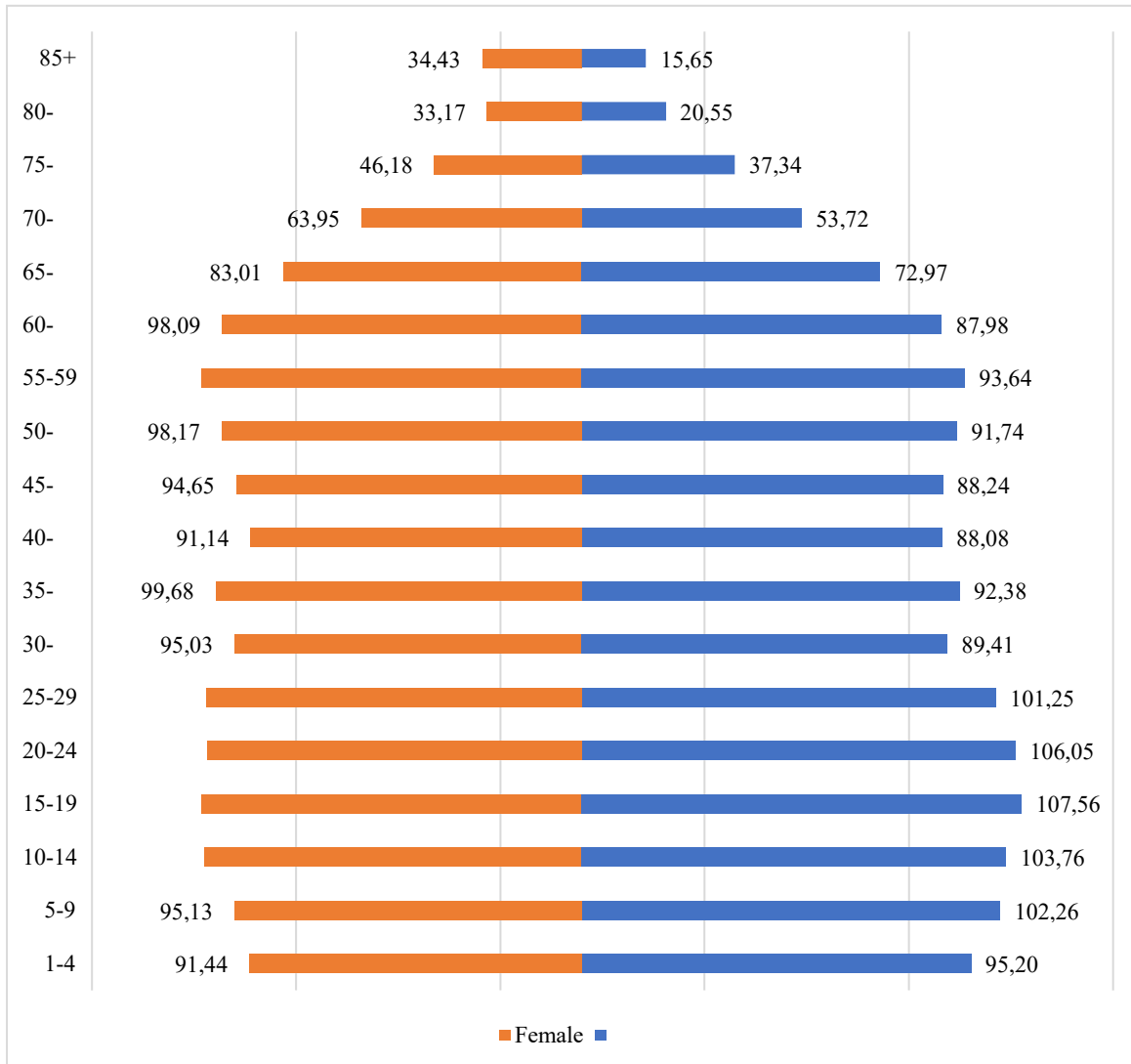
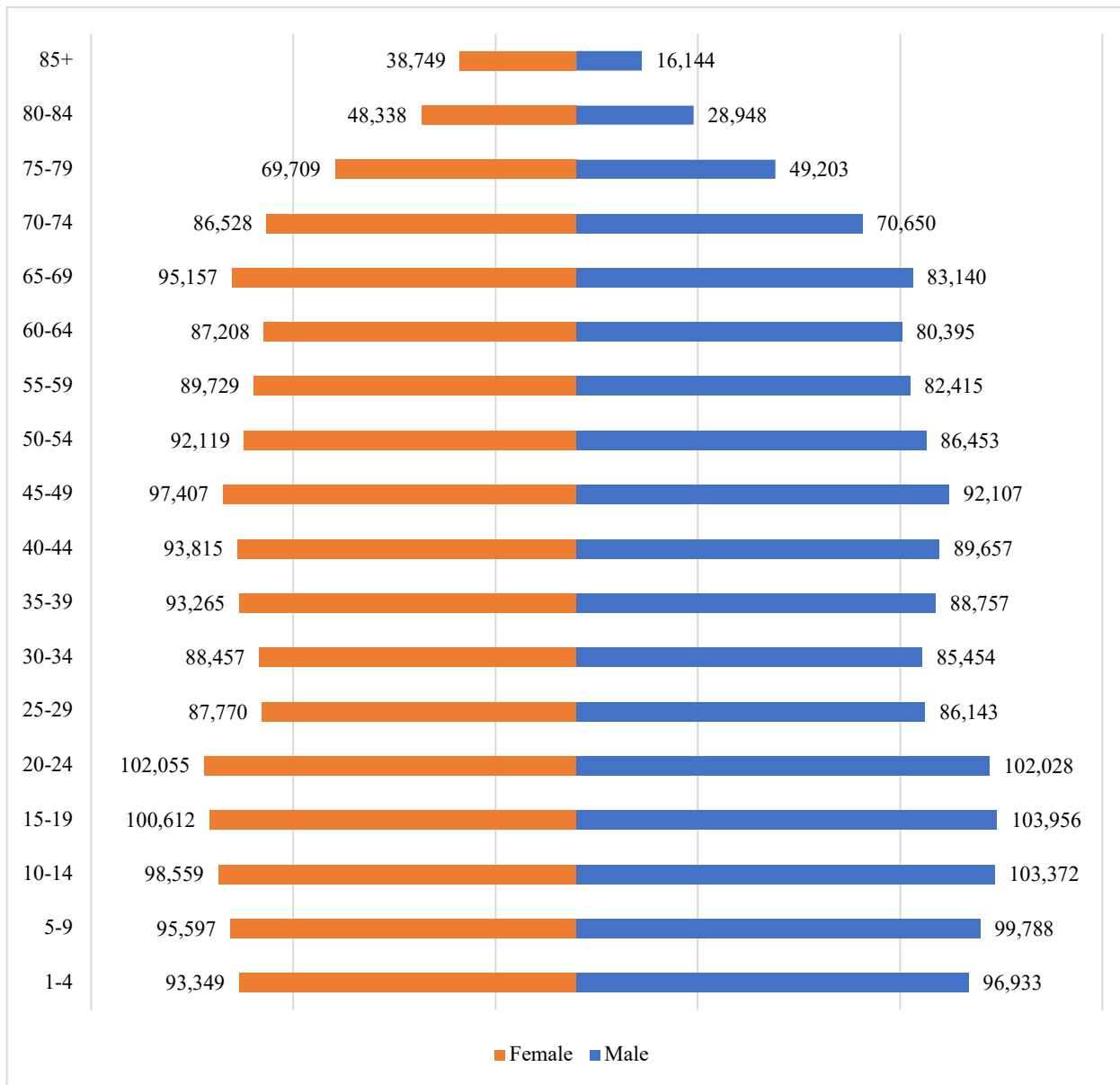


Figure 28: Projected Population by Age and Sex, 2030



Source: University of Virginia Weldon Cooper Center, Demographics Research Group. (2018). National Population Projections. Retrieved from <https://demographics.coopercenter.org/national-population-projections>.

Individuals with Disabilities make up the following percentages in Mississippi:

*Table 34: Disability Status of The Civilian Noninstitutionalized Population*

	Total	Total With a Disability	Percentage With a Disability
Civilian Noninstitutionalized Population (CNP)	2,916,886	478,427	16.4%
Under 18 years old	711,219	34,983	4.9%
18 to 64 years old	1,757,974	258,316	14.7%
65 years old and over	447,693	185,128	41.4%

Source: U.S. Census Bureau, American Community Survey, 2015-2019 5-Year Estimates.

Data from the 2019 5-Year American Community Survey also indicate that:

- Among Mississippians age 55 and older, 12.7 percent are veterans
- 52.1 percent of the overall population of Mississippi live in non-metropolitan counties;
- 1.6 percent of Mississippians speak English less than “very well”;
- Of the total population in Mississippi:
  - White: 58.4 percent
  - Black or African American number: 37.7 percent
  - American Indian and Alaska Native number: 0.5 percent
  - Asian number: 1.0 percent
  - Native Hawaiian or Pacific Islander number: less than 0.1 percent,
  - Some other race number: 1.0 percent,
  - Two or more races number: 1.4 percent.

Educational attainment statistics from the 2019 census are only available for the total population over 25, not specifically for those over 55, but show the following:

*Table 35: Educational Attainment Statistics*

	Total	Percentage of Population over 25
Population 25 years and over	1,975,670	-
Less than 12th grade, no diploma	306,105	15.5%
High school graduate (includes equivalency)	601,355	30.4%
Some college or associate degree	633,057	32.0%
Bachelor's degree	269,736	13.7%
Graduate or professional degree	165,417	8.4%
Percent high school graduate or higher	1,669,565	84.5%
Percent bachelor's degree or higher	435,153	22.0%

Source: U.S. Census Bureau, American Community Survey, 2015-2019 5-Year Estimates.

### *A. 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))

In July 1, 2012, the Mississippi Department of Employment Security (MDES) was designated as the SCSEP State Grantee. Since MDES is the state agency that operates the state workforce system, coordination of SCSEP with other workforce programs in the state should increase greatly.

#### **Coordination with State’s Title I Workforce Innovation and Opportunity Act (WIOA) Activities.**

MDES is the agency that oversees WIOA in Mississippi. MDES staff members are liaisons to the Local Workforce Development Areas and track the use of WIOA funding. WIOA in Mississippi and the LWDA are important partners to SCSEP. The SCSEP Managers rely on MDES and the LWDA for labor market information, training, and job search assistance.

SCSEP participants register with the WIN Job Centers (American Job Centers) to research the available jobs in their area and jobs of interest to them. Participant training plans are based on the employment opportunities for which they are interested. Employment specific training is usually coordinated through the WIOA course offerings.

Coordination with Title I WIOA is further enhanced through the WIN Job Centers' option to participate as host agencies. Placing participants in the WIN Job Centers serves many purposes such as:



- having a senior on site provides a more comfortable setting, thereby attracting other seniors;
- provides an opportunity for the older worker to network with potential businesses and locate unsubsidized employment;
- provides an opportunity for the older work to recruit eligible individuals into the SCSEP program;and,
- provides an opportunity to research jobs regularly.

**B. Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))**

The U.S. Department of Labor provides funds to operate SCSEP to States and other national sponsor organizations. Governor Reeves has designated the Mississippi Department of Employment Security as the State SCSEP Grantee. Currently, MDES subgrants funds to the ten Planning and Development Areas for the administration of the SCSEP. In Mississippi, the Area Agencies on Aging are subordinate agencies within the nonprofit economic development organizations known as Planning and Development Districts. The Area Agencies on Aging are experienced providers of services for the senior population. Currently, the AAAs operate SCSEP in 9 of the 10 PDDs and the Workforce Division operates SCSEP in Southern MS PDD.

Activities Carried out Under Other Titles of the Older Americans Act:

- **Transportation.**

Transportation is offered to older adults as an option to assist in continuing their independence. SCSEP participants that cannot drive may take advantage of the local Area Agency on Aging transportation services. The state and National Grantees target transportation providers with a goal of benefiting SCSEP participants interested in training with the transportation providers acting in a host agency capacity.

- **Nutrition.**

The Nutrition Program serves a dual purpose; it provides a well-balanced meal for SCSEP participants, and it provides host agencies that train participants at their congregate meal sites. Training at the Nutrition Program congregate meal sites offers skills training in food handling and preparation, management skills, and recreation development. SCSEP Managers' goals are to continue partnering with the Nutrition Program congregate meal sites as host agency sites.

- **Aging and Disability Resource Center.**

The state and National Grantees plan to partner with the Aging and Disability Resource Center (ADRC), an online database of resources. The Aging and Disability Resource Center Program (ADRC), a collaborative effort of AoA and the Centers for Medicare & Medicaid Services (CMS), is designed to streamline access to long-term care. The ADRC program provides states with an opportunity to effectively integrate the full range of long-term supports and services into a single, coordinated system. The ADRC provides a single entry-point for resources that can assist SCSEP participants to meet their personal and family needs. Additionally, the ADRC will identify eligible participants for SCSEP.

- **Adult Day Care.**

The Adult Day Care program is beneficial for the SCSEP participants that are also caregivers. The Adult Day Care program allows participants to continue training at host agencies with the reassurance their family member is taken care of. The state and National Grantees also benefit from the Adult Day Care Program in a host agency capacity. Certified Nursing Assistants(CNA) are needed in Adult Day Care centers; CNA Training is an opportunity for participants interested in furthering their careers or entering the medical field.

- **Family Caregiver Support Program.**

The Family Caregiver Support Program provides information about services, assistance in gaining access to services, counseling, respite care, and supplemental services to complement the care provided by the caregivers. The program can support the needs of SCSEP participants that are caregivers needing to be trained for unsubsidized employment.

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))

### **National Sponsors**

Mississippi has three (3) national sponsor organizations operating SCSEP. The following is a list of the national sponsors and the contact person for each of those agencies.

National Caucus and Council on Black  
Aged, Inc. Chester A. Johnson, Program  
Manager  
Post Office Box  
545 Cleveland,  
MS 38732  
(662) 846-6992

Email: [cjohnson@myncba.com](mailto:cjohnson@myncba.com)

Center for Workforce Inclusion

Joshua Wadsworth, National SCSEP  
Director 8403 Colesville Road, Suite 200

Silver Spring, MD 20910  
[jwadsworth@workforceinclusion.org](mailto:jwadsworth@workforceinclusion.org)  
[www.centerforworkforceinclusion.org](http://www.centerforworkforceinclusion.org)

Institute for Indian Development, Inc.

Garilyn Ward, SCSEP National Program Director

991 Grand Caillou Road Houma, Louisiana 70363-  
5705 (985) 851-5408 Phone/Fax

[gward@itcla.com](mailto:gward@itcla.com)

### **Service Organizations and Community Based Organizations**

The state's subgrantees, the PDDs, through the AAAs, utilize the services of or directly contract with the service organizations that serve the aging population, such as elder abuse prevention services, legal services, and transportation services. Many of these services are provided by community-based organizations. Due to these relationships, AAA and PDD staff members remain in constant contact with the service provider staff from which participant and host agency referrals are made. SCSEP managers, through the AAAs, work with homemakers, transportation, nutrition providers, and community action organizations. Service providers and community action agencies are invited to the public hearings held annually to discuss aging programs, including SCSEP.

Collaboration with Other Public and Private Entities and Programs that Provide Services to Older Americans

### **Community Based Organizations.**

The state subgrants SCSEP to the 10 PDDs in the state; the PDDs/AAAs have a direct contractual relationship with community-based organizations as service providers. Local community action agencies work closely with the state grantee to collaborate on SCSEP.

## **Transportation Programs.**

Transportation providers are generally non-profit organizations that partner with AAAs. The rural nature of the state is compounded by the lack of an entity with mandated responsibility for providing transportation assistance to citizens in need. To combat transportation problems:

- the Mississippi Department of Transportation is actively involved in leading the United We Ride campaign in the state;
- the Planning and Development Districts either sponsor or closely partner with the Regional Transportation Councils.

### **a. 1. D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))**

## **Labor Market Effects on Employment Opportunities and Host Agencies.**

Employment opportunities for SCSEP participants vary greatly based on the jobs available in the local labor market. Data on the local jobs, such as type, availability, and potential growth should determine the types of host agencies and the how many are needed to support SCSEP participant training. Also, each SCSEP participant's Individual Employment Plan is developed based on the skills needed for the available jobs in the region and should guide the training he or she receives. The labor market data needed to drive these decisions comes from the MDES Labor Market Information unit and is provided in partnership with the LWDBs through board meetings, conferences, the Workforce Innovation and Opportunity Act State Plan, and local WIN Job Centers.

## **Collaboration with Other Labor Market and Job Training Initiatives.**

MDES is the State Grantee for SCSEP and developed the 5-Year SCSEP State Plan. MDES is also the designated state workforce agency, and as such, provided Governor Phil Bryant's WIOA Combined State Plan to the US Department of Labor for WIOA, Wagner-Peyser, and other DOL-funded workforce programs. The combined plan is centered on an effective and efficient state workforce development system that meets the demands of Mississippi's businesses and job seekers by creating a Work-Ready Mississippi. This system will integrate state and local resources to create a seamless system to serve the business community and the individuals who use the system. The SCSEP plan will coordinate with, support, and benefit from the WIOA Combined State Plan and the Governor's workforce initiatives.

The Combined State Plan will guide the strategic and operational workforce planning for state agencies. The priorities include providing an attractive economic climate for current and emerging industries that foster economic opportunity, job creation, capital investment and infrastructure development by developing a well-trained, educated, and productive workforce. The initial emphasis will be placed on growth sectors, Healthcare, Advanced Manufacturing, and Energy, which were the focus of important pieces of legislation passed in the 2012 legislative session.

Mississippi passed the Mississippi Health Care Industry Zone Act that expands the healthcare industry. This law advocates centralizing health care and encouraging healthcare-related businesses to create high-paying jobs and to locate within qualified Health Care Zones. Businesses that create jobs in the research, development, manufacturing or processing of pharmaceuticals, biologics, biotechnology, medical supplies and medical equipment, diagnostic imaging and other shared services would be eligible for incentives.

As Mississippi's population ages, the need for quality, accessible medical care will increase. This increase in need for medical care will require an increase in the number of healthcare jobs, as evidenced by the national growth in this sector of twenty-one percent between 2001 and 2010. Mississippi jobs in healthcare pay 40 percent more than the statewide average. This is an area in which older Mississippians can be placed in unsubsidized employment after SCSEP job training.

At the heart of Mississippi's economy are our existing businesses and industries. Developing a workforce for the growth and sustainability of Mississippi businesses large and small - from tourism on the Mississippi Blues Trail to the high tech and advanced manufacturing of military drones - must remain a priority. The vision is simple: to help our state attract, keep, and grow businesses that create good jobs.

Mississippi understands that our economic growth is dependent on a comprehensive statewide workforce system that integrates education, industry, employment and economic development into a unified enterprise with a shared vision and common goal. This system is employer-focused and demand-driven. The growth of high wage employment is dependent upon Mississippi having a trained workforce, a continued supply of skilled Mississippians who are ready, willing, and able to fill jobs, regardless of their age.

Mississippi has identified five keys to meet the shortage a high-quality workforce:

- A high-quality education for all citizens is a key tenet of competitiveness that makes Mississippi an attractive place to create, locate and grow a business;
- High wage jobs must be filled by highly skilled workers possessing the appropriate skills to do the job and further business growth. Unfilled job positions are wasted opportunities in the short- and long-term causing employers to look outside Mississippi for talent;
- An information system that supports data-driven planning and decision making for state and local workforce stakeholders;
- An increase in post-secondary credentials and certifications that help jobseekers access the high-skill, high-growth jobs of the future; and
- A pipeline for workforce development must be advanced through strategic partnerships with a common vision among K-12, community colleges, universities, state agencies and other stakeholders devoted to workforce training and retraining.

Each of these five keys is as critical in helping seniors fill a part of the shortage in skilled workforce as they are for other workers.

### **Leveraging Resources from Key Partners to Support SCSEP.**

PDDs work with community colleges to provide training to SCSEP participants at a reduced cost; many provide tuition waivers for SCSEP participants. Community colleges are an integral component of the WIOA programs offered through the WIN Job Centers. SCSEP participants are encouraged to dual enroll in WIOA with the WIN Job Centers for job search assistance and training classes.

[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. \(20 CFR 641.335\)](#)

### **Infrastructure Funding Agreements.**

Each PDD is required in their subgrant with the state to negotiate with a local WIN Job Center (WJC) to ensure SCSEP's required partner presence in the center. Each PDD entered into a Memorandum of Understanding (MOU) with the WJC and negotiated payment for space used and provided a copy of the MOU and the basis for the cost to MDES. Funds in the amount of that cost basis are included in the PY19 SCSEP allocations for estimated cost for the space, and the PDDs include these costs in their budget narratives submitted to MDES.

### **Collaboration with State Vocational Rehabilitation.**

The Mississippi Department of Rehabilitation Services, like SCSEP, is a required partner in the WIOA programs. SCSEP and Vocational Rehabilitation will collaborate with the WIN Job Centers for employment assistance for older individuals with disabilities.

### **Collaboration with Adult Education and Literacy Providers.**

SCSEP participants complete an initial assessment upon entrance into the program to determine their employment plan. For participants that are interested in completing their High School Equivalency Diploma (HSE), SCSEP partners with the Adult Education program administered by the Mississippi Community College Board. The Adult Education program is designed to offer opportunities to enhance the skills and abilities of individuals preparing for the workforce. SCSEP

participants are encouraged to prepare themselves in the areas of math, reading, writing, communication, and computer skills to become employment ready. The Adult Education program provides assistance in developing these skills based on the individual's skilllevel and learning capacity.

The Adult Education program is available statewide through community colleges, public schools, and other resources. SCSEPParticipants can test at any of the available high school equivalency sites across the state.

### **Collaboration with Education and Training Providers.**

The SCSEP program collaborates with the WIN System to offer SCSEP participants access to training using Individual Training Accounts (ITAs) through the state's Eligible Training Provider System. Available courses include, but are not limitedto:

- Accounting;
- Administrative Services;
- Animal Husbandry;
- Auto Mechanics;
- Banking and Finance;
- Building Maintenance;
- Clerical;
- Computer;
- Data Word Processing;
- Forestry;
- Health Services;
- Industrial;
- Landscaping;
- Manicuring;
- Medical Coding;
- Pharmacy Tech;
- Retail Sales;
- Teacher Assistant; and,
- Welding.

### **F. Efforts to work with local economic development offices in rural locations.**

#### **Local Governments.**

PDDs are also directly linked to the economic development of the region and receive funds from local cities, counties and local governments. PDDs have direct relationships with cities, counties and local governments; many are host agencies for SCSEPParticipants. The following are government agencies that SCSEP works with on an ongoing basis:

- Board of Supervisors;

- Cities;
- Towns;
- Libraries;
- Local Chambers of Commerce; and,
- State Chamber of Commerce.

SCSEP staff from all grantees and subgrantees will continue to foster these relationships to increase their participation as host agencies. These entities may potentially hire participants into unsubsidized employment.

### **Business Organizations.**

State subgrantees and their SCSEP managers work with business organizations such as the Mississippi Manufacturers Association and local chambers of commerce to develop job opportunities. They collaborate with Medicaid and regional transportation and economic assistance providers to access services to SCSEP participants in need. They also solicit advice and recommendations from support service organizations through public hearings and joint conferences.

### **Mississippi Chambers of Commerce.**

The mission of a Chamber of Commerce is to provide leadership in economic development activities, support existing businesses, attract new businesses, and promote civic, cultural, and recreational activities that improve the quality of life for businesses and residents. There are about one hundred (100) Chambers of Commerce in Mississippi.

### **Strategy for Collaborating with Chambers of Commerce.**

SCSEP Managers will contact the chambers to educate them on the benefits of hiring older workers. The mission of the chambers supports the goals of SCSEP; working together will strengthen the case for targeting older workers when meeting new and existing businesses. Additionally, the chambers will be avenues that SCSEP Managers can use to identify industry appropriate training opportunities for SCSEP participants interested in the local labor market opportunities.

### **Strategy for Seeking Advice and Recommendations.**

The state and national grantees will meet with the Chambers of Commerce at Workforce Development Board meetings, conferences, and individually to seek their advice and recommendation on improving SCSEP. The chambers can provide important information on the local economy and ensure that SCSEP Managers meet with and partner with existing and new businesses interested in hiring and/or training older workers. Partnering with chambers as host agencies and providing a SCSEP participant to train onsite brings recognition to SCSEP while providing valuable training to participants. Chambers of Commerce that are host agency sites provide skills training in clerical, phone skills, record keeping, etc.

### **Economic Development Agencies.**

Economic development is a focus on the state level as well as at the local community level. SCSEP grantees and subgrantees in the state will target economic development agencies for partnership opportunities.

### **Strategy for Collaborating with Economic Development Agencies.**

The state and national grantees will work with economic development agencies at the state and local level to network and educate on employment training opportunities for older workers that new and existing businesses can utilize to hire skilled older workers. Collaboration with the economic development agencies through the Mississippi Economic Development Council allows SCSEP a single point of entry to providing education on older workers to the more than 3,100 manufacturing entities that drive the state's economy. The Mississippi Economic Development Council organizes two conferences a year. SCSEP Managers will attend the conferences to network with businesses.

### **Strategy for Seeking Advice and Recommendations.**

The state and national grantees will network with the economic development agencies and attend their meetings and conferences. SCSEP Managers will present the benefits of hiring older workers at Local Workforce Development Board meetings and conferences, such as the Governor’s Conference on Workforce Development, to increase the entered employment rate for SCSEP participants. The state and national grantees will glean information from the economic development agencies on ways to improve participant’s individual employment plans to ensure that participants are receiving the training needed to be job ready in the industries that support our economy.

### **Labor Organizations.**

Labor unions for business organizations in Mississippi can assist SCSEP Managers by providing information for the design of individual employment plans for participants, as they best know the skills needed for worker safety and career advancement.

b. 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\(e\)\) \(May alternatively be discussed in the State strategies section of strategic plan.\)](#)

### **Strategy for Collaborating with Major Employers.**

The state and national grantees will target the major employers with an educational campaign to raise awareness of the benefits of hiring older workers. The goals are to increase the rate of entered employment of exited SCSEP participants and increase the number of higher paying jobs (with benefits) for SCSEP participants.

- **Strategy for Seeking Advice and Recommendations**

Seeking advice and recommendations from local businesses is beneficial to SCSEP. Businesses can provide information on the skills needed for employment to assist in the development of the SCSEP participant’s individual employment plan. Another possibility is to increase the number of On-the-Job Training contracts that SCSEP managers can enter into with businesses to ensure that SCSEP participants received the training needed for hiring by the business. SCSEP managers will attend job fairs and will require all participants to attend as part of their training.

- **Engaging and Developing Partnerships with Businesses.**

The state and national grantee SCSEP managers will coordinate with the LWDBs to show businesses the benefits of hiring older workers. Older workers in general have low turnover rates, are flexible and open to change, are interested in learning new skills, have low absentee rates, have experience and knowledge, and are willing to work. Therefore, hiring older workers is a solution to the shortage of workers in the state.

SCSEP managers will work with the LWDBs to develop partnerships with businesses by utilizing recruitment efforts such as sending brochures and fact sheets on the older workers, sending letters to businesses outlining the benefits of older workers and following up with a presentation to the Human Resources Director and/or President, and where applicable recruit them to become a host agency. Developing partnerships with businesses creates the opportunity to share success stories from other businesses that hire older workers.

To increase partnerships with businesses, SCSEP managers are encouraged to:

- increase contacts with local businesses;
- promote On-the-Job Training contracts with businesses;
- make presentations to businesses; and,
- assist local businesses with training needs.

### **Retention Activities for Participants in Unsubsidized Employment.**

Once a SCSEP participant is trained and placed in unsubsidized employment, the SCSEP manager continues to follow the participant for one year to ensure he/she has the support needed to remain employed.

SCSEP participants in unsubsidized employment may need additional training and support to keep up with the demands of the changing workforce. Support will be provided in the form of tracking, counseling, and job development.

SCSEP managers will work with the LWDAs to educate businesses on how to retain older workers. Once businesses see the value older workers bring to their businesses, they will be looking for ideas to retain their older workers. SCSEP assists in restructuring jobs that help employees to maintain or advance their careers. Managers can educate businesses on the following strategies for creating a positive environment for older workers:

- **Flextime:** employees can begin and end their workday at varying times;
- **Job Sharing:** use two employees for one job position;
- **Part-time Position:** older workers may be looking for 20-30 hours a week;
- **Consulting:** older workers may prefer to work in a consultant role;
- **Compressed Work Week:** work longer hours, but fewer days; and,
- **Telecommuting:** working from home.

**b. 3. The State’s long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))**

The State subgrants to the Planning and Development Districts since their AAAs are the primary provider of other services to the aging community and have established contacts and rapport in the community. The PDDs should collaborate with the WIN Job Centers and other workforce system partners to provide outreach services to minority populations.

MDES provides the required Equitable Distribution (ED) report and Minority Report to USDOL annually. MDES will continue to use both the ED and the Minority Report to guide the PDDs as they provide SCSEP services and to advise the national grantees that operate the program in the state.

**b. 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)**

**Process Implemented to Identify Community Service Needs.**

MDES will work with the national grantees and the 10 PDDs to collect information on the participants, services, and skills needs of the businesses in the area that each serves. Identifying gaps between the participants, the skill requirements, and the services provided will guide decisions on targeted recruitment, training, host agency assignments, and recruitment of businesses willing to hire seniors into unsubsidized training.

The industry makeup of the state varies by region. The Delta region of the state is predominately agricultural with a secondary gaming and tourism emphasis; the northeastern region is industrial; the west-central region is mixed with agriculture, manufacturing, and professional, with a recent growth in oil production; and the southern region is agricultural, gaming and tourism, and industrial. Due to the variety of industries in the state, SCSEP managers will continue to work with the local WIN Job Centers and other stakeholders to identify local community service needs and obtain recommendations on how SCSEP participants can bridge those gaps. Individual Employment Plans will be tailored to meet the needs of the participants and the community service assignments.

**Timeline for Identifying and Recruiting Host Agencies to Meet Community Service Needs.**

State and national grantees, with the assistance of the LWDAs, will identify non-profits and government organizations as potential host agencies for a resource list. The resource list will guide the SCSEP managers in their attempts to recruit host agencies to train SCSEP participants. The USDOL data collection system will assist SCSEP managers to track the types of host agencies using the host agency management reports. The state and national grantees will increase the number of host agencies every program year to meet the needs of participants.



b. 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))

Since the Mississippi Department of Employment Security (MDES) was designated as the State Grantee as of July 1, 2012, coordination with other workforce programs in the state has greatly increased. The division of MDES that has direct oversight of the SCSEP also provides direct fiscal and programmatic support for WIOA to the state's four Local Workforce Development Areas.

### Improving SCSEP Services.

#### **Long-Term Strategy to Improve SCSEP Services.**

The State has implemented a WIOA Common Intake and Reporting System, known as the Hub”, that captures common participant information for the four core programs. The system aligns resources and generates automatic referrals among the core programs and partner programs such as SCSEP.

Using a no wrong door policy, all participants will develop an individualized success plan that coordinates the optimum blend of services and funding to achieve their goals for success. This success plan also indicates which of the pathways in the SmartStart Pathways Model to which the participant will be assigned. A connection to a career pathway must be included as part of an older worker’s individual service strategy or MS Smart Start Success plan. This model is an integrated compilation of programs and services intended to develop basic, technical and employability skills; provide continuous education and training; and work supports that lead to high-demand jobs in targeted sectors.

#### **Planned Changes in the Utilization of SCSEP Grantees and Program Operators.**

In PY2015, the State Grantee's largest subgrantee, Southern Mississippi Planning and Development District, moved its SCSEP staff from the Area Agency on Aging division to the Workforce Division. This puts SCSEP in this district under the direction of the Twin Districts Workforce Development Area. SMPDD is the SCSEP subgrantee of both the State subgrant and The Center for Workforce Inclusion (CWI), operating a total of 125 slots. SMPDD will use the Smart Start Pathways Model throughout its service area. CWI intends for all of its subgrantees to follow the lead of SMPDD and use Smart Start as the service model.

#### **Increased Frequency of Formal Collaboration Activities Among SCSEP Grantees.**

The state grantee will conduct training annually and provide ongoing Technical Assistance. The state is dedicated to increasing the number of collaborative activities and efforts in the state regarding the benefit of older workers. MDES will work collaboratively with its national grantee, 10 PDDs, and other partners to connect older workers with various programs.

#### **Development of Criteria for Selection of Subrecipients.**

The state grantee, in collaboration with USDOL, will develop more stringent criteria for the selection of sub-recipients. Subgrantees will be selected based on their ability to run SCSEP effectively, measured by performance measure results. The program is designed to develop economic self-sufficiency and promote useful opportunities in community service activities to increase the number of persons who may enjoy the benefits of unsubsidized employment in both the public and private sectors. A performance-driven selection process for sub granting SCSEP will ensure the program meets its performance measures.

#### **Opportunities to Share Best Practices Statewide.**

The state grantee will work with National Grantees to share best practices through regular contact including the annual Equitable Distribution Meeting. Working together statewide will ensure that SCSEP is serving the eligible and the target population effectively.

MDES will also coordinate with the National Council on Black Aging (NCBA) to assist and provide the following:

- Work together in collecting and sharing labor market information in any specific area to identify the skills areabusinesses require so that we can develop targeted recruitment of both the participants and host agencies.
- Remain in compliance with DOL equitable distribution of positions in the state. NCBA will work closely with thestate to ensure that the distribution always remains equitable.
- As a national administrator of the SCSEP program in Mississippi, NCBA has recognized and experienced the manychallenges presented by the rural nature of the state. NCBA will continue to work with the state to develop and implement plans to meet these challenges and help the participants gain unsubsidized employment.

b. 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))

**State’s Plan for Ensuring Goals are Achieved.**

SCSEP managers receive performance measures from the USDOL prior to the start of the Program Year. The 2006 amendments to the Older Americans Act section 513(a) mandates that SCSEP managers are given the opportunity to negotiatetheir performance measures based on state-specific data. Acceptable sources of data include but are not limited to: TANF; state unemployment rate; labor market information, and past performance.

The USDOL provides the SCSEP managers with management reports via the web-based data collection system known as SPARQ (SCSEP Performance And Results QPR). Management reports are produced quarterly to gauge progress towards performance measures. The USDOL has proposed significant changes to the SPARQ system for the upcoming year. The following management reports will be used by the state, national grantees, and SCSEP managers:

**Applicant**

- Pending
- Ineligible
- Eligible, Not Assigned or on Waiting List
- Waiting List Participants

**Current/Exited**

- Started Employment but Not Yet Achieved Entered Employment
- Achieved Entered Employment but Not Yet Achieved Retention
- Waiver of Durational Limit
- Participants Who Have Reached Durational Limit
- Participants With Approved Break(s)

**Follow-Ups**

- Pending
- Pending, Displayed by Month

**Actions**

Most In Need/Waiver Factor Actions

## **Host Agencies**

- Host Agencies
- Assignments by Host Agency

## **Employers**

- Unsubsidized Employers
- Placements by Employer

## **Meetings, trainings, and conference calls.**

Meetings among the state, national grantees, and subgrantees will be held on a regular basis, either in person or using electronic means such as conference calls and webinars. As issues warrant, MDES will meet with subgrantees on an individual basis by phone or during site visits, monitoring visits, or data validation visits. Topics may include:

- Data entry review prior to close date for reports
- Quarterly reports
- Reports reviewed
- Reports discussed by SCSEP Managers.

### *C. Location and Population Served, including Equitable Distribution*

1. A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

## **Current and Projected Employment Opportunities in the State.**

There has been a shift in the last two decades in the nation as a whole from an industrial to a service and knowledge-based economy. According to the U.S. Bureau of Labor Statistics, Mississippi has followed the national industrial trend with 36 percent of the workforce employed in service-oriented jobs. In the service industry, the largest sub-sectors include healthcare and social assistance followed by administrative and support services.

The economic priorities for Mississippi over the next four years and guidance from the SWIB will guide the strategic and operational workforce planning for state agencies. The priorities include providing an attractive economic climate for current and emerging industries that foster economic opportunity, job creation, capital investment and infrastructure development by developing a well-trained, educated, and productive workforce.

The initial emphasis will be placed on the three sectors in the Combined State Plan; Advanced Manufacturing, Healthcare and Energy, which were the focus of important pieces of legislation passed in the 2012 legislative session. Of equal importance is the retention and expansion of existing industries such as transportation and logistics, agribusiness, tourism; and defense and homeland security.

## **Employment Projections for High Growth Industries and Occupations.**

The state relies on labor market information disseminated by the MDES Labor Market Information division to ensure that SCSEP meets the local labor market demands. Labor market information shows that all industry sectors are in need of skilled workers, especially those that require the application of technology and knowledge such as automotive and health care professionals.

The SCSEP managers must emphasize the need to obtain skills through training at host agencies in order to generate quality job placements in high growth industries. Mississippi projects that over 1.2 million jobs are expected to be available in the next ten years. Increasing SCSEP job placements in the high growth areas will move Mississippi ahead.

## Industries and Occupations with Employment Opportunities for SCSEP participants.

Participants are encouraged to design their employment plan around the following industries most in need of skilled workers:

- service sector;
- healthcare;
- retail;
- food service;
- social assistance; and,
- education.

## Employment Histories and Skills Possessed by Eligible Individuals in the State.

Generally, SCSEP participants in Mississippi have very limited skills and work history; many are displaced homemakers or widows with limited work experience. Therefore, the state and national grantees must ensure that the SCSEP participant's Individual Employment Plan includes the skills training needed to locate unsubsidized employment upon exiting the program. Training may be attained at the host agency, the WIN Job Centers, community colleges, and at participant educational meetings.

Mississippi ranks last in educational attainment in the adult population, particularly older females. In the state, 15.59 percent of SCSEP participants have no high school degree, 41.34 percent have a high school degree or equivalent, and only 8.25 percent have a bachelor's degree or higher. A snapshot of the Mississippi SCSEP participant education, age, and wages from the SPARQ database follows:

*Table 36: Participant Education, Age, and Wages by Mississippi Grantee – PY 2020 Final*

	<b>IID</b>	<b>NCBA</b>	<b>SSA</b>	<b>MS</b>	<b>All Mississippi SCSEP</b>	
<b>Total</b>	45	248	247	101	641	100%
Educational Attainment						
<b>8th grade &amp; under</b>	11	5	2	3	21	3.27%
<b>9th grade - 11th grade</b>	8	40	27	4	79	12.32%
<b>High School diploma or equivalent</b>	22	106	92	45	265	41.34%
<b>1 - 3 years college</b>	3	70	79	31	183	28.54%
<b>Post-secondary Certificate</b>	0	4	2	0	6	0.93%
<b>Associate degree</b>	1	4	23	6	34	5.30%
<b>Bachelor's degree or equivalent</b>	0	18	15	8	41	6.39%
<b>Some graduate school</b>	0	0	3	1	4	0.62%
<b>Master's degree</b>	0	1	4	3	8	1.24%
<b>Doctoral degree</b>	0	0	0	0	0	0.00%

Age						
<b>55-64</b>	35	133	122	56	346	53.97%
<b>65+</b>	10	115	125	45	295	46.02%
Wages & Hours						
<b>Median Placement Wages</b>	\$10.00	\$9.00	\$9.49	\$9.18		
<b>Average Hours per Week</b>	35	27.5	30.4	22.7		

Source: SCSEP Quarterly Progress Report, ETA 5140, PY20 Final

c. 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.

This data is listed in the Program Year 2018 Equitable Distribution List by National and State Grantee with Counties (Provided in Appendix I8A).

c. 3. Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

The US Department of Labor has redistributed positions among The Center for Workforce Inclusion, National Caucus on Black Aged, the Institute for Indian Development, and the Department of Employment Security in order to serve the eligible population more equitably as indicated by the 2020 Census through the USDOL distribution process. In Mississippi, the state and national grantees agree that the distribution is currently equitable.

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.

The U.S. Department of Labor implemented revisions to the required Equitable Distribution Report. The four grantees provided their Grantee Reports to the USDOL and MDES compiled the information from the four into a Statewide Grant Report, which was also submitted to DOL on June 22, 2021. The state grantee will monitor distribution and service of the slots to ensure that all grantees are working to implement the action plans stated in the reports. We will also continue to monitor distribution of slots relative to demographic changes and will address any potential issues as they arise through communication with DOL.

B. Equitably serves rural and urban areas.

See answer above at c.4.A.

C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

See answer above at c.4.A.

c. 5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

See answer above at c.4.A.

6. The relative distribution of eligible individuals who:

A. Reside in urban and rural areas within the State

The State of Mississippi is a predominately rural state, with a large percentage of Mississippians living in rural counties. Access to transportation and limited numbers of host agencies in the most rural counties will continue to be a challenge that all SCSEP grantees must work together to overcome.

## **Inadequate Resources.**

The state and national grantees strive to serve both rural and urban areas of Mississippi equitably. In order to accomplish this, state and National Grantees must work together to overcome inadequate resources (limited employment prospects, few host agencies, lack of transportation, etc.).

## **Employment.**

The rural nature of the state combined with an agrarian-based economy makes it difficult to provide adequate unsubsidized placement opportunities. The number of jobs available is few and because public and mass transportation are not available, access to many of the existing jobs or employment opportunities can be problematic. In some instances, the cost of transportation and other job maintenance factors exceed the benefits of employment.

## **Host Agencies.**

The rural nature of the state also creates a shortage of host agencies. The state and national grantees operating in the state know the challenge of developing enough host agencies to rotate participants appropriately according to their individual employment plan. SCSEP managers will continue to partner with the LWDBs to assist in developing new business opportunities and to partner with new and existing non-profit organizations located in the state.

## **Transportation.**

Access to transportation continues to be a problem in areas outside of the metropolitan area of Jackson. To alleviate transportation concerns, the state grantees may reimburse participants for transportation costs only when travel is necessary for training, physical exams or enrollee meetings. If there is no public transportation available, and there are no other options, and if the participant could not otherwise participate in the program, transportation to and from host agency assignment may be reimbursed until another option is identified.

The state grantee will attempt to collaborate with other local agencies and resources to provide participant transportation at no cost or reduced cost whenever possible.

Additionally, flexible scheduling is encouraged to help participants reduce travel costs by training more hours on fewer days, providing the same community service assignment hours.

### *C. Specific Populations Groups.*

*The state and national grantees offer various recruitment and selection techniques in order to address Older Americans Act Section 518(b) as detailed below:*

OAA Section 518(b) defines priority individuals as those who qualify based on one or more of the following criteria:

- Are aged 65 years or older;
- Have a disability;
- Have limited English proficiency or low literacy skills;
- Reside in a rural area;
- Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act, 38 U.S.C. sec. 4215(a)(1);
- Have low employment prospects;
- Have failed to find employment after utilizing services provided under Title 1 of WIOA; or,
- Are homeless or at risk of homelessness.

Other populations identified in the statute are defined in OAA Section 503(a)(4)(C)(i)-(iv) as:

- Eligible individuals with the “greatest economic need” (as defined in 20 CFR 641.140);

- Eligible individuals who are minority individuals; and,
- Eligible individuals who are individuals with “greatest social need” (as defined in 20 CFR 641.140).

The LWDBs that oversee the workforce system in the state are key partners for both the state and national grantees in the state as they provide labor market information and economic data to assist grantees in developing new host agencies, educating employers on the benefits of hiring older workers, and providing job search assistance for SCSEP participants. The workforce system provides an additional avenue to recruit eligible individuals to participate in the SCSEP.

Additional recruitment activities include, but are not limited to, the following:

- attending job fairs;
- advertising in local newspapers and newsletters;
- referrals from exited participants, host agencies, faith-based organizations and local officials;
- running public service announcements;
- visiting local senior centers;
- partnering with organizations that serve aging and/or disabled adults;
- distributing brochures, flyers, posters and fact sheets throughout the state; and,
- partnering with the local WIN Job Centers.

#### B. Have the greatest economic need

See response included at c.6.A.

#### C. Are minorities

See response included at c.6.A.

#### D. Are Limited English Proficient

See response included at c.6.A.

#### E. Have the greatest social need. (20 CFR 641.325(b))

See response included at c.6.A.

*c. 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))*

The state and national grantees are dedicated to the avoidance of disruptions in the service to SCSEP participants. Mississippi’s state and national SCSEP grantees will follow the recommendation of the USDOL that when there is over-enrollment, for any reason, there will be a gradual shift that encourages current participants to move into unsubsidized employment to make positions available for eligible individuals in the areas that are underserved. Grantees understand that participants are not entitled to remain in a subsidized community service assignment indefinitely and will adhere to the time limits on a SCSEP community service assignment as detailed in the Older Americans Act.

SCSEP standards define the program requirements that state subgrantees must adhere to. Issued in March 2006, the standards address Designation of Service, slot movement, and time in training assignment

#### *d. 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;*

#### **A. Organizational Structure**

The Office of Grant management at MDES has day-to-day responsibilities for the administration and operation of the Workforce Innovation and Opportunity Act (WIOA) Title I and SCSEP in Mississippi. The SCSEP funds will be subgranted to 10 Planning and Development Districts. The AAAs, which are housed with the PDDs, currently operate the SCSEP and are experienced in all aspects of the program.

The Grants and Contracts Department (GCD) within OGM, is staffed with an ES-Employment Manager IV and five (5) staff, one (1) of whom is tasked 90% of her time to SCSEP. The GCD is listed on the MDES Organizational Chart as one (1) of two (2) subunits of the Office of Grant Management, which answers directly to the agency's COO/Deputy Executive Director of External Relations. This department of six (6) staff serves as fiscal and programmatic liaisons to the four Local Workforce Development Areas and to other WIOA subgrantees. As liaisons, they provide technical assistance on all financial, programmatic, and performance issues.

The OGM Director, who also has nine (9) years' experience implementing SCSEP, will spend approximately five percent (5%) of his time; the GCD ES-Employment Manager IV, approximately ten percent (10%) of her time; the ES Technical Specialist II will devote approximately ninety percent (90%) of her time to the grant. The OGM Data Validation / Program Oversight staff will assign approximately ten percent (10%) of her time to the grant, and the fiscal oversight staff person, approximately ten percent (10%) of his time. MDES has requested an increase for the Administrative Cost from 13.5% to 20% for this grant. State administration is budgeted at 10% and the Project Operator at 10% of the total grant, for a total administration cost of 20%.

*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;*

Subgrantees/Area Agencies on Aging (AAAs) at the PDDs have administered the Senior Community Service Employment Program (SCSEP) since its inception in Mississippi. The AAAs are assigned chief responsibility for planning, coordinating, developing, and pooling resources to assure the availability and provision of a comprehensive range of services at the substate level to enhance project administration and overall accountability. The names and locations of the nine AAAs and one PDD, the counties they serve, and the number of authorized positions for which they are responsible, are shown in the 2019 County Slots by PDD Chart. The attached Mississippi AAA Map & Contacts document includes the locations of the 10 subgrantees (Appendix I8B).

*C. describe training that will be provided to local staff;*

Meetings among the state, national grantees, and subgrantees will be held on a regular basis, either in person or using electronic means such as conference calls and webinars. As issues warrant, MDES will meet with subgrantees on an individual basis by phone or during site visits, monitoring visits, or data validation visits. Topics may include:

- Data entry review prior to close date for reports
- Quarterly reports
- Reports reviewed
- *Reports discussed by SCSEP managers*

*D. describe how projects will be monitored for program and financial compliance, including audit plans; and*

MDES complies with the monitoring requirements of the Uniform Administrative Requirements for Federal Grants at 2 CFR 200.327 - 332 and the audit requirements at 2 CFR 200.500 - 520. MDES monitors its



subrecipients annually through a contract with an independent monitoring firm and requires audits from those who meet the \$750,000 threshold for annual federal expenses. We also follow our agency's WIOA Programmatic and Fiscal Monitoring policy

- Policy #8, Revision 3, and require the PDDs to monitor their host agencies and subcontractors. (Appendix IIC).

*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.*

The state manages our providers by monthly review of expenditures and quarterly review of SCSEP Reports as well as through monitoring, technical assistance, and training. The state currently does not plan to identify new providers to serve the state since the AAAs are the primary provider of other services to the aging community and have established contacts and rapport in the community. If the need arises to defund or replace a local provider, the state will do so in consultation with our Federal Project Officer and other USDOL SCSEP staff.

*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.*

Recruitment and selection of participants is performed by the Area Agency on Aging staff at the PDDs or by their subcontractors. MDES monitors the local projects' ability to meet their staffing needs and avoid vacancies by monthly review of the expense reports, and quarterly through the SPARQ performance reports. MDES also reviews eligibility determination in its annual monitoring of the PDDs/AAAs.

*3. Income Eligibility: describe how participant income will be recertified each year, including where eligibility records will be maintained.*

The PDDs/AAAs are required to recertify each participant annually to verify income eligibility. This process is verified by the State through annual monitoring and data validation.

Eligibility records are kept in the participant records at the PDD offices.

*4. Orientation: describe the orientation procedures for:*

#### *A. Participants*

Before a participant begins the community service assignment, the host agency must provide an assignment related orientation including but not limited to the host agency background and purpose, the community service(s) it provides, agency personnel policies and procedures related to work hours, time and attendance, and work performance expectations.

A Safety Procedures Consultation must also be included in the orientation if it has not already been done with the participant, including: the location(s) and use of fire extinguishers and alarms; the posted designated route(s) of escape in event of a fire; the participant's role, if any, in an emergency; and a review of all other disaster action plans for the agency.

The participant signs a Certification of Orientation stating that they have completed orientation with the host agency. This document is retained in the participant file.

#### *B. Host Agencies*

Host agencies are provided orientation by the PDD and sign an acknowledgement of Orientation. The most recent modification to the Host Agency Handbook includes a host agency acknowledgement in which the host agency supervisor states that he has received, read, understood, and agreed to follow the program requirements stated in the SCSEP host agency handbook.

This agreement reinforces the supervisor's understanding of the SCSEP as a training program as well as the supervisor's responsibility to cooperate with all job development efforts made on the participant's behalf.

*1. 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.*

MDES has chosen to adhere to the program-required Duration Limit of 48 months as provided in 20 CFR 641.570 (a) and not to allow waiver of the limit as allowed in 641.570 (b). The Mississippi Individual Durational Limit Policy is attached as Appendix I8E.

2. *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).*

**Mississippi Works and Skill Gap Analysis.**

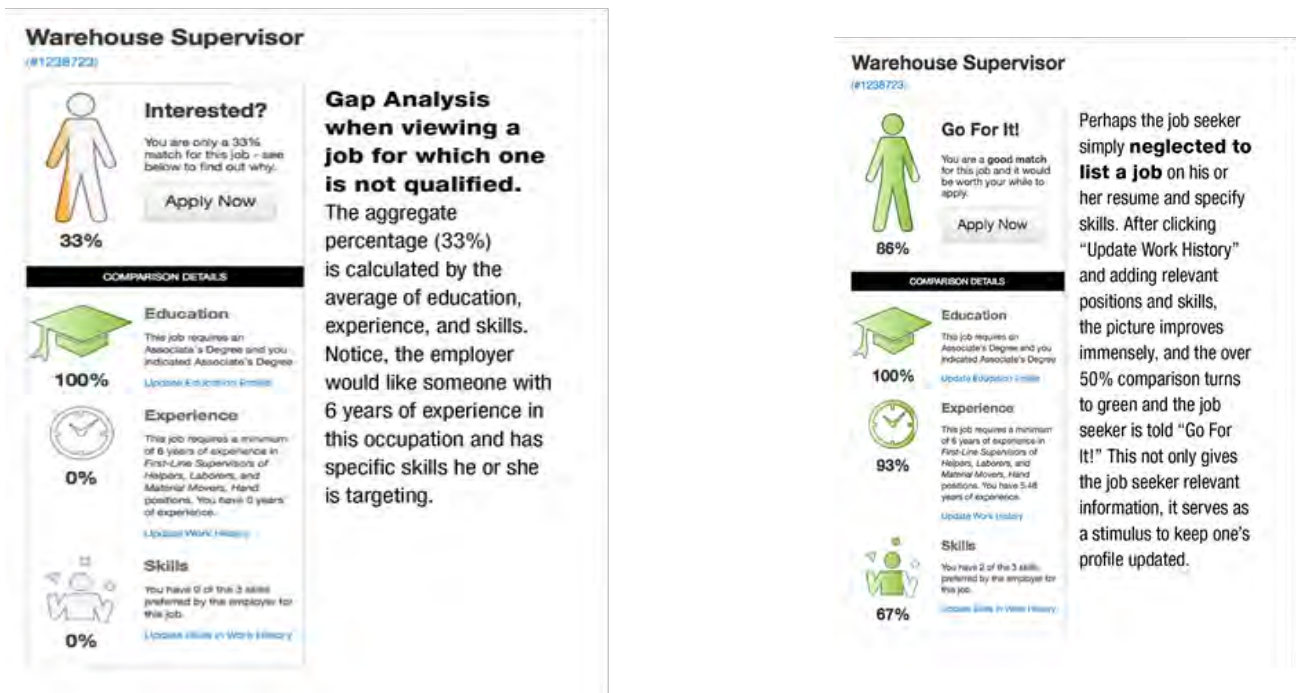
Mississippi Works is a smartphone app and web-based job resource provided by MDES where employers and job seekers connect. The connection is driven by the ability of job seekers to match experience and qualifications to employer needs. Mississippi Works can be a valuable tool for seniors and SCSEP staff to identify participant skill gaps and training needs.

Labor market studies show that the largest share of future employment opportunities will be middle-skill jobs. Middle-skill jobs account for 69 percent of Mississippi’s labor market but only 37 percent of the state’s workers are trained to a middle skill level, thus creating a gap. In program year 2013, Mississippi Works added a gap analysis tool to help workers make informed decisions on career choices and training needs. The Mississippi Works is easy to use. The user simply creates a profile and begins the job search; this launches the gap analysis tool.

After clicking on a recommended job, a question arises for the job seeker: “How do I measure up?” The user needs some means of figuring out how his or her credentials measure up to the job’s requirements. Here is where real-time gap analysis comes into play. If the job originated in Mississippi Works, the system can ask employers explicitly what skills, what level of education, and what kinds of experience are required for the candidate to have the best chance to be hired. The system then compares the job seeker’s credentials against the credentials required by the employer. In the case of jobs that might be taken from an external labor exchange or other sources, Mississippi Works has a statistical library of career requirements enabling it to give best estimates to the job seeker based on a survey of job seekers in the particular career area.

The following is an example of the Mississippi Works Skill Gap Analysis screen showing a participant with a skill gap and after the participant has closed that gap with training or by additional information to their profile.

Figure 29: Mississippi Works Skills Gap Analysis Screen



Mississippi Works and its skill gap analysis abilities can provide SCSEP participants and counselors with a powerful tool that can guide the participants' individual training decisions and improve their IEPs. MDES will inform our subgrantees and the national grantees about this new system and the provide training for it, as needed.

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;*

B. *the extent to which participants will be placed in the administration of the project itself;*

C. *The types of host agencies used and the procedures and criteria for selecting the assignments;*

D. *the average number of hours in a participant's training week;*

E. *the fringe benefits offered (if any); and*

F. *procedures for ensuring adequate supervision.*

**Training Positions Available at Host Agencies.**

- Telephone Operator
- Janitorial
- Administrative Assistant
- Landscaping
- Homemaker
- Food Preparation
- Maintenance
- Outreach/Referral
- Recreation/Senior Center
- Nutrition Program
- Education, Training, and Library
- Healthcare
- Retail and Sales
- Transportation

**Skill Training Offerings.**

- Computer Training
- Heavy Equipment Training
- Custodial
- Clerical
- Telephone skills

- Adult Basic Education
- Record Keeping

### **Training Linkages Negotiated with the One-Stop.**

- Resume writing classes
- Interviewing Skills
- Word Processing Instruction
- Typing Classes
- Conflict Resolution
- Job Search Assistance
- Labor Market Information

### **Ensuring Community Services Assignments Provide Skill Training that Meets the Needs of Participants and Employers: A Collaborative Effort.**

The state and national grantees will follow the SCSEP regulations that require participants be assessed to determine the most suitable employment and community service assignment. They will also require that case managers conduct reassessments every six months to develop and amend IEPs and to ensure that the training the participants receive at the host agency provides the skills training necessary to secure unsubsidized employment in the fields that support the local economy. Additionally, the state will host a collaborative meeting with the national grantees, LWIBs, and host agencies to ensure that community service assignments are truly providing skill training that meets the needs of both participants and employers.

The USDOL Subgrantee Performance Assessments and Reporting Quarterly (SPARQ) data collection system generates management reports that allow grantees to track performance. The SPARQ reporting system generates reports on the types of host agencies that allow SCSEP managers to track the types of host agencies used to provide training to participants to ensure that the training participants receive meets the needs of the participant and the employers. The USDOL has proposed significant changes to the SPARQ system in the upcoming year.

*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.*

### **Classroom Training.**

Older workers are willing and sometimes eager to update their skills. However, structured training can cause anxiety and fear of failure in older workers. To reduce anxiety, SCSEP managers provide participants with studying tips, shorter hours of training, and assurance that the training is hands-on. Training will be coordinated with WIN Job Centers, local community colleges, SCSEP education meetings and libraries.

### **Other Training Opportunities.**

SCSEP participants will also be prepared for unsubsidized employment through training that is in addition to their community service assignments. SCSEP Managers assist participants to identify other training opportunities based on their Individual Employment Plans. Other training opportunities may include:

- lectures;
- seminars;
- classroom instruction;

- individual instruction;
- private sector on-the-job experiences; and,
- work experience.

### **Strategies for Improving Training Opportunities.**

Stressing the need for participant training to all levels of the SCSEP service delivery system – grantees, sub-grantees, host agencies, and participants – will keep this vitally important aspect of the program at the forefront of SCSEP in Mississippi. To this end, we will work with our partners to provide information on free, reduced price, and partner-funded training resources that can be utilized by our service providers, host agencies, and our participants to further the skills and abilities of our participants. Utilizing Mississippi Works and its skill gap analysis tool can help simplify this process.

Mississippi’s network of WIN Job Centers is the centerpiece of the Mississippi workforce system. These centers provide easy access to employment services such as education and training for workers, human resource assistance for businesses and information for economic developers. MDES will provide information to the national grantees and to our sub-grantees regarding which WIN Job Centers offer onsite training classes. MDES will also coordinate the development of computer training classes geared specifically to the needs of our seniors, many of whom may be computer illiterate and fearful of learning new technologies.

MDES continues to encourage training to address literacy skills among participants when needed. For participants that are interested in completing their high school equivalency, SCSEP partners with the Adult Education program administered by the Mississippi Community College Board (MCCB). The Adult Education program is designed to offer opportunities to enhance the skills and abilities of individuals preparing for the workforce. A link to Adult Education information at the MCCB website will be provided on our website.

MDES has redesigned our agency website and added a section providing information on SCSEP in Mississippi for participants, our SCSEP partners, and the public. Included on the site is information on what SCSEP offers to the senior population, who qualifies for the program, and the benefits of being a host agency in the program. Future upgrades to the website would include information on the training options for our participants to inform our host agencies and partners about what classes and programs are offered, where and when the trainings are offered, and which entities are providing the classes.

#### *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).*

Supportive services are available to participants and may include but are not limited to counseling in areas such as health, nutrition, and Medicare benefits, etc.; supportive services may also include work shoes, badges, or eyeglasses; in addition, transportation to training or the worksite may be paid for if no other source of payment is available.

All participant supportive services are dependent upon funding and must be pre-approved by the SCSEP staff. The need for supportive services will be identified in the original IEP if possible or the plan will be updated once the need for a specific supportive service is identified. Requests for supportive services must be made in writing or by email and must include the approximate cost of the service. Written approval (letter or fax) or an email approving the supportive service will be sent prior to the service being provided.

#### *10. Termination: describe procedures for terminating a participant, including IEP terminations. Please provide a copy of the current termination procedures.*

The SCSEP Termination Policy sets forth the state’s procedures for termination of participants in the SCSEP based on the guidance set forth in the Older Americans Act Amendments of 2006 and the SCSEP Final Rule. The policy is provided in Appendix I8C.

#### *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.*

The SCSEP Programmatic Grievances Policy and the SCSEP Equal Opportunity Discrimination Policy set forth the state's procedures for grievances or complaints alleging violations of the requirements of the Older Americans Act of 1965 (OAA) from participants and other interested or affected parties based on the guidance set forth at OAA sections 306(a)(10) and 307(a)(5)(b) and 20 CFR, 641.910. These policies are provided in Appendix I8D.

*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.*

The processes described at c.4.A. regarding equitable distribution are used by the state and national grantees to balance slot imbalances statewide. The state grant staff also interact at least monthly with the ten PDDs to ensure that vacant slots are filled in a timely manner and that over-enrollments are limited. This proactive management helps maximize service to area seniors, expenditures, and performance requirements.

*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 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:*

Entered

employment,

Employment

retention,

Average

earnings, Service

level,

Service to most-in-need, and

Community Service

<b>DOL Negotiated SCSEP Final PY 2020 Grantee Targets and Goals</b>	<b>Mississippi</b>
PY 2020 Q2 Employment Final Target	27.5%
PY 2020 Q4 Employment Final Target	19.1%
PY2020 Median Earnings Final Target	\$3259
PY 2020 Service Level Final Goal	N/A
PY 2020 Community Service Final Goal	N/A
PY 2020 Most in Need Final Goal	2.88
PY 2020 Customer Satisfaction--Participant Final Goal	88.2
PY 2020 Customer Satisfaction--Host Agency Final Goal	88.5
PY 2020 Customer Satisfaction--Employer Final Goal	85.8

14. Administrative Costs: describe any request for an increase in administrative costs consistent with section 502(c)(3) of the Older Americans Act.

Mississippi requested and received an increase in the administration cost limitations to twenty percent (20%) of total grant allocation pursuant to TEGL 22-19. This reflects an increase for both the state grantee and the project operators to ten percent (10%) each. The reasons for this increase are as follows:

Accomplishments for SCSEP in Mississippi during PY20:

1. Technical Assistance visits were conducted virtually with program directors and front-line staff provided an opportunity to exchange information/updates and field questions
2. Regular check-in with subgrantees for COVID-19 follow-up response and any other challenges
3. Subgrantee Handbooks are in the process of being updated
4. Digital resource material was developed and implemented
5. Training was conducted for program directors, front-line staff, WIN Job Center staff, and national partners on a one-by-one basis virtually.

The rural nature of Mississippi and the small project size does not allow sufficient funds to cover the cost for administering the program. We anticipate the impact of COVID-19 will further escalate administrative cost for managing SCSEP, and this increase will exceed the 13.5% of the grant that is currently allowed. Transitioning to a new normal, additional TA visits and calls, and Extended Durational Limits and Caps will require additional management and oversight to ensure the least amount of disruption for participants. This additional management and oversight will have a greater effect on the state level administration than the local PDD level.

TA visits will be scheduled as soon as it becomes safe to travel and restrictions are lifted, however meetings continue to be conducted virtually or by telephone. Data will be collected and reviewed to determine the impact of COVID-19 for providers and participants. It is our hope that COVID-19 can become a positive for our state and SCSEP by generating innovative ideas, procedures, and processes for the future. Mississippi's response has been very successful by adapting quickly to a virtual world, adapting our thinking, and implementing new out-of-the-box ways of meeting challenges.

Mississippi's grant is less than one million dollars and at the usual five percent (5%) state level, administrative cost is less than \$50,000 per year. The oversight needed for this grant requires most of the time for one FTE.

SCSEP Assurances

	X or N/A	STATEMENT OF ASSURANCE	DOCUMENTATION and COMMENT
1.	X	<p><b>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 ACSEP 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.</b></p>	<p>In writing the SCSEP State Plan, the state followed the procedure outlined in Section 503(a)(2) of the Older Americans Act (OAA) Amendments of 2006 which requires that the State Plans describe the state’s process for ensuring the involvement, advice and recommendations 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.</p> <p>The State Plan described how it ensured an open and inclusive planning process with meaningful opportunity for public comment, per 20 CFR 641.350.</p> <p>The State will establish a written policy to ensure compliance with these requirements.</p>



**2024 MISSISSIPPI**  
*WORKFORCE INNOVATION & OPPORTUNITY ACT*  
**STATE PLAN**





# STATE WORKFORCE INVESTMENT BOARD

OFFICE OF THE GOVERNOR

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# Appendix A: Workforce and Innovation Opportunity Act Memorandum of Understanding



## STATE OF MISSISSIPPI WORKFORCE INNOVATION AND OPPORTUNITY ACT

# Memorandum of Understanding

This Memorandum of Understanding ("MOU") is between the following parties as it pertains to the Mississippi Workforce Innovation and Opportunity Act (WIOA) Combined Plan ("State Workforce Plan" or "WIOA plan"): Mississippi Office of Workforce Development, Mississippi Community College Board, Mississippi Department of Employment Security, Mississippi Department of Human Services, Mississippi Department of Rehabilitation Services, Mississippi Department of Corrections, Mississippi Department of Education, Mississippi Development Authority, and the Local Workforce Development Areas, collectively referred to as the "Partners."

### **BACKGROUND**

In 2020, Governor Tate Reeves and the Mississippi Legislature established the Office of Workforce Development, branded as AccelerateMS. The charter legislation charged AccelerateMS with a mission to review existing programs; provide information, guidance, and significant influence on how funding sources should be utilized for the purposes of workforce development; and serve as the coordinating entity for all workforce development stakeholder agencies in Mississippi. In 2021, Governor Reeves designated AccelerateMS as the coordinating entity for the WIOA plan. This WIOA combined plan represents the efforts of AccelerateMS to convene all state workforce and WIOA stakeholders around a unified vision that addresses the challenges workers face to gain credentials and skills to meet business and industry needs.

### **PURPOSE**

This MOU serves as a functional tool for how the partners will work together to achieve the unified vision. The Partners agree to establish and maintain a framework of cooperation, collaboration, and communication in assisting the Governor to carry out the State Workforce Plan.

### **ROLES, RESPONSIBILITY AND GOVERNANCE STRUCTURE**

AccelerateMS will serve as the coordinating entity for all workforce development partners and stakeholders to ensure alignment and effectiveness.

The Partners agree to work cooperatively to prevent duplication of services, and to streamline and coordinate services delivered throughout the workforce system.

The Partners shall continue to have statutory responsibilities relating to the administration of their respective programs outside of, and not contained in, WIOA, and certify that federal funds received to carry out core programs will not be expended for any purpose other than for activities authorized with respect to such funds.

The Partners agree to provide data necessary to the performance of a comprehensive review of Mississippi's workforce development efforts, including the amount spent and effectiveness of programs supported by state or federal funds. Data provided should be in accordance with data sharing agreements in place amongst partners and the State Longitudinal Data System.

The Partners commit to cross-training of staff, as appropriate, and to providing other professional learning opportunities that promote continuous quality improvement.

**IMPASSE-DISPUTE RESOLUTION**

For the purposes of this MOU, in the event that a conflict should arise, each Partner expressly agrees to participate in good faith negotiations to reach a consensus. However, should a dispute arise among any Partners to this MOU in negotiations to amend or renew this MOU or in matters pertinent to WIOA operations or activities not addressed in this MOU, all Partners agree to utilize the process cited below. The Executive Directors or Agency Heads of applicable State agencies will designate an individual to negotiate and resolve any impasses involving state-level Partners. All Partners agree to enlist the following process for the resolution of disputes:

1. The Partners shall first attempt to resolve all disputes informally. Any Partner may call a meeting of all Partners to this MOU to discuss and resolve disputes.
2. Should information resolution efforts fail, the dispute shall be referred to Chairman of the State Workforce Investment Board ("SWIB"), who shall place the dispute on the agenda of a regular or special called meeting of the SWIB. The SWIB shall attempt to mediate and resolve the dispute. The SWIB will mediate and issue a written recommendation.

In the event that all reasonable attempts to resolve the impasse are unsuccessful, the SWIB will report the impasse to the Governor, who will intervene with the parties to resolve the disputed issue(s).

**MODIFICATION OR AMENDMENT**

This agreement shall not be modified, altered, or changed except by mutual consent of the Partners hereto. The Partners agree to renegotiate the agreement if federal and/or state revisions of any applicable laws or regulations make changes in this agreement necessary. Any modification or amendment shall be made in writing, clearly stating the changes being affected and shall be duly executed by an authorized representative of each Partner.

**ASSIGNMENTS**

It is expressly understood that commitments to be performed under this MOU shall not be subcontracted, assigned, transferred, or sublet without prior written approval of all Partners.

**AUTHORITY**

All activities under this MOU shall be subject to all applicable federal and/or state laws, rules, and regulations and construed in accordance with the laws of the State of Mississippi. All Partners shall comply with applicable federal, state, and local laws and regulations.

**LIABILITY**

Each Partner shall be responsible for any liability resulting from the actions/inactions of its

officers, agents, and employees, acting within the course and scope of their official duties, to the degree and within the parameters permitted under Mississippi law.

**DURATION**

This MOU is entered into on September 8, 2022. This MOU will become effective as of the date of signing by the final signatory below and remain in effect for five years or until all Partners agree in writing to cancel the terms of the MOU, whichever is sooner.

**WIOA MOU STATE OF MISSISSIPPI**

**PARTNER REPRESENTATIVE SIGNATURES**

Each of the undersigned individuals represents and warrants that he or she is expressly and duly authorized to execute this MOU and to legally bind each agency into this MOU. In witness whereof, the parties of this MOU certify that they have read, understood, and agreed to the terms and conditions of this MOU.

  
\_\_\_\_\_  
**Tate Reeves**  
Governor

SEPTEMBER 8, 2022  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
**Patrick Sullivan**  
Chair, State Workforce Investment Board

9/10/22  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
**Ryan Miller**  
Executive Director, Accelerate MS

9/8/22  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
**Kell Smith**  
Interim Executive Director, Mississippi Community College Board

9/8/22  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
**Robin Stewart**  
Deputy Executive Director, Mississippi Department of Employment Security

9-8-22  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
**Bob Anderson**  
Executive Director, Mississippi Department of Human Services

9/8/22  
\_\_\_\_\_  
Date

**WIOA MOU STATE OF MISSISSIPPI**




**PARTNER REPRESENTATIVE SIGNATURES (Continued)**



**Chris Howard**  
Executive Director, Mississippi Department of Rehabilitation Services

8/8/22  
Date



**Kim Benton**  
Interim State Superintendent, Mississippi Department of Education

9/8/2022  
Date



**Laura Hipp**  
Deputy Executive Director, Mississippi Development Authority

9-8-22  
Date



**Mitzi Woods**  
Delta Local Workforce Development Area

9-8-22  
Date



**Terry Treadaway**  
Mississippi Partnership Local Workforce Development Area

9-5-22  
Date



**Robin Parker**  
Southcentral Mississippi Works Local Workforce Development Area

9/8/22  
Date



**Allison Hawkins**  
Twin Districts Local Workforce Development Area

09/08/22  
Date

**WIOA MOU STATE OF MISSISSIPPI**

# Appendix B: SLDS Governing Board Rules & Regulations

## Title 10: Education Institutions and Agencies

### Part 501: Statewide Longitudinal Data System Governing Board Rules & Regulations

#### Part 501 Chapter 1: STATUTORY AUTHORITY

*Rule 1.1: Statutory Authority.* The SLDS Governing Board was established effective July 1, 2013 through Mississippi Code Annotated § 37-154-1 and 37-154-3.

Source: Miss. Code Ann. §37-154-3

*Rule 1.2: Organization and policy and procedure.* Miss. Code Ann. §37-154-3 provides for the SLDS Governing Board to be composed of a representative designated from each agency or entity providing data to the system, and others as determined by the Board, in accordance with Board Rules and Regulations. The Chair of the SLDS Governing Board will serve a two-year term. The Chair will appoint a vice-chair. Half of all board members shall be a quorum. The chairman shall be responsible for ensuring official minutes of each meeting are kept.

Source: Miss. Code Ann. §37-154-3

#### Part 501 Chapter 2: SYSTEM MANAGEMENT

*Introduction:* The SLDS Governing Board is authorized to contract with a third party to manage and maintain the system and to ensure the policies and procedures developed by the board are enforced. The system shall be referred to as LifeTracks. LifeTracks includes activities within three categories:

- A. Securing and managing data;
- B. Supporting, maintaining, and expanding the online reporting portal ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)); and
- C. Developing research design and methodology for the purpose of conducting scientific research that addresses policy and research questions.

*Rule 2.1: STATE DATA CLEARINGHOUSE.* The SLDS Governing Board shall enter into a five-year memorandum of agreement with a third party to serve as the state data clearinghouse. The third-party contractor shall be a center of excellence and a research organization with a demonstrated track record of combining and extracting information from disparate large administrative data sets; creating, preserving, analyzing, and reporting on those data in a safe and secure manner; and building and sustaining partnerships with data contributors. The third party shall also be an organization with the knowledge and

experience necessary to provide flexible, streamlined services and to design and implement best practices for data integration and data security. The organization must have experience with SLDS-type architecture and data modeling, and be qualified to provide all necessary technical resources aligned with the scope and objectives of the SLDS.

Source: Miss. Code Ann. §37-154-3

*Rule 2.2: APPLICATION HOST.* The SLDS Governing Board shall select an entity to provide application hosting services for [www.lifetracks.ms.gov](http://www.lifetracks.ms.gov). Any data residing on the application server shall have been de-identified so that the identities of subjects cannot be readily ascertained or otherwise associated with the data by any users. The SLDS Governing Board shall make provisions for this as part of the contract with the third-party contractor acting as the state data clearinghouse.

Source: Miss. Code Ann. §37-154-3

### **Part 501 Chapter 3: DATA SCOPE**

*Rule 3.1: DATA SCOPE.* All data transferred for LifeTracks shall flow to the third-party contractor in accordance with applicable SLDS Governing Board rules, regulations, policies and procedures and in accordance with applicable state and federal laws.

- A. Individual governmental entities shall transfer data to the third-party contractor for inclusion in LifeTracks that includes:
  - 1. All data transferred as part of the development of LifeTracks as specified in individual data dictionaries for each data stakeholder;
  - 2. All data required to meet the 12 elements of the America COMPETES Act (Public Law 110-69);
  - 3. Data necessary to provide decision makers a tool to develop policies to support objectives.
  - 4. All data necessary for the successful continuation, management, and development of the online reporting portal ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)); and
  - 5. All data required to fulfill authorized ad hoc research and reporting requests.
  
- B. In an effort to maintain the highest degree of accuracy, LifeTracks shall adopt the business rules, logic, and calculation methodology of the contributing data provider. The third-party contractor shall maintain agency/entity specific LifeTracks data dictionaries defining data elements:

1. Included in the development and initial deployment of LifeTracks;
2. Necessary for maintaining the system as deployed; and
3. Necessary for future development.

Copies of all agency/entity specific data dictionaries will be available to the public on the LifeTracks website.

Source: Miss. Code Ann. §37-154-3

*Rule 3.2: SOCIAL SECURITY NUMBERS.* The SLDS Governing Board is cognizant of the fact that it is necessary to transmit and process personal information in the form of Social Security Numbers (SSNs) in order to conduct the business of the board. The SLDS Governing Board takes its responsibilities with respect to the use of SSNs seriously and seeks to provide functional secure systems for the appropriate handling of this information through the use of administrative, technical, and physical safeguards. To comply with Miss. Code Ann. §25-1-111, the following have been established:

- A. Individual governmental entities shall transfer the SSN to the third-party contractor for the purpose of creating a global unique identification number (GUID) that replaces the SSN and becomes the common link allowing all data in LifeTracks to be connected across different points in time. In regards to the Mississippi Department of Education, the specific method of transfer of data containing social security numbers or other unique identifiers is subject to written agreement by the SLDS Governing Board and the MDE.
- B. Destruction of SSN information that is no longer needed shall be handled in an approved manner and completed using accepted methods that will not enable inappropriate recovery of data.
- C. Individuals and entities are expected to comply with laws and policies pertaining to the collection and use of SSNs and are expected to take the steps necessary to protect this information.
- D. SSN information is exempt from inclusion as public record information and is never to be provided in response to such requests.

Source: Miss. Code Ann. §37-154-3

*Rule 3.3: IDENTIFICATION NUMBERS.* Agency/entity and/or program specific identification numbers shall also be transferred to the third-party contractor for the purpose of conducting data validation and quality control activities and to allow individual governmental entities contributing data to LifeTracks to use information from LifeTracks for internal

agency use.

Source: Miss. Code Ann. §37-154-3

**Part 501 Chapter 4: STANDARDS FOR PRIVACY, CONFIDENTIALITY & SECURITY OF DATA**

*Rule 4.1: SECURITY OF DATA.* The third-party contractor will establish a framework to initiate and control the implementation of security policies and standards for the SLDS Governing Board. The Governing Board will ensure that the State Data Clearinghouse's security posture is adequate and compliant with the Department of Information Technology Services' Enterprise Information Security Plan and that an organizational structure is in place that focuses on information security.

In addition, the third-party contractor shall establish processes and procedures for incident reporting objectives, goals and deliverables identified in the ITS Enterprise Security Policy and ITS Enterprise Information Security Plan.

All data transferred from individual governmental entities contributing data to LifeTracks to the third-party contractor shall be held in a secure file location that is accessible only by authorized third party contractor personnel. This access limitation shall be enforced by third party contractor and board approved industry standard file access locks and an independent security system. The permissions structure shall be designed to only allow authorized users to access files. The independent security system shall be implemented to guard access to sensitive file storage areas and provide robust augmentation of security provided through file access locks and credentialing.

The third-party contractor shall perform appropriate background checks and screening of all employees that have any access to the clearinghouse data.

The third-party contractor shall employ technical safeguards to ensure personal information transmitted over an electronic communications network is not accessed by unauthorized persons or groups. Encryption shall be used when PII are in transmit or at rest. Unencrypted PII shall not be transmitted over public networks to third parties.

The third-party contractor shall employ data integrity procedures that protect PII including mechanisms to authenticate records and corroborate that they have not been altered or destroyed in an unauthorized manner.

The third-party contractor shall implement a risk assessment strategy plan that is updated annually which includes access and control processes, security risks, threats and vulnerabilities assessments, and methods for managing risks and incidents.

The third-party contractor shall maintain and update the incident response plan that establishes procedures to follow in case a breach occurs and processes for notifying organizations in the event of unauthorized acquisition of files or documents. The third-party contractor shall be subject to an annual external data security audit conducted by the Mississippi Office of the State Auditor.

Source: Miss. Code Ann. §37-154-3

*Rule 4.2: DE-IDENTIFICATION OF DATA.* All de-identification procedures shall be implemented with appropriate physical, technical, and administrative protections in place to maximize security, minimize risk, and ensure regulatory compliance. Data shall be de-identified through a process wherein a GUID is created that becomes the common link across all data in LifeTracks that ensures data can be reliably aligned over time and across governmental entities contributing data to LifeTracks. The SSN shall only be used for assigning the GUID.

Other internal identification numbers shall remain part of the transferred data to facilitate data validation and matching and to allow governmental entities contributing data to LifeTracks to use information from LifeTracks for internal agency use.

Source: Miss. Code Ann. §37-154-3

*Rule 4.3: GUID PROCESS.* A software generated global unique identification number (GUID) will be created for each record. For all data transferred from governmental entities contributing data to LifeTracks to the third-party contractor, the SSN shall be replaced with the GUID that becomes the common link allowing all data in LifeTracks to be connected across different points in time.

Source: Miss. Code Ann. §37-154-3

*Rule 4.4: ADDITIONAL STANDARDS FOR PRIVACY AND CONFIDENTIALITY.* Additional privacy and confidentiality safeguards shall include only releasing information generated from the data transferred from individual state agencies and state entities to the third-party contractor in tabular form via the online reporting portal ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)) and applying appropriate data suppression techniques when cell sizes fail to meet minimum SLDS Governing Board defined reporting requirements.

The minimum allowable cell size or subgroup contained in any reports shall be not less than ten (10); any cell size or subgroup with a number smaller than ten (10) shall be suppressed.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 5: PROVIDING DATA**

*Introduction:* All data provided to the SLDS shall be provided in accordance with local, state and federal laws governing the protection and sharing of such data.

*Rule 5.1: DATA MANAGER.* All governmental entities contributing data to LifeTracks shall designate a data manager to serve as the primary point of contact for all LifeTracks activities at the beginning of each state fiscal year and communicate this in writing to the SLDS Governing Board Chair and the designated third-party contractor.

The third-party contractor shall be subject to an annual external audit conducted by the Mississippi Office of the State Auditor for compliance with SLDS Governing Board rules and regulations.

Source: Miss. Code Ann. §37-154-3

*Rule 5.2: MEMORANDUM OF UNDERSTANDING (MOU).* Memorandums of understanding (MOUs) shall be executed between the governmental entity providing data and the third-party contractor to ensure the safety, quality, and integrity of data in accordance with state and federal law. At any such time as the third-party contractor shall change, new MOUs shall be executed between individual governmental entities contributing data to LifeTracks and the third-party contractor.

Source: Miss. Code Ann. §37-154-3

*Rule 5.3: DATA TRANSFER.* Data shall be transferred from individual governmental entities contributing data to LifeTracks as necessary to meet the requirements of Chapter 3 and in accordance with applicable MOUs but not less than annually and no later than October 15 of each calendar year.

All data shall be transferred from individual governmental entities contributing data to LifeTracks via an SLDS Governing Board approved secure file transfer solution chosen by the third-party contractor. The selected managed file transfer solution shall employ industry standard file transfer encryption and include the ability to assign private destination folders to each data exchange partner that shall be locked down with and credentialed to individual source users such that only they can see their own folder. All data received by LifeTracks shall be transferred to a secure work area that is only accessible to authorized staff.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 6: DATA VALIDATION**

*Rule 6.1: DATA INVENTORY.* Governmental entities shall submit data in accordance with state and federal law. Upon receipt of data, the third-party contractor shall verify the list of

data elements received from data contributors within ten (10) working days of receipt.

Upon verification of the list of fields, tables, and relationships between tables by the data contributor, the data shall undergo the complete LifeTracks data inventory process. The complete data inventory process shall include updating or creating data dictionaries and program data mapping documents. Data dictionaries shall include metadata such as meaning, relationship to other data, origin, usage, and format. Program data mapping documents shall provide information on how data fields relate to other data fields across multiple data sets. The program data mapping document shall be used to compare and contrast data elements collected across multiple governmental entities and over time.

Source: Miss. Code Ann. §37-154-3

*Rule 6.2: DATA VALIDATION.* Data validation shall be the primary responsibility of the third-party contractor and undertaken in accordance with SLDS Governing Board rules and regulations and the terms of applicable MOUs. The business rules, logic, and calculation methodology provided by the governmental entity contributing the data shall be used for data validation. The objective of the data validation process shall be to verify that data transferred by governmental entities contributing data to LifeTracks mirrors data contributor internal data so that accurate reports can be produced across systems.

The data validation process shall entail individual data contributors working closely with the third-party contractor staff as part of a process designed to detect and correct inaccurate or incomplete records so that LifeTracks data will be consistent and reliable. Data validation diagnostics run to ensure high-quality, accurate, and complete data are available for LifeTracks shall include, but not be limited to:

- A. Checking that all tables, records, and fields, and the full contents of each field have been successfully transmitted and read;
- B. Comparing record counts between the source data and the data transmitted to the third-party contractor; and
- C. Producing a report with basic summary statistics for validation by the data contributor.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 7: REPORTS**

*Rule 7.2: AD HOC REQUESTS AND REPORTS.* Data from LifeTracks shall be used to address requests that require data from multiple data contributors, and requests that are longitudinal in nature requiring data at different points in time.



Requests for reports involving data within a single state agency/entity shall be referred to the relevant state agency/entity.

Requests from the following entities will be provided as a result of state money appropriated to fund the maintenance and operation of the SLDS:

- A. Office of Workforce Development;
- B. Governor's Office;
- C. Lt. Governor and Senate Committee Chairs;
- D. Speaker of the House and House Committee Chairs;
- E. Mississippi Development Authority.

Third party contractor shall notice SLDS Governing Board members of all requests upon receipt of requests.

Notices to the SLDS Governing Board shall be made via email to Board members. The notifications shall include the feasibility of satisfying the request and, if feasible, a brief description of data sources required to meet the requests. The purpose of the notices to inform Board members of data requests on a timely basis and provide Board members an opportunity to inquire about or provide input to the third-party contractor concurrent with the production of the report.

Public agencies contributing data to the SLDS may request up to 5 reports per state fiscal year with additional reports provided upon approval from the Governing Board. Federally mandated reports required of the public agencies contributing data to the SLDS shall have priority over other requested reports.

Statewide elected officials may request reports from the third-party contractor. Upon request, third-party contractor shall provide the feasibility of completing the report, provide an estimate of time and cost to meet the request, and notify the Governing Board.

Requests may also be made by any other person or entity to the SLDS at public and private rates published on the official SLDS website, as approved by the SLDS. Upon request, third party contractor shall provide the feasibility of completing the report and an estimate of time and cost to meet the request. If work is completed under the estimated timeframe, cost shall decrease accordingly. If third party contractor is to exceed the estimated timeframe to perform the work, notice shall be provided to the requestor to determine if work shall proceed. The Governing Board shall be notified by the third-party contractor of all requests.

Source: *Miss. Code Ann. §37-154-3*

**Chapter 8: ONLINE REPORTS. REPEALED. Effective 5/13/2023.**

**Part 501 Chapter 9: REPEALED. Effective 09/03/2021**

## **Part 501 Chapter 10: PUBLIC RECORDS**

*Rule 10.1 Statutory authority and purpose.* These public records rules are promulgated by the SLDS Governing Board in compliance with the Mississippi Public Records Act of 1983, Miss. Code Ann. §25-61-1, et seq., except as noted in 3-3.2-D of these regulations. “It is the policy of the Legislature that public records must be available for inspection by any person unless otherwise provided by this act. Furthermore, providing access to public records is a duty of each public body and automation of public records must not erode the right of access to those records.” Section 25-61-1, Miss. Code of 1972.

“[A]ll public records are hereby declared to be public property, and any person shall have the right to inspect, copy or mechanically reproduce or obtain a reproduction of any public record of a public body in accordance with reasonable written procedures adopted by the public body concerning the cost, time, place and method of access, and public notice of the procedures shall be given by the public body.” Section 25-61-5, Miss. Code of 1972.

The act defines “public record” to include any “all books, records, papers, accounts, letters, maps, photographs, films, cards, tapes, recordings or reproductions thereof, and any other documentary materials, regardless of physical form or characteristics, having been used, being in use, or prepared, possessed or retained for use in the conduct, transaction or performance of any business, transaction, work, duty or function of any public body, or required to be maintained by any public body.” Section 25-61-3(b).

The purpose of these rules is to establish the procedures the SLDS Governing Board will follow in order to provide full access to public records. These rules provide information to persons wishing to request access to public records of the SLDS Governing Board and establish processes for both requestors and SLDS Governing Board staff that are designed to best assist members of the public in obtaining such access.

The purpose of the act is to provide the public full access to public records concerning the conduct of government. The act and these rules will be interpreted in favor of disclosure. In carrying out its responsibilities under the act, the SLDS Governing Board will be guided by the provisions of the act describing its purposes and interpretation.

If the Contractor receives a public records request for information pertaining to SLDS or any data contributors, the third-party contractor shall immediately inform all SLDS Governing Board members.

Source: Miss. Code Ann. §37-154-3

*Rule 10.2 Contact information.* Any person wishing to request access to public records of the SLDS Governing Board, or seeking assistance in making such a request should make the request in writing to the third-party contractor. Information is also available on the LifeTracks website at [www.lifetracks.ms.gov](http://www.lifetracks.ms.gov).

Source: Miss. Code Ann. §37-154-3

*Rule 10.3 Availability of public records.* Any person wishing to request access to public records of the SLDS Governing Board is encouraged to view the documents available on the LifeTracks website prior to submitting a records request. Meeting minutes shall be posted on Lifetracks.

- A. Any person wishing to inspect or copy public records of the SLDS Governing Board should make the request in writing to the third-party contractor and including the following information:
  - 1. Name of requestor;
  - 2. Address of requestor;
  - 3. Other contact information, including telephone number and any e-mail address;
  - 4. Identification of the public records adequate so that the record may be located; and
  - 5. The date and time of day of the request.
- B. If the requestor wishes to have copies of the records made instead of simply inspecting them, he or she should so indicate and make arrangements to pay for copies of the records or a deposit. The SLDS Governing Board shall determine the cost of providing access to and/or copies of the records being requested. Upon receipt of the payment (cash, check, or money order) of the estimated costs in advance, the SLDS Governing Board will provide copies of the records.

Source: Miss. Code Ann. §37-154-3

*Rule 10.4 Processing of public records requests.* The SLDS Governing Board acknowledges that “providing access to public records is a duty” and that “any person shall have the right to inspect, copy or mechanically reproduce or obtain a reproduction of any public record” in accordance with these rules (Miss. Code Ann. §25-61-1 and §25-61-5). The SLDS Governing Board will process requests in the order allowing the most requests to be processed in the most efficient manner.

- A. Acknowledging receipt of request. Within seven (7) business days of receipt of the request, the SLDS Governing Board designee shall provide an estimate of time required and associated cost to the requestor.
  - 1. Make the records available for inspection or copying;
  - 2. If copies are requested and payment of a deposit for the copies, if any, is made or terms of payment are agreed upon, send the copies to the requestor;
  - 3. Provide a reasonable estimate of when records will be available; for records that do not fall within the provisions of Mississippi Code Annotated §25-61-9 regarding third party notification requirements, the SLDS Governing Board designee will provide a written explanation if the records cannot be produced within the seven (7) business day period;
  - 4. If the request is unclear or does not sufficiently identify the requested records, request clarification from the requestor. Such clarification may be requested and provided by telephone. The SLDS Governing Board designee may revise the estimate of when records will be available;
  - 5. Deny the request, with documentation to the requestor as to the reason for denial.
  
- B. Consequences of failure to respond. If the SLDS Governing Board designee does not respond in writing within seven (7) business days of receipt of the request for disclosure, the requestor should consider contacting the SLDS Governing Board designee to determine the reason for the failure to respond.
  
- C. Protecting rights of others. In the event that the requested records contain information that may affect rights of others and may be exempt from disclosure, the SLDS Governing Board designee may, prior to providing the records, give notice to such others whose rights may be affected by the disclosure. Such notice should be given so as to make it possible for those other persons to contact the requestor and ask him or her to revise the request, or, if necessary, seek an order from a court to prevent or limit the disclosure. The notice to the affected persons will include a copy of the request.
  
- D. Denial of request.
  - 1. Records exempt from disclosure. Some records are exempt from disclosure, in whole or in part. If the SLDS Governing Board designee believes that a record is exempt from disclosure and should be withheld, the SLDS Governing Board designee will state the specific exemption and provide a brief explanation of why the record or a portion of the record is being withheld. If only a portion of a record is exempt from disclosure, but the remainder is not exempt, the SLDS Governing Board designee will redact

the exempt portions, provide the nonexempt portions, and indicate to the requestor why portions of the record are being redacted.

2. Record does not exist or SLDS Governing Board does not have the record. The SLDS Governing Board must only provide access to public records in existence at the time of the request. If a public record is created or comes into the possession of the SLDS Governing Board after the request is received by the SLDS Governing Board, that record will not be provided. The requestor must make a new request to obtain subsequently-created public records.

- E. Inspection of records. Consistent with other demands and with prior written notice by the requestor to the SLDS Governing Board, it shall promptly provide space to inspect nonexempt public records. No member of the public may remove a document from the viewing area or disassemble or alter any document. The requestor shall indicate which documents he or she wishes the public body to copy.

The requestor must claim or review the assembled records within ten (10) business days of the SLDS Governing Board notification to him or her that the records are available for inspection or copying. The SLDS Governing Board will notify the requestor in writing of this requirement and inform the requestor that he or she should contact the SLDS Governing Board to make arrangements to claim or review the records. If the requestor or a representative of the requestor fails to claim or review the records within the ten-day period or make other arrangements, the SLDS Governing Board may close the request and refile the assembled records. Other public records requests can be processed ahead of a subsequent request by the same person for the same or almost identical records, which can be processed as a new request.

- F. Providing copies of records. After inspection is complete, the SLDS Governing Board shall make the requested copies or arrange for copying. The requestor must provide payment for copies at the time copies are made. Alternatively, the requestor may ask that the SLDS Governing Board provide the requested information directly to the requestor, in printed or electronic form, without prior inspection of the information by the requestor.
- G. Providing records in installments. When the request is for a large number of records, the SLDS Governing Board will provide access for inspection and copying in installments, if he or she reasonably determines that it would be practical to provide the records in that way. If, within ten (10) business days, the requestor fails to inspect the entire set of records or one or more of the installments, the SLDS Governing Board or designee may stop searching for the remaining records and close the request.
- H. Completion of inspection. When the inspection of the requested records is

complete and all requested copies are provided, SLDS Governing Board will indicate that it has completed a diligent search for the requested records and made any located nonexempt records available for inspection.

- I. Closing withdrawn or abandoned request. When the requestor either withdraws the request or fails to fulfill his or her obligations to inspect the records or pay required fees, the SLDS Governing Board will close the request and indicate to the requestor that the SLDS Governing Board has closed the request.
- J. Later discovered documents. If, after the SLDS Governing Board has informed the requestor that it has provided all available records, the SLDS Governing Board becomes aware of additional responsive documents existing at the time of the request, it will promptly inform the requestor and data contributors of the additional documents and provide them on an expedited basis

Source: Miss. Code Ann. §37-154-3

*Rule 10.5 Processing of public records requests for electronic records.*

With the consent of the requestor, the SLDS Governing Board may provide customized access if the record is not reasonably locatable or not reasonably translatable into the format requested. The SLDS Governing Board may charge the actual cost for such customized access.

Source: Miss. Code Ann. §37-154-3

*Rule 10.6 Exemptions.* The Public Records Act, as well as other statutes and court decisions, provide that a number of types of documents are exempt from public inspection and copying. In addition, other statutes or rules of law, such as various privacy restrictions, may prohibit disclosure. Requestors should be aware of the following exemptions, outside the Public Records Act, that restrict the availability of some documents held by the SLDS Governing Board for inspection and copying. This list is provided for informational purposes only and may not be all- inclusive:

- Academic records exempt from public access, see § 37-11-51.
- Appraisal records exempt from access, see § 31-1-27.
- Archaeological records exempt from public access, see § 39-7-41.
- Attorney work product, examination, exemption, see § 25-1-102.
- Birth Defects Registry, see § 41-21-205.
- Bureau of vital statistics, access to records, see § 41-57-2.

- Charitable organizations, registration information, exemption from public access, see § 79-11-527.
- Concealed pistols or revolvers, licenses to carry, records, exemption, see § 45-9-101.
- Confidentiality, ambulatory surgical facilities, see § 41-75-19.
- Defendants likely to flee or physically harm themselves or others, see § 41-32-7.
- Environmental self-evaluation reports, public records act, exemption, see § 49-2-71.
- Hospital records, Mississippi Public Records Act exemption, see § 41-9-68.
- Individual tax records in possession of public body, exemption from public access requirements, see § 27-3-77.
- Insurance and insurance companies, risk based capital level requirements, reports, see § 83-5-415.
- Judicial records, public access, exemption, see § 9-1-38.
- Jury records exempt from public records provisions, see § 13-5-97.
- Licensure application and examination records exemption from Public Records Act, see § 73-52-1.
- Medical examiner, records and reports, see § 41-61-63.
- Personnel files exempt from examination, see § 25-1-100.
- Public records and trade secrets, proprietary commercial and financial information, exemption from public access, see § 79-23-1.
- Workers' compensation, access to records, see § 71-3-66.
- Records subject to privilege, such as Attorney/Client, Physician/Patient, etc.

SLDS Governing Board will describe why each withheld record or redacted portion of a record is exempt from disclosure.

Source: Miss. Code Ann. §37-154-3

*Rule 10.7 Third-party information.* Upon request to inspect or copy any third-party document, the SLDS Governing Board shall notify the third party who filed the document. Seven (7) working days after such notice, the document will be made available for public inspection and/or copying unless the third party shall have either (i) obtained a court order protecting such records as confidential pursuant to Section 25-61-9, Miss. Code of 1972 or (ii) furnished the SLDS Governing Board a copy of the filed petition for a protective court order, providing the petition was timely filed upon the third party's receipt of notification from the SLDS Governing Board regarding the request for information.

The third party must prove to the court's satisfaction that the record or portion of the records is exempt from disclosure and must deliver the court order preventing the release of all or part of the information to the SLDS Governing Board prior to the deadline to prevent

disclosure of the information. The third party must name the requestor as a party to any action to enjoin disclosure.

The SLDS Governing Board will not make a determination as to whether a requested record provided by a third party contains trade secrets or confidential commercial or financial information. The SLDS Governing Board will provide the third-party notice as outlined above and allow the court to determine if a protective order should be issued.

Documents are frequently produced by the SLDS Governing Board that contain specific information directly obtained from a third party and, as such, may be subject to third party notice as described above.

Source: Miss. Code Ann. §37-154-3

*Rule 10.8 Costs for fulfilling a request.* Costs of providing public records shall be determined in accordance with Miss. Code Ann. §25-61-7(1) that reads as follows: “Except as provided in subsection (2) of this section, each public body may establish and collect fees reasonably calculated to reimburse it for, and in no case to exceed, the actual cost of searching, reviewing and/or duplicating and, if applicable, mailing copies of public records.”

- A. A requestor may obtain standard black and white photocopies for 15 cents per page and color copies for 15 cents per page. Copy charges for some specific types of records are set by statute and may exceed the amount stated above. Before copies can be made and/or provided to the requestor, the requestor must pre-pay all reasonably estimated costs of copying all the records selected by the requestor. The SLDS Governing Board may also require the payment of the remainder of the copying costs before providing all the records in an installment before providing that installment. The SLDS Governing Board will not charge sales tax when it makes copies of public records.
- B. Costs for electronic records. The cost of electronic copies of records shall be specified as the media cost for a CD. The cost of scanning existing SLDS Governing Board paper or other non-electronic records will be calculated at the hourly service rate. There will be no charge for e-mailing electronic records to a requestor, unless another cost applies such as a scanning fee or system costs.
- C. Costs of mailing. The SLDS Governing Board may also charge actual costs of mailing, including the cost of the shipping container.
- D. Payment. Payment may be made by cash, check, or money order to the SLDS Governing Board for the amount specified.
- E. Charges for searching, reviewing and redacting. The actual cost of searching for and reviewing and, if necessary, redacting exempt information from public



records shall be based upon the hourly service rate multiplied by the actual time to complete the task.

Source: Miss. Code Ann. §37-154-3

*Rule 10.9 Review by Ethics Commission.* Pursuant to Section 25-61-13, if the SLDS Governing Board denies a requestor access to public records, the requestor may ask the Ethics Commission to review the matter. The Ethics Commission has adopted rules on such requests. They may be found at [www.ethics.state.ms.us](http://www.ethics.state.ms.us).

Any person whose request for public records was denied may institute a suit in the chancery court of Hinds County, seeking to reverse the denial, as set forth in Section 25-61-13.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 11: RULEMAKING ORAL PROCEEDINGS**

*Rule 11.1 Rulemaking oral proceedings.* These rules apply to all oral proceedings held for the purpose of providing the public with an opportunity to make oral presentations or written input on proposed new rules, amendments to rules, and proposed repeal of existing rules for the SLDS Governing Board.

When a political subdivision, an agency, or ten (10) persons request an oral proceeding in regards to a proposed rule adoption, the requestor must submit a printed, typewritten, or legibly handwritten request.

- A. Each request must be submitted on 8-1/2" x 11" white paper.
- B. The request may be in the form of a letter addressed to the Chair of the SLDS Governing Board or in the form of a pleading as if filed with a court.
- C. Each request must include the full name, telephone numbers, and mailing address of the requestor(s).
- D. All requests shall be signed by the person filing the request, unless represented by an attorney, in which case the attorney may sign the request.

Notice of the date, time, and place of all oral proceedings shall be filed with the Secretary of State's Office for publication in the Administrative Bulletin. The SLDS Governing Board shall provide notice of oral proceedings to all persons requesting notification of proposed rule adoptions. The oral proceedings will be scheduled no earlier than twenty (20) days from the filing of the notice with the Secretary of State. The Chair of the SLDS Governing Board

or designee who is familiar with the substance of the proposed rule shall preside at the oral proceeding on a proposed rule.

Public participation shall be permitted at oral proceedings, as follows:

- A. At an oral proceeding on a proposed rule, persons may make statements and present documentary and physical submissions concerning the proposed rule.
- B. Persons wishing to make oral presentations at such a proceeding shall notify the Chair of the SLDS Governing Board at least three (3) business days prior to the proceeding and indicate the general subject of their presentations. The presiding officer in his or her discretion may allow individuals to participate that have not contacted the SLDS Governing Board prior to the proceeding.
- C. At the proceeding, those who participate shall indicate their names and addresses, identify any persons or organizations they may represent, and provide any other information relating to their participation deemed appropriate by the presiding officer.
- D. The presiding officer may place time limitations on individual presentations when necessary to assure the orderly and expeditious conduct of the oral proceeding. To encourage joint presentations and to avoid repetition, additional time may be provided for persons whose presentations represent the views of other individuals as well as their own views.
- E. Persons making presentations are encouraged to avoid restating matters that have already been submitted in writing. Written materials may be submitted at the oral proceeding.
- F. Where time permits and to facilitate the exchange of information, the presiding officer may open the floor to questions or general discussion. The presiding officer may question participants and permit the questioning of participants by other participants about any matter relating to that rule-making proceeding, including any prior written submissions made by those participants in that proceeding. No participant shall be required to answer any question.

Physical and documentary submissions presented by participants in an oral proceeding shall be submitted to the presiding officer. Such submissions become the property of the SLDS Governing Board, part of the rulemaking record, and are subject to the SLDS Governing Board public records request procedure. The SLDS Governing Board may record oral proceedings by stenographic or electronic means.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 12: DECLARATORY OPINIONS**

*Introduction.* These rules and regulations govern the form, content, and filing of requests for declaratory opinion, the procedural rights of persons in relation to the written requests, and the SLDS Governing Board's procedures regarding the disposition of requests as required by Miss. Code Ann. §25-43-2.103.

*Rule 12.1 Declaratory Opinions.* The SLDS Governing Board will issue declaratory opinions regarding the applicability to specified facts of:

- A. A statute administered or enforceable by the SLDS Governing Board;
- B. A rule or regulation promulgated by the SLDS Governing Board; or,
- C. An order issued by the SLDS Governing Board.

A request must be limited to a single transaction or occurrence.

When a person with substantial interest, as required by Miss. Code Annotated §25-43-2.103, requests a declaratory opinion, the requestor must submit a printed, typewritten, or legibly handwritten request.

- A. Each request must be submitted on 8-1/2" x 11" white paper.
- B. The request may be in the form of a letter addressed to the Chair of the SLDS Governing Board or in the form of a pleading as if filed with a court.
- C. Each request must include the full name, telephone numbers, and mailing address of the requestor(s).
- D. All requests shall be signed by the person filing the request, unless represented by an attorney, in which case the attorney may sign the request.
- E. Each request must clearly state that it is a request for a declaratory opinion.

Any party who signs the request shall attest that the request complies with the requirements set forth in these rules, including but not limited to a full, complete, and accurate statement of relevant facts and that there are no related proceedings pending before any agency, administrative, or judicial tribunal.

Each request must contain the following:

- A. A clear identification of the statute, rule, regulation, or order at issue;
- B. The question for the declaratory opinion;

- C. A clear and concise statement of all facts relevant to the question presented;
- D. The identity of all other known persons involved in or impacted by the facts giving rise to the request including their relationship to the facts, and their name, mailing address, and telephone number; and,
- E. A statement sufficient to show that the requestor has a substantial interest in the subject matter of the request.

The SLDS Governing Board may, for good cause, refuse to issue a declaratory opinion. The circumstances in which declaratory opinions will not be issued include, but are not necessarily limited to the following:

- A. The matter is outside the primary jurisdiction of the SLDS Governing Board;
- B. There is a lack of clarity concerning the question presented;
- C. There is pending or anticipated litigation, administrative action or anticipated administrative action, or other adjudication which may either answer the question presented by the request or otherwise make an answer unnecessary;
- D. The statute, rule, or order on which a declaratory opinion is sought is clear and not in need of interpretation to answer the question presented by the request;
- E. The facts presented in the request are not sufficient to answer the question presented;
- F. The request fails to contain information required by these rules or the requestor failed to follow the procedure set forth in these rules;
- G. The request seeks to resolve issues which have become moot or are abstract or hypothetical such that the requestor is not substantially affected by the rule, statute, or order on which a declaratory opinion is sought;
- H. No controversy exists or is certain to arise which raises a question concerning the application of the statute, rule, or order;
- I. The question presented by the request concerns the legal validity of a statute, rule, or order;
- J. The request is not based upon facts calculated to aid in the planning of future conduct, but is, instead, based on past conduct in an effort to establish the effect of that conduct;
- K. No clear answer is determinable;

- L. The question presented by the request involves the application of a criminal statute or sets forth facts which may constitute a crime;
- M. The answer to the question presented would require the disclosure of information which is privileged or otherwise protected by law from disclosure;
- N. The question is currently the subject of an Attorney General's opinion request;
- O. The question has been answered by an Attorney General's opinion;
- P. One or more requestors have standing to seek an Attorney General's opinion on the proffered question;
- Q. A similar request is pending before this agency, or any other agency, or a proceeding is pending on the same subject matter before any agency, administrative or judicial tribunal, or where such an opinion would constitute the unauthorized practice of law; or,
- R. The question involves eligibility for a license, permit, certificate, or other approval by the SLDS Governing Board or some other agency and there is a statutory or regulatory application process by which eligibility for said license, permit, or certificate or other approval may be determined.

Within forty-five (45) days after the receipt of a request for a declaratory opinion which complies with the requirements of these rules, the SLDS Governing Board shall, in writing:

- A. Issue an opinion declaring the applicability of the statute, rule, or order to the specified circumstances;
- B. Agree to issue a declaratory opinion by a specified time but no later than ninety (90) days after receipt of the written request; or,
- C. Decline to issue a declaratory opinion, stating the reasons for its action.

The forty-five (45) day period shall begin on the first business day after which the request is received by the SLDS Governing Board.

Declaratory opinions and requests for declaratory opinions shall be available for public inspection and copying at the expense of the viewer during normal business hours. All declaratory opinion and requests shall be indexed by name, subject, and date of issue. Declaratory opinions and requests which contain information which is confidential or exempt from disclosure under the Mississippi Public Records Act or other laws shall be exempt from this requirement and shall remain confidential.

Source: Miss. Code Ann. §37-154-3

**Part 501 Chapter 13: REVIEW AND AUDIT**

*Rule 13.1 Review and Audit.* These rules and regulations shall be subject to review by an SLDS Governing Board committee on annual basis as set forth by the SLDS Governing Board Chair. The SLDS Governing Board committee shall prepare a report including recommendations for any actions to be considered by the convened governing board.

Source: Miss. Code Ann. §37-154-3

# Appendix C: Local Workforce Development Area Designation Policy. WIOA Policy #1

**MISSISSIPPI**  
**Policy Number 1**  
**LOCAL WORKFORCE DEVELOPMENT AREA DESIGNATION POLICY**  
**Workforce Innovation and Opportunity Act**  
**Office of Grant Management**

## **I. SCOPE AND PURPOSE**

Section 106 of the Workforce Innovation and Opportunity Act (WIOA) requires the Governor to designate Local Workforce Development Areas within the state through consultation with the State Workforce Development Board and after consultation with the chief elected officials and comments from the general public as described in Section 102(b)(2)(E)(ii)(II). For the purposes of this policy, the term “Governor” shall mean the Governor or his designee.

The purpose of this policy is to provide guidance regarding the initial and subsequent designation of Local Workforce Development Areas in Mississippi.

## **II. REQUIREMENTS**

WIOA provides for three types of local workforce development area designation: Initial Designation, Subsequent Designation, and Designation on Recommendation of the State Board. The Governor *shall* approve requests for initial and subsequent designation submitted by chief elected officials, provided the area under consideration meets the applicable eligibility criteria. Under the third designation type, the Governor *may* approve such requests from any unit of general local government on recommendation from the State Workforce Development Board.

### **A. Initial Designation [Section 106(b)(2)]:**

During the first two (2) full program years following the date of enactment of the Act, July 22, 2014, the Governor *shall* approve a request for initial designation as a local area from any area that (a) was designated as a local area for purposes of the Workforce Investment Act of 1998 for the two-year period preceding the date of enactment of this Act, (b) has performed successfully, and (c) sustained fiscal integrity.

1. “The term “performed successfully,” used with respect to a local area, means the local area met or exceeded the adjusted levels of performance for primary indicators of performance described in section 116(b)(2)(A) (or, if applicable, core indicators of performance described in section 136(b)(2)(A) of the Workforce Investment Act of 1998, as in effect the day before the date of enactment of this Act) for each of the last 2 consecutive years for which data are available preceding the determination of performance under this paragraph.” *(The local area has achieved at least 80 percent of their local performance goal on each performance*

*measure for Program Year 2012 and Program Year 2013 as stated in Section 106(e)(1) of the WIOA.)*

2. “The term “sustained fiscal integrity,” per Section 106(e)(2) is used with respect to a local area, means that the Secretary has not made a formal determination, during either of the last two (2) consecutive years preceding the determination regarding such integrity, that either the grant recipient or the administrative entity of the area misexpended funds provided under subtitle B (or, if applicable, Title I of the Workforce Investment Act of 1998 as in effect prior to the effective date of such subtitle B) due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration.”

**B. Subsequent Designation [Section 106(b)(3)]:**

After the two full program years initial designation period, the Governor *shall* approve a request for subsequent designation from such local area, if such area –

1. performed successfully;
2. sustained fiscal integrity;
3. and in the case of a local area in a planning region, met the requirements described at Section 106(c)(1).

**C. Governor Not Prohibited:**

If justification exists to explain why a local area(s) did not meet or exceed the adjusted levels of performance under the Initial or Subsequent Designation clauses, the Governor *may* approve such local area designation.

Nothing in the requirements to approve certain initial or subsequent designations of local areas shall be construed as prohibiting the Governor from approving such areas as may be recommended by the State board or the chief elected officials and which conform to the majority but not all of the requirements.

**D. Designation on Recommendation of State Board and Approval of Governor [Section 106(b)(1)]:**

The Governor *may* approve a request for a local area designation from any unit of general local government or combination of such units if the State Board determines that such area should be so designated. In making the designation of local areas, the Governor must give considerations consisting of the extent to which the areas:

1. are consistent with labor market areas in the State;
2. are consistent with regional economic development areas in the State; and



3. have available the Federal and non-Federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of WIOA, including whether the areas have the appropriate education and training providers such as institutions of higher education and area career and technical education schools.

**E. Regions [Section 106(a)]:**

Before the second full program year after the date of enactment of the Act, in order for a State to receive an allotment under Section 127(b) or 132(b) and as part of the process for developing the State Plan, a State *shall* identify regions in the State after consultation with the local boards and chief elected officials in the local areas and consistent with the considerations described in Section 106(b)(1)(B). The State *shall* also identify regions consistent with the requirements of Section 106 (a)(2).

**F. State Appeals Process [Section 106(b)(5)]:**

If an existing local workforce area under the WIA requests but is not granted designation as a local workforce development area under WIOA Section 106(b)(2) or Section 106(b)(3), the unit (or combination of units) of general local government or grant recipient may submit an appeal to the State Board under an appeal process established in the State Plan.

The written appeal must explain the appellant's opinion that the denial is contrary to the designation provisions of WIOA Section 106(b)(2) or 106(b)(3). Entities may not appeal a denial if their designation request does not meet the requirements of Section 106(b)(2) or 106(b)(3). The State Workforce Board will issue a determination within thirty (30) days of receipt of an appeal.

If the appeal to the State Board does not result in designation, the appellant, if appealing an initial designation under WIOA Section 106(b)(2) or subsequent designation under Section 106(b)(3), may request review by the Secretary of Labor. An appeal to the Secretary must be submitted by the appellant or grant recipient no later than 30 days after receipt of written notification from the State Board that the appeal has been denied. Appeals must be submitted by certified mail, return receipt requested, to the Secretary, U.S. Department of Labor, Washington, DC 20210, Attention: Assistant Secretary, Employment and Training Administration. A copy of the appeal must be simultaneously provided to the State Board.

If the Secretary determines that the appellant was not accorded procedural rights under the appeal process established under the above section, or that the area meets the requirements for initial or subsequent designation in WIOA Section 106(b)(2) or 106(b)(3), the Secretary may require that the area be designated as a workforce development area. The Secretary must issue a written decision to the Governor.

**III. EFFECTIVE DATE**

This policy shall be effective immediately upon signature.

Yolanda Boone                      3/2/2015  
Director                                      Date  
Office of Grant Management

## Appendix D: State and Regional Economic Analysis

### Current Industry Structure, 2022

Table D1: Current Wholesale/Retail Trade Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
General Merchandise Retailers	36,153	20.7	\$26,721	1,214
Merchant Wholesalers, Durable Goods	19,328	11.1	\$74,277	2,839
Motor Vehicle and Parts Dealers	18,765	10.7	\$55,131	1,562
Food and Beverage Stores	18,725	10.7	\$23,722	1,136
Gasoline Stations and Fuel Dealers	15,277	8.7	\$24,195	2,290
Building Material and Garden Equipment and Supplies Dealers	14,354	8.2	\$36,139	888
Merchant Wholesalers, Nondurable Goods	14,199	8.1	\$63,878	1,532
Sporting Goods, Hobby, Musical Instrument, Book, and Miscellaneous Retailers	10,515	6.0	\$26,413	1,444
Health and Personal Care Retailers	10,313	5.9	\$40,408	1,151
Clothing, Clothing Accessories, Shoe, and Jewelry Retailers	9,629	5.5	\$22,702	1,294
Furniture, Home Furnishings, Electronics, and Appliance Retailers	5,766	3.3	\$38,399	753
Wholesale Electronic Markets and Agents and Brokers	1,660	1.0	\$87,322	690
<b>Total</b>	<b>174,684</b>	<b>100.0</b>	<b>\$39,816</b>	<b>16,793</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

Table D2: Current Manufacturing Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
Transportation Equipment	28,428	19.1	\$68,132	143
Food	23,893	16.1	\$42,503	228
Furniture and Related Products	16,802	11.3	\$39,985	198
Machinery	14,820	10.0	\$53,566	159
Fabricated Metal Product	10,238	6.9	\$56,361	357
Wood Product	9,396	6.3	\$56,944	244
Plastics and Rubber Products	8,758	5.9	\$54,570	119
Electrical Equipment and Appliances	6,073	4.1	\$54,803	40
Chemical Manufacturing	5,995	4.0	\$76,432	150
Primary Metal	4,210	2.8	\$81,235	38
Paper	4,194	2.8	\$73,366	57
Nonmetallic Mineral Product	3,125	2.1	\$58,407	168
Miscellaneous	2,498	1.7	\$48,088	158
Petroleum and Coal Products	2,471	1.7	\$141,623	34
Computer and Electronic Product	2,291	1.5	\$66,688	31
Apparel	1,345	0.9	\$41,716	26
Printing and Related Support Activities	1,158	0.8	\$43,296	175
Textile Mills	1,145	0.8	\$60,527	18
Textile Product Mills	826	0.6	\$34,955	42
Beverage and Tobacco Product	810	0.5	\$63,283	36
Leather and Allied Product	229	0.2	\$51,060	3
<b>Total</b>	<b>148,705</b>	<b>100.0</b>	<b>\$57,305</b>	<b>2,424</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

Table D3: Current Leisure and Hospitality Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
Food Services and Drinking Places	98,079	72.5	\$18,579	5,497
Accommodation	26,899	19.9	\$31,958	907
Amusement, Gambling, and Recreation Industries	8,424	6.2	\$20,430	618
Performing Arts, Spectator Sports, and Related Industries	1,055	0.8	\$36,746	155
Museums, Historical Sites, and Similar Institutions	832	0.6	\$36,480	75
<b>Total</b>	<b>135,289</b>	<b>100.0</b>	<b>\$21,606</b>	<b>7,252</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

Table D4: Current Healthcare and Social Assistance Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
Hospitals	59,484	33.6	\$61,457	183
Ambulatory Health Care Services	57,688	32.5	\$66,343	5,446
Social Assistance	33,257	18.8	\$25,112	2,154
Nursing and Residential Care Facilities	26,801	15.1	\$34,891	478
<b>Total</b>	<b>177,230</b>	<b>100.0</b>	<b>\$52,210</b>	<b>8,261</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

Table D5: Current Natural Resources and Mining Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
Crop Production	3,061	21.3	\$34,687	638
Forestry and Logging	2,860	19.9	\$47,798	444
Animal Production and Aquaculture	2,462	17.1	\$53,314	191
Support Activities for Agriculture and Forestry	2,410	16.7	\$48,037	375
Support Activities for Mining	2,018	14.0	\$82,876	289
Mining (except Oil and Gas)	899	6.2	\$69,267	54
Oil and Gas Extraction	399	2.8	\$126,444	50
Fishing, Hunting and Trapping	284	2.0	\$74,184	27
<b>Total</b>	<b>14,393</b>	<b>100.0</b>	<b>\$54,953</b>	<b>2,068</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

## Current Occupations, 2022

Table D6: Top 10 Occupations in the Wholesale/Retail Trade Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Retail Salespersons	33,727	19.3	\$8.56	\$12.45	\$19.02
Cashiers	28,329	16.2	\$8.36	\$10.17	\$13.38
Stockers and Order Fillers	14,856	8.5	\$10.37	\$14.44	\$22.77
First-Line Supervisors of Retail Sales Workers	12,046	6.9	\$10.97	\$17.75	\$30.53
Laborers and Freight, Stock, and Material Movers, Hand	6,481	3.7	\$11.48	\$14.64	\$19.71
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	6,110	3.5	\$13.50	\$24.53	\$52.75
General and Operations Managers	5,311	3.0	\$15.27	\$32.65	\$77.78
Customer Service Representatives	4,303	2.5	\$11.49	\$14.76	\$21.95
Light Truck Drivers	3,923	2.2	\$10.31	\$17.92	\$35.06
Automotive Service Technicians and Mechanics	3,553	2.0	\$11.48	\$17.94	\$34.11
<b>Total</b>	<b>118,639</b>	<b>67.8</b>	<b>\$9.95</b>	<b>\$14.77</b>	<b>\$24.81</b>

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Wholesale/Retail Trade jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

Table D7: Top 10 Occupations in the Manufacturing Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Miscellaneous Assemblers and Fabricators	13,554	9.1	\$11.29	\$17.07	\$26.86
Laborers and Freight, Stock, and Material Movers, Hand	8,775	5.9	\$11.48	\$14.64	\$19.71
Meat, Poultry, and Fish Cutters and Trimmers	6,961	4.7	\$10.87	\$17.94	\$19.38
First-Line Supervisors of Production and Operating Workers	5,631	3.8	\$15.95	\$28.85	\$48.76
Welders, Cutters, Solderers, and Brazers	5,170	3.5	\$15.86	\$23.50	\$30.49
Inspectors, Testers, Sorters, Samplers, and Weighers	4,072	2.7	\$12.37	\$17.62	\$28.49
Industrial Machinery Mechanics	3,443	2.3	\$17.95	\$25.45	\$39.76
Helpers--Production Workers	2,919	2.0	\$10.60	\$14.27	\$19.72
Industrial Truck and Tractor Operators	2,786	1.9	\$13.70	\$17.59	\$24.18
Maintenance and Repair Workers, General	2,597	1.7	\$11.08	\$17.44	\$27.95
<b>Total</b>	<b>55,908</b>	<b>37.6</b>	<b>\$12.72</b>	<b>\$19.03</b>	<b>\$27.81</b>

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Manufacturing jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

Table D8: Top 10 Occupations in the Leisure and Hospitality Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Fast Food and Counter Workers	17,871	13.2	\$8.35	\$10.02	\$12.75
Waiters and Waitresses	17,112	12.6	\$7.42	\$8.79	\$15.37
Cooks, Fast Food	13,982	10.3	\$8.41	\$10.12	\$13.31
Cashiers	10,728	7.9	\$8.36	\$10.17	\$13.38
Cooks, Restaurant	9,688	7.2	\$9.05	\$13.14	\$16.30
First-Line Supervisors of Food Preparation and Serving Workers	9,159	6.8	\$10.00	\$13.86	\$22.58
Food Preparation Workers	5,889	4.4	\$8.89	\$10.57	\$15.23
Maids and Housekeeping Cleaners	4,360	3.2	\$8.34	\$10.47	\$13.75
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	3,353	2.5	\$8.00	\$10.15	\$12.77
Hotel, Motel, and Resort Desk Clerks	2,928	2.2	\$8.30	\$10.40	\$13.02
<b>Total</b>	<b>95,070</b>	<b>70.3</b>	<b>\$8.44</b>	<b>\$10.59</b>	<b>\$14.89</b>

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Leisure and Hospitality jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

Table D9: Top 10 Occupations in the Healthcare and Social Assistance Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Registered Nurses	26,701	15.1	\$24.03	\$30.45	\$40.40
Home Health and Personal Care Aides	20,645	11.7	\$9.00	\$10.52	\$13.67
Nursing Assistants	13,121	7.4	\$10.00	\$13.19	\$16.40
Licensed Practical and Licensed Vocational Nurses	9,370	5.3	\$17.43	\$21.99	\$26.82
Childcare Workers	4,712	2.7	\$8.32	\$9.83	\$13.15
Receptionists and Information Clerks	4,386	2.5	\$9.94	\$13.91	\$17.85
Medical Assistants	3,989	2.3	\$11.29	\$14.87	\$19.90
Nurse Practitioners	3,639	2.1	\$41.17	\$52.37	\$73.57
Clinical Laboratory Technologists and Technicians	3,368	1.9	\$12.88	\$19.26	\$31.73
Office Clerks, General	3,222	1.8	\$9.06	\$14.68	\$23.36
<b>Total</b>	<b>93,153</b>	<b>52.8</b>	<b>\$15.80</b>	<b>\$20.17</b>	<b>\$26.80</b>

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Healthcare and Social Assistance jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

Table D10: Top 10 Occupations in the Natural Resources and Mining Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Farmworkers and Laborers, Crop, Nursery, and Greenhouse	1,901	13.2	\$8.40	\$16.50	\$21.63
Farmers, Ranchers, and Other Agricultural Managers	1,549	10.7	\$14.79	\$15.07	\$29.06
Farmworkers, Farm, Ranch, and Aquacultural Animals	1,247	8.7	\$9.58	\$17.92	\$25.73
Logging Equipment Operators	1,231	8.5	\$10.00	\$18.75	\$28.31
Heavy and Tractor-Trailer Truck Drivers	846	5.9	\$14.34	\$22.99	\$37.37
Roustabouts, Oil and Gas	435	3.0	\$14.85	\$19.00	\$24.72
Animal Trainers	348	2.4	\$8.64	\$10.47	\$16.21
First-Line Supervisors of Farming, Fishing, and Forestry Workers	314	2.2	\$14.23	\$23.78	\$47.31
Bookkeeping, Accounting, and Auditing Clerks	286	2.0	\$11.87	\$18.03	\$27.55
First-Line Supervisors of Construction Trades and Extraction Workers	275	1.9	\$18.20	\$29.06	\$45.09
<b>Total</b>	<b>8,432</b>	<b>58.5</b>	<b>\$11.58</b>	<b>\$18.04</b>	<b>\$28.01</b>

Source: U.S. Bureau of Labor Statistics, OES 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Natural Resources and Mining jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

## New and Emerging Sectors, 2022

Table D11: Current Advanced Manufacturing Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
Transportation Equipment	28,428	31.6	\$68,132	143
Furniture and Related Product	16,802	18.7	\$39,985	198
Machinery	14,820	16.5	\$53,566	159
Plastics and Rubber Products	8,758	9.7	\$54,570	119
Electrical Equipment, Appliance, and Components	6,073	6.8	\$54,803	40
Chemical	5,995	6.7	\$76,432	150
Primary Metal	4,210	4.7	\$81,235	38
Petroleum and Coal Products	2,471	2.8	\$141,623	34
Computer and Electronic Products	2,291	2.5	\$66,688	31
<b>Total</b>	<b>89,848</b>	<b>100.0</b>	<b>\$61,395</b>	<b>912</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.



Table D12: Current Healthcare Support Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
General Warehousing and Storage	21,527	81.0	\$45,069	230
Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers	2,086	7.9	\$95,712	389
Pharmaceutical Preparation Manufacturing	1,061	4.0	\$60,185	22
Drugs and Druggists Sundries Merchant Wholesalers	1,044	3.9	\$148,378	291
Surgical and Medical Instrument Manufacturing	350	1.3	\$57,860	4
Surgical Appliance and Supplies Manufacturing	206	0.8	\$61,824	18
Dental Laboratories	166	0.6	\$45,776	29
Ophthalmic Goods Manufacturing	132	0.5	\$52,481	2
<b>Total</b>	<b>26,572</b>	<b>100.0</b>	<b>\$54,047</b>	<b>985</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

Table D13: Current Tourism Industry Structure

Industry	Employment	Percent	Average Annual Wages	Establishment
Food Services and Drinking Places	98,079	48.5	\$18,579	5,497
Administrative and Support Services	66,739	33.0	\$33,331	4,930
Accommodation	26,899	13.3	\$31,958	907
Amusement, Gambling, and Recreation Industries	8,424	4.2	\$20,430	618
Performing Arts, Spectator Sports, and Related Industries	1,055	0.5	\$36,746	155
Motion Picture and Sound Recording Industries	906	0.4	\$29,507	109
<b>Total</b>	<b>202,102</b>	<b>100.0</b>	<b>\$25,452</b>	<b>12,216</b>

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

## New and Emerging Occupations, 2022

Table D14: Top 10 Occupations in the Advanced Manufacturing Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Miscellaneous Assemblers and Fabricators	11,441	12.7	\$11.29	\$17.07	\$26.86
Welders, Cutters, Solderers, and Brazers	4,210	4.7	\$15.86	\$23.50	\$30.49
First-Line Supervisors of Production and Operating Workers	3,502	3.9	\$15.95	\$28.85	\$48.76
Laborers and Freight, Stock, and Material Movers, Hand	3,058	3.4	\$11.48	\$14.64	\$19.71
Inspectors, Testers, Sorters, Samplers, and Weighers	2,699	3.0	\$12.37	\$17.62	\$28.49
Upholsterers	2,285	2.5	\$12.19	\$18.00	\$22.95
Electricians	1,852	2.1	\$17.20	\$26.27	\$33.36
Engine and Other Machine Assemblers	1,820	2.0	\$14.17	\$17.04	\$22.08
Industrial Machinery Mechanics	1,808	2.0	\$17.95	\$25.45	\$39.76
Machinists	1,749	1.9	\$13.82	\$19.50	\$30.16
<b>Total</b>	<b>34,424</b>	<b>38.2</b>	<b>\$13.43</b>	<b>\$20.00</b>	<b>\$29.71</b>

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Advanced Manufacturing jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

Table D15: Top 10 Occupations in the Healthcare Support Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Stockers and Order Fillers	5,107	19.2	\$10.37	\$14.44	\$22.77
Laborers and Freight, Stock, and Material Movers, Hand	4,151	15.6	\$11.48	\$14.64	\$19.71
Industrial Truck and Tractor Operators	4,073	15.3	\$13.70	\$17.59	\$24.18
Shipping, Receiving, and Inventory Clerks	1,787	6.7	\$12.71	\$17.12	\$23.41
First-Line Supervisors of Transportation and Material Moving Workers, Except Aircraft Cargo Handling Supervisors	1,069	4.0	\$16.12	\$24.80	\$39.25
Heavy and Tractor-Trailer Truck Drivers	838	3.2	\$14.34	\$22.99	\$37.37
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	579	2.2	\$13.50	\$24.53	\$52.75
First-Line Supervisors of Office and Administrative Support Workers	486	1.8	\$14.68	\$22.45	\$38.37
General and Operations Managers	429	1.6	\$15.27	\$32.65	\$77.78
Maintenance and Repair Workers, General	381	1.4	\$11.08	\$17.44	\$27.95
<b>Total</b>	<b>18,900</b>	<b>71.0</b>	<b>\$12.39</b>	<b>\$17.37</b>	<b>\$26.71</b>

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Healthcare Support jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

Table D16: Top 10 Occupations in the Tourism Industry

Occupation	Employment	Percent*	Hourly Wage		
			PCT10**	Median	PCT90***
Fast Food and Counter Workers	18,190	9.0	\$8.35	\$10.02	\$12.75
Waiters and Waitresses	17,114	8.5	\$7.42	\$8.79	\$15.37
Cooks, Fast Food	13,983	6.9	\$8.41	\$10.12	\$13.31
Cashiers	10,875	5.4	\$8.36	\$10.17	\$13.38
Cooks, Restaurant	9,692	4.8	\$9.05	\$13.14	\$16.30
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	9,625	4.8	\$8.87	\$11.54	\$16.31
First-Line Supervisors of Food Preparation and Serving Workers	9,216	4.6	\$10.00	\$13.86	\$22.58
Security Guards	7,830	3.9	\$8.99	\$12.01	\$19.26
Customer Service Representatives	6,173	3.1	\$11.49	\$14.76	\$21.95
Food Preparation Workers	5,920	2.9	\$8.89	\$10.57	\$15.23
<b>Total</b>	<b>108,618</b>	<b>53.9</b>	<b>\$8.71</b>	<b>\$11.04</b>	<b>\$15.89</b>

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

\*Percent of all Tourism jobs. \*\* Hourly 10<sup>th</sup> percentile wage. \*\*\* Hourly 90<sup>th</sup> percentile wage.

## Appendix E: Characteristics of Individuals with Employment Barriers

Table E1: Demographic and Economic Characteristics of People with Disabilities

Statewide		
	Number	Percent
Total Disabled Population	487,068	-
Total Age 18-64	262,580	-
RACE (All Ages)		
White	176,985	36.3
Black	292,805	60.1
American Indian	2,128	0.4
Other	15,150	3.1
GENDER (Ages 18-64)		
Female	134,950	51.4
Male	127,630	48.6
AGE (Ages 18-64)		
18-34	57,318	21.8
35-64	205,262	78.2
EDUCATION (Ages 25+)		
Less than High School Graduate	102,617	23.9
High School Diploma/GED	146,412	34.1
Some College/Associate Degree	180,331	42
ECONOMIC CHARACTERISTICS		
Employment Rate	-	88.8
Median Earnings	-	\$23,501
TYPE OF DISABILITY* (Ages 18-64)		
Hearing Difficulty	45,248	17.2
Vision Difficulty	63,634	24.2
Cognitive Difficulty	75,851	28.9
Ambulatory Difficulty	125,190	47.7
Self-care Difficulty	39,860	15.2
Independent Living Difficulty	77,721	29.6

Source: U.S. Census Bureau, American Community Survey, 2015-2019 5-Year Estimates.

Note: May not total to 100 percent due to rounding. \* Individuals may have more than one type of disability, so these numbers and percentages, when added, may be greater than the total number of individuals and 100 percent, respectively.

Table E2: Characteristics of Temporary Assistance for Needy Family (TANF) Program Work-Eligible Recipients

<b>Statewide</b>		
	Number	Percent
Total TANF Recipients	5,340	-
Total Ages 18-64	558	-
<b>RACE (Ages 18-64)</b>		
Black	506	90.7
White	41	7.3
American Indian	<10	-
Others	<10	-
<b>GENDER (Ages 18-64)</b>		
Female	539	96.6
Male	19	3.4
<b>AGE (Ages 18-64)</b>		
18 - 25	158	28.3
26 - 35	312	55.9
36 - 45	70	12.5
46 - 64	18	3.2
<b>EDUCATION (Ages 18-64)</b>		
Less than High School Graduate	167	29.9
High School Diploma/GED	55	9.9
Some College	266	47.7
Not Available	70	12.5
<b>ECONOMIC CHARACTERISTICS (Ages 18-64)</b>		
Employment Rate for the cohort 2023*	-	74.4
Median Earnings for the cohort 2023*	-	\$17,313
Employment Rate One Year After Exit for the cohort 2022*	-	79.4
Average Earnings One Year After Exit for the cohort 2022*	-	\$15,725

Source: Mississippi Department of Human Services, Temporary Assistance for Needy Families, 2023; Mississippi Department of Employment Security, 2023.

Note: May not total to 100 percent due to rounding.

\*: This data is preliminary, which may be revised.

Table E3: Characteristics of Supplemental Nutrition Assistance Program (SNAP) Recipients

<b>Statewide</b>		
	<b>Number</b>	<b>Percent</b>
Total SNAP Recipients	570,637	-
Total Ages 18-64	218,532	-
<b>RACE (Ages 18-64)</b>		
Black	132,318	60.5
White	80,608	36.9
American Indian	1,182	0.5
Other	4,424	2
<b>GENDER (Ages 18-64)</b>		
Female	140,161	64.1
Male	78,371	35.9
<b>AGE (Ages 18-64)</b>		
18 - 25	35,074	16
26 - 35	44,467	20.3
36 - 45	50,638	23.2
46 - 64	88,353	40.4
<b>EDUCATION (Ages 18-64)</b>		
Less than High School Graduate	37,608	17.2
High School Diploma/GED	17,863	8.2
Some College	55,700	25.5
Not Available	107,361	49.1
<b>ECONOMIC CHARACTERISTICS (Ages 18-64)</b>		
Employment Rate for the cohort 2023*	-	42.7
Median Earnings for the cohort 2023*	-	\$21,784
Employment Rate One Year After Exit for the cohort 2022*	-	59.7
Average Earnings One Year After Exit for the cohort 2022*	-	\$22,397

Source: Mississippi Department of Human Services, 2023; Mississippi Department of Employment Security, 2023.

Note: May not total to 100 percent due to rounding

\*: This data is preliminary, which may be revised.

Table E4: Characteristics of Ex-Offenders

<b>Statewide</b>		
	<b>Number</b>	<b>Percent</b>
Total Ex-Offenders	5,818	-
Total Ages 18-64	5,674	-
<b>RACE (Ages 18-64)</b>		
Black	2,822	49.7
White	2,773	48.9
American Indian	12	0.2
Other	67	1.2
<b>GENDER (Ages 18-64)</b>		
Female	752	13.3
Male	4,922	86.7
<b>AGE (Ages 18-64)</b>		
18 - 25	472	8.3
26 - 35	1,938	34.2
36 - 45	1,888	33.3
46 - 64	1,376	24.3
<b>EDUCATION (Ages 18-64)</b>		
Less than High School Graduate	2,140	37.7
High School Diploma/GED	454	8
Some College	758	13.4
Not Available	2,322	40.9
<b>ECONOMIC CHARACTERISTICS (Ages 18-64)</b>		
Employment Rate for the cohort 2023*	-	23.1
Median Earnings for the cohort 2023*	-	\$21,853

Source: Mississippi Department of Corrections, 2023; Mississippi Department of Employment Security, 2023.

Note: May not total to 100 percent due to rounding.

\*: This data is preliminary, which may be revised.

## Appendix F: Labor Market Trends

Table F1: Top 20 Occupations in Advanced Manufacturing Industry with the Highest Job Growth

Occupation	10-Year Projected Openings	Job Openings in FY2023
Miscellaneous Assemblers and Fabricators	611	<10
Welders, Cutters, Solderers, and Brazers	229	951
Laborers and Freight, Stock, and Material Movers, Hand	215	822
First-Line Supervisors of Production and Operating Workers	167	530
Inspectors, Testers, Sorters, Samplers, and Weighers	115	212
Electricians	106	154
Electrical, Electronic, and Electromechanical Assemblers, Except Coil Winders, Tapers, and Finishers	96	91
Upholsterers	91	367
Machinists	85	349
Sewing Machine Operators	81	110
Industrial Machinery Mechanics	79	129
Shipping, Receiving, and Inventory Clerks	75	294
Packaging and Filling Machine Operators and Tenders	72	216
Engine and Other Machine Assemblers	70	130
Helpers--Production Workers	66	750
Production, Planning, and Expediting Clerks	66	96
Maintenance and Repair Workers, General	57	321
Plumbers, Pipefitters, and Steamfitters	56	536
Coating, Painting, and Spraying Machine Setters, Operators, and Tenders	52	<10
Industrial Engineers	51	348
<b>Total</b>	<b>2,440</b>	<b>6,406</b>

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.



Table F2: Top 20 Occupations in Healthcare Support Industry with the Highest Job Growth

Occupation	10-Year Projected Openings	Job Openings in FY2023
Laborers and Freight, Stock, and Material Movers, Hand	514	14
Stockers and Order Fillers	466	<10
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	290	21
Industrial Truck and Tractor Operators	230	55
Heavy and Tractor-Trailer Truck Drivers	146	<10
Light Truck Drivers	121	<10
Shipping, Receiving, and Inventory Clerks	119	17
Miscellaneous Assemblers and Fabricators	95	<10
First-Line Supervisors of Transportation and Material Moving Workers, Except Aircraft Cargo Handling Supervisors	94	<10
General and Operations Managers	82	85
Office Clerks, General	72	<10
Bookkeeping, Accounting, and Auditing Clerks	65	<10
First-Line Supervisors of Non-Retail Sales Workers	62	18
Customer Service Representatives	61	14
Driver/Sales Workers	56	<10
First-Line Supervisors of Production and Operating Workers	49	48
Computer Numerically Controlled Tool Operators	44	<10
Maintenance and Repair Workers, General	42	33
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	42	<10
Chemical Equipment Operators and Tenders	41	<10
<b>Total</b>	<b>2,691</b>	<b>315</b>

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.

Table F3: Top 20 Occupations in Tourism Industry with the Highest Job Growth

Occupation	10-Year Projected Openings	Job Openings in FY2023
Fast Food and Counter Workers	2,161	<10
Waiters and Waitresses	1,897	568
Cooks, Fast Food	1,031	262
Cooks, Restaurant	974	877
Cashiers	921	666
First-Line Supervisors of Food Preparation and Serving Workers	832	1,013
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	757	1,134
Security Guards	590	902
Food Preparation Workers	567	578
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	459	259
Maids and Housekeeping Cleaners	413	798
Laborers and Freight, Stock, and Material Movers, Hand	396	678
Customer Service Representatives	382	2,410
Landscaping and Groundskeeping Workers	332	899
Hotel, Motel, and Resort Desk Clerks	276	201
Bartenders	269	167
Food Servers, Non-restaurant	248	300
Gambling Dealers	242	126
Dining Room and Cafeteria Attendants and Bartender Helpers	194	92
Miscellaneous Assemblers and Fabricators	190	<10
<b>Total</b>	<b>13,131</b>	<b>11,930</b>

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.

Table F4: Job Growth in Well-Established Industries

Occupation	10-Year Projected Openings
<b>Wholesale/Retail Trade</b>	
Building Material and Garden Equipment and Supplies Dealers	981
Clothing, Clothing Accessories, Shoe, and Jewelry Retailers	626
Food and Beverage Stores	1,482
Health and Personal Care Retailers	586
Merchant Wholesalers, Durable Goods	1,010
Motor Vehicle and Parts Dealers	1,106
Sporting Goods, Hobby, Musical Instrument, Book, and Miscellaneous Retailers	791
Wholesale Electronic Markets and Agents and Brokers	113
<b>Finance</b>	
Funds, Trusts, and Other Financial Vehicles	<10
Real Estate	446
Rental and Leasing Services	216
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	57
<b>Non-Advanced Manufacturing</b>	
Fabricated Metal Product Manufacturing	521
Nonmetallic Mineral Product Manufacturing	172
Textile Mills	50
<b>Transportation and Warehousing</b>	
Couriers and Messengers	483
Support Activities for Transportation	251
Transit and Ground Passenger Transportation	110
Truck Transportation	1,177
Warehousing and Storage	1,119
Water Transportation	47
<b>Natural Resources</b>	
Crop Production	367
Forestry and Logging	214
Mining (except Oil and Gas)	39
<b>Healthcare</b>	
Ambulatory Health Care Services	2,583
Hospitals	2,728
Nursing and Residential Care Facilities	1,519
Social Assistance	2,124
<b>Education Services</b>	
Education Services	6,025
<b>Total</b>	<b>26,946</b>

Sources: Mississippi Department of Employment Security, 2023.

Table F5: Top 20 Occupations in Well-Established Industries with the Highest Job Growth

Occupation	10-Year Projected Openings	Job Openings in FY2023
Retail Salespersons	1,799	1,284
Home Health and Personal Care Aides	1,489	<10
Heavy and Tractor-Trailer Truck Drivers	997	1,345
Cashiers	977	4,213
Laborers and Freight, Stock, and Material Movers, Hand	910	647
Nursing Assistants	857	<10
Registered Nurses	842	4,779
Stockers and Order Fillers	827	<10
Teaching Assistants, Except Postsecondary	545	<10
Passenger Vehicle Drivers, Except Bus Drivers, Transit & Intercity	532	<10
Elementary School Teachers, Except Special Education	506	16
Cooks, Institution and Cafeteria	485	294
Childcare Workers	476	293
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	441	311
Office Clerks, General	422	208
First-Line Supervisors of Retail Sales Workers	421	809
Light Truck Drivers	420	446
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	413	131
Licensed Practical and Licensed Vocational Nurses	390	1,431
Secondary School Teachers, Except Special and Career/Technical Education	359	<10
<b>Total</b>	<b>14,108</b>	<b>16,216</b>

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.

## Appendix G: Performance Goals for Core Programs

	Program Year:			
	Program Year:		Program Year:	
	Negotiated Level	Expected Level	Negotiated Level	Expected Level
Employment (Second Quarter after Exit)	81	75	82	76
Employment (Fourth Quarter after Exit)	75	72	77	74
Median Earnings (Second Quarter after Exit)	5600	5200	5800	5300
Credential Attainment Rate	52	48	54	50
Measurable Skill Gains	Baseline	Baseline	Baseline	Baseline

	Program Year:			
	Program Year:		Program Year:	
	Negotiated Level	Expected Level	Negotiated Level	Expected Level
Employment (Second Quarter after Exit)	74	70	75	71
Employment (Fourth Quarter after Exit)	65	68	67	70
Median Earnings (Second Quarter after Exit)	5100	5000	5200	5100
Credential Attainment Rate	50	48	52	50
Measurable Skill Gains	Baseline	Baseline	Baseline	Baseline

	Program Year:		Program Year:	
	Negotiated Level	Expected Level	Negotiated Level	Expected Level
Employment (Second Quarter after Exit) <a href="#">21</a>	74	72	75	73
Employment (Fourth Quarter after Exit) <a href="#">22</a>	71	70	72	72
Median Earnings (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	71	70	72	70.50
Measurable Skill Gains	Baseline	Baseline	Baseline	Baseline

	Program Year:		Program Year:	
	Negotiated Level	Expected Level	Negotiated Level	Expected Level
Employment (Second Quarter after Exit)	46 %		47 %	
Employment (Fourth Quarter after Exit)	46 %		47 %	
Median Earnings (Second Quarter after Exit)	2,948.00		2948.00	
Credential Attainment Rate	600		700	
Measurable Skill Gains	51 %		52 %	

	Program Year:		Program Year:	
	Negotiated Level	Expected Level	Negotiated Level	Expected Level
Employment (Second Quarter after Exit)	65	65	66	66
Employment (Fourth Quarter after Exit)	65	65	65	65
Median Earnings (Second Quarter after Exit)	3950	3900	4000	3900
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	Program Year:		Program Year:	
	Negotiated Level	Expected Level	Negotiated Level	Expected Level
Employment (Second Quarter after Exit) 22	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit) 22	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit) <a href="#">23</a>	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate 22	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains				

	All WIOA Core Programs			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers	Not applicable	Not applicable	Not applicable	Not applicable

Additional Indicators of Performance
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2.
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4.
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6.



# Appendix H: Sample WIOA Allocation Communication



## Mississippi Department of Employment Security

Tate Reeves  
Governor

Robin Stewart  
Interim Executive Director

**WIOA COMMUNICATION NUMBER: 22-004**

**DATE: May 8, 2023**

**SUBJECT: Program Year 2023 WIOA Local Area Allocations**

### I. BACKGROUND:

#### A. State Allocations

The U.S. Department of Labor has published TEGL 15-22 which announces the Workforce Innovation and Opportunity Act (WIOA) state allocation for Program Year (PY) 2023. States are required to distribute the PY 2023 allotment for WIOA Youth, Adult, and Dislocated to local workforce development areas. The amount available for the Governor's reserve has been appropriated at 15 percent. Local Workforce Development Boards should refer to TEGL 15-22 for additional guidance and explanation.

SOURCE	TOTAL STATE	STATE ACTIVITIES	LOCAL ACTIVITIES
Adult	\$ 9,171,420	\$ 1,375,713	\$ 7,795,707
Youth	\$ 9,566,263	\$ 1,434,939	\$ 8,131,324
Dislocated Worker	\$ 12,778,348	\$ 5,111,339	\$ 7,667,009
<b>TOTAL</b>	<b>\$ 31,516,031</b>	<b>\$ 7,921,991</b>	<b>\$ 23,594,040</b>

The allocations to the local areas are calculated based on the formulas described below. The allocation worksheets will be provided via e-mail upon request.

*Helping Mississippians Get Jobs*

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## B. Adult

The WIOA allows the following allocation process:

### 1. Standard Allocation Formula

- a. 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each area, compared to the total number of unemployed individuals in areas of substantial unemployment in all areas. The term "area of substantial unemployment" means any area that is of sufficient size and scope to sustain a program of workforce investment activities carried out under this subtitle and that has an average rate of unemployment of at least 6.5 percent for the most recent 12 months.
- b. 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each area, compared to the total excess number of unemployed individuals in all areas. The term "excess number" means, used with respect to the excess number of unemployed individuals within a State, a higher of (1) the number that represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force; or (2) the number that represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment.
- c. 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged adults in each area, compared to the total number of disadvantaged adults in all areas. The term "disadvantaged adult" means an adult who received income, or is a member of a family that received a total family income that, in relation to family size, does not exceed that higher of: (1) the poverty line; or (2) 70 percent of the lower living standard income level.

### 2. Transfer Authority

Under WIOA, DOL allows transfer of up to 100% of funds between Dislocated Worker and Adult funding streams.

### 3. Availability

Approximately 20 percent of funds described below will be available for expenditure no earlier than July 1, 2023. The remaining 80 percent will be available for expenditure no earlier than October 1, 2023.

4. Allocation

The following allocation was calculated based on the formula described above. The allocation worksheets will be provided via e-mail upon request.

<b>WIOA ADULT</b>			
<b>Local Workforce Development Area</b>	<b>Local Allocation</b>	<b>Available July 1, 2023</b>	<b>Available October 1, 2023</b>
Delta	\$ 1,764,745	\$ 347,080	\$ 1,417,665
MS Partnership	\$ 2,078,715	\$ 408,831	\$ 1,669,884
Southcentral MS	\$ 1,725,564	\$ 339,375	\$ 1,386,189
Twin Districts	\$ 2,226,683	\$ 437,931	\$ 1,788,752
<b>TOTAL</b>	<b>\$ 7,795,707</b>	<b>\$ 1,533,217</b>	<b>\$ 6,262,490</b>

**C. Youth**

The WIOA allows for the following allocation process:

1. Standard Allocation Formula

- a. 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each area, compared to the total number of unemployed individuals in areas of substantial unemployment in all areas;
- b. 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each area, compared to the total excess number of unemployed individuals in all areas; and
- c. 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged youth in each area, compared to the total number of disadvantaged youth in all areas.

2. Availability

One hundred percent of the funds described below will be available for expenditure no earlier than April 1, 2023.

3. Allocation

The following allocation was calculated based on that formula described above. The allocation worksheets will be provided via e-mail upon request.

<b>WIOA YOUTH</b>		
<b>Local Workforce Development Area</b>	<b>Local Allocation</b>	<b>Available April 1, 2023</b>
Delta	\$ 1,860,955	\$ 1,860,955
MS Partnership	\$ 2,184,798	\$ 2,184,798
Southcentral MS	\$ 1,736,581	\$ 1,736,581
Twin Districts	\$ 2,348,990	\$ 2,348,990
<b>TOTAL</b>	<b>\$ 8,131,324</b>	<b>\$ 8,131,324</b>

**D. Dislocated Workers**

1. Allocation Formula

The State shall allocate not less than 60 percent based on an allocation formula prescribed by the Governor. The formula shall use the most recent available information and shall include:

- a. Insured unemployment data,
- b. Unemployment concentrations,
- c. Plant closing and mass layoff data,
- d. Declining industries,
- e. Farmer-rancher economic hardship data,
- f. Long term unemployment data.

The formula used by the state is as follows:

<b>ALLOCATION FACTOR</b>	<b>WEIGHT ASSIGNED IN FORMULA</b>
Insured Unemployment Data	10%
Unemployment Concentrations Data	25%
Plant Closing and Mass Layoff Data	10%
Declining Industries Data	20%
Farmer-Rancher Economic Hardship Data	5%
Long-Term Unemployment Data	30%

2. Under WIOA, DOL allows transfer of up to 100% of funds between Dislocated Worker and Adult funding streams

3. Availability

Approximately 21.5 percent of the funds described below will be available for expenditure no earlier than July 1, 2023. The remaining 78.5 percent will be available for expenditure no earlier than October 1, 2023.

4. Rapid Response

The allocation does not include funds set aside for Rapid Response personnel at the local area. Requests for Rapid Response funds should be directed to the Office of Grant Management.

5. Allocation

WIOA DISLOCATED WORKER			
Local Workforce Investment Area	Local Allocation	Available July 1, 2023	Available October 1, 2023
Delta	\$ 1,540,386	\$ 332,193	\$1,208,193
MS Partnership	\$ 1,894,039	\$ 408,461	\$ 1,485,578
Southcentral MS	\$ 1,995,921	\$ 430,432	\$ 1,565,489
Twin Districts	\$ 2,236,663	\$ 482,350	\$1,754,313
<b>TOTAL</b>	<b>\$ 7,667,009</b>	<b>\$1,653,436</b>	<b>\$ 6,013,573</b>

**E. Funds Availability**

The funds described above will be available to the Local Workforce Development Board for expenditure upon receipt of a Notice of Funds Availability (NFA) from the Office of Grant Management.

**II. REQUIRED ACTION AND DUE DATE:** Comments and questions on the allocation process should be provided to the Office of Grant Management (OGM) in writing by June 15, 2023.

**III. CONTACT:** Questions concerning this instruction should be addressed to Robert DeYoung at 601-321-6477 or [rdeyoung@mdes.ms.gov](mailto:rdeyoung@mdes.ms.gov) or Jeffrey Crump at 601-321-5481 or [jcrump@mdes.ms.gov](mailto:jcrump@mdes.ms.gov).



Robert DeYoung, Director  
Office of Grant Management

# Appendix I: Assurances/Compliances

## Section I1. Common Assurances

### I1A. Conflict of Interest Policy, State Policy #5

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 5**  
**CONFLICT of INTEREST**  
**Workforce Innovation and Opportunity Act (WIOA)**

#### **I. SCOPE AND PURPOSE**

This policy sets forth the requirements to ensure that individuals or representatives of organizations entrusted with public funds do not personally or professionally benefit from the award or expenditure of such funds. Individuals or representatives of organizations entrusted with public funds, as referenced above, shall hereinafter be understood to include a State Workforce Development Board (SWDB) member, SWDB staff, a Local Workforce Development Board (LWDB) member, and local workforce area staff.

The SWDB and each LWDB must develop a conflict of interest policy that incorporates MDES State Policy Number 5 and meets the minimum federal and state requirements described in Section III, herein.

#### **II. LAWS GOVERNING CONFLICTS OF INTEREST**

##### **A. Federal Requirements**

The laws governing conflicts of interest under WIOA are found at *Workforce Innovation and Opportunity Act, 113 P.L. 128, Section 101(f) and 101(h)*. These sections state as follows:

A member of a State board may not:

- (1) vote on a matter under consideration by the State Board (A) regarding the provision of services by such member (or by an entity that such member represents); or (B) that would provide direct financial benefit to such member or the immediate family of such member; or (2) engage in any other activity determined by the Governor to constitute a conflict of interest as specified in the State plan.

A member of a local board may not:

- (1) vote on a matter under consideration by the local board (A) regarding the provision of services by such member (or by an entity that such member represents); or (B) that would provide direct financial benefit to such member or the immediate family of such member; or (2) engage in any other activity determined by the Governor to constitute a conflict of interest as specified in the State plan.

## B. State Requirements

State law is more proscriptive than federal law; therefore, the policies of the SWDB or individual LWDBs should include additional State requirements, as outlined below. References to the Ethics Commission Opinions are provided for further clarification.

### 1. State Law

*Mississippi Code Annotated §25-4-105(1) (1972)*, prohibits a public servant from using his position in government to obtain pecuniary benefit for himself, certain relatives or a “business with which he is associated.” A public servant may avoid using his position, and therefore avoid a violation of *Section 25-4-105(1)*, by recusing himself from the matter giving rise to the conflict of interest. An abstention is considered a vote with the majority and is *not* a recusal.

*Section 109 of the Mississippi Constitution of 1890*, and its statutory parallel, *Mississippi Code Annotated §25-4-105(2)*, prohibit a member of a public board from having any direct or indirect interest in a contract with the government funded or otherwise authorized by that board during his or her term or for one year thereafter.

A recusal will *not* prevent or ameliorate a violation of *Section 109* and *Section 25-4-105(2)*, as these sections do not require any affirmative act by an individual member to give rise to a conflict, but merely action by the board. Accordingly, recusal by the affected SWDB or LWDB member will not prevent a violation of these sections.

### 2. Mississippi Ethics Commission Opinion 13-014-E

In Advisory Opinion 13-014-E, the Mississippi Ethics Commission interpreted the application of Section 109 and Section 25-4-105(2) as follows:

The LWDB is a public board subject to statutory sections. If the LWDB funds a contract in which a member of that board has a prohibited interest, that member will be in violation of these sections. Any contract, which violates either section, is null and void.

The owner and CEO of a business will have an interest in all contracts entered by the business. Employees of these businesses also presumably have an interest in all contracts entered by their employer. Accordingly, a business whose owner, CEO, or employee

serves on an LWDB is prohibited by *Section 109* and *Section 25-4-105(2)* from receiving any contract that is funded by the LWDB. This prohibition applies to all contracts funded during the LWDB member's term and for one year after the LWDB member's term.

A recusal will not prevent or ameliorate a violation of Section 109 and Section 25-4-105(2), as these sections do not require any affirmative act by an individual member to give rise to a conflict, but merely action by the board. Accordingly, recusal by the affected SWDB or LWDB member will not prevent a violation of these sections. *See also* Ethics Commission Opinion 06-099-E & 04-076-E.

MDES notes that advisory opinions from the Mississippi Ethics Commission, including No. 13-014-E, are merely advisory and they are merely opinions. They do not have the force of law possessed by a statute or a court decision.

### 3. Recusal

A total and complete recusal requires that the public servant not only avoid debating, discussing or taking action on the subject matter during official meetings or deliberations, but also avoid discussing the subject matter with staff or any other person. This includes casual comments, as well as detailed discussions, made in person, by telephone or by any other means.

Furthermore, the minutes or other record of the meeting should state the recusing member left the room before the matter came before the public body and did not return until after the vote.

## III. POLICY REQUIREMENTS

The SWDB and each LWDB shall have a conflict of interest policy, which at a minimum meets the requirements shown below:

1. A written code of standards or conduct governing the performance of persons engaged in the award and administration of WIOA contracts and subgrants.
2. No individual in a decision-making capacity shall engage in any activity, including participation in the selection, award, or administration of a subgrant or contract supported by WIOA funds, if a conflict of interest (real, implied, or apparent) would be involved.



3. No member of the SWDB or LWDB shall cast a vote, or participate in any decision-making capacity, on the provision of services by such member (or any organization which that member directly represents), or on any matter which would provide any direct financial benefit to the member, the immediate family of such member, or to the member's organization.

A conflict of interest under paragraphs 2 or 3 would arise when one of the following persons or groups has a financial or other interest, either through ownership or employment, and participates in the selection or award of funding for themselves, their family, or that organization or firm.

- An individual; i.e., employee, officer, or agent,
  - Any member of the individual's immediate family (parent, spouse, children, or siblings),
  - The individual's business partner, or
  - An organization which employs, or is about to employ any of the above individuals (individual has received a job offer from the organization),
4. The officers, employees, agents, or members of the SWDB or LWDB making the awards will neither solicit nor accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements.
  5. Reference the Mississippi Ethics in Government Laws and their applicability to members of the SWDB and LWDB, including a statement that advises members of all relevant opinions from the Mississippi Ethics Commission and the proper procedure for recusal.
  6. The code of conduct shall contain penalties, sanctions, or other disciplinary actions in accordance with state and local law for violations of the provisions against conflict of interest.

#### **IV. REQUIRED ACTION**

- A. In accordance with Training and Employment Guidance Letter 35-10, issued by the United States Department of Labor, SWDB and LWDB members are encouraged to regularly review and be aware of the relevant Federal, state, and board rules guiding procurement decisions and other board responsibilities.
- B. The SWDB and LWDB must develop a conflict of interest policy that incorporates State Policy Number 5. The SWDB or LWDB policy may be more proscriptive, at the discretion of the board. In either case, the policy and the background information should be reviewed regularly with state and local

boards, and all boards should include this guidance in orientations for new board members.


- C. The SWDB and LWDB must develop a Conflict of Interest Acknowledgement form that must be signed by each member of the SWDB and LWDB and local workforce area staff stating that they have been made aware of the federal and state conflict of interest requirements, and will abide by those requirements in the service of these boards.

**V. REFERENCES**

29 U.S.C. 2821(f) (1998)  
29 U.S.C. 2832 (g) (1998)  
U.S. Department of Labor TEGL 35-10  
Section 109, Mississippi Constitution of 1890  
Section 25-4-103, Mississippi Code of 1972  
Mississippi Ethics Commission Opinion 13-014-E  
Mississippi Ethics Commission Opinion 06-099-E  
Mississippi Ethics Commission Opinion 04-076-E

**VI. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

  
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Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 4**  
**SUNSHINE PROVISION POLICY**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

This policy sets forth the requirements to conduct business in an open manner as mandated by the Workforce Innovation and Opportunity Act (WIOA). Conducting business in an open manner involves making the activities of the State Workforce Development Board (SWDB) and the Local Workforce Development Boards (LWDB) available to the public (including individuals with disabilities) on a regular basis via electronic means and open meetings.

**II. STATUTES GOVERNING SUNSHINE PROVISIONS AND APPLICABLE ACTS**

**A. Federal Requirements**

The legislation outlining the Sunshine Provision under WIOA, as prescribed for the SWDB, is found in *Workforce Innovation and Opportunity Act, 113 P.L. 128, Section 101(g)*.

“Sunshine Provision. – The State board shall make available to the public, on a regular basis through electronic means and open meetings, information regarding the activities of the State board, including information regarding the State plan, or a modification to the State plan, prior to submission of the plan or modification of the plan, respectively, information regarding membership, and, on request, minutes of formal meetings of the State board.”

The legislation outlining the Sunshine Provision under WIOA, as prescribed for the LWDBs, is found in *Workforce Innovation and Opportunity Act, 113 P.L. 128, , Section 107(e)*.

“Sunshine Provision. – The local board shall make available to the public, on a regular basis through electronic means and open meetings, information regarding the activities of the local board, including information regarding the local plan prior to submission of the plan, and regarding membership, the designation and certification of one-stop operators, and the award of grants or contracts to eligible providers of

youth workforce investment activities, and on request, minutes of formal meetings of the local board.”

The laws governing open meeting accessibility for the disabled are found at *Title III of the Americans with Disabilities Act (ADA)*, 42 USC § 12181 et seq. More specifically, the relevant sections, 28 CFR § 36.201(a) (2010), 28 CFR § 36.104 (2010), 28 CFR § 36.303(a) (2010), 28 C.F.R. § 36.104 (2010)[U.S. Department of Justice Regulation to Title III of the Americans with Disabilities Act, 56 Fed. Reg. 35544 (July 26, 1991)] are as follows:

“No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any private entity who owns, leases (or leases to), or operates a place of public accommodation.” 28 CFR § 36.201(a) (2010)

“Public accommodation means a private entity that owns, leases [or leases to], or operates a place of public accommodation.” 28 CFR § 36.104 (2010)

“A public accommodation shall take those steps that may be necessary to ensure that no individual with a disability is excluded, denied services, segregated or otherwise treated differently than other individuals because of the absence of auxiliary aids and services, unless the public accommodation can demonstrate that taking those steps would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations being offered or would result in an undue burden, i.e., significant difficulty or expense.” 28 CFR § 36.303(a) (2010)

“Qualified interpreter means an interpreter who is able to interpret effectively, accurately and impartially both receptively and expressively, using any necessary specialized vocabulary.” 28 C.F.R. § 36.104 (2010)

## **B. State Requirements**

The policies of the SWDB and individual LWDBs must also include State requirements as prescribed in Mississippi’s Open Meetings Acts, *Title 25, Chapter 41, Mississippi Code of 1972* and in Mississippi’s Public Records Act, *Title 25, Chapter 61, Mississippi Code of 1972*. These acts collectively govern public bodies, state and local, that hold meetings on public matters, and ensure the public’s right to access public records. The Mississippi Ethics Commission is given authority to hold hearings, take complaints, issue subpoenas, hold hearings and issue orders subsequent to alleged violations of the Open Meetings Act and the Public Records Act.

1. **State Law- The Open Meetings Act**

**Miss. Code Ann. § 25-41-3(a)**, defines a “public body” as any executive or administrative board, commission, authority, council, department, agency, bureau or any other policy making entity, or committee thereof, of the State of Mississippi, or any political subdivision or municipal corporation of the state, whether such entity be created by statute or executive order, which is supported wholly or in part by public funds or expends public funds, and any standing, interim or special committee of the Mississippi Legislature.

**Miss. Code Ann. § 25-41-5**, outlines official meetings of public bodies specifically as follows:

“(1) All official meetings of any public body, unless otherwise provided in this chapter or in the Constitutions of the United States of America or the State of Mississippi, are declared to be public meetings and shall be open to the public at all times unless declared an executive session as provided in Section 25-41-7.

(2) A public body may conduct any meeting through teleconference or video means. A quorum of a public body as prescribed by law may be at different locations for the purpose of conducting a meeting through teleconference or video means provided participation is available to the general public at one or more public locations specified in the public meeting notice.

(3)(a) Notice of any meetings held pursuant to subsection (2) of this section shall be provided at least five (5) days in advance of the date scheduled for the meeting. The notice shall include the date, time, place and purpose for the meeting and shall identify all locations for the meeting available to the general public. All persons attending the meeting at any of the public meeting locations shall be afforded the same opportunity to address the public body as persons attending the primary or central location. Any interruption in the teleconference or video broadcast of the meeting shall result in the suspension of action at the meeting until repairs are made and public access restored.

(b) Five-day notice shall not be required for teleconference or video meetings continued to address an emergency as provided in subsection (5) of this section or to conclude the agenda of a teleconference or video meeting of the public body for which the proper notice has been

given, when the date, time, place and purpose of the continued meeting are set during the meeting prior to adjournment.

(4) An agenda and materials that will be distributed to members of the public body and that have been made available to the staff of the public body in sufficient time for duplication and forwarding to all locations where public access will be provided shall be made available to the public at the time of the meeting. Minutes of all meetings held by teleconference or video means shall be recorded as required by Section 25-41-11. Votes taken during any meeting conducted through teleconference or video means shall be recorded by name in roll-call fashion and included in the minutes. In addition, the public body shall make an audio recording of the meeting, if a teleconference medium is used, or an audio/visual recording, if the meeting is held by video means. The recording shall be preserved by the public body for a period of three (3) years following the date of the meeting and shall be available to the public.

(5) A public body may meet by teleconference or video means as often as needed if an emergency exists and the public body is unable to meet in regular session. Public bodies conducting emergency meetings through teleconference or video means shall comply with the provisions of subsection (4) of this section requiring minutes, recordation and preservation of the audio or audio/visual recording of the meeting. The nature of the emergency shall be stated in the minutes.”

**Miss. Code Ann. § 25-41-9**, states that the public body convening the meeting may make and enforce rules and regulations pertaining to the conduct of attendees.

**Miss. Code Ann. § 25-41-11**, sets parameters defining minutes and their recording as follows:

“(1) Minutes shall be kept of all meetings of a public body, whether in open or executive session, showing the members present and absent; the date, time and place of the meeting; an accurate recording of any final actions taken at such meeting; and a record, by individual member, of any votes taken; and any other information that the public body requests be included or reflected in the minutes. The minutes shall be recorded within a reasonable time not to exceed thirty (30) days after recess or adjournment and shall be open to public inspection during regular business hours.

(2) Minutes of a meeting conducted by teleconference or video means shall comply with the requirements of Section 25-41-5.

(3) Minutes of legislative committee meetings shall consist of a written record of attendance and final actions taken at such meetings.”

**Miss. Code Ann. § 25-41-13**, states that notice of public meetings will contain the place, date, hour and subject matter, but if a public body has regularly scheduled meetings at certain times and places mandated by statute, then no additional notice is required unless a meeting is recessed, or adjourned. In the case that there is an interim meeting or special meeting called, notice must be posted, in a publicly accessible place, preferably in the building in which the meeting will be held, within one (1) hour of the start of the meeting. This notice must be included in the minutes or other records of the public body. This section also prescribes that public bodies without statutory provisions in place detailing times and places of meetings must detail in the minutes the upcoming times, places and procedure by which its meetings will be held.

## 2. State Law- The Public Records Act

**Miss. Code Ann. § 25-61-2**, defines the public records policy of the State of Mississippi as allowing the public, unless otherwise specified, access to all non-classified public records. The responsibility of providing access to these records is a duty of each public body. No person, due to automation, shall be denied access to public records. With an increase in technological use and advances, public bodies must provide reasonable access to electronically maintained records, subject to retention policies.

## III. PROPOSED POLICY REQUIREMENTS

In order to comply with WIOA’s transparency mandates to conduct business in an open manner and make activities of the board available to the public and to garner public trust, the SWDB and each LWDB shall have a sunshine provision policy which, at a minimum, meets the requirements shown below:

1. A written code of standards or conduct governing the procedural direction of all meetings held by or relating to SWDB and LWDBs as prescribed by WIOA.
  - a. Specifically that these meetings shall be conducted on a regular basis and as open meetings.

- b. Direction of meetings will specifically address the activities of the SWDB and LWDBs in relation to State and local plan activities and modifications. These activities must be addressed, in open meetings, prior to the submission of the plan or modification of the plan, respectively.
2. The SWDB and each LWDB shall establish written protocols defining the collection of meeting minutes, whether held in person, via teleconference or video, or any combination of the aforementioned.
  - a. Parameters for storage of these minutes, must also be cited, identified and maintained in a publicly accessible place, preferably in an online format.
  - b. Notation of and information regarding all members of SWDB and each LWDB must be identified and made available and easily accessed by the public.
  - c. Priority must be given to public accessibility.
  - d. All information must also be ADA compliant.
3. Each LWDB shall publicly identify the designation and certification of one-stop operators for the public, accessible at all times.
4. Each LWDB shall publicly provide all information regarding the award of grants or contracts to eligible providers of youth workforce investment activities.
5. The SWDB and each LWDB shall have the ability to provide minutes of formal meetings upon request. All requests for information in braille must be made two weeks in advance to meet the production requirements of the information.
6. No meeting shall be held by either the SWDB or any LWDB in a closed capacity, or in any way deny access to the public. This includes making reasonable accommodations for the disabled as outlined in the ADA requirements outlined in this document.
7. The officers, employees, agents, and members of the SWDB and LWDBs will make every effort to comply with the transparency requirements as defined by WIOA with the intent of establishing trust among all individuals, agencies and entities involved in the State of Mississippi's workforce development system.



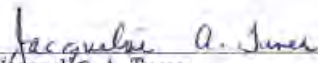
8. The code of conduct shall contain penalties, sanctions, or other disciplinary actions in accordance with state and local law for violations of the provisions against open meetings and the public information.

**IV. REQUIRED ACTION**

- A. The SWDB or LWDB must develop a sunshine provision policy that incorporates this State Policy Number 4. The SWDB or LWDB policy may be more proscriptive, at the discretion of the board. In either case, the policy and the background information should be reviewed regularly with state and local boards, and all boards should include this guidance in orientations for new board members.
- B. The State shall include in its monitoring of local areas a review of local adherence to the requirements described in this guidance.
- C. The State shall verify and ensure SWDB adherence to the requirements described in this guidance.

**V. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

  
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Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**State Policy Number 8, Revised February 2018**  
**WIOA PROGRAMMATIC and FISCAL MONITORING**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

This policy sets forth requirements for the monitoring of all entities receiving Workforce Innovation and Opportunity Act (WIOA) funds in accordance with Sections 183(a-c) of the Act and Federal regulations 2 CFR Part 200.330 – 200.332, and Federal Acquisition Regulation (FAR) 31.2 of the Final Rule.

Audit Regulations, 2 CFR 200.501-512, shall be applicable for non-profit and for-profit entities who expend \$750,000 a year in federal awards from all sources.

Each Local Workforce Development Area and State sub-recipient shall develop a policy to govern its monitoring activities. This document provides guidelines for developing the policy and describes the minimum elements to be included in the policy.

**II. STATE REQUIREMENTS**

**A. State Monitoring Policy**

The Office of Grant Management (OGM) is responsible for monitoring all Local Workforce Development Areas and State sub-recipients. On-site and/or desk reviews will be conducted pursuant to established standard operating procedures to ensure compliance with the WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and, when applicable, Federal Acquisition Regulations (FAR).

**1. Monitoring Review Process**

- An on-site and/or desk review is conducted consisting of:
- An entry conference or written notification of desk review, as appropriate, to brief agency officials on the scope of the review and to make appropriate arrangements;
- A review of administrative, fiscal, equal opportunity, and programmatic systems and transactions;
- Performance of test work, based on a review and examination of WIOA records and interviews; and
- An exit conference for on-site reviews to inform agency officials of monitoring results.

**2. Monitor the following, as applicable:**

- program goals and objectives

- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

### **3. Monitoring Report**

After each review, a monitoring report will be prepared by OGM detailing the results of the monitoring visit. The report will be completed within three weeks of completion of the review. Indexed working papers will also be prepared to provide supporting documentation for test work performed and for any findings. The monitoring report will be transmitted to the entity for review, and appropriate corrective action will be requested, if necessary.

### **4. Corrective Action Response**

If any findings were noted during the review, a corrective action response will be required within 45 days from date of the monitoring report. Upon receipt of the entity's corrective action plan, the monitors will review the response and comment on the acceptability of the proposed corrective action. If the corrective action plan is deemed acceptable, the file will be closed. If the corrective action plan or any part thereof is unacceptable, additional corrective action shall be requested. The file will remain open until all corrective action has been accepted.

### **5. Acceptance/Non-acceptance of Corrective Action**

Notice of acceptance or non-acceptance of the sub-recipient's proposed corrective action plan will be forwarded by OGM to the sub-recipient within 30 working days of receipt of the plan. If the proposed plan is not accepted, OGM may require submission of a subsequent

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plan to be received within 30 days from the date of the notice.

If the subsequent plan is deemed unacceptable, OGM may again request submission of a new plan within a specified timeframe or take other action as deemed appropriate relevant to the circumstances.

**6. Monitoring Files**

A monitoring file will be maintained by OGM for each monitoring visit or desk review.

**7. Follow-up Visits and Verification of Corrective Action**

Follow-up visits will be conducted by OGM, if deemed necessary.

**8. Unannounced Visits**

Unannounced visits may be conducted by OGM, if deemed necessary.

**III. LOCAL WORKFORCE DEVELOPMENT AREA/ STATE SUB-RECIPIENT REQUIREMENTS**

**A. Local Workforce Development Area/State Sub-recipient Monitoring Policy**

WIOA Section 107(d)(8) requires the local board, in partnership with the chief elected official, to conduct monitoring with respect to local programs of youth activities authorized under section 129(c), adult and dislocated worker local employment and training activities authorized under section 134(b), (c), and (d), and the one-stop delivery system in the local area.

WIOA Section 184(a) (3&4) and 2 CFR 200 parts 330-332 of the Federal regulations require each recipient and sub-recipient of WIOA Title I funds to conduct monitoring of the WIOA activities of its sub-recipients in order to:

- Determine whether expenditures have been made against the cost categories and within the cost limitations specified in WIOA and Federal regulations;
- Determine whether there is compliance with all applicable requirements; and
- Provide technical assistance as necessary and appropriate.

**1. Scope**

The Local Workforce Development Area (LWDA) or State sub-recipient shall develop a monitoring policy describing the procedures that will be implemented to ensure compliance with WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and Federal Acquisition Regulation (FAR).

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Local fiscal monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA or State sub-recipient's determination of "risk" and other factors which should consider whether the sub-recipient is subject to the Single Audit Act; when the most recent previous on-site review was conducted; previous findings or corrective actions required; etc.

LWDA or State sub-recipient programmatic compliance and equal opportunity monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA's determination of "risk" and other factors which should consider the type of WIOA activity performed by the sub-recipients; when the most recent previous on-site review was conducted; previous findings or corrective actions required; the existence of current reviews conducted by the state or its authorized representative that adequately address all criteria in the LWDA or State sub-recipient monitoring instrument, etc.

Monitor the following, as applicable:

- program goals and objectives
- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

## 2. Frequency

The policy shall include procedures to ensure monitoring is completed in a

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timely manner. Each sub-recipient or State sub-recipient shall be monitored at least once per year during the program year or during the sub-award period.

**B. Local Workforce Development Area/State Sub-recipient Monitoring Procedures**

**1. Annual Monitoring Schedule**

The policy shall include procedures to ensure an annual monitoring schedule is prepared. The schedule should include sub-recipient names and addresses, contact numbers, planned dates of reviews, and names of individuals to perform the reviews. Annual monitoring schedules shall be submitted to OGM.

**2. Review Notification**

The policy shall include procedures to ensure that written notification of the scheduled review is provided to the entity in advance of the actual review, except when unannounced monitoring visits are deemed necessary.

**3. Desk Review Instrument**

A written desk review monitoring instrument must be prepared and should precede an on-site monitoring visit. This process will ensure that all pertinent records are reviewed prior to each visit. The policy shall describe the procedures for completing a desk review instrument before the on-site visit.

**4. Monitoring Instrument**

The policy shall include procedures for the development of an objective monitoring instrument for use in monitoring reviews to ensure that pertinent data can be collected and analyzed for all program activities.

**5. Documentation of Findings**

The policy shall include procedures to ensure findings are adequately documented and include a written description of the deficiency or violation.

**6. Monitoring Report**

The policy shall include procedures to ensure a monitoring report is prepared following each on-site or desk review. The report should be completed within three weeks of the review and should include the following elements:

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- A face page signed by the monitor(s) and the signature of supervisory level staff or the executive director (applicable to on-site visits only);
- The dates of the review and areas covered during the review.
- A listing of findings, if applicable that consists of a narrative description of the deficiency or violation noted; and
- For each finding, a recommendation which sets forth the most appropriate action to correct the deficiency or violation noted.

**7. Corrective Action**

The policy shall include procedures to ensure monitoring reports are forwarded to the sub-recipient with a transmittal letter. If findings were noted in the report, the transmittal letter shall require a written corrective action plan from the sub-recipient within 45 days from the date of the report.

**8. Acceptance/Non-acceptance of Corrective Action**

The policy shall describe the procedures that will be used to determine the acceptance or non-acceptance of the sub-recipient corrective action plan. Notification of the determination shall be provided to the sub-recipient within 30 working days of receipt of the proposed corrective action plan.

**9. Follow-up Monitoring and Verification of Corrective Action**

The policy shall include procedures for follow-up monitoring reviews determined by the risk of the finding and the sub-recipient response to the finding. The policy shall include procedures to determine if corrective action measures taken were adequate to resolve the noted deficiencies.

**9. Unannounced Visits**

The policy shall describe the procedures for conducting unannounced visits of sub-recipients when such visits are deemed necessary.

**10. Monitoring Files**

The policy shall include procedures establishing and maintaining the monitoring files. A separate file shall be maintained for each monitoring review. At a minimum, the files shall contain the following records:

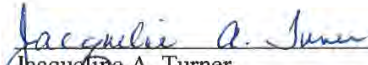
- notification of monitoring dates;
- completed desk review instrument;

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- signed monitoring report;
- completed monitoring instrument;
- transmittal letter, and if applicable, request for a corrective action plan;
- response from sub-recipient, when appropriate;
- letter to sub-recipient accepting/rejecting corrective action; and
- working paper file to include supporting documentation.

**IV. EFFECTIVE DATE**

This policy shall be effective as of February 1, 2018.

  
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Jacqueline A. Turner  
Deputy Executive Director, CFO

Revised 1/2018



## 11D. One-Stop Certification Policy

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 16**  
**ONE-STOP CERTIFICATION**  
**Workforce Innovation and Opportunity Act (WIOA)**

### **I. SCOPE AND PURPOSE**

To provide guidance, process, and deadlines for the certification of one-stop centers and the one-stop delivery system that is to be conducted by local workforce development boards, and to set criteria for the development of a local policy for one-stop certification.

### **II. BACKGROUND**

The Workforce Innovation and Opportunity Act (WIOA) specifies in section 101(d)(6) and 121 (g)(1) that the State Workforce Development Board (SWDB) shall establish the minimum criteria for certification of one-stop centers and the one-stop delivery system. Certification is required to be done by Local Workforce Development Boards (LWDBs) at least once every three years in order for one-stop centers and the one-stop delivery system to receive infrastructure funding.

LWDBs must assess the effectiveness, physical and programmatic accessibility, and continuous improvement of one-stop centers and the one-stop delivery systems using the criteria in these guidelines. The LWDB may establish additional criteria, or set higher standards for service coordination, than those set by the State criteria. Both State and local WDBs must review and update the criteria every two years as part of the review and modification of the State and local planning process as described in 20 CFR 676.580.

When the local area is the one-stop operator as described in 20 CFR 679.410, the State Workforce Investment Board must certify the one-stop center (20 CFR 678.800).

### **III. CERTIFICATION CRITERIA**

In order to be certified, one-stop centers and the one-stop delivery system must meet or exceed the standards established for each of the following areas:

#### **A. Effectiveness**

Evaluations of effectiveness must include how well the one-stop center integrates available services for participants and businesses, meets the workforce development needs of participants and the employment needs of local employers, operates in a cost-efficient manner, coordinates services among the one-stop partner programs, and provides access to partner program services to the maximum extent practicable, including providing services outside of regular business hours where there is a workforce need, as identified by the LWDB.

#### **B. Programmatic and Physical Accessibility**

These evaluations must take into account feedback from one-stop customers. They must also include evaluations of how well the one-stop center ensures equal opportunity for individuals, regardless of disability or cultural background, to participate in or benefit from one-stop center services. These evaluations must include criteria evaluating how well the centers and delivery systems take actions to comply with the disability-related regulations implementing WIOA sec. 188 and 29 CFR Part 38. Such actions include, but are not limited to:

1. Providing reasonable accommodations for individuals with disabilities;
2. Making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination against persons with disabilities;
3. Administering programs in the most integrated setting appropriate;
4. Communicating with persons with disabilities as effectively as with others;
5. Providing appropriate auxiliary aids and services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity; and
6. Providing for the physical accessibility of the one-stop center to individuals with disabilities.

All one-stop centers must comply with applicable physical and programmatic accessibility requirements, as set forth in 29 CFR part 38, the implementing regulations of WIOA sec. 188.

#### C. Continuous Improvement

Evaluations of continuous improvement must include how well the one-stop center supports the achievement of the negotiated local levels of performance for the indicators of performance for the local area that it serves. Other continuous improvement factors may include a regular process for identifying and responding to technical assistance needs, a regular system of continuing professional staff development, and having systems in place to capture and respond to specific customer feedback.

LWDBs are responsible for assessing the one-stop centers and the one-stop delivery system using the criteria outlined in Attachment A and submitting a record of the assessment and certification determination via email to the Director of the Office of Grant Management within 10 days of completing the certification determination.

Local boards are required to have policies and procedures in place for assessing the one-stop centers and the one-stop delivery system. This State policy requires local workforce boards to develop policies and procedures by June 30, 2017. The policies and procedures:

- Must include the criteria outlined in these guidelines;

- May include additional criteria beyond the items outlined in this policy; and
- Must be incorporated into the Local Area Plans.

Certification should be completed by the local board prior to the end of program year 2016 and at least every three years thereafter. One-stop centers that are certified by the local board within the prescribed timeframes shall be eligible to receive required infrastructure funding.

#### **IV. INQUIRIES**

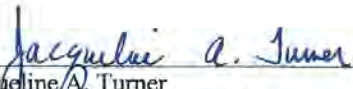
Inquiries regarding this policy may be directed to Laura Ring, [lring@mdes.ms.gov](mailto:lring@mdes.ms.gov) or 601-321-6017.

#### **V. REFERENCES**

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, WIOA Section 101(d)(6), 121(e), and 121(g).
- 20 CFR 678 Subpart F
- TEGL 16-16

#### **VI. EFFECTIVE DATE**

This policy shall be effective as of April 1, 2017.

  
\_\_\_\_\_  
Jacqueline A. Turner  
Deputy Executive Director, CFO



### APPLICATION FOR WIN JOB CENTER CERTIFICATION

**Organization Name:**

**Date:**

**Contact Person/Title:**

**Phone:**

**Email:**

**Site to be certified:**

**Address:**

**Website**

**Hours of Operation**

**Current Certification:**

- Comprehensive       Affiliate       Sector Training Plus Comprehensive       None

**If requesting a different certification level, check level requested:**

- Comprehensive       Affiliate       Sector Training Plus Comprehensive

specific centers. To achieve the goal of increased access, the State of Mississippi recognizes three levels of sites that can be certified within the one-stop service delivery system.

#### **Comprehensive One-Stop Center**

- Accessible to the general public during regular business days, as well as physically and programmatically accessible to individuals with disabilities
- Portal site for electronic access
- Provider of **basic and individualized career services, and training services**
- **Provider of business services**
- Representation of **five** mandated core partner programs (WIOA Titles I-IV, TANF)
- Additional related employment and training resources

#### **Affiliate One-Stop Center**

- Accessible to the general public and physically and programmatically accessible to individuals with disabilities
- Portal site for electronic access
- Provider of **basic career services**
- Representation of **one** or more mandated partners
- Additional related employment and training resources
- Established working relationship as part of an integrated system of WIN Job Center sites

#### **Sector Training Plus Comprehensive One-Stop Center**

- Provides access to all of the services in the Comprehensive Services
- Provider of **basic and individualized career services, and sector-related training services**
- Additional related employment and training resources
- Established working relationship as part of an integrated system of WIN Job Center sites

Sites seeking certification as a Comprehensive Center, Affiliated, or Sector Training Plus Comprehensive One-Stop Center are required to submit an application and receive a site visit from the Local Workforce Development Board (LWDB) One-Stop Certification Committee. Staff will answer questions about their site and how it functions to add value and provide customers with quality services as a part of the WIN Job Center system. This Committee is comprised of LWDB members and staff as well as other community partners who have specific expertise in serving populations with barriers. Note: In areas where the LWDB functions as the Site Operator, LWDB staff will only serve in an administrative support role to the Certification Committee and will ensure that the process is conducted objectively. Following the site visit, interviews, and final responses to any follow up questions, the Certification Committee will provide a written response within 30 days indicating one of three outcomes:

Attachment A  
One-Stop Certification Checklist

<b>REQUIRED PROGRAMS/PARTNERS</b>	<b>ON-SITE (AVERAGE HOURS/WEEK)</b>	<b>OFF-SITE ELECTRONIC CONNECTION</b>	<b>OFF-SITE BASIC CAREER SERVICES MADE AVAILABLE IN ANOTHER MANNER</b>
WIOA Title 1-B Adult Services			
WIOA Title 1-B Dislocated Worker Services			
WIOA Title 1-B Youth Services			
Wagner-Peyser Title III – Mississippi Department of Employment Security (MDES)			
Adult Education and Family Literacy Title II (ABE)			
Rehabilitation Act Title IV – Mississippi Division of Vocational Rehabilitation (VR)			
Rehabilitation Act Title IV – Mississippi Department of Services for the Blind			
Title V – Older Americans Act/ Senior Community Service Employment Program (SCSEP)			
TANF – Mississippi Department of Human Services (MDHS)			
Trade Adjustment Assistance – Mississippi Department of Employment Security			
Veterans Employment Services – Mississippi Department of Employment Security			
Unemployment Compensation			

**CAREER SERVICES CHECKLISTS**

In the column named “On-Site”, check the basic career, individualized career, and training services that are currently available on-site for all job seeking customers who come into the WIN Job Center Comprehensive Site, Affiliate Site, or Sector Training Plus Comprehensive Site.

BASIC CAREER SERVICES	ON-SITE	BASIC CAREER SERVICES	ON-SITE	BASIC CAREER SERVICES	ON-SITE
Initial assessment of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs;		Outreach, intake and orientation to the information and other services available through the one-stop delivery system		Eligibility determination	
Labor exchange services, including job search and placement assistance, career counseling, provision of information on in-demand industry sectors and occupations, provision of information on nontraditional employment		Appropriate recruitment and other business services on behalf of employers, including small employers, which may include providing information and referral to specialized business services not traditionally offered through the one-stop delivery system		Referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and other workforce development programs	

Attachment A  
One-Stop Certification Checklist

INDIVIDUALIZED CAREER SERVICES	ON-SITE	INDIVIDUALIZED CAREER SERVICES	ON-SITE	INDIVIDUALIZED CAREER SERVICES	ON-SITE
Comprehensive and specialized evaluation to identify barriers to employment and employment goals		Development of Individual Employment Plan (IEP)		Group Counseling	
Individual Counseling		Career / Vocational Planning		Short-Term Pre-Employment/ Vocational Services	
Internships and Work Experiences		Workforce preparation activities		Financial Literacy Services	
Out-of-Area Job Search		English Language acquisition and integrated education and training programs		Follow Up Services	
<i>(Insert other Individualized Services as needed)</i>		<i>(Insert other Individualized Services as needed)</i>		<i>(Insert other Individualized Services as needed)</i>	

BUSINESS SERVICES	On-Site
Establish and develop relationships and networks with large and small employers and their intermediaries	
Develop, convene, or implement industry or sector partnerships	
Customized screening and referral of qualified participants in training services to employers	
Customized services to employers, employer associations, or other such organizations, on employment-related issues	
Customized recruitment events and related services for employers including targeted job fairs	
Human resource consultation services, e.g., writing/reviewing job descriptions and employee handbooks; Developing performance evaluation and personnel policies; Creating orientation sessions for new workers; Honing job interview techniques for efficiency and compliance; Analyzing employee turnover; or Explaining labor laws to help employers comply with wage/hour and safety/health regulations;	
Customized labor market information for specific employers, sectors, industries or clusters	
Customized assistance or referral for assistance in the development of a registered apprenticeship program	



- **Functional and Programmatic Integration** - It is critical for WIOA in Mississippi that its partners think and act as an integrated system. Workforce partners ensure that client services are aligned to common goals and the customer experience is seamless – regardless of funding streams. Each customer is mutually regarded as a shared customer, with all staff and programs operating at the site having a vested stake in that customer’s success. Integration of programs is incorporated into planning, intake, assessment, registration, and service processes, information sharing, resource decisions, actions, results, and analyses.

Check the box where you think the site is with regard to Functional and Programmatic Integration.

5       4       3       2       1

Describe your site’s approach to integrated service delivery and the use of functional teams to deliver career services to all customers.

Include a detailed diagram of customer flow, services available, assessment and referrals, and describe how the MS Works and the WIOA Hub System are used to facilitate shared customer management across partner programs.

Describe the procedure used to ensure timely follow-up on partner referrals.

*Please list any best practices to highlight and share for continuous improvement.*

- **Performance and Accountability** - Results and outcomes for the public investment in the Mississippi workforce system are essential to the system’s relevance. The effectiveness of the workforce system for employers and job seekers is evident in system performance and service delivery decisions are based on data. On an ongoing basis, customer data from one-stop partners and regional economic data is collected, analyzed, and shared with all workforce system staff and community stakeholders. Plans for improvement, enhancement, or adjustment are established and acted upon.

Check the box where you think the site is with regard to Performance and Accountability.

5       4       3       2       1

Describe how you measure, analyze, review, and improve workforce system performance through the use of data and information.

Describe your wireless internet infrastructure.

How are the needs of populations with barriers met through staff-assisted and other means?

*Please list any best practices to highlight and share for continuous improvement.*

- **Customer Satisfaction** - Performance and value are ultimately judged by customers – businesses and job seekers. Customer-centered design relies upon satisfying customer needs, identifying shortcomings and responding accordingly on a timely and ongoing basis. Tools to obtain feedback are appropriate for each customer’s use take into consideration factors including literacy levels, use of technology, disability, and language.

**Check the box where you think the site is with regard to Customer Satisfaction.**

5       4       3       2       1

Describe how the voice of the customer is listened to and how your site incorporates both job seeker and business customer feedback as part of continuous quality improvement? How are the voices of populations with barriers heard and brought to the table when designing services and facilities? How do you inform customers of how their feedback was reviewed and any action taken from their feedback? What metrics are used to show improvement and success?

*Please list any best practices to highlight and share for continuous improvement.*

- **Staff Competence and Staff Training Participation** - Professional development is a key feature in order to ensure that staff are aware of the implications of recent evidence-based research and can implement the latest policies and procedures established at the local, State and Federal levels. Also of vital importance is the use of labor market information by staff to better inform customers’ career and training decision-making. The investment in staff development is substantial, ongoing, and focused on cross-training with partner programs, overall skill development, and use of labor market information. Every member of the one-stop staff has the ability and authority to meet customer needs, either directly or, where appropriate, by helping the customer make the right connections to the expertise he or she seeks. Participation in one-stop-sponsored training is required.

**Check the box where you think the site is with regard to Staff Proficiency and Staff Training Participation.**

5       4       3       2       1

- **Employer Engagement** – Business is one of our primary customers and one-stop partners work collaboratively to deliver value-added services and eliminate duplication. Business services staff from all one-stop partners have a comprehensive understanding of labor market conditions, economic development activities, skill needs of the workforce and are connected to regional and local business partnership activities and sector strategies. Employers’ human capital needs are communicated to and acted upon by the workforce system. Business services are coordinated to the maximum extent possible to limit duplication and streamline the employer experience.

Check the box where you think the site is with regard to Employer Engagement.

5       4       3       2       1

Describe how partners work to deliver seamless business services. How do business services staff use and share labor market information? What strategies are used to involve employers in identifying skill gaps and developing solutions to meet their workforce needs?

Describe how regional and local sector strategies are used to target services and resources to focus workforce efforts on investments and improve outcomes.

How are career pathways and training modalities such as industry-recognized credentials, apprenticeship, on-the-job training, and other work-based learning opportunities aligned with employers’ needs and marketed to support talent development?

*Please list any best practices to highlight and share for continuous improvement.*

## Section 12. Adult, Dislocated Worker, and Youth Program Requirements and Assurances.

### 12A. WIOA Eligible Training Provider Certification. State Policy #9

**MISSISSIPPI**  
**Policy Number 09, Revision 2**  
**WIOA ELIGIBLE TRAINING PROVIDER CERTIFICATION**  
**Workforce Innovation and Opportunity Act**

#### **I. SCOPE AND PURPOSE:**

This Policy sets forth the State of Mississippi's requirements for Workforce Innovation and Opportunity Act (WIOA) Title I Training Provider Eligibility, the State's List of Eligible Training Providers, and programs. WIOA and its regulations established the allowable types of training, including both work-based and classroom instruction, with the goal of ensuring provider performance, job-driven training, informed consumer choice, continuous improvement, and cost-effective investment of public funds. This policy guidance focuses on the requirements for providing certain training with contracts, establishing initial provider and program eligibility and continued eligibility for use of ITAs, establishing roles and responsibilities of the State of Mississippi and Local Workforce Development Areas for maintaining the ETP list, disseminating the ETP list, and addressing unique requirements for Registered Apprenticeship Programs (RAPs).

#### **II. Types of Training Allowed by this policy under WIOA Title I:**

WIOA authorizes various funding mechanisms for allowable participant training. Allowable types of training include:

- 1 Occupational skills training, including training for nontraditional employment;
- 2 On-the-Job Training (OJT);
- 3 Incumbent Worker Training (IWT);
- 4 Programs that combine workplace training with related instruction, which may include cooperative education programs;
- 5 Training programs operated by the private sector;
- 6 Skill upgrading and retaining;
- 7 Entrepreneurial training;
- 8 Job readiness training provided in combination with the training services described in (a) through (g) of this chart or transitional jobs;
- 9 Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services provided in any of clauses (a) through (g); and
- 10 Customized training conducted with a commitment by an employer or group.

of employers to employ an individual upon successful completion of the training.

These mechanisms include direct contracts for services and individual training accounts (ITAs). An ITA may be used to pay for any allowable type of training, as long as the program of training service (also referred to as "program of study") is on the state list of eligible training providers (ETP list). Direct contracts for training services with employers and the state or Local Workforce Development Area (Local Area) may be for OJT, IWT, and customized training. A state or Local Area, when it is determined most appropriate, may also establish a contract with an institution of higher education or other provider of training services for a group of WIOA participants concurrently training in in-demand industry sectors or occupations, provided that the contract does not limit customer choice. As long as training services are chosen in a manner that achieves the goals outlined in the purpose section of this policy, select training services may also be provided using a contract between the provider and the Local Workforce Development Board (Local Board). For these select training services, participants can receive the training from a program that is not on the ETP list.

### III. Exempt Training Services:

Training services that are exempt from the Section 122(a) through (f) eligibility requirements include:

1. On-the-job training; customized training; incumbent worker training; transitional employment; or
2. Training provided under the circumstances described in WIOA Section 134(c)(3)(G)(ii) and 20 CFR 680.320, where the Local Board determines that:
  - There is an insufficient number of ETPs in the Local Area to accomplish the purposes of a system of ITAs;
  - There is a training services program with demonstrated effectiveness offered in the Local Area by a community-based organization or other private organization to serve individuals with barriers to employment;
  - It would be most appropriate to award a contract to an institution of higher education or other provider of training services to facilitate the training of multiple individuals in one or more in-demand industry sectors or occupations, and such contract does not limit customer choice; or
  - When the Local Board provides training services through a pay-for-performance contract.

For training programs that are exempt from the Section 122(a) through (f) eligibility requirements, the Governor may establish performance criteria those providers must meet to receive funds under the adult or dislocated worker programs. Local Boards must collect this information, if required, and determine whether the providers meet the Governor's performance criteria before entering into contracts with training providers that meet these criteria.

#### **IV. Types of Entities Eligible to Apply to be Eligible Training Providers:**

Only the entities listed below may apply for inclusion on the ETP list, and these are the only entities eligible to provide training for participants who enroll in a WIOA Title I-funded program of training services, except as discussed above in section II of this policy. Training provider entities eligible to apply for inclusion on the ETP list include:

1. Institutions of higher education that provide a program that leads to a recognized postsecondary credential;
2. Apprenticeship programs, including Registered Apprenticeship Programs (RAP) in accordance with the language below and in forthcoming guidance on RAPs and WIOA;
3. Other public or private providers that provide training, which may include community-based organizations (CBOs) and joint labor-management organizations;
4. Eligible providers of adult education and literacy activities under WIOA Title II if such activities are provided in combination with training services described in
5. 20 CFR § 680.350; and
6. Local Board, if they meet the conditions of WIOA Section 107(g)(1).

ETPs are subject to the equal opportunity and nondiscrimination requirements contained in Section 188 of WIOA and implementing regulations at 29 CFR part 38.

#### **V. Eligible Programs of Training Services (programs of study):**

A program of study is defined as one or more courses or classes, or a structured regimen that provides job-driven training services and leads to a recognized post-secondary credential, as defined in WIOA Section 3(52), which includes an industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the state involved or Federal Government, a postsecondary credential, secondary school diploma or its equivalent, employment, or measurable skill gains toward a recognized postsecondary or secondary school diploma or its equivalent credential or employment. These training services could be

delivered in person, online, or in a blended approach.

#### **VI. Registered Apprenticeship Program (RAP) Sponsors**

Registered Apprenticeship Programs are automatically eligible to be included on the ETP list and are exempt from state and local ETP eligibility requirements. This policy requires the state to have a process for adding RAPs that imposes minimal burden on the RAP. This process may require that the RAP provide the following basic information:

- Occupations included within the RAP;
- The name and address of the RAP sponsor;
- The name and address(es) of the Related Technical Instruction provider(s) and the location(s) of instruction if different from the program sponsor's address;
- The method and length of instruction; and
- The number of active apprentices.

For RAPs that opt for inclusion on the ETP list, states and Local Area must add them without applying any additional eligibility requirements that they might otherwise apply to other types of training providers. Furthermore, states must maintain RAPs on the list until:

- The RAP program notifies the state agency it no longer wants to be included on the list;
- The program becomes deregistered under the National Apprenticeship Act;
- The program is determined to have intentionally supplied inaccurate information; or,
- A determination is made that the RAP substantially violated any provision of Title I of WIOA or the WIOA regulations, including 29 CFR part 38.

Similar to the RAP exemption from the eligibility requirements, RAPs also are exempt from ETP performance reporting requirements in WIOA Sections 116(d)(4) and 113, including any additional ETP reporting requirements that have been added by the state or Local Area. This also means that the states and Local Areas must not establish any RAP-specific performance reporting requirements; however, RAPs may voluntarily report performance outcomes. States may require only the information necessary to verify the registration status for the RAP, in accordance with procedures established by the state in consultation with the state office of apprenticeship.

#### **VII. Eligible Training Provider (ETP) List Requirements and Responsibilities:**

**Required State Responsibilities:**

- A. The Mississippi Department of Employment Security (MDES) must develop and maintain the ETP list (providers and their programs of study):**
  1. The state eligible training provider list must be accompanied by appropriate information to assist participants in choosing employment and training activities. Such information must include the following, disaggregated by Local Areas served, as applicable:
    - a. Recognized post-secondary credential(s) offered;
    - b. Provider information supplied to meet the state's eligibility procedure;
    - c. Performance and cost information; and;
    - d. Additional information as the state determines appropriate, such as the number of units (for example, credits, hours or semesters) needed to earn the credentials offered.
  2. The state eligible training provider list must be accompanied by relevant performance and cost information.
  3. The state eligible training provider list must be widely available to the public (including all Local Board) through electronic means, including websites and searchable databases, as well as any other means states use to disseminate information to consumers, and easily understood.
    - a. MDES must disseminate the list to the Local Boards, the one-stop system, its partner programs, the public, and the state's secondary and postsecondary education system.
    - b. The state eligible training provider list must be accessible to individuals with disabilities, individuals seeking information on training outcomes, and individuals participating in employment and training programs funded under WIOA.
    - c. The State eligible training provider list must not reveal personally identifiable information about individual participants.
- B. The state must establish a minimally burdensome mechanism for adding Registered Apprenticeship programs (RAPs) to the list and verifying registration status at least every two years.**
- C. The Governor must work with the State Workforce Development Board to develop procedures, information requirements, and criteria for determining eligibility (including clarifying state and Local Board responsibilities).**
  1. Initial eligibility requirements must



- a. Include required initial eligibility components listed on Eligibility Policy Checklist as described in Training and Employment Guidance Letter 8-19 Attachment III;
  - b. Require providers seeking initial eligibility to provide verifiable program specific performance information;
  - c. Require providers to submit required information for the programs to be considered for initial eligibility in accordance with the state's procedure; and,
  - d. Only permit initial eligibility to last for one year for each program of study.
  - e. *Exempt from eligibility determinations: RAPs.*
  - f. If a RAP expresses interest in being on the state eligible training provider list, the state must request the RAPs provide the following information to the state:
    - Occupations included within the RAP;
    - The name and address of the RAP sponsor;
    - The name and address of the Related Technical Instruction provider, and the location of instruction if different from the program sponsor's address;
    - The method and length of instruction; and,
    - The number of active apprentices.
- 1) Continued eligibility requirements must:
- a. Establish an application procedure for training providers to maintain their eligibility and the eligibility of their programs;
  - b. Establish a procedure that ensures that all providers are subject in review and renewal of their eligibility within a year of their initial eligibility determination and at least every two years thereafter, which can establish minimum standards;
  - c. Describe the application procedure for continued eligibility in the State Plan, and outline the roles of the state and Local Areas in receiving and reviewing provider applications, and in making eligibility determinations;
  - d. Include the continued eligibility components listed on Eligibility Policy Checklist as described in Training and Employment Guidance Letter 8-19 Attachment III; and
  - e. Take into account whether the provider accurately and timely submitted all of the information required for completion of eligible training provider performance reports (WIOA section 116(d)(4)) and all of the information required for initial and continued eligibility.

- f. Information requirements for continued eligibility established by the Governor must require eligible training providers to submit appropriate, accurate, and timely information for participants receiving training under WIOA title I. That information must include:
    - The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
    - The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
    - The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
    - The percentage of program participants who obtain a recognized postsecondary credential, or secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program;
    - Information on recognized postsecondary credentials received by program participants;
    - Information on cost of attendance, including costs of tuition and fees, for program participants; and
    - Information on the program completion rate for such participants.
  3. The policies and procedures must include RAP sponsors requesting ETP list inclusion as long as the program is registered or until the program sponsor notifies the state that it no longer wants to be included on the list, until the program is deregistered, or until they are determined to have intentionally supplied inaccurate information or have substantively violated a provision of Title I of WIOA or its regulations.
  4. The policies and procedures must not subject RAPs to the same application and performance information requirements or to a period of initial eligibility or continued eligibility procedures.
  5. The Governor and State Workforce Development Board must work with the federal Office of Apprenticeship (OA) state director, or if the state oversees the apprenticeship system, with the SAA to develop a mechanism to contact all RAPs within the state in order to allow them to indicate interest.
- (D) For initial and continue eligibility procedures, the Governor must:
1. During a designated time period, solicit and consider recommendations from Local Boards and training providers regarding the procedures.
  2. Provide an opportunity for public comment regarding the initial and continued eligibility procedures.

- E. The designated state entity must determine whether the provider submitted accurate information for the eligibility criteria and performance levels, and take enforcement actions as needed if the provider intentionally submitted inaccurate information or substantially violated the requirements of WIOA or initial and continue eligibility procedures, the Governor must:
1. The Governor's procedures must include what the Governor considers to be a substantial violation of the requirement to timely and accurately submit all of the information required for completion of the eligible training provider performance reports required under WIOA Section 116(d)(4) and all of the information required for initial and continued eligibility.
    - a. These procedures must take into account exceptional circumstances beyond the provider's control such as natural disasters, unexpected personnel transitions, and unexpected technology-related issues.
    - b. Providers who substantially violate the requirement to timely and accurately submit all required information must be removed from the ETP list.
- F. The designated state entity must ensure that state-established minimum performance levels for initial and/or continued eligibility are met (if applicable) including verifying the accuracy of the information.
- G. The Governor must establish procedures for removing a provider from the list. Such procedures must:
1. Remove programs that do not meet established eligibility criteria or state established minimum performance levels (if applicable).
  2. Identify which entity is responsible for revoking a provider's eligibility (Local Board or state agency).
  3. Ensure that revocation is for a period not less than two years for providers that intentionally supply inaccurate information or substantially violate any provision of WIOA or its regulations and that the training provider is liable to repay all adult and dislocated worker training funds received during the period of noncompliance.
  4. Providers removed from the statewide ETP list, or from a particular Local Area list of eligible training providers, must be afforded the opportunity to appeal the removal.
  5. Establish an appeals procedure for providers of training to appeal a denial of eligibility. The procedure must include an opportunity for a hearing

and must explain the appeals process for denial or termination of eligibility of a provider of training services.

- H. **The Governor must establish a procedure by which a provider can demonstrate that providing state-required additional performance and cost information would be unduly burdensome or costly. If the state determines that providers have demonstrated such extraordinary costs or undue burden:**
1. The state must provide access to cost-effective methods for the collection of the information.
  2. The state may provide additional resources to assist providers in the collection of the information from funds for statewide workforce investment activities reserved under WIOA secs. 128(a) and 133(a)(1), or
  3. The state may take other steps to assist eligible training providers in collecting and supplying required information such as offering technical assistance.
- I. **The Labor Market Information Division (LMI) of the Mississippi Department of Employment Security (MDES) will establish a list of demand occupations for the State. LMI data can be found at <http://www.mdes.ms.gov/information-center/labor-market-information/>. Each Local Board will establish and maintain a list of local demand occupations in response to local labor market needs.**

**Allowable State Responsibilities:**

- A. Governors may require any additional performance information (such as the information described at WIOA Section 122(b)(1)) that the Governor determines to be appropriate for eligibility or to better inform consumers.
- B. Governors may establish minimum performance standards for initial and continued eligibility, based on the performance information required for each.
- C. The Governor may establish procedures and timeframes for providing technical assistance to eligible training providers who are not intentionally supplying inaccurate information or who have not substantially violated any of the requirements under this section but are failing to meet the criteria and information requirements due to undue cost or burden.
- D. State policies and procedures may provide for reciprocal or other agreements established with another state to permit eligible training providers in a state to accept ITAs provided by the other state.

**Required Local Board Responsibilities:**

- E. Local Boards must ensure that there are sufficient numbers and types of providers of training services (including eligible providers with expertise in assisting individuals with disabilities and eligible providers with expertise in assisting adults in need of adult education and literacy activities) serving the Local Area and providing the services involved in a manner that maximizes consumer choice and leads to competitive integrated employment for individuals with disabilities.
- F. Local Boards must complete other responsibilities delegated to the Local Boards by the state (state may not delegate responsibilities specifically designated as a state responsibility unless explicitly stated in this guidance, the WIOA Final Rule, or WIOA statute). For example, Local Boards must collect such performance information as the state may require and determine whether the providers meet the state's performance criteria.
- G. Local Boards must remove ETPs that fail to meet local performance standards (if applicable) from the local ETP list, in accordance with state and local policies and procedures. This process must allow for appeals in accordance with the state's appeals procedure for providers of training to appeal a denial of eligibility from the local list of eligible training providers.
- H. Local Boards must ensure that the state's ETP list is disseminated publicly through the local one-stop system, including in formats accessible to individuals with disabilities, and its partner programs.
- I. The policies and procedures established by each Local Board must meet the minimum requirements of the guidelines set by the State. Local Boards may adopt more restrictive policies.

**Allowable Local Board Responsibilities:**

- A. The Local Board may, except with respect to registered apprenticeship programs:
  - 1. Require additional criteria and information from local providers as criteria to become or remain eligible in that Local Area; and
  - 2. Set higher levels of performance than those required by the state as criteria for local programs to become or remain eligible to provide services in that Local Area.
- B. Local Boards may supplement the criteria and information requirements established by the Governor in order to support informed consumer choice and the achievement of local performance indicators. However, the Local Board may not do so for registered apprenticeship programs.  
This additional information may include:

3. Information on programs of training services that are linked to occupations in demand in the Local Area;
  4. Performance and cost information, including program-specific performance and cost information, for the local outlet(s) of multi-site eligible training providers;
  5. Information that shows how programs are responsive to local requirements; and
  6. Other appropriate information related to the objectives of WIOA.
- C. Local Boards may make recommendations to the Governor on the procedure used to determine eligibility of providers and programs.

#### **Training Provider Responsibilities:**

- A. Training providers must submit accurate and timely performance data and cost information for both initial eligibility and continued eligibility at least every two years, according to procedures established by the Governor.
- B. Training providers must deliver results and provide accurate information in order to retain status as an ETP.
- C. RAPs must submit the information necessary to indicate interest in being on the ETP list according to procedures established by the state, after being contacted by the state. These items should include the items in the checklist as described in Training and Employment Guidance Letter 8-19 Attachment III.
- D. Intermediaries serving as RAPs who are employers using an outside instructional provider must identify their instructional provider in accordance with requirements established by their Local Board.
- E. The training provider will be bonded, registered by the applicable state agency, and licensed to do business in Mississippi.
- F. Eligible training providers who choose to seek continued eligibility of existing training course(s) during the annual open enrollment and recertification period beginning April 1 of each year and ending at midnight April 15 of each year will be monitored annually.

#### **Registered Apprenticeship Program (RAP) Required Information for ETP List**

- A. RAPs approved under National Program Standards must submit to ETA the following information to be added to ETP list(s):
  1. Occupations included within the RAPs;
  2. The name and address of the Registered Apprenticeship program sponsor;

3. The name and address(es) of the Related Technical Instruction provider(s), and the location(s) of instruction if different from the program sponsor's address; (Note: If the provider of Related Technical Instruction is different from the program sponsor, cost of the instruction may be requested);
4. The method and length of instruction; and
5. The number of active apprentices.

## VIII. INITIAL ELIGIBILITY DETERMINATION POLICY

### A. Initial Eligibility Application Process

1. The Initial Application Process for Eligible Training Providers is automated in the State's ETPL system and is a two-part process. The first application, also known as the registration process, is to provide to the LWDBs and the State a training provider profile, contact and user information, location(s) of training, and all necessary documentation required to show proof of registration, bonding, and etcetera.
2. The State has developed the following registration procedure for use by the State ETPL Administrators and LWDBs in determining the eligibility for all Training Providers of training as described in WIOA section 134(a). The registration application is an automated, on-line form and is located in the State's ETPL system at <https://etpl.mdes.ms.gov/MaintNewProviderRequest.aspx?usrAction=Add>
  - Registration applications that are completed and submitted as prescribed in the initial on-line application are assigned by the ETPL system to the appropriate Local Board(s) and its designee(s) based on the information the eligible training provider selects at the time the application is made. Each LWDB selected on the registration template will receive a copy of the application for review. The applicant must ensure that the required documents are sent to each of the LWDBs selected on the registration application. The ETPL system will assign a temporary three-digit code to the eligible training provider's registration application.
  - The LWDBs will look for factors concerning whether the provider is in a partnership with business; Factors that indicate high-quality training, including factors related to the quality of a training program, including programs of training that lead to a recognized postsecondary credential; and Factors concerning alignment of the training with in-demand industry sectors and occupations, to the extent practicable.
  - The LWDBs will review all registration applications forwarded to them by the ETPL system, assure that the providers meet the requirements of WIOA law and local policies, including required performance data (where applicable), and will approve eligible training provider's initial registration application and all training program(s) of study associated with the ETPL system.

- If the LWDB denies the initial registration application, the LWDB will send a letter to the eligible training provider explaining why the initial application was denied. (For appeal instructions, please see additional information in the Appeal section of this policy.) If the LWDB grants an approval on the application, the ETPL system will notify the ETPL Administrator via a system generated email, and the ETPL Administrator at the State Office will assign a permanent provider code to the eligible training provider, activate the user ID(s), and send an email notice to the eligible training provider that their registration application was approved and access has been granted to the ETPL system. At this time, the eligible training provider can make initial application for their program(s) of study.
  - A State review to verify performance data may be required.
3. Once the eligible training provider has received notice from the State's ETPL Administrator via email that the registration application has been approved, that a permanent provider coded has been granted, and the user(s) identified in the aforementioned application template have been given access to the ETPL System, the eligible training provider can then log into the ETPL system at <https://etpl.mdes.ms.gov/Login.aspx> and enter the initial training course application(s). The eligible training provider will use the automated, on-line application form at <https://etpl.mdes.ms.gov/NewEPLAppEntry.aspx?userAction=Add>.
- a. All eligible training providers will provide the following institution and program information:
- i. Name, mailing address, and physical address of the training facility;
  - ii. Name and description of the program(s) of study;
  - iii. Total hours of instruction associated with the program of study;
  - iv. Cost of the training program, including tuition, fees, books, and any required tools, uniforms, equipment or supplies, as well as all unmet needs costs;
  - v. Detailed description of the training program;
  - vi. Information on whether students in the program are eligible for Title IV of the Higher Education Act funding (e.g., Pell Grant);
  - vii. Signed assurance that **no more than 75%** of your class/course enrollment are WIOA-funded on an annualized basis;
    - Providers with greater than 75% of their class/course annual enrollment being funded by WIOA must show justification and an action plan to correct the imbalance to the LWDB.
    - The LWDB may issue an exception to the provider, if it feels the imbalance is justified.



- The LWDB may choose to locally increase the ratio of non-WIOA to WIOA-funded participants.
- vii. Documentation of licensure to provide training or instruction and to do business in the state in which the training will be provided, and from the appropriate oversight agency or department, if required;
  - This includes, but is not limited to, the Bureau of Apprenticeship and Training, the Southern Association of Colleges and Schools, the Mississippi Commission on Proprietary School and College Registration, the Mississippi Department of Education, the Mississippi State Boards of Nursing, Cosmetology, Massage Therapy, or Barber Examiners, and/or other generally recognized national, regional, state, or local certifying bodies.
  - Non-Profit training providers, Community-Based Organizations (CBOs), Faith-Based Organizations (FBOs), or any other provider not otherwise licensed or certified as required above in paragraph ii) i., must be registered with the Mississippi Commission on Proprietary School and College Registration (CPSCR), a division of the Mississippi Community College Board. The minimum requirements for registration shall include:
    - Submitting Federal Tax Identification Number.
    - Posting of minimum bond amount of \$50,000 as prescribed by Mississippi Community College Board (MCCB).
    - Having a refund policy in place that conforms to the minimum standards set forth by law (75-60-18, MS Code of 1972), or adopting the refund policy developed by the State (Attachment C), and
    - Other requirements as prescribed by MCCB <http://www.mccb.edu/program/psDefault.aspx>.
  - Registration with the Secretary of the State of Mississippi.
- viii. Documentation of Certification to teach the subject matter for the program of training, if required, i.e. Microsoft, ISO9000, or similar certification generally recognized by employers; and
  - a. Any additional information required by the LWDB.
- b. Performance Data for eligible training providers' programs of study applications must include (with the exception of Registered Apprenticeship sponsors) the following:
  - i. Standard Performance Data (Section J – All Participants)

The number of ALL participants who entered training and were scheduled to complete during the 12-month program year date range is to be provided for each training program by the eligible training provider and annotated in

Section J of the on-line training course application in the State's ETPL system @ [www.etpl.mdes.ms.gov](http://www.etpl.mdes.ms.gov), both in the initial application and annually during each open enrollment and recertification period held beginning April 1 and ending April 15 of each year. The ETPL administrator will send an ETPL system generated email to all active users prior to the open enrollment and recertification period to remind the eligible training providers that the open enrollment and recertification period is approaching and to inform eligible training providers of the 12-month date range. Additionally, the following information should be kept for each training course or program for review by the LWDB:

- The program completion rates for individuals participating in the program(s);
- The percentage of individuals participating in the program(s) who obtained unsubsidized employment; and
- Wages at placement in employment of individuals participating in the program(s).

ii. **Provided Performance Data (Section K – WIOA Participants)**

Prior to the open enrollment and recertification period, the ETPL Administrator will determine the 12-month program year date range and request a data extract from the State's ETPL financial tracking system to identify the participants who received WIOA training funds with a training completion that falls within the identified 12-month program year date range. The data file extract will include, at minimum, the participant's first and last name, social security number, the name of the eligible training provider, and name of the training course. This data file will be used to match all trained participants in the state and national wage data bases using the State's Unemployment Insurance Wage Records and the State Wage Interchange System (SWIS), respectively. Once the wage data has been compiled, the State will determine the following information for each training course in the State's ETPL system and The ETPL Administrator will key the following data on each training course application where WIOA activity occurs:

- The number of participants who entered training;
- The number of participants who completed training;
- The number of participants who entered employment;
- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
- The median earnings of program participants who are in unsubsidized

employment during the second quarter after exit from the program;

- The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (subject to clause (vi)), during participation in or within 1 year after exit from the program;
- The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.

On July 22, 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law and provides comprehensive legislation that reforms and modernizes the public workforce system. As a result, the State is mandated by WIOA law to provide an annual report to the U.S. Department of Labor's (DOL) Employment and Training Administration (ETA) a 3-year report card on all WIOA approved eligible training providers and their approved programs of study for all participants who participated in the program of study. This instruction can be found in Training and Employment Guidance Letter (TEGL) 10-16 and report template ETA 917). The first report is due to DOL October 1, 2017 and annually on this date each year that follows. For purposes of meeting the DOL's reporting requirements, the State will provide additional information and instructions to WIOA approved eligible training providers regarding the data that is required of the participants served through their institution.

#### e. Assurances

No Training Provider will be placed on the Eligible Training Provider List until a signed Certificate of Assurances is received by either the LWDA, the State office or both confirming that they will comply fully with all nondiscrimination, equal opportunity, all performance indicators, and all provisions of the laws listed below. This document is found at <https://etgl.mdes.ms.gov/Assurances.pdf>.

- i. WIOA section 188, which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in any WIOA Title I-financially assisted program or activity;
- ii. Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color and national origin;
- iii. Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
- iv. The Americans with Disabilities Act (ADA) of 1990 which prohibits discrimination against qualified people with disabilities based on disability;

- v. The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age;
- vi. Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs;
- vii. 29 CFR part 37 and all other regulations implementing the laws listed above. This assurance applies to the grant applicant's operation of the WIOA Title I financially assisted program or activity, and to all agreements the grant applicant makes to carry out the WIOA Title I financially assisted program or activity. The grant applicant understands that the United States has the right to seek judicial enforcement of this assurance;
- viii. WIOA trainees shall make up no more than 75% of each class;
  - (A) As an eligible training provider to WIOA participants you will provide industry-recognized certificates and certifications, offer quality programs of training that lead to recognized postsecondary credentials, and provide indicators that you provide training to individuals who are employed and individuals with barriers to employment;
  - (B) As an approved WIOA eligible training provider you will provide indicators of effectiveness in serving employers, factors that indicate high-quality training, factors concerning alignment of the training with in-demand industry sectors and occupations, and you are in partnership with businesses.

#### **B. Initial Application Timeline and Requirements**

1. Advertisement: Local Areas shall provide adequate notice through public advertisement of the upcoming enrollment and subsequent eligibility period held annually during April 1 -15.
2. State of Mississippi Community Colleges, Higher Education Act and/or National Apprenticeship Act Providers, Other Public and Private Training Providers:
  - a. Applications will only be accepted during the open enrollment and recertification period of April 1—15 each year. The ETPL system will open for eligible training providers to make application and modify existing training courses during this period. This enrollment allows for initial and continued eligibility processes to take concerning eligible training providers' programs of study. No additional applications or modifications will be accepted after midnight April 15<sup>th</sup> of each year.
  - b. Beginning on April 16<sup>th</sup> of each year following the open enrollment and continued eligibility, the ETPL Administrator will begin the automated processes which will update required information and assign the applications to the respective LWDB for review.

- c. The LWDB will review the application(s) in the ETPL system and annotate on the application either an approval or denial. If the LWDB annotates a denial in the ETPL system, the ETPL system will automatically generate an email notification to the eligible training provider stating the reason or reasons for denial (only one reason is needed for denial), provide the timeline in which the appeal is required, and to whom the appeal is to be directed.
  - d. During the review period, the LWDB, the State or its designated representative(s) may make an on-site visit to the eligible training provider's program sites.
  - e. All approved course applications will be included as part of the system data upload by July 15th of the current year and becomes the new eligible training provider and course list made available to the public via the State's online ETPL system @ [http://mdes.ms.gov/i-need-a-job/job-searching-resources/training-education/eligible-training-provider-list-\(etpl\)-systems/](http://mdes.ms.gov/i-need-a-job/job-searching-resources/training-education/eligible-training-provider-list-(etpl)-systems/).
  - f. Any courses not recertified through the previously described process or approved by the LWDB will be removed from the ETPL list.
3. State Acceptance:
- a. For applications from Community Colleges, Higher Education Act and/or National Apprenticeship Act, the LWDB's approval is the final decision. The State's ETPL Administrator will place the eligible training provider program(s) on the Statewide Eligible Training Provider List online system prior to July 15th of the current year after the April 1- 15 open enrollment and continued eligibility period.
  - b. For applications from all other public and private providers of a training program, the LWDB's approval is the final decision. The State's ETPL Administrator will place the eligible training provider program(s) on the Statewide Eligible Training Provider List online system prior to July 15th of the current year after the April 1- 15 open enrollment and continued eligibility period.
  - c. Registered Apprenticeships do not require LWDB approval to be placed on the ETPL list.

## **IX. CONTINUED ELIGIBILITY DETERMINATION POLICY**

### **A. Continued Eligibility Determination Process**

Program of study applications must be submitted via the State's online system at [www.etpl.mdes.ms.gov](http://www.etpl.mdes.ms.gov) during the open enrollment and continued eligibility period held between April 1 - 15 each year, at such time, in such a manner, and containing such information as necessary to adequately fulfill the LWDB's and State's performance information requirements for each training program of study. The continued eligibility process is required of each eligible training provider. The Registered Apprenticeship program sponsors are exempt from the performance indicators and outcome measures. On April 16, the ETPL Administrator will administer the online processes to assign the training course applications to the respective LWDBs for review.

1. Training providers, regardless of their previous eligibility status, who wish to apply for continued eligibility, must meet the initial eligibility criteria as previously stated in this policy. Failure to meet the revised criteria for initial eligibility will result in that provider's removal from the Eligible Training Providers List web based system.
2. To remain eligible, all training providers must undergo an annual eligibility determination by the LWDBs. This determination will include a review of program-specific performance and cost information as well as a review of actual performance compared to performance levels established by the Governor (See Attachment A). An onsite review may be part of the process.
3. The eligible training provider should keep verifiable, program-specific performance information for each program of study. This information must be available for each program to be considered for continued eligibility and may be reviewed by the LWDB or State:
  - a. Outcomes for all individuals participating in the program:
    - i. Program completion rates;
    - ii. Percentage who obtained unsubsidized employment; and
    - iii. Average wage at placement in employment.
    - iv. Signed assurance that **no more than 75%** of your class/course participants are WIOA-funded, on an annualized basis.
      - Providers with greater than 75% of their course's annual participants being funded by WIOA must show justification and an action plan to correct the imbalance to the LWDB,
      - The LWDB may issue an exception to the provider, if they feel the imbalance is justified; and will forward the exception to the State for final approval.
      - The LWDB may choose to locally increase the ratio of non-WIOA to WIOA-funded participants.



4. All approved program of study course application(s) will be included as part of the system data upload on or before July 15th of the current year and becomes the new eligible training provider course list made available to the public via the State's online ETPL system at <http://mdes.ms.gov/i-need-a-job/job-searching-resources/training-education/eligible-training-provider-list-etpl-system/>. No log in or user access is required to view the list of eligible training providers and their respective courses approved by the LWDBs. Public access is also provided via the MDES website at [www.mdes.ms.gov](http://www.mdes.ms.gov) and selecting the Customer/Public Access link in the bottom right corner. The public may search by selecting the Local Area map, the certified training course list by course name, training provider, etc.
5. The LWDB and the State may accept program-specific performance information consistent with the requirements for eligibility under Title IV of the Higher Education Act of 1965 from the provider for purposes of enabling the provider to fulfill the requirements for continued eligibility determination if the information is substantially similar to the information required.
6. Alternate procedures may be used to collect and verify supplemental outcome training performance information.

**B. Performance Measures**

The LWDB shall annually adopt its standards within 90 calendar days after the State issues its standards of performance. LWDB standards must meet or exceed the standards adopted by the State. The baseline State Performance Measures are included as Attachment A of this policy.

**C. Continued Eligibility Timeline**

1. Continued eligibility certification will be performed annually at the anniversary of the initial eligibility application. As of April 1, 2013, the State will have one continued eligibility period each year. The continued eligibility period will be held April 1 – 15 each year. Failure to apply for continued eligibility of training course(s) or programs of study will result in the expiration of the current certification and removal from the statewide approved training provider list. The course will then be stored in the ETPL system archives as an inactive course. The training provider may request to activate inactive programs of study outside of the continued eligibility period, but only with the prior consent of the LWDA. Once the LWDA agrees that the course(s) may be modified, the LWDA must notify the ETPL Administrator at [etpladmin@mdes.ms.gov](mailto:etpladmin@mdes.ms.gov) that approval has been granted by the LWDA. The ETPL Administrator will ensure that the processes are initiated that move the course(s) to an active status.
2. Eligible training providers seeking continued eligibility certification will key the total number of participants who entered training in Section I of each training course application. Upon request, performance data for the most recent 12-month period as described in the first section of attachment A of this policy should be



made available to the LWDA or MDES for each program of study application for continued eligibility

3. The LWDB shall review and certify the performance data of all registrations and applications as soon as possible following the close of the application period (midnight April 15 of each year) and shall annotate such approval or denial on each training course application in the State's ETPL system. The ETPL system will automatically generate an email notification to each active user for the eligible training provider stating the reason or reasons for denial (only one reason is needed for denial), and provide the timeline in which the appeal is required, and to whom it is to be directed.
4. During the review period, the LWDA or its designated representative(s) may, as determined reasonable by the LWDA, make an on-site visit to the eligible training provider program sites for the purpose of confirming information.
5. Once all of the LWDA's have annotated their approvals in the ETPL system for each training course application assigned, and the 10 day window for appeal has expired, the ETPL Administrator will conduct the upload of the new list and data for each program of study application on or before July 15th of the current year.
6. State Acceptance:
  - a. For applications from Community Colleges, Higher Education Act and/or National Apprenticeship Act, the LWDB's approval is the final decision. The State's ETPL Administrator will place the eligible training provider program(s) on the Statewide Eligible Training Provider List online system prior to July 15th of the current year after the April 1- 15 open enrollment and subsequent eligibility period.
  - b. For applications from all other public and private providers of a training program, the LWDB's approval is the final decision. The State's ETPL Administrator will place the eligible training provider program(s) of study on the Statewide Eligible Training Provider List online system prior to July 15th of the current year after the April 1- 15 open enrollment and subsequent eligibility period.

#### D. LWDB Considerations in Determining Subsequent Eligibility

1. The Local Board should have established criteria for determining subsequent eligibility, so that decisions are not arbitrary. [20 CFR 663.535(f)(1)&(2)]. Such factors may include, but are not limited to:
  - a. Specific economic, geographic, and demographic factors in the Local Area(s) in which the provider seeking eligibility is located;
  - b. Characteristics of the population(s) served by the provider seeking eligibility, including the demonstrated difficulties in serving such population(s), where applicable;
  - c. Current and projected occupational demand within the Local Area;

- d. Performance of a provider of a program(s) of training; including the extent to which the annual standards of performance established by the LWDB have been achieved;
  - e. Cost of training;
  - f. Involvement of employers in the establishment of skill requirements for the training program;
  - g. Feedback of employers who employ individuals who recently completed WIOA-supported training to verify that the training provided produced the expected skills; and,
  - h. Number of individuals considered in calculated percentages for performance measures.
2. The LWDB may require enhancements to programs or courses to meet local industry needs as a contingency for subsequent eligibility.

## **X. DENIAL AND APPEAL PROCESSES**

### **A. Denial Process**

1. LWDB Denials
  - a. Upon a determination by the LWDB that an application by a training provider for a specific program does not meet the eligibility requirements set forth in WIOA or State/local policy, or does not meet the established criteria for determining subsequent eligibility, the LWDB shall annotate that the course is denied on the electronic application in the State's ETPL system with at least one reason why the course has been denied.
  - b. The ETPL system will automatically send a system generated email to the active users for the eligible training provider and shall comply with the following requirements:
    - i. Notification by email to each active user in the ETPL system for the eligible training provider;
    - ii. Indicate the "date mailed" on the system generated email denial notice;
    - iii. Identify the program and project code that was denied;
    - iv. Describe the specific reason or reasons for the denial; and
    - v. Inform the training provider of the appeal process as outlined below.
  - c. LWDB policy shall determine the circumstances under which reconsideration may be afforded to a provider that was denied initial eligibility determination. An entity whose initial application for certification was denied may not reapply until the following year of initial applications.
2. State Denials

- a. The State's ETPL Administrator will move all of the initial and subsequent eligible training provider training course applications that have been disapproved or denied to a historical archive file in the ETPL system as an inactive course on or before July 15<sup>th</sup> of the current year. All information and data on the application will remain in the system. Once the training course application becomes inactive, it is not available for view by the public and is not available for the ITA staff to generate an obligation of WIOA funds.
- b. In denying or removing a training program from the Eligible Training Provider List, the State shall follow the guidelines as outlined in the WIOA federal regulations.

#### **B. Appeal Process**

1. The training provider has ten (10) working days from the date of the ETPL system generated email in which to file an appeal to the originator of the notice, which is the LWDA.
2. The request for appeal must clearly indicate that the training provider wants to appeal the denial and must clearly identify the training program being denied.
3. The request for appeal must be submitted in writing, signed, dated and postmarked no later than 10 working days from the ETPL system generated notice, and must include a factual basis for the appeal.
4. The LWDB will review the request for appeal and, based on this review, may reverse their original decision if an administrative error was made or if additional information submitted by the training provider changes the basis on which the original decision was issued.
5. Additional information regarding appeals can be found in the MD&S agency policy number 32 entitled Programmatic Grievance and Complaints Policy.
6. **Decision Reversals**
  - a. If the LWDB reverses a prior decision, the LWDB will make the reversal on the application in the ETPL system. A system generated email will be sent to all active users of the eligible training provider informing the provider of the reversal. If the course(s) was not included in the mass data upload on or before July 15<sup>th</sup> of the current year, the course(s) will be uploaded to an active status immediately after the reversion is noted on the training course application by the LWDB.
  - b. If the State reverses a prior decision, the State will notify both the LWDB and the training provider of the reversal and will follow the appropriate procedures to include the training course in the State's system upload so that the course becomes active and is available for public viewing, and ITA staff for the purpose of obligating WIOA funds.

## **XI. COMPLIANCE AND REQUIREMENTS**

**A. Local**

The Local Areas shall be responsible for:

1. accepting, reviewing, and approving or denying eligible training providers' applications of programs of study;
2. compiling a Local Demand Occupation List, based on the Statewide Demand Occupation List;
3. monitoring of the eligible training providers to ensure compliance with WIOA Rules and Regulations, including Program Performance Information, with applicable OMB Circulars, and with the Performance and Enrollment requirements as stated in this and other State Policies.

**B. Statewide**

The State shall compile a single Eligible Training Provider List from all Local Areas in the State and disseminate such list, and the performance information and program cost information, to the One-Stop service delivery systems within the State. This List and information shall be made widely available to participants in employment and training activities and other customers through the One-Stop service delivery system. The eligible training provider, their respective courses, training locations etcetera can be accessed by the public at [http://rules.ms.gov/i-need-a-job/job-searching-resources/training-education/eligible-training-provider-list-\(eipl\)-system/](http://rules.ms.gov/i-need-a-job/job-searching-resources/training-education/eligible-training-provider-list-(eipl)-system/).

**C. Regulatory Requirements**

1. **Accuracy of information:** If the LWDB and/or designated State agency, after consultation with the Local Board involved, determines that an eligible training provider or individual(s) supplying information on behalf of the provider intentionally supplies inaccurate information under this section, the agency shall terminate the eligibility of the provider to receive funds described in subsection (a) for any program for a period of not less than two years.
2. **Noncompliance:** If the designated State agency, or the Local Board working with the State agency, determines that an eligible training provider described in subsection (a) substantially violates any requirement under this Act, the agency, or the Local Board working with the State agency, may terminate the eligibility of such provider to receive funds described in subsection (a) for the program involved or take such other action as the agency or Local Board determines to be appropriate.
3. **Repayment:** A provider whose eligibility is terminated under paragraph (1) or (2) for a program shall be liable for repayment of all funds described in subsection (a) received for the program during any period of noncompliance described in such paragraph.
4. **Conflict of Interest:**
  - a. As stated in 20 CFR 667.200(a)(4)(j), a Local Board member or Youth Council member must neither cast a vote on, nor participate in, any decision-

making capacity on the provision of services by the member (or any organization the member directly represents), nor on any matter that would provide direct financial benefit to the member or a member of his immediate family.

- b. As stated in 20 CFR 667.200(a)(4)(ii), neither membership on the Local Board or the Youth Council nor the receipt of WIOA funds to provide training and related services, by itself, violates the conflict of interest provisions.

**XII. EFFECTIVE DATE.**

This policy is effective immediately.

\_\_\_\_\_  
Rob Stewart  
Interim Executive Director

1/28/2022

Rob Stewart

Date

Interim Executive Director

- Attachments: A - State Performance Levels  
B - State Refund Policy  
C - System Access Confidentiality Agreement

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 7**  
**PRIORITY of SERVICE for**  
**WIOA ADULT PROGRAM PARTICIPANTS**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

To establish a policy for determining priority of services for adults receiving direct, monetary services such as support services or training under the Workforce Innovation and Opportunity Act (WIOA).

**II. REQUIREMENTS**

WIOA section 134(c)(3)(E) establishes the need for the local Workforce Investment Area to have a system of priority for services to adults:

“With respect to funds allocated to a local area for adult employment and training activities ... priority shall be given to recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for receipt of career services ... and training services. The appropriate local board and the Governor shall direct the one-stop operators in the local area with regard to making determinations related to such priority.”

Proposed § 680.600(b) requires States and local areas to establish criteria for providing priority to individualized career services and training services with WIOA adult funds under title I. The criteria may include other resources and funds for providing career and training-related services in the local area, as well as the needs of specific groups in the local area, as well as other factors the local areas determines appropriate.

Proposed § 680.600(c) clarifies that while priority must be given under WIOA adult funds to low-income individuals, public assistance recipients, or individuals who are basic skills deficient for individualized career services and training services, the Local Board and Governor may establish a process that also gives priority to other individuals.

**A. Background**

The Adult Program under Title I of WIOA provides workforce development services to adults to increase their employment, retention in employment, and earnings and also support their occupational skill attainment and career advancement. Local workforce development boards are charged with strategic

planning and oversight activities in support of workforce and economic development.

WIOA specifies that services for adults will be provided through One-Stop Career Centers. Services such as career guidance and workforce information may also be provided virtually. WIOA authorizes two types of service that are potentially available to job seekers:

1. Career Services - includes outreach, job search and placement assistance, provision of labor market information, comprehensive assessments, development of individual employment plans, counseling and career planning, and other services specified in §134(c)(2).
2. Training Services - includes Occupational Skills Training, On-the-Job Training activities, Customized Training, Individual Training Accounts, and other training services specified in §134(c)(3)(D).

Priority for both career and training services must be given recipients of public assistance, other low income individuals, and individuals who are basic skills deficient in accordance with the federal requirements specified in Section II, above.

Funds allocated for WIA Dislocated Workers or TAA eligible individuals are not subject to this Policy.

#### **B. Compliance with the Jobs for Veterans Act**

Mississippi's workforce system will provide priority of service to veterans and eligible spouses, as specified in the Jobs for Veterans Act and its implementing regulations at 20 CFR part 1010, and articulated in State Policy Number 6 - Priority of Service for Veterans and Eligible Spouses.

When Veterans Priority is applied in conjunction with Priority of Service for WIOA Adult Program Participants, veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient will receive first priority. The second priority would be recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient who are not veterans or eligible spouses.


#### **C. Local Board Requirements**

Local Workforce Development Boards are required to develop and include in their local plan, policies that implement Priority of Service for WIOA Adult Program Participants for the one Stop Centers and a service delivery plan for the local training providers.

**III. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

**IV. APPROVAL**

  
Jacqueline A. Turner  
Deputy Executive Director, CFO



**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**State Policy Number 11**  
**WIOA ALLOCATION POLICY**  
**Workforce Innovations and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to provide guidance and information to Local Workforce Development Areas regarding the Workforce Innovation and Opportunity Act (WIOA) Title 1 allotments for operating Adult, Dislocated Worker, Youth and Rapid Response activities. The funds allocated to the local areas for youth, adult, and dislocated worker activities will be allocated based on the formulas specified in WIOA Section 128(b)(2)(A)(I) and 132(b)(2)(A)(I), respectively. The State will consult with the State Workforce Development Board (SWDB) on the development of allocation formulas for the distribution and operation of approved WIOA activities.

**II. REQUIREMENTS FOR WIOA ALLOCATION AND DISTRIBUTION**

**A. Adult**

The WIOA allows the following allocation process:

1. Standard Allocation Formula
  - a. 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each area, compared to the total number of unemployed individuals in areas of substantial unemployment in all areas. The term “area of substantial unemployment” means any area that is of sufficient size and scope to sustain a program of workforce investment activities carried out under this subtitle and that has an average rate of unemployment of at least 6.5 percent for the most recent 12 months.
  - b. 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each area, compared to the total excess number of unemployed individuals in all areas. The term “excess number” means, used with respect to the excess number of unemployed individuals within a State, a higher of: (1) the number that represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force; or (2) the number that represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment.
  - c. 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged adults in each area, compared to the total number of disadvantaged adults in all areas. The term “disadvantaged adult” means

an adult who received income, or is a member of a family that received a total family income that, in relation to family size, does not exceed the higher of: (1) the poverty line; or (2) 70 percent of the lower living standard income level.

**B. Youth**

The WIOA allows for the following allocation process:

1. Standard Allocation Formula

- a. 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each area, compared to the total number of unemployed individuals in areas of substantial unemployment in all areas;
- b. 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each area, compared to the total excess number of unemployed individuals in all areas; and
- c. 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged youth in each area, compared to the total number of disadvantaged youth in all areas.

**C. Dislocated Worker**

1. Allocation Formula

The State shall allocate not less than 60 percent based on an allocation formula prescribed by the Governor. The formula shall use the most recent available information and shall include:

- a. Insured unemployment,
- b. Unemployment concentrations,
- c. Plant closing and mass layoff,
- d. Declining industries,
- e. Farmer-rancher economic hardship,
- f. Long term unemployment.

<b>ALLOCATION FACTOR</b>	<b>WEIGHT ASSIGNED IN FORMULA</b>
Insured Unemployment Data	10%
Unemployment Concentrations Data	25%
Plant Closing and Mass Layoff Data	10%
Declining Industries Data	20%
Farmer-Rancher Economic Hardship Data	5%
Long-Term Unemployment Data	30%

2. Transfer Authority

DOL allows transfer of up to 100% of funds between Dislocated Worker and Adult funding streams.

**D. Distribution of Rapid Response Funds**

As described in WIOA Part 682, the State will reserve up to 25% of dislocated worker funds for rapid response activities. Once the State has reserved adequate funds for rapid response activities, the remainder of the funds may be used by the state to provide funds to local areas that experience increased numbers of unemployed individuals due to natural disasters, plant closings, mass layoffs or other events for provision of direct services to participants.

**III. EFFECTIVE DATE**

This policy is effective July 1, 2015.

  
\_\_\_\_\_  
Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 6**  
**PRIORITY OF SERVICE**  
**For VETERANS and ELIGIBLE SPOUSES**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to articulate the procedures for providing priority of service to veterans and the eligible spouses of veterans with respect to qualified job training programs.

**II. REQUIREMENTS**

The requirement to provide priority of service applies to all Workforce Innovation and Opportunity Act (WIOA) and Wagner-Peyser funded activities, including technology-assisted activities; the Senior Community Service Employment Program (SCSEP); Indian and Native American Programs (INAP); National Farmworker Jobs Training Programs (NFJP); Trade Adjustment Assistance Programs (TAA); job training programs funded through the Women’s Bureau, and any other current or future qualified job training program.

Additionally, all program operators are required to ensure that priority of service is applied by all sub-recipients of DOL funds. All program activities issued or executed by program operators, regardless of how they are procured, must be administered in compliance with priority of service requirements.

**A. Background**

The Jobs for Veterans Act (JVA), Public Law (P.L.) 107-288 was signed into law in November 2002, establishing a priority of service requirement for covered persons, as defined by this statute, in qualified job training programs.

The Department of Labor, in December 2008, published 20 CFR Part 1010 to reflect the statutory requirement of section 605 of the Veteran’s Benefits, Health Care, and Information Technology Act of 2006, (P.L. 109-461), implementing priority of service via regulation.

The Final Rule took effect in January 2009, stating that recipients of funds subject to these regulations should review and, if necessary, enhance their current policies to ensure adequate protocols are in place.

## B. Definitions

### 1. Priority of Service

With respect to any qualified job training program, a covered person shall be given priority over a non-covered person for the receipt of employment training and placement services provided under that program.

### 2. Covered Person

As defined in Federal Rule (20 CFR Part 1010), a covered person means a veteran or eligible spouse of a veteran.

### 3. Veteran

A veteran is defined as a person who served in the active military, naval, or air service, who was discharged or released under conditions other than dishonorable.

### 4. Eligible Spouse

- a. The spouse of any persons who died of a service-connected disability
- b. The spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - missing in action
  - captured in the line of duty by hostile force; or
  - forcibly detained or interned in the line of duty by a foreign government or power
- c. The spouse of any persons who have a total disability permanent in nature resulting from a service-connected disability; or
- d. The spouse of a veteran who died while a disability so evaluated was in existence.

The United States Department of Labor (USDOL) has indicated for clarification concerning (a) and (d) above that the re-marriage of the spouse would not terminate their eligibility. However, if a spouse

becomes divorced from a veteran under (b) and (c) above, eligibility for priority of service is terminated.

It is further understood that this policy does not exclude from eligibility spouses who were not citizens at the time that the veteran was discharged or retired, nor does it stipulate that a spouse had to be married to a veteran at the time of his or her discharge or retirement.

5. Qualified Job Training Program

Any program or service for workforce preparation, development or delivery that is directly funded, in whole or in part, by the USDOL.

**C. Implementing Priority of Service**

The regulations provide that priority of service means the right of eligible covered persons to take precedence over eligible non-covered persons in obtaining services. They further specify that taking precedence may mean:

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

The regulations specify how priority of service is to be applied across three different types of qualified job training programs:

- Universal access programs that do not target specific groups;
- Discretionary targeting programs that focus on certain groups but are not mandated to serve target group members before other eligible individuals; and,
- Statutory targeting programs that are mandated by federal law to provide priority or preference to certain groups.

**D. Identifying and Informing Covered Persons**

All recipients of funds for qualified job training programs are required to identify covered persons at the point of entry to programs to enable them to take full advantage of priority of service. The USDOL will not prescribe how this is to be done. Program operators are reminded, however, that self-registration systems are not, at this stage, to require documents to be produced that verify status, unless the point of entry is also the point at which program eligibility determination and registration or enrollment takes place. Even then, the

applicant should be permitted to enroll and follow-up subsequently with the verification of his or her status. Point of entry will include physical locations as well as websites and other virtual service delivery resources.

Protocol should require that the receptionist or office manager ask each applicant if he or she is a veteran or eligible spouse. Staff should also explain to each applicant that veterans and eligible spouses get priority of service, and describe any eligibility requirements for those services or programs.


**E. Local Board Requirements**

Local Workforce Development Boards are required to develop and include in their local plan, policies which implement priority of service for the one Stop Centers and a service delivery plan for the local training providers.

**III. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

**IV. APPROVAL**

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**State Policy Number 8, Revised February 2018**  
**WIOA PROGRAMMATIC and FISCAL MONITORING**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

This policy sets forth requirements for the monitoring of all entities receiving Workforce Innovation and Opportunity Act (WIOA) funds in accordance with Sections 183(a-c) of the Act and Federal regulations 2 CFR Part 200.330 – 200.332, and Federal Acquisition Regulation (FAR) 31.2 of the Final Rule.

Audit Regulations, 2 CFR 200.501-512, shall be applicable for non-profit and for-profit entities who expend \$750,000 a year in federal awards from all sources.

Each Local Workforce Development Area and State sub-recipient shall develop a policy to govern its monitoring activities. This document provides guidelines for developing the policy and describes the minimum elements to be included in the policy.

**II. STATE REQUIREMENTS**

**A. State Monitoring Policy**

The Office of Grant Management (OGM) is responsible for monitoring all Local Workforce Development Areas and State sub-recipients. On-site and/or desk reviews will be conducted pursuant to established standard operating procedures to ensure compliance with the WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and, when applicable, Federal Acquisition Regulations (FAR).

**1. Monitoring Review Process**

- An on-site and/or desk review is conducted consisting of:
- An entry conference or written notification of desk review, as appropriate, to brief agency officials on the scope of the review and to make appropriate arrangements;
- A review of administrative, fiscal, equal opportunity, and programmatic systems and transactions;
- Performance of test work, based on a review and examination of WIOA records and interviews; and
- An exit conference for on-site reviews to inform agency officials of monitoring results.

**2. Monitor the following, as applicable:**

- program goals and objectives



- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

**3. Monitoring Report**

After each review, a monitoring report will be prepared by OGM detailing the results of the monitoring visit. The report will be completed within three weeks of completion of the review. Indexed working papers will also be prepared to provide supporting documentation for test work performed and for any findings. The monitoring report will be transmitted to the entity for review, and appropriate corrective action will be requested, if necessary.

**4. Corrective Action Response**

If any findings were noted during the review, a corrective action response will be required within 45 days from date of the monitoring report. Upon receipt of the entity's corrective action plan, the monitors will review the response and comment on the acceptability of the proposed corrective action. If the corrective action plan is deemed acceptable, the file will be closed. If the corrective action plan or any part thereof is unacceptable, additional corrective action shall be requested. The file will remain open until all corrective action has been accepted.

**5. Acceptance/Non-acceptance of Corrective Action**

Notice of acceptance or non-acceptance of the sub-recipient's proposed corrective action plan will be forwarded by OGM to the sub-recipient within 30 working days of receipt of the plan. If the proposed plan is not accepted, OGM may require submission of a subsequent

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plan to be received within 30 days from the date of the notice.

If the subsequent plan is deemed unacceptable, OGM may again request submission of a new plan within a specified timeframe or take other action as deemed appropriate relevant to the circumstances.

**6. Monitoring Files**

A monitoring file will be maintained by OGM for each monitoring visit or desk review.

**7. Follow-up Visits and Verification of Corrective Action**

Follow-up visits will be conducted by OGM, if deemed necessary.

**8. Unannounced Visits**

Unannounced visits may be conducted by OGM, if deemed necessary.

**III. LOCAL WORKFORCE DEVELOPMENT AREA/ STATE SUB-RECIPIENT REQUIREMENTS**

**A. Local Workforce Development Area/State Sub-recipient Monitoring Policy**

WIOA Section 107(d)(8) requires the local board, in partnership with the chief elected official, to conduct monitoring with respect to local programs of youth activities authorized under section 129(c), adult and dislocated worker local employment and training activities authorized under section 134(b), (c), and (d), and the one-stop delivery system in the local area.

WIOA Section 184(a) (3&4) and 2 CFR 200 parts 330-332 of the Federal regulations require each recipient and sub-recipient of WIOA Title I funds to conduct monitoring of the WIOA activities of its sub-recipients in order to:

- Determine whether expenditures have been made against the cost categories and within the cost limitations specified in WIOA and Federal regulations;
- Determine whether there is compliance with all applicable requirements; and
- Provide technical assistance as necessary and appropriate.

**1. Scope**

The Local Workforce Development Area (LWDA) or State sub-recipient shall develop a monitoring policy describing the procedures that will be implemented to ensure compliance with WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and Federal Acquisition Regulation (FAR).

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Local fiscal monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA or State sub-recipient's determination of "risk" and other factors which should consider whether the sub-recipient is subject to the Single Audit Act; when the most recent previous on-site review was conducted; previous findings or corrective actions required; etc.

LWDA or State sub-recipient programmatic compliance and equal opportunity monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA's determination of "risk" and other factors which should consider the type of WIOA activity performed by the sub-recipients; when the most recent previous on-site review was conducted; previous findings or corrective actions required; the existence of current reviews conducted by the state or its authorized representative that adequately address all criteria in the LWDA or State sub-recipient monitoring instrument, etc.

Monitor the following, as applicable:

- program goals and objectives
- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

## 2. Frequency

The policy shall include procedures to ensure monitoring is completed in a

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timely manner. Each sub-recipient or State sub-recipient shall be monitored at least once per year during the program year or during the sub-award period.

**B. Local Workforce Development Area/State Sub-recipient Monitoring Procedures**

**1. Annual Monitoring Schedule**

The policy shall include procedures to ensure an annual monitoring schedule is prepared. The schedule should include sub-recipient names and addresses, contact numbers, planned dates of reviews, and names of individuals to perform the reviews. Annual monitoring schedules shall be submitted to OGM.

**2. Review Notification**

The policy shall include procedures to ensure that written notification of the scheduled review is provided to the entity in advance of the actual review, except when unannounced monitoring visits are deemed necessary.

**3. Desk Review Instrument**

A written desk review monitoring instrument must be prepared and should precede an on-site monitoring visit. This process will ensure that all pertinent records are reviewed prior to each visit. The policy shall describe the procedures for completing a desk review instrument before the on-site visit.

**4. Monitoring Instrument**

The policy shall include procedures for the development of an objective monitoring instrument for use in monitoring reviews to ensure that pertinent data can be collected and analyzed for all program activities.

**5. Documentation of Findings**

The policy shall include procedures to ensure findings are adequately documented and include a written description of the deficiency or violation.

**6. Monitoring Report**

The policy shall include procedures to ensure a monitoring report is prepared following each on-site or desk review. The report should be completed within three weeks of the review and should include the following elements:

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- A face page signed by the monitor(s) and the signature of supervisory level staff or the executive director (applicable to on-site visits only);
- The dates of the review and areas covered during the review.
- A listing of findings, if applicable that consists of a narrative description of the deficiency or violation noted; and
- For each finding, a recommendation which sets forth the most appropriate action to correct the deficiency or violation noted.

**7. Corrective Action**

The policy shall include procedures to ensure monitoring reports are forwarded to the sub-recipient with a transmittal letter. If findings were noted in the report, the transmittal letter shall require a written corrective action plan from the sub-recipient within 45 days from the date of the report.

**8. Acceptance/Non-acceptance of Corrective Action**

The policy shall describe the procedures that will be used to determine the acceptance or non-acceptance of the sub-recipient corrective action plan. Notification of the determination shall be provided to the sub-recipient within 30 working days of receipt of the proposed corrective action plan.

**9. Follow-up Monitoring and Verification of Corrective Action**

The policy shall include procedures for follow-up monitoring reviews determined by the risk of the finding and the sub-recipient response to the finding. The policy shall include procedures to determine if corrective action measures taken were adequate to resolve the noted deficiencies.

**9. Unannounced Visits**

The policy shall describe the procedures for conducting unannounced visits of sub-recipients when such visits are deemed necessary.

**10. Monitoring Files**

The policy shall include procedures establishing and maintaining the monitoring files. A separate file shall be maintained for each monitoring review. At a minimum, the files shall contain the following records:

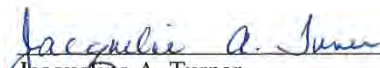
- notification of monitoring dates;
- completed desk review instrument;

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- signed monitoring report;
- completed monitoring instrument;
- transmittal letter, and if applicable, request for a corrective action plan;
- response from sub-recipient, when appropriate;
- letter to sub-recipient accepting/rejecting corrective action; and
- working paper file to include supporting documentation.

**IV. EFFECTIVE DATE**

This policy shall be effective as of February 1, 2018.

  
\_\_\_\_\_  
Jacqueline A. Turner  
Deputy Executive Director, CFO

Revised 1/2018

**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**Revised State Policy Number 13**  
**YOUTH ELIGIBILITY POLICY**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to provide guidance to the local workforce development boards and state subgrantees for use in developing policies and/or procedures for youth eligibility. Each Local Workforce Development Board (LWDB) or state subgrantee shall have appropriate procedures to ensure that only eligible individuals are served in programs funded under Title I of the Workforce Innovation and Opportunity Act (WIOA).

WIOA sections 3(18) and 129 (a) (1) (B) and (C) describe eligibility for the Title I youth formula-funded program, which includes two groups: In-School Youth (ISY) and Out-of-School Youth (OSY), and establishes specific criteria for each group. In addition, the Notice of Final Rulemaking, 20 CFR Part 681.220 provides additional clarification that should be considered when determining eligibility. The eligible WIOA Title I youth population represents youth who face challenges and barriers to success in the labor market.

**II. REQUIREMENTS**

Local Workforce Development Boards, in consultation with chief elected officials, must establish WIOA Title I eligibility policies and procedures consistent with the guidance provided herein.

The following provisions of WIOA shall apply when determining eligibility to participate in Title I youth programs funded by WIOA.

Youth eligible for services must be U. S. citizens or otherwise legally entitled to work in the U.S. and registered for selective service, if applicable. WIOA establishes separate criteria for Out-of-School Youth and In-School Youth.

**A. Out-of-School Youth** is defined as an individual who is:

- 1) Not attending any school (as defined under State law). In addition, WIOA includes a new criterion: a youth who is within the age of compulsory school attendance but has not attended school for at least the most recent school year calendar quarter. Because school districts differ in what they use for school year quarters, the time period of a school year quarter is based on how a local school district defines its school year quarter.

**NOTE:** State law does not define **not attending** school.

- 2) Not younger than 16 or older than 24 at the time of enrollment; **and** meets one of the following conditions:
  - School Dropout;
  - Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar is based on how a local school district defines its school year quarters.
- 3) Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner;
- 4) Subject to the juvenile or adult justice system;
- 5) A homeless child or youth, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
- 6) Pregnant or parenting;
- 7) An individual with a disability;
- 8) Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. (WIOA sections 3(46) and 129(a)(1)(B)).

**B. In-School Youth** is defined as an individual who is:

- 1) Attending school (as defined by State law);
- 2) Not younger than 14 or (unless an individual with a disability who is attending school under State law) older than 21 at the time of enrollment;
- 3) Low-income; **and**
- 4) Meets one or more of the following conditions:
  - Basic Skills Deficient
  - An English Language Learner
  - An Offender



- Homeless, a runaway, in foster care or has aged out of foster care system, a child eligible for assistance under 477 of the Social Security Act (42 U.S.C), or in an out-of-home placement.
- Pregnant or parenting
- An individual with a disability
- Requires additional assistance to complete an educational program or to secure or hold employment.

### C. Definitions

1) Youth Requiring Additional Assistance to enter or complete an educational program or to secure and hold employment is defined as an In-School Youth (ISY) or Out-of-School Youth (OSY) who is low income **and** meets one of the following documented criteria:

- Lacking relevant work experience to secure or hold employment;
- Lacking a credential related to local or regional targeted sectors;
- In need of an ITA to complete the Smart Start or Career Technical Pathway; or
- Criteria defined by the Local Workforce Development Board and included in the local area plan.

The list below contains examples Local Workforce Development Areas (LWDAs) can use during the eligibility process if a youth participant “Requires Additional Assistance”.

- Has a court/agency referral mandating school attendance (ISY);
- A victim of or resides in an abusive environment;
- Has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided (OSY)
- Has been fired from a job within six (6) months (or longer) prior to application (OSY);
- Has never held a full-time job (30+ hours per week) for more than thirteen (13) consecutive weeks (OSY);
- Has a currently incarcerated parent; and
- Has been referred to or treated by an agency for substance abuse/ psychological problems.

If a Local Workforce Development Area (LWDA) elects to include additional criteria as a part of its policy and local plan; the criteria must be approved by the Local Workforce Development Board. The criteria must be reasonable, quantifiable, and based on evidence that the specific characteristic of the youth identified in the policy objectively required additional assistance. Supporting

documentation and/or strong case notes are necessary when documenting all eligibility criteria.

**Note:** WIOA Section 129(a)(3)(B) states that in each local area, not more than five percent (5%) of ISY assisted may be eligible based on paragraph (1)(C)(iv)(VII), which refers to the barrier for an ISY who requires additional assistance to complete an education program or to secure or hold employment.

2) Low income is defined as in individual who:

- Receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program;
- Received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (inclusive of unemployment compensation, child support payments, payments described in subparagraph (A), and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402)) that, in relation to family size, does not exceed the higher of—
  - the poverty line, for an equivalent period; or
  - 70 percent of the lower living standard income level, for an equivalent period;
- Is a member of a household that receives (or has been determined within the 6-month period prior to application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.);
- Qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302);
- Is a foster child on behalf of whom State or local government payments are made; or
- Is an individual with a disability whose own income meets the requirements of (3b).
- WIOA contains a new provision that allows for youth living in a high-poverty area to automatically meet the low-income criterion that is one of the eligibility criteria for ISY and for some OSY.
- In addition, an ISY who receives or is eligible to receive free or reduced price lunch would meet the low-income requirement.

**Note:** When a school does not use individual eligibility criteria to determine who is eligible for free or reduced price lunch, whole school receipt of free or reduced price lunch cannot be used to determine WIOA low-income status for ISY. In schools where the whole school automatically receives free or reduced price lunch, WIOA programs must base low-income status on an individual

student's eligibility to receive free or reduced price lunch or on meeting one of the other low-income categories under WIOA.

Local programs can check with their local school districts for determining whether individual students are eligible to receive free or reduced price lunch. While the free/reduced lunch low-income category primarily applies to ISY, there is one exception where it could apply to an OSY.

If an OSY is a parent living in the same household as a child who receives or is eligible to receive free or reduced price lunch based on their income level, then such an OSY would meet the low-income criteria based on his/her child's qualification.

#### **D. Exception to Low Income**

WIOA Section 129(3)(A)(ii) allows local areas to serve youth who are not low income who meet all other criteria listed for OSY and ISY except low income. However, because not all OSY are required to be low-income, the five percent (5%) low-income exception under WIOA is calculated based on five percent (5%) of newly enrolled youth in a given program year who would ordinarily be required to meet the low-income criteria.

#### **E. Documentation**

Local Boards must maintain documentation that demonstrates a youth's eligibility to participate in WIOA Title I activities.

### **III. PROGRAM SERVICE ELEMENTS**

Local Boards must ensure that all 14 program service elements are available to youth in the local area, although individual youth participants need not participate in all 14 program service elements. Participation in the program service elements is based on a youth's objective assessment and individual service strategy.

Providers of youth services do not need to provide all 14 program service elements with WIOA funds if certain services are already accessible for all eligible youth in the local area.

Local Boards should identify the extent to which the 14 program service elements are available or already being provided in the local area through a combination of resource mapping, competitive selection of providers, or through community partnerships. Local Boards may leverage partner resources to provide program elements that are available in the local area. If a local program does not fund an activity with WIOA Title I youth funds, the local area **must** have an agreement in place with the partner to offer the program element and ensure that the activity is closely connected and coordinated with the WIOA youth program if enrolled youth participate in the program element.

To support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, service providers shall provide services consisting of the following elements:

- 1) Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;
- 2) Alternative secondary school services, or dropout recovery services, as appropriate;
- 3) Paid and unpaid work experiences that have as a component academic and occupational education, which may include:
  - summer employment opportunities and other employment opportunities available throughout the school year;
  - pre-apprenticeship programs;
  - internships and job shadowing; and
  - on-the-job training opportunities.
- 4) Occupational skills training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area;
- 5) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;
- 6) Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
- 7) Supportive services;
- 8) Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
- 9) Follow-up services for not less than 12 months after the completion of participation, as appropriate;
- 10) Financial Literacy Education;
- 11) Entrepreneurial Skills Training;



**MISSISSIPPI**  
**Policy Number 20**  
**LOCAL ONE-STOP INFRASTRUCTURE POLICY**  
**Workforce Innovation and Opportunity Act**  
**Office of Grant Management**

**I. SCOPE AND PURPOSE**

To provide guidance to Mississippi's local workforce development boards (LWDBs), Chief Elected Officials (CEOs), and all one-stop partners regarding the establishment of a local one-stop center operating budget and the negotiation of infrastructure and additional cost funding agreements between LWDBs and all Workforce Innovation and Opportunity Act (WIOA) required one-stop partners to jointly support the costs associated with local one-stop centers<sup>1</sup> and one-stop delivery systems. The funding agreements of local one-stop centers are attachments to the memoranda of understanding (MOU) between LWDBs and all WIOA required one-stop partners.

**II. REFERENCES**

- Workforce Innovation and Opportunity Act (WIOA) Sections 121, 134
- WIOA Regulations §361.300-§361.435, §361.500-§361.510, §361.700-§361.760, §678.400-§678.430, §678.700-§678.760,
- Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR Parts 200 and 2900
- U.S. Dept. of Education One-Stop Infrastructure Costs FAQs, Released: December 28, 2016
- TEGL 17-16: Infrastructure Funding of the One-Stop Delivery System, Released January 18, 2017

**III. DEFINITIONS**

**Comprehensive One-Stop Center**

- (a) A comprehensive one-stop center is a physical location where job seeker and employer customers can access the programs, services, and activities of all required one-stop partners. A comprehensive one-stop center must have at least one title I staff person physically present.
- (b) The comprehensive one-stop center must provide:
- (1) Career services, described in WIOA Sec. 134(c)(2);
  - (2) Access to training services described in § 680.200 of the WIOA regulations;
  - (3) Access to any employment and training activities carried out under sec. 134(d) of WIOA;
  - (4) Access to programs and activities carried out by one-stop partners listed in §§ 678.400 through 678.410 of the WIOA regulations, including the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA title III (Wagner-Peyser Act Employment Service program); and
  - (5) Workforce and labor market information.
- (c) Customers must have access to these programs, services, and activities during regular business days at a comprehensive one-stop center.

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<sup>1</sup> Local one-stop centers include comprehensive, affiliate, and specialized centers in a local workforce development area.

#### **Affiliate One-Stop Center**

- (a) An affiliated site, or affiliate one-stop center, is a site that makes available to job seeker and employer customers one or more of the one-stop partners' programs, services, and activities. An affiliated site does not need to provide access to every required one-stop partner program. The frequency of program staff's physical presence in the affiliated site will be determined at the local level. Affiliated sites are access points in addition to the comprehensive one-stop center(s) in each local area. If used by local areas as a part of the service delivery strategy, affiliate sites must be implemented in a manner that supplements and enhances customer access to services.
- (b) As described in WIOA regulations § 678.315, Wagner-Peyser Act employment services cannot be a stand-alone affiliated site.

#### **Specialized One-Stop Center**

Specialized centers address specific needs, including those of dislocated workers, youth, or key industry sectors, or clusters.

#### **Access**

"Access" to each partner program and its services means:

1. Having a program staff member physically present at the one-stop center;
2. Having a staff member from a different partner program physically present at the one-stop center appropriately trained to provide information to customers about the programs, services, and activities available through partner programs; or
3. Making available a direct linkage through technology to program staff who can provide meaningful information or services.
  - i. A "direct linkage" means providing direct connection at the one-stop center, within a reasonable time, by phone or through a real-time Web-based communication to a program staff member who can provide program information or services to the customer.
  - ii. A "direct linkage" cannot exclusively be providing a phone number or computer Web site or providing information, pamphlets, or materials.

#### **One-Stop System**

The one-stop delivery system brings together workforce development, educational, and other human resource services in a seamless customer-focused service delivery network that enhances access to the programs' services and improves long-term employment outcomes for individuals receiving assistance. One-stop partners administer separately funded programs as a set of integrated streamlined services to customers.

#### **State Funding Mechanism**

The state funding mechanism is the formula the state will develop and apply that will determine the infrastructure costs of all WIOA required one-stop partners in a local area when one or more partners fail to reach consensus locally.

### **IV. REQUIREMENTS**

WIOA requires each LWDB to develop and finalize a Memorandum of Understanding (MOU) among itself and its WIOA-required partners with the agreement of the CEO for the Local Workforce Development Area (LWDA). The MOU coordinates operation of the local one-stop delivery system, provision of programs and services, and apportionment of costs. The MOU must include two types of funding agreements pertaining to the costs of the local one-stop centers and delivery system in each LWDA: Infrastructure Funding Agreement(s) (IFA) and Additional Cost Funding Agreement(s).

**A. One-Stop Center Operating Budget**

The local one-stop center operating budget is a financial plan in which one-stop partners, with approval from the LWDB in each LWDA, will agree upon and use to determine each partner's contribution to certain costs contained therein. The local one-stop center operating budget will contain a set of components that consists of costs that are specifically identified in WIOA: infrastructure costs and additional costs.

**B. Funding Agreements**

Once the local one-stop center operating budget has been established and agreed upon by all one-stop partners, with approval from the LWDA, negotiations of partner contributions towards infrastructure and additional costs of local one-stop centers will begin.

**1. Infrastructure Funding Agreement**

WIOA requires the agreed upon contributions towards *infrastructure* costs by each one stop partner to be memorialized in an IFA between the LWDB or its designee and all WIOA-required one-stop partners and any additional partners. For the purpose of affiliate and specialized centers, only the LWDB or its designee and those partners participating in the operation of that center are required to enter into the IFA for that particular center.

**2. Additional Cost Funding Agreement**

The agreed upon contributions by each partner towards *additional* costs shall be memorialized in an Additional Cost Agreement and attached to the MOU.

All funding agreements shall be products of good faith local discussion and negotiation amongst the partners. Each required one-stop partner must contribute to the infrastructure and additional costs of local one-stop centers and the one-stop delivery system based on the program's proportionate use and benefit received, consistent with the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200 (Uniform Guidance). LWDBs and one-stop partners may define their own methodology to determine contribution amounts, so long as it is based on the partner's proportionate use and benefit received, consistent with the Uniform Guidance, and WIOA regulations.

**C. Mississippi's WIOA One-Stop Partners**

One-stop partners shall contribute towards infrastructure costs and additional costs of local one-stop centers.

Mississippi's Combined State Plan Core Partners (as listed on page 4 of Mississippi's approved Combined State Plan) include:

- Programs authorized under the Wagner-Peyser Act (29 U.S.C. 49 et seq.);
- 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 programs authorized under chapter 41 of title 38 of the U.S.C.;
- Programs authorized under State unemployment compensation laws (in accordance with applicable Federal law);
- Vocational Rehabilitation programs authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.) (other than section 112 or part C of title I of such Act (29 U.S.C. 732, 741);
- Temporary Assistance to Needy Families (TANF) activities authorized under part A of title IV



- of the Social Security Act (42 U.S.C. 601 et seq.), subject to subparagraph (C);
- Programs authorized under Title I of WIOA, including:
  - Adult
  - Dislocated worker
  - Youth
- Adult Education and Literacy activities authorized under title II of WIOA; and
- The Senior Community Service Employment Program (SCSEP) authorized under Title V of the Older Americans Act (42 U.S.C. 3056 et seq.).

Mississippi's Combined State Plan Strategic Partners (page 4 of state plan) include:

- Postsecondary career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.);
- Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.);
- Employment and training activities carried out by the Department of Housing and Urban Development; and
- Programs authorized under Section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532).

Additional programs and entities that carry out activities as part of the one-stop delivery system may be included as one-stop partners with the approval of the LWDB and chief elected official. All partners, including additional partners, must be identified in the MOU and funding agreements. All one-stop partners shall negotiate funding agreements with the LWDB or its designee through their respective governing entities as specified by Federal and/or State law. Additional partners are only required to contribute towards infrastructure costs. Additional partners MAY contribute towards additional costs, but they are not required to do so.

#### **D. Roles and Responsibilities**

##### **1. Local Workforce Development Boards**

The LWDB may designate an individual to carry out the LWDB's roles and responsibilities outlined herein. The designee must consult with the LWDB on a regular basis throughout the negotiation process. LWDBs shall be responsible for the following:

- Serving as a consult to MDES Office of Grant Management (OGM), as needed, in the development of this guidance;
- Acting as the convener for the purpose of negotiating funding agreements;
- Ensuring the one-stop partners adhere to all applicable guidance;
- Working with the one-stop partners to achieve consensus and informally mediate any possible conflicts or disagreements;
- Providing technical assistance to new one-stop partners and local grant recipients to ensure they are informed and knowledgeable of the elements contained in the MOU and funding agreements;
- Developing a local one-stop center operating budget as a starting point for the negotiations;
- Ensuring the negotiations include an agreed upon budget and methodology for allocating infrastructure and additional costs amongst all partners;
- Ensuring allocation methodology complies with the Uniform Guidance and be based on

- proportionate use and benefit received by each partner program;
- Ensuring that all of the infrastructure and additional costs are paid according to the provisions of the MOU; and
- Informing OGM if there is an impasse.

## 2. One-Stop Partners

Each one-stop partner in the local workforce area shall be responsible for the following:

- Designating an individual(s) who is knowledgeable about the partner programs and activities and has the authority to commit the partner programmatically and financially to act on its behalf in the negotiations, if applicable;
- Acting in good faith to negotiate infrastructure and additional costs in accordance with this guidance; and
- Entering into the local MOU and attached funding agreements.

## 3. MDES Office of Grant Management

OGM shall be responsible for the following:

- Providing guidance and technical assistance to each LWDB and partners throughout the infrastructure and additional cost negotiation process;
- Convening state-level partner teams, in coordination with the LWDB, to negotiate each local funding agreement if needed; and
- Monitoring of IFA and Additional Cost Agreements.

## 4. State Workforce Investment Board

The SWIB shall be responsible for the following:

- Serving as a consult to OGM, as needed; and
- Developing the formula to be used under the state funding mechanism to determine a local one-stop center's operating budget (if not agreed upon locally or rejected) and determine each partner's contribution to infrastructure costs of the local one-stop centers.

## 5. Infrastructure Costs

Each partner that carries out a program or an activity as part of the one-stop delivery system must use a portion of the funds available for the program or activity to contribute to the infrastructure costs of local one-stop centers based on their proportional use relative to the benefit received by the partner through their participation in the local one-stop center. Each partner's contribution must adhere to that partner program's Federal authorizing statute and to the Federal Cost Principles requiring that costs are reasonable, necessary, and allocable. WIOA specifies infrastructure costs of local one-stop centers as non-personnel costs that are necessary for the general operation of the local one-stop center. Local one-stop center infrastructure costs may include, but are not limited to:

- Facility rental;
- Utilities and maintenance;
- Equipment (including assessment-related products and assistive technology for individuals with disabilities);

- Technology to facilitate access to the local one-stop centers, including technology used for the center's planning and outreach activities; and
- Common identifier costs, such as the cost of signage for local one-stop centers.

#### 6. Additional Costs

Each partner that carries out a program or an activity as part of the one-stop delivery system should use a portion of the funds available for the program or activity to contribute to the additional (non-infrastructure) costs of the local one-stop centers based on their proportional use relative to the benefit received by the partner through their participation in the one-stop delivery system. Additional costs must include applicable career services (identified in the WIOA regulations §678.430) and may include shared operating costs and shared services that are necessary for the general operation of the local one-stop center. Required partners must contribute to additional costs, however; additional partners are encouraged to contribute though they are not required to do so. Shared service costs may include:

- Initial intake;
- Assessment of needs;
- Appraisal of basic skills;
- Identification of appropriate services to meet such needs;
- Referrals to other one-stop partners;
- Business services; and
- LWDB staff functions not otherwise paid using WIOA Title I funds and support the general operations of the local one-stop centers.

Each partner's contribution must adhere to that partner program's Federal authorizing statute and to the Federal Cost Principles requiring that costs are reasonable, necessary, and allocable.

#### 7. Types of Funds a One-Stop Partner May Use to Make Infrastructure and Additional Cost Contributions

Infrastructure and additional costs can be funded through cash, non-cash, third-party in-kind contributions, and can include any funding from philanthropic organizations or other private entities, or through other alternative financing options. Funding must be stable and equitable. The one-stop partner's proportionate share must be calculated in accordance with the Uniform Guidance based upon a reasonable cost allocation methodology whereby infrastructure and additional costs are charged in proportion to use of the local one-stop center/system, relative to the benefit received. Costs must also be allowable, reasonable, necessary, and allocable. (For more information, see §678.720, §678.760).

#### 8. Examples of Reasonable Infrastructure and Additional Cost Allocation Methodologies

Examples of reasonable cost allocation methodologies for infrastructure costs may include using a partner's square footage footprint within a local one-stop center, number of full-time equivalents available to a local one-stop center, or number of clients served by the partner within the one-stop delivery system, and/or a combination of all of the above.

## 9. Infrastructure and Additional Funding Agreement Content

Each funding agreement must specify:

- The effective time period;
- The infrastructure and additional costs budget for each comprehensive and affiliate center;
- The LWDB entering into the agreement;
- The name and signatures of the required one-stop partner designee entering into the agreement;
- The allocation methodology used and each partner's contribution based on an appropriate cost-allocation methodology and reconciliation;
- A description of the quarterly review and reconciliation process to ensure equitable benefit among partners; and
- A description of the process to be used among partners to resolve issues related to infrastructure funding during the MOU duration period when consensus cannot be reached.

## 10. Impasse

### Extension of Time

If the LWDB and a one-stop partner(s) do not believe they will be able to reach an agreement on appropriate levels of infrastructure cost funding contributions by July 1 of each program year, the LWDB may request an extension of time (Attachment A) if the LWDB can demonstrate they have made sufficient progress towards reaching an agreement. The request must be submitted to OGM no later than **June 15 of each program year**. OGM will review the request and make a determination to grant or deny the extension of time. If the extension is granted, the LWDB will have up to sixty (60) days to continue negotiations and reach an agreement on infrastructure cost contributions. OGM will provide technical assistance as requested by the LWDB.

### Impasse

If the LWDB is unable to reach an agreement on the funding of infrastructure costs with all partners by **July 1 of each program year** (or after the applicable extension of time deadline, if granted), the LWDB or affected partner must immediately notify OGM that an agreement cannot be reached using the *Report of Outcomes from Local Infrastructure Funding Agreement Negotiations* (Attachment B). Once notified, the Governor must administer the State funding formula to determine the appropriate share of infrastructure contributions for all partners for the program year impacted. Please note, failure to agree on additional costs amongst partners will not be considered an impasse, nor will it trigger the state funding mechanism.

### *Review and Reconciliation*

#### Periodic Review

Each local one-stop center operating budget/funding agreements shall be reviewed quarterly and

reconciled against actual costs incurred to ensure that costs charged to any one-stop partner are proportionate to the use of the local one-stop center and one-stop delivery system and relative to the benefit received by the one-stop partner. If any significant changes to the operating budget/funding agreements are required following the quarterly review, the LWDB must reconvene all partners to reach an agreement on the necessary budget and/or allocation changes.<sup>2</sup> If there is disagreement amongst partners to accommodate for these changes, the LWDB or affected partner shall contact the OGM for assistance. Any changes not deemed significant may be charged to each partner so long as there is an agreement amongst the partners to do so.

#### **Annual Re-Negotiation**

Each local one-stop operating budget and funding agreements shall be fully reviewed and re-negotiated on an annual basis.

#### *Modification*

Each time a funding agreement is modified, the associated MOU must also be reviewed to determine if modification or re-signing will be necessary.

#### **V. Action**

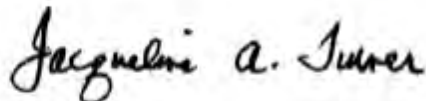
Finalized Infrastructure and Additional Cost Funding Agreements consistent with this policy must be complete and available for OGM review no later than July 1 of each program year. Additional resource information can be found in Attachments C-F.

#### **VI. Inquiries**

Contact Robert DeYoung at [rdevyoung@mdes.ms.gov](mailto:rdevyoung@mdes.ms.gov) or 601-321-6477 with questions concerning this policy.

#### **VII. Effective Date**

This policy shall be effective January 1, 2018, and shall remain in effect until modification or rescission.



Jacqueline A. Turner  
Deputy Executive Director, CFO

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<sup>2</sup> Significant change is defined as a twenty percent (20%) change to the dollar number of a single cost category or to a partner's cost within the existing funding agreement. These significant changes may occur as a result of losing/gaining office space, adding an additional one-stop partner, etc.

## **Attachments**

**Attachment A** – Request for Extension of Time

**Attachment B** – Report of Outcomes from Local Infrastructure Funding Agreement Negotiations

**Attachment C** – One-Stop Center Operating Budget Breakdown

**Attachment D** – One-Stop Operating Costs

**Attachment E** – Examples of Cost Pools and Possible Allocation Bases

**Attachment F** – Infrastructure Costs: Funding Sources

**Attachment A**  
**REQUEST FOR EXTENSION OF TIME**

Local Workforce Development Area: \_\_\_\_\_

Local Workforce Development Board Contact Person: \_\_\_\_\_

Contact's Phone Number: \_\_\_\_\_

Contact's Email: \_\_\_\_\_

Notice is hereby provided that, the LWDB and each one-stop partner(s) have made progress towards reaching agreement on funding infrastructure costs; however, agreement will not be reached by July 1, \_\_\_\_\_ and the LWDB is requesting an extension of time to continue negotiations and reach an agreement.

Please describe the LWDB's progress in reaching agreement on infrastructure costs thus far:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please explain why the LWDB does not believe they will be able to reach an agreement by July 1, \_\_\_\_\_:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

How much additional time is the LWDB requesting to reach an agreement?: \_\_\_\_\_

Does the LWDB need technical assistance from OGM to reach an agreement? If so, please describe assistance needed:

\_\_\_\_\_  
\_\_\_\_\_

Signature      Printed Name

\_\_\_\_\_  
Chair, Local Workforce Development Board

\_\_\_\_\_  
Printed Name

## Attachment B

### REPORT OF OUTCOMES FROM LOCAL INFRASTRUCTURE FUNDING AGREEMENT NEGOTIATIONS

Local Workforce Development Area: \_\_\_\_\_

Local Workforce Development Board Contact Person: \_\_\_\_\_

Contact's Phone Number: \_\_\_\_\_

Contact's Email Address: \_\_\_\_\_

Notice is hereby provided as required by §678.725 that, despite every effort, the required partner(s) in this local area did not reach consensus on a local Infrastructure Funding Agreement for the period beginning July 1, \_\_\_\_\_. The inability to reach agreement was because one or more required partners do not agree with how local one-stop center infrastructure costs will be funded. Listed below are the program partner(s) that did not agree to the Infrastructure Funding Agreement.

Program Partner Name	Reasons for Failure to Agree
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	

Signature

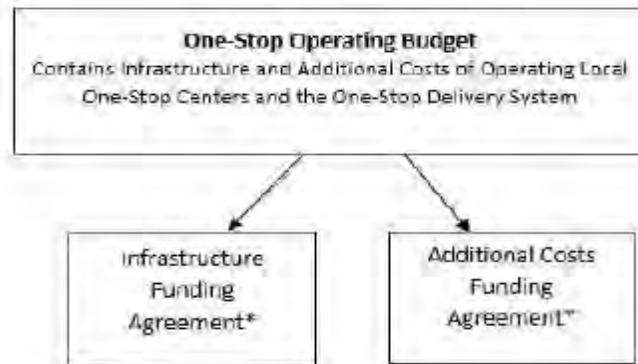
Printed Name

\_\_\_\_\_  
Chair, Local Workforce Development Board

\_\_\_\_\_  
Printed Name



### Attachment C



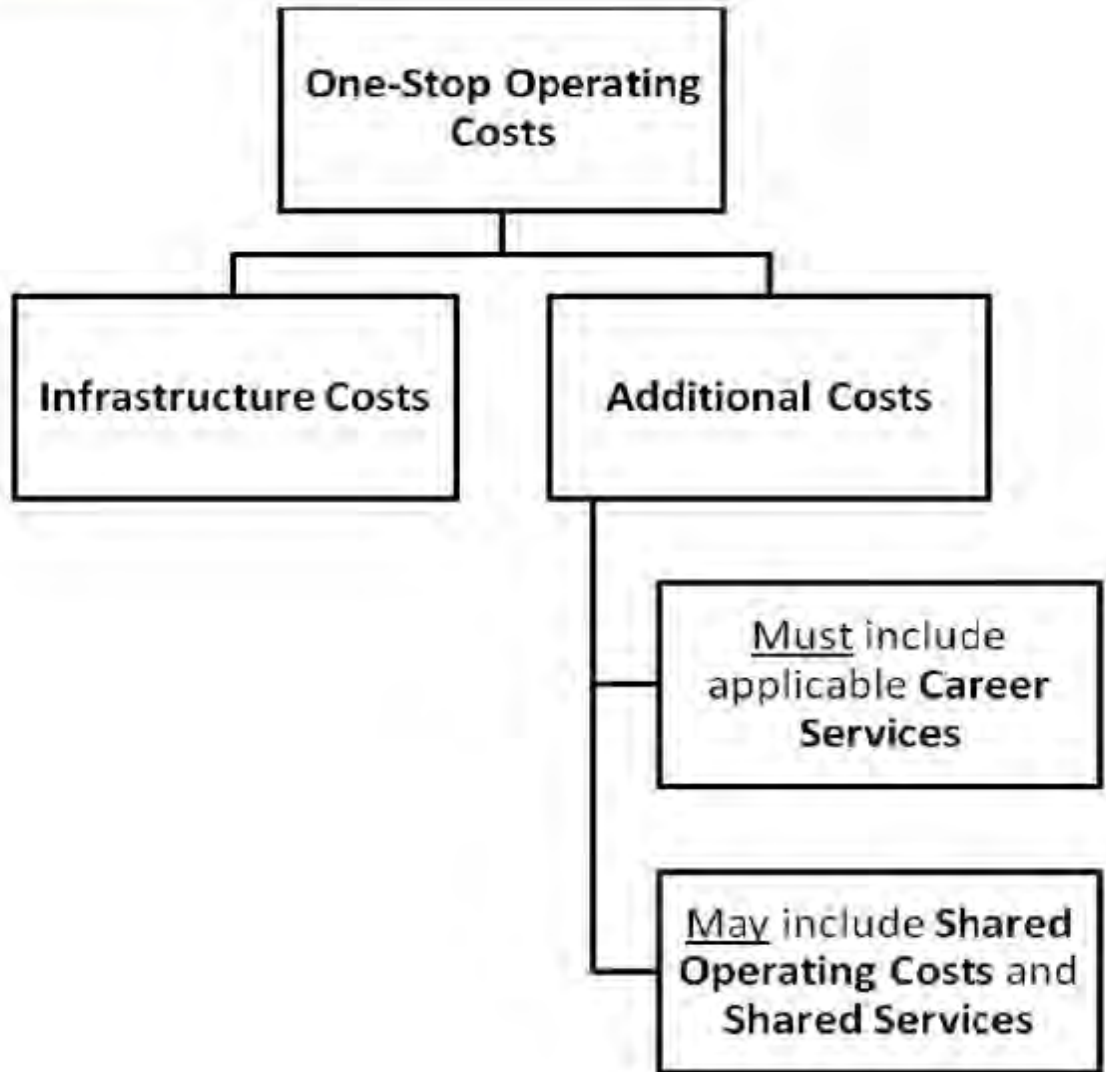
\*Both funding agreements must be included as attachments to the Memoranda of Understanding between the local Workforce Development Board (WDB) and its partners. There may be one or more of each type of agreement for each local workforce development area (LWDA). For example, a LWDA may choose to have a separate infrastructure funding agreement for each center or combine all centers into one agreement.

**Please note: The state funding mechanism ONLY applies to failure to reach an agreement on Infrastructure Funding Agreements.**

### Attachment D

Cost Pool	Possible Allocation Bases
<b>Facilities:</b> Building rent, maintenance costs, utilities, tenant improvements, or any other similar costs related to the physical structure housing the one-stop center.	Square footage occupied by each partner agency as compared to the total space. Workstation usage by partners as compared to total workstations.
<b>Telecommunications:</b> Monthly telephone costs, telephone system equipment, data lines, T-1 lines, and other similar costs.	Dedicated telephone units as compared to all units.
<b>Information Technology:</b> Shared equipment, software, IT maintenance costs, Internet access, and other similar costs.	Number of dedicated computers (including all necessary equipment) as compared to total.
<b>Resource Center:</b> Costs of shared equipment, displays, computer learning, specialized software for computer learning, furniture, copier, fax machine; may also include related staff costs.	Number of program participants or reportable individuals utilizing the resource center.
<b>Common Intake System:</b> Costs of developing common intake data formats, preparation and interview of customers, and similar costs.	Use of common data formats and data elements required for each program. Use of number of customer or participant records maintained by each partner program.
<b>One-Stop Center Management Staff:</b> Costs of the center director.	Number of partner program staff FTEs. Square footage of partner program benefit or number of program participants and reportable individuals served.
<b>One-Stop Center General Operations Staff:</b> Costs of the receptionist, staff of the resource center.	Number of partner program participants.
<b>Shared Equipment and Supplies:</b> Staff copier, fax, associated supplies, and furniture.	Usage by staff of each partner program. Occupancy (square footage) basis; numbers of staff workstations.
<b>Career Services:</b> Staff and benefit costs, development of common forms for case management, and similar costs.	Time distribution system (time sheets, work sampling, time and motion studies); numbers of clients eligible for specific program; weighted participation numbers.

Attachment E



**Attachment F**

Dept.	Partner Program	Required/ Additional Partner	Admin. Funds to Pay for Infrastructure Costs <sup>1</sup>	Program Funds to Pay for Infrastructure Costs	State Funding Mechanism Applicable <sup>2</sup>
DOL	WIOA Title I programs: • Adult, Dislocated Worker, & Youth	Required	Yes	Yes	Yes
DOL	• Job Corps	Required	No	Yes	Yes
DOL	• YouthBuild	Required	Yes	Yes	Yes
DOL	• NFJP	Required	Yes	Yes	Yes
DOL	• Native American programs <sup>3</sup>	Required	Yes	Yes	No
DOL	Wagner-Peyser Act ES	Required	N/A <sup>4</sup>	Yes	Yes
DOL	SCSEP	Required	Yes	Yes	Yes
DOL	TAA program	Required	Yes	Yes	Yes
DOL	UC programs	Required	N/A <sup>4</sup>	Yes	Yes
DOL	JVSG programs	Required	N/A <sup>4</sup>	Yes	Yes
DOL	REO programs authorized under sec. 212 of the Second Chance Act of 2007 (42 U.S.C. 17532) and WIOA sec. 169	Required	Yes	Yes	Yes
ED	AEFLA program, authorized under WIOA title II	Required	Yes	No	Yes
ED	The State VR program authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), as amended by WIOA title IV	Required	N/A <sup>4</sup>	Yes	Yes
ED	Career and technical education programs at the postsecondary level, authorized under the Carl D. Perkins Career and Technical Education Act of 2006	Required	Yes	No	Yes
HUD	Employment and training activities carried out by HUD	Required	Consult partners' authorizing documents.	Consult partners' authorizing documents.	Yes
HHS	Employment and training activities carried out under the CSBG programs	Required	Consult partners' authorizing documents.	Consult partners' authorizing documents.	Yes
HHS	TANF	Either <sup>5</sup>	Yes	No	Yes/No <sup>6</sup>
Other	Partners as outlined by WIOA sec. 121(b)(2)(B) and 20 CFR 678.410 <sup>7</sup>	Additional	Consult partners' authorizing documents.	Consult partners' authorizing documents.	No

**LIMITATIONS:**

<sup>1</sup> Partners' funding contributions for infrastructure costs are subject to the partner programs' administrative cost limitations and restrictions.

<sup>2</sup> The definition of administrative costs may also differ from one partner program to the next.

<sup>3</sup> Statutory caps for infrastructure funds is applicable only if the State Funding Mechanism is being implemented.

<sup>4</sup> Native American programs, as required One-stop partners, are strongly encouraged to contribute to infrastructure costs, but they are not required to make such contributions under WIOA.

<sup>5</sup> These programs do not distinguish between program or administrative funds since there is only one allotment from which all expenditures — administrative costs and program costs — must be paid. Although the VR program imposes no limits on the amount of funds that may be spent on administrative costs, VR agencies must report funds spent for infrastructure costs as administrative costs.

<sup>6</sup> At the discretion of the Governor, in accordance with WIOA sec. 121(b)(1)(C) and 20 CFR 678.405.

<sup>7</sup> The Governor may determine that TANF will not be a required partner.

<sup>8</sup> Additional partners are required to share in infrastructure costs when participating in the one-stop service delivery system; however, the State funding mechanism is not applicable to additional partners.

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 21**  
**RAPID RESPONSE - LAYOFF AVERSION POLICY AND PROCEDURES**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

This policy sets forth the procedures and requirements for providing Layoff Aversion activities. This policy applies to Local Workforce Development Area (LWDA), and other entities that receive Rapid Response funds by the allocation, pass-through, and subgrant award methods unless otherwise instructed by the Office of Grant Management (OGM).

Each LWDA must develop a Layoff Aversion activity plan that incorporates Mississippi Department of Employment Security (MDES) State Policy Number 21 and meets the minimum federal and state requirements described in Section II, herein.

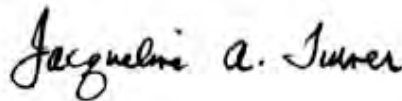
**II. PROCEDURES**

- A. The Rapid Response unit must work in conjunction with local workforce development boards, chief elected officials, and other stakeholders.
- B. State and local Rapid Response programs have the discretion to determine which strategies and activities are applicable in given situations, based upon specific needs, policies, and procedures within the State or Local area.
- C. Layoff Aversion includes the strategies and activities that are designed to prevent, or minimize the duration of, unemployment. The US Department of Labor Employment and Training Administration encourages state and local Rapid Response operators to design innovative solutions, including those described below, for both businesses and workers in transition. Layoff Aversion may include a wide array of possible strategies or activities, including but not limited to:
  - 1. Ongoing engagement, partnership, and relationship-building activities with businesses in the community, in order to create an environment for successful layoff aversion efforts and to enable the provision of assistance to dislocated workers in obtaining reemployment as soon as possible;
  - 2. Providing assistance to employers in managing reductions in force, which may include early identification of firms at risk of layoffs, assessment of the needs of and options for at-risk firms, and the

delivery of services to address these needs;

3. Funding feasibility studies to determine if a company's operations may be sustained through a buyout or other means to avoid minimize layoffs;
  4. Developing, funding, and managing incumbent worker training programs or other worker upskilling approaches as part of a layoff aversion strategy or activity;
  5. Connecting companies to: Short-time compensation or other programs designed to prevent layoffs or to reemploy dislocated workers quickly, available under Unemployment Insurance programs; Employer loan programs for employee skill upgrading; and other Federal, State and local resources as necessary to address other business, needs that cannot be funded with resources provided under this title;
  6. Establishing linkages with economic development activities at the Federal, State and local levels, including Federal Department of Commerce programs and available State and local business retention and expansion activities;
  7. Partnering or contracting with business-focused organization to assess risks to companies, propose strategies to address those risks, implement services, and measure impacts of services delivered;
  8. Conducting analyses of the suppliers of an affected company to assess their risks and vulnerabilities from a potential closing or shift in production of their major customer;
  9. Engaging in proactive measures to identify opportunities for potential economic transition and training needs in growing industry sectors or expanding businesses; and
  10. Connecting businesses and workers to short-term, on-the-job, or customized training programs and registered apprenticeships before or after layoff to help facilitate rapid reemployment.
- D. For more information on allowable layoff aversion strategies and activities, see Training and Employment Notice (Code of Federal Regulation) title 20, *Employment and Training Administration, Department of Labor*.

### III. APPROVAL



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Jacqueline A. Turner  
Executive Director

## Section 13. Wagner-Peyser Assurances

### 13A. Memorandum of Understanding (MOU) between MDES and MDRS

**MEMORANDUM OF UNDERSTANDING  
BETWEEN  
THE MISSISSIPPI DEPARTMENT OF REHABILITATION SERVICES  
&  
THE MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY  
CONCERNING  
IMPLEMENTATION AND ENFORCEMENT OF THE PROVISIONS OF THE  
WORKFORCE INNOVATION AND OPPORTUNITY ACT OF 2014 SECTION 504  
AND THE AMERICANS WITH DISABILITIES ACT**

This Memorandum of Understanding (hereafter MOU) outlines a partnership between THE MISSISSIPPI DEPARTMENT OF REHABILITATION SERVICES (MDRS) and the MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY (MDES), entered into on a voluntary, non-legally binding basis, expressing a mutual agreement to work together in a positive spirit to continually improve the lifestyle, acceptance and accessibility of persons within the Mississippi Workforce Investment Network with a disability. This MOU will become effective upon execution by both parties, and will remain in effect until June 30, 2021.

**Background:**

The MDRS and the MDES have, over the years, demonstrated their commitment to persons with disabilities in many ways and in various programs. With the enactment of the Workforce Innovation and Opportunity Act of 2014 and the Mississippi Comprehensive Workforce Training and Education Consolidation Act of 2004, a partnership was forged to ensure that all stakeholders in Mississippi's Workforce system are afforded the same services, rights, privileges and benefits. The goal is to continue to strengthen awareness of contributions in the workforce and society in general by people with disabilities.

**General areas of partnership:**

A major focus of the partnership is the obligation to eliminate discrimination on the basis of disability. The guiding principle in this partnership is to ensure that each individual with a disability participates in the most integrated setting appropriate to that individual.

The partnership agreement includes the following:

- MDES provides assurances that communication with persons with disabilities is as effective as with others - (List of certified interpreters of Sign Language for the State of Mississippi, <http://www.odhh.org/interpreter-registration/>).
- MDES provides assurances that accessible computer workstations, including adaptive software, currently located in WIN Job Centers and the MDES State Office will be evaluated at the same time as all other computer workstations for the latest technology and software updates, and will install any needed upgrades as resources permit.
- MDRS performs Accessibility Surveys in WIN Job Centers and the MDES State Office to determine if there are any structural accessibility barriers that are architectural and/or communicational in nature, upon request and as MDRS resources and staff workload permits.
- MDRS provides limited general advice and guidance with assistive technology which allows equal access to information, services, and activities within the Mississippi Workforce Investment Network to people with disabilities. MDRS will direct MDES and other partners in the State's workforce network to other available resources for more in-depth advice and guidance pertaining



to assistive technology. Other available resources include, but are not limited to, the following: 1) Job Accommodation Network (JAN), askjan.org 2) Alliance for Technology Access (ATA), ataccess.org; and, 3) Southeast ADA Center, ADAsetheast.org

- MDRS provides limited general advice and guidance regarding adaptive hardware and software used to accommodate disabilities. MDRS staff will answer general questions regarding computers and adaptive software. (Examples are workstation setup for adaptive software and hardware such as Screen Reader software (JAWS), Screen Magnification software (ZoomText), adaptive mice and keyboards, and adjustable height desks.) More in-depth questions should be directed to other assistive technology resources such as those resources listed above or to vendors of assistive technology such as computers and adaptive software.
- The partnership provides educational and outreach activities with the goal of improving quality of life for those with a disability and building awareness of those without disabilities.

### Other Terms and Conditions

**A. Termination.** Notwithstanding any other provision of this Agreement to the contrary, this Agreement may be terminated by either party within thirty (30) days written notice at any time during the performance period of this MOU.

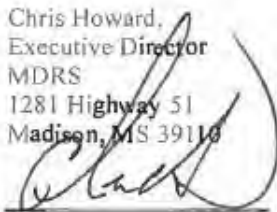
**B. Amendment.** This MOU may not be amended or modified in any respect except by an instrument in writing signed by both parties hereto.

**C. Best Efforts.** MDES agrees to exert its best efforts in the performance of its obligations under this MOU. However, MDES disclaims any liability associated with the performance or non-performance of this MOU, or the consequences of any error or mistake on its part. Moreover, the execution by MDES of this MOU shall not be construed to create a cause of action for any party, whether public and/or private.

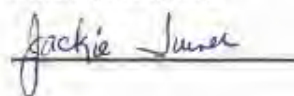
**D. Confidentiality.** The use or disclosure of any information deemed confidential under State or Federal law is prohibited, except to the extent necessary to administer the terms and conditions of this MOU, or to the extent required by law. In addition, any individual who is in possession of said information will take all necessary precautions to prevent disclosure to unauthorized individuals.

IN WITNESS WHEREOF, the parties hereto have caused this MOU to be duly executed on this the 3<sup>rd</sup> day of February, 2020.

Chris Howard,  
Executive Director  
MDRS  
1281 Highway 51  
Madison, MS 39110




Jackie Turner  
Executive Director  
MDES  
1235 Echelon Parkway  
Jackson, MS 39213



Section 14. Adult Basic Education Program Specific Requirements

14A. Adult Education and Family Literacy Act Program Certifications and Assurances

**ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS AND ASSURANCES**

<b>States must provide written and signed certifications that:</b>	
1.	The plan is submitted by the State agency that is eligible to submit the plan;
2.	The State agency has authority under State law to perform the functions of the State under the program;
3.	The State legally may carry out each provision of the plan;
4.	All provisions of the plan are consistent with State law;
5.	A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;
6.	The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
7.	The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
8.	The plan is the basis for State operation and administration of the program;
<b>The State Plan must include assurances that:</b>	
1.	The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);
2.	The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;
3.	The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;
4.	Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.
5.	The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).
I do hereby certify that all statements made by me are true and correct, to the best of my knowledge, information and belief, further, I understand that in the event that I have knowingly and willfully made any false statements, I will be liable for punishment in accordance with all applicable state and federal laws and statutes.	
Signature	
Printed Name	Kell Smith
Title of Signatory	Interim Executive Director, Mississippi Community College Board
Date Signed	1/24/22

## CERTIFICATION REGARDING LOBBYING

**Certification for Contracts, Grants, Loans, and Cooperative Agreements:** The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid to or on behalf of the undersigned, or any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall comply and submit Standard Form-L.L. "Disclosure of Lobbying Activities," in accordance with its instructions;

(3) The undersigned shall require that the language of this certification be included in the award documents for all subcontracts at all tiers (including subcontracts, subgrants, and subloans under grants, loans, and cooperative agreements) but that all subagreements shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for entering or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Statement for Loan Guarantees and Loan Insurance:**

The undersigned certifies, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall comply and submit Standard Form-L.L. "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for entering or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

* APPLICANT'S ORGANIZATION Mississippi Community College Board	
* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	
Prefix: Mr	* Last Name: Kell
* Last Name: Smith	Title: [ ]
* Title: Interim Executive Director	
* SIGNATURE: 	* DATE: 1/24/22

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**Note:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant I certify that the applicant:

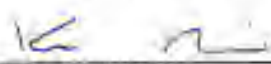
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management, and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States, and if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. [ ] 728-4765) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. [ ] 681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. [ ] 94), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. [ ] 6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) [ ] 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. [ ] 290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. [ ] 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with the provisions of the Hatch Act (5 U.S.C. [ ] 501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by OMB Circular A-102

- 9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- 12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11583 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- 18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Interim Executive Director
APPLICANT ORGANIZATION Mississippi Community College Board	DATE SUBMITTED 1/24/22

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**GEPA Section 427 Statement:**

*"The Department of Education's General Education Provisions Act (GEPA) applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382)."*

*"The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in the Federally-funded project or activity."*


The Equal Employment Opportunity Commission enforces five statutes that prohibit job discrimination by private employers and state and local government agencies:

1. Title VII of the Civil Rights Act of 1964 (Title VII)
2. The Age Discrimination in Employment Act of 1967 (ADEA)
3. The Equal Pay Act of 1963 (EPA)
4. The Americans with Disabilities Act of 1990 (ADA)
5. Sections of the Civil Rights Act of 1991 (CRA) which amended provisions of Title VII, the ADEA, and the ADA.

The Mississippi Community College Board, in its capacity as the coordinating Board of the community and junior colleges of the State of Mississippi, strongly urges each of the colleges to comply fully with federal and state nondiscrimination laws and executive orders, which constitute the legal mandate for equal employment opportunity. The Board also strongly urges each community and junior college to ensure that no one shall be excluded from participating in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity of the college on the grounds of race, sex, age, color, creed, national origin, religion, disability, or any other protected group. The Board itself further adheres to the principle of equal educational and employment opportunity as mandated by each of these statutes.

The Office of Adult Education will ensure to the fullest extent possible equitable access to, participation in, and appropriate educational opportunities for all federally funded local adult education programs to include faculty, staff and students with special needs. Activities, programs and services will be accessible to all teachers, students, and other program beneficiaries with special needs allowing them to participate fully in the projects. The Office of Adult Education does not discriminate on the basis of age, color, religion, creed, disability, marital status, veteran status, socio-economic status, national origin, race, gender or sexual orientation in its education and research programs, or its services and activities. It provides reasonable and appropriate accommodations to meet the learning and evaluation needs of a diverse group of students, faculty, community members and other participants.


All funded AEFLA programs submitted a GEPA plan as part of the application process and are monitored by the Office of Adult Education.

Signature	
Printed Name	Keli Smith
Title of Signatory	Interim Executive Director
Date Signed	1/24/22



## WIOA Statement of Certification

### ADULT BASIC EDUCATION AND LITERACY PROGRAMS CERTIFICATIONS

STATEMENTS OF CERTIFICATION	
1.	I certify that the <b>Mississippi Community College Board (hereinafter referred to as "MCCB")</b> is the eligible agency authorized to submit the plan for the Adult Basic Education and Literacy Programs for the State of Mississippi.
2.	I certify that <b>MCCB</b> has authority under State law to perform the functions of the State under the program of Adult Basic Education and Literacy.
3.	I certify that the State legally may carry out each provision of the Adult Basic Education and Literacy plan.
4.	I certify that all provisions of the Adult Basic Education and Literacy plan are consistent with State of Mississippi law.
5.	I, the <b>Executive Director of MCCB</b> , certify that I have authority under Mississippi State law to receive, hold, and disburse Federal funds made available under the Adult Basic Education and Literacy plan.
6.	I, the <b>Executive Director of MCCB</b> , certify that I have the authority to submit the plan for the State of Mississippi for Adult Basic Education and Literacy.
7.	I certify that <b>MCCB</b> has adopted or otherwise formally approved the Adult Basic Education and Literacy plan.
8.	I certify that Mississippi's Adult Basic Education and Literacy plan is the basis for State operation and administration of the program.
I do hereby certify that all statements made by me are true and correct, to the best of my knowledge, information and belief, further, I understand that in the event that I have knowingly and willfully made any false statements, I will be liable for punishment in accordance with all applicable state and federal laws and statutes.	
Signature:	
Printed Name:	Kell Smith
Title of Signatory:	Interim Executive Director, Mississippi Community College Board
Date Signed:	1/24/22

## 14B. Monitoring Checklist

### Adult Education Monitoring Tool

Fiscal Years 2021-2025



Provider: \_\_\_\_\_

Date: \_\_\_\_\_

#### Vision:

The vision of the MOCB OAE is to provide leadership, training, and technical assistance to adult education and literacy programs and ensure that quality educational services are available to adults and out-of-school youth across Mississippi.

#### Mission:

The adult education system will provide research-proven instruction and college and career readiness pathways that allow adults to master academic and technical skills in order to attain their career and educational goals, become full partners in the educational development of their children, and successfully navigate education and employment opportunities.

#### Goals:

- Implement and scale comprehensive, innovative college and career pathways to accelerate student completion and foster economic growth.
- Guide and support transformational instructional practices that accelerate student completion to certificates, and AA/BA degrees leading to family sustaining employment.
- Contextualize adult education courses to support transition to high school completion & equivalency certification, postsecondary education, and employment.
- Strengthen and maintain a culture of rigorous instruction and evidence of increased performance.
- Create and maintain strategic alliances to leverage local resources and increase navigational support to participants.
- Foster student self-efficacy.

This tool is based on our state's Strategic Workforce Plan, with specific detail on the implementation of the *Workforce Innovation and Opportunity Act (WIOA)*, the *Adult Education and Family Literacy Act (AEFLA)*, and the Adult Education and Integrated English Literacy and Civics Education (IELCE) Grants. This tool will guide discussion about the implementation of the minimum components and other compliance requirements for providers receiving funding from MOCB – Office of Adult Education (MS OAE).

#### Before the Visit

- It is highly recommended that you fill out this tool prior to the visit/interview. The check boxes indicate specific evidence is needed. In preparation for the compliance (team) visit/interview, the Monitoring Tool must be answered and submitted to the Assistant Director of Adult Education for Assessment and Program Quality, a minimum of seven days prior to the date of the visit.
- Labeled documentation folders need to be available for the team the day(s) of the visit addressing each of the monitoring items.
- Prepare materials/records to share with the review team. Examples of materials needed for this review include:
  - Student records showing daily attendance and distance education proxy hours, Intake Forms, Assessment records, Tuition Waivers (if applicable)
  - Memorandums of Understanding (MOU) with Core Partners and Community-based Organizations
  - Pathway diagrams, IET Single-set of Learning Objectives, written policies and procedures, data flowchart, materials driven by the College and Career Readiness Standards published by provider
  - Time and Effort forms, job descriptions, non-MS OAE trainings attended, and staff credentials
  - Accounting and enrollment records (invoices, travel, inventory lists, budgets, class sign-ins sheets, and class schedules)
- Ensure meeting space is reserved and appropriate AE and MIBEST program staff are included as needed.

#### During the Visit

- Discuss program responses to each item/prompt in the tool and share materials/records. The tool and other materials/records will not be collected during face-to-face visits but will be required for submission via Canvas or copied for follow-up and feedback. The sections can be discussed in any order to accommodate program staff needing to return to other duties.
- The Compliance Team will mark the "YES" column after evidence is reviewed and determined to meet requirements. If the evidence does not meet requirements or is not available, the "NO" or "N/A" column is marked and corrective action may be required.
- At the end of the visit, preliminary results will be shared in an Exit Interview format.

#### After the Visit

- Within four (4) weeks of the visit, a monitoring follow-up letter will be sent to the program director noting any commendations, recommendations, and findings for areas that need corrective action. If corrective action is required, the letter will outline the timeline for a reply from the program.
- One (1) week after the monitoring follow-up letter is sent, the AE program director will receive a request for evaluation of the monitoring visit conducted. Responses are required to be submitted within one (1) week of receipt. Responses should be honest and informative in order to be used to improve the monitoring process and enhance the services provided to all programs funded by the Office of Adult Education.



Section 1 – Program Overview and Coordination with State Plan				
Questions	Compliant			Comments
	YES	NO	N/A	
<b>Program Overview</b>				
<p>1. How does your program select, orient, and retain qualified staff and instructors. How do you ensure instructors maintain or increase skills necessary to provide up-to-date and evidence-based instructional practices that accelerate student completion?</p> <p><input type="checkbox"/> Requirements outlined in the MS OAE Program Guidelines</p> <p><input type="checkbox"/> Job Descriptions</p> <p><input type="checkbox"/> Professional Development (PD) Training records</p> <p><input type="checkbox"/> Improvement Plans</p> <p><input type="checkbox"/> Confidentiality Agreement</p> <p><input type="checkbox"/> Termination/Resignation letter</p> <p><input type="checkbox"/> Degree/Credentials</p> <p><input type="checkbox"/> Staff Evaluations</p> <p><input type="checkbox"/> Technology Use Policy</p> <p><input type="checkbox"/> Other: _____</p>				
<p>2. Describe the educational needs of the community your program serves and what services you offer to foster self-efficacy and economic improvement. Include activities that support our MS State Plan goals.</p> <p><input type="checkbox"/> Provide services to individuals who have low levels of literacy in content domains of reading, writing, mathematics, and English language acquisition</p> <p><input type="checkbox"/> Provide services that lead to unsubsidized employment, attainment of a secondary school diploma or equivalent, and transition to post-secondary education and training</p> <p><input type="checkbox"/> Services provided that align with the MS State Plan in regards to concurrent enrollment in programs and activities under Title I of WIOA, as appropriate</p>				
<p>3. What processes and procedures does your program have in place to ensure equitable access to and participation in program services for participants, teachers, and other stakeholders regardless of gender, race, national origin, color, disability or age?</p> <p><input type="checkbox"/> General Education Provisions Act (GEPA)</p> <p><input type="checkbox"/> Americans with Disabilities Act and the Americans with Disabilities Amendments Act (ADAAA) policy</p> <p><input type="checkbox"/> Coordination with MDRS and/or community partners</p>				
<p>4. Briefly describe the program planning process used to assess the needs of the adult education program, including developing site locations and creating class schedules.</p> <p><input type="checkbox"/> Counties served by program</p> <p><input type="checkbox"/> Staff placement</p> <p><input type="checkbox"/> Availability of instruction for low-level literacy skills, English language learners, and integrated education and training (IET) services</p> <p><input type="checkbox"/> Core partner referrals</p>				
<b>Coordination with State Plan</b>				
<p>5. How does the program ensure / demonstrate alignment between AE activities and services and the strategy and goals of the MS State Plan and WIOA, as well as the activities and services of the one-stop partners to expand access to employment, education and other services for individuals with barriers to employment through career pathways?</p> <p><input type="checkbox"/> Memoranda of Understandings (MOUs) or similar agreements among critical WIOA partners such as: Workforce Centers, DRS local offices, Support Service Providers (i.e. transportation, childcare, financial aid, counseling, and career advising), or Business and Industry</p> <p><input type="checkbox"/> MOUs contain a description of duration, procedures, and services to be provided by both entities and/or through the one-stop delivery system</p> <p><input type="checkbox"/> One-Stop MOUs contain operating budgets identifying the costs of services and the operating costs of the system</p>				

<input type="checkbox"/> Contains methods of referring individuals between the partner agencies <input type="checkbox"/> Contains methods to ensure that the needs of workers, youth, and individuals with disabilities, are addressed in providing access to services and technology				
6. What processes and procedures does your program have in place to evaluate the effectiveness of core partner collaborative efforts?				
7. Is there a WIOA resource list/guide of available support services to foster retention, recruitment, and student transition accessible to participants?				
8. Does the program have an active Advisory Council? <input type="checkbox"/> Copies of agendas/sign-in sheets/minutes of advisory council meetings				

**Section 2 – Integrated Education & Training Services and Intake & Orientation**  
(State Plan Goals 1,2,3,4,5, 6,7 & NRS reporting)

Questions	Compliant			Comments
	YES	NO	N/A	
9. Describe the college and career pathways at your organization and detail how you promote or advertise transition options for college, training, and careers with participants and the community.				
<input type="checkbox"/> Materials used with participants exploring pathways, for example program maps, meta-major diagrams, courses designed & sequenced for a pathway, etc. <input type="checkbox"/> Smart Start <input type="checkbox"/> Integrated Education and Training <input type="checkbox"/> Single Set of Learning Objectives <input type="checkbox"/> Integrated English Literacy and Civics Education				
10. Once in your program, how do you guide and support participants along a career or college pathway? Describe the navigational, advising, counseling or other supports available to participants to mitigate educational and employment barriers. Include goal-setting procedures related to fostering student self-efficacy. <input type="checkbox"/> Examples can include goal-setting activities, advising documentation, the Transition Specialist activity log, etc. <input type="checkbox"/> MS OAE Student Success Plan (SSP) <input type="checkbox"/> Transition Activity Log <input type="checkbox"/> Career Navigator <input type="checkbox"/> MIBEST Student File Checklist				
11. How often do you have participants reevaluate education and career goals to ensure participants are on track to complete and transition? <input type="checkbox"/> Materials used with participants when revisiting goals <input type="checkbox"/> Materials used with participants tracking progress towards transitions				
12. Based on transition data, what will you do to improve transitions? <input type="checkbox"/> Federal Table 5 <input type="checkbox"/> Federal Table 11 <input type="checkbox"/> IET/MIBEST enrollments (Verified by Career Navigator Signature) <input type="checkbox"/> Collaborative partnerships with Core Partners and/or Business and Industry				

<p>13. What services is the program providing to address the components of the IET/MIBEST program?</p> <p><input type="checkbox"/> Activities, programs, or services that are designed to help an individual acquire a combination of basic academic skills, critical thinking, digital literacy, and self-management skills</p> <p><input type="checkbox"/> Employability skills that address competencies in using resources and information, working with others, understanding systems, and obtaining skills necessary to successfully transition to and complete postsecondary education, training, and employment</p> <p><input type="checkbox"/> Other employability skills that increase an individual's preparation for the workforce</p> <p><input type="checkbox"/> Services are integrated, concurrent, and contextualized</p> <p><input type="checkbox"/> Access to internships/co-ops, apprenticeships, or work-based learning opportunities</p>				
<p><b>Intake &amp; Orientation</b></p> <p>14. Does the program have samples of current marketing materials available for review?</p> <p><input type="checkbox"/> Materials used for recruiting ABE, ESL, and IET/ELCE participants</p>				
<p>15. What form do you use to collect intake data?</p> <p><input type="checkbox"/> Using MS OAE Student Success Plan (SSP)</p> <p><input type="checkbox"/> MIBEST Student File Checklist</p> <p><input type="checkbox"/> Online Intake Platform</p>				
<p>16. Describe the program's intake and orientation process and how the program's intake process ensures proper student placement in regards to ABE, ESL, and IET/ELCE procedures.</p> <p>Include how your program provides education services to English language learners, including professionals with degrees and credentials in their native countries that enables them to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens.</p> <p><input type="checkbox"/> Written policy and procedure for intake and orientation</p> <p><input type="checkbox"/> Written placement policy</p>				

<p>17. How is the program assisting adults to become literate, and obtain the knowledge and skills necessary for employment and economic self-sufficiency?</p> <p><input type="checkbox"/> Number of ABE and ESL participants (EFLs 1-4 &amp; ESL 1-6) served for the last three (3) program years. (Table 1)</p> <p><input type="checkbox"/> IET Bridge Programs</p> <p><input type="checkbox"/> Apprenticeships</p>			
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**Section 3 – Data Quality and Achievement & Performance Feedback**  
 (State Plan Goal 1, 4, 6, 7, & NRS)

Questions	Compliance			Comments
	YES	NO	N/A	
<p><b>Data Quality</b></p> <p>18. Has the program established written data collection policy and procedures as stated in the Technical Assistance Guide of the National Reporting System? How do you verify staff understand the data flow process and staff responsibility?</p> <p><input type="checkbox"/> Written Data Collection Process to include:</p> <ul style="list-style-type: none"> <li>➤ Data flowchart including job responsibilities</li> <li>➤ Use of the Data Management System</li> <li>➤ Timely input of data</li> <li>➤ Includes demographics</li> <li>➤ Barriers to employment</li> <li>➤ Verification of withdrawal for 16-17 year olds</li> <li>➤ Assessment</li> <li>➤ Attendance data</li> <li>➤ Data review and correction</li> <li>➤ Performance reviews</li> <li>➤ Student cumulative folder review</li> <li>➤ Competency-based diploma verification</li> </ul>				

<p>19. Has the program developed a process to implement the MS Office of Adult Education (OAE) Assessment Policy to meet Measurable Skills Gains?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Use of state-approved assessments outlined in the MS OAE Program Guidelines</li> <li><input type="checkbox"/> Completion of TABE certification by all staff</li> <li><input type="checkbox"/> Track participants with 12 or more instructional hours</li> <li><input type="checkbox"/> Correction of out-of-range scores</li> <li><input type="checkbox"/> Use of locator for guidance</li> <li><input type="checkbox"/> Use of alternate testing forms</li> <li><input type="checkbox"/> MS OAE Program Guidelines assessment resources for NRS educational functioning levels</li> <li><input type="checkbox"/> Post-test Rate report showing evidence of maintaining a post-test rate of at least 65%</li> </ul>				
<p>20. Describe how staff confirm data quality and accomplish reporting requirements (i.e. database error-checking function, data match through external data systems, Integrated Education and Training (IET) participants, multiple Periods of Participation, ESL needs, Integrated English Literacy and Civics Education (IELCE), etc.).</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Does the data on student demographics raise any issues?</li> <li><input type="checkbox"/> Does the proportion of students served in ABE, ASE, and ESL appear reasonable based on program needs?</li> <li><input type="checkbox"/> Does the student outcome data on Table 4 indicate adequate performance?</li> <li><input type="checkbox"/> Identification of technical assistance needs</li> </ul>				
<p>21. What data are used for individuals, business, and industry as part of the career pathways development?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Job skills of participants</li> <li><input type="checkbox"/> Local workforce sectors</li> <li><input type="checkbox"/> Employment trends</li> <li><input type="checkbox"/> Available pathways within the program</li> </ul>				
<p>22. What demographic or other data were used to determine the target population for this IELCE program?</p>				
<p>23. How do you ensure IET/MIBEST and IELCE program data quality in the following areas:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Local process outlined (if applicable)</li> <li><input type="checkbox"/> List of IETP/MIBEST participants (Verified by Career Navigator)</li> <li><input type="checkbox"/> List if IELCE participants</li> <li><input type="checkbox"/> Attendance captured accurately</li> <li><input type="checkbox"/> IETP/MIBEST participants post-tested</li> <li><input type="checkbox"/> IELCE participants post-tested</li> </ul>				
<p><b>Achievement &amp; Performance Feedback</b></p> <p>24. Does your program have a history of meeting MS performance indicator targets?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Table 4 outcomes for past three years</li> </ul>				
<p>25. Are you demonstrating continual improvements in outcomes, consistent with WIOA performance accountability requirements?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Smart Start credential attainment</li> <li><input type="checkbox"/> IETP/IELCE completion</li> <li><input type="checkbox"/> Increase in participants on Table 5</li> </ul>				
<p>26. Does the average number of instructional hours indicate that programs are of sufficient intensity and duration to produce Measurable Skill Gains?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Calculated from the MS OAE Desktop Monitoring Tool, Columns B, D, &amp; O of Table 4</li> </ul>				
<p>27. What is your plan to increase credential accrual rates for all participants?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Participants with no Earned Credentials in the Smart Start and/or IET/MIBEST/IELCE options</li> </ul>				

<p>28. How will you maintain or increase your enrollment and attendance hours? Compare the number of participants the program proposed to serve in its MS OAE Grant application to actual service levels.</p> <p><input type="checkbox"/> Enrollment Proposed by provider in MS OAE Grant application.</p>				
<p><b>Section 4 – Curriculum &amp; Instructional Practices</b> (State Plan Goals 2, 3, 5 &amp; 6)</p>				
<p><b>Questions</b></p>	<p>Compliant</p> <p>YES NO N/A</p>			<p><b>Comments</b></p>
<p>29. How do instructors use assessments (i.e. TABE Profile Report, WorkKeys, practice and official high school equivalency (HSE) test, instructor-designed instrument, etc.) to identify and analyze competency and skill gaps in order to inform instructional practices?</p> <p><input type="checkbox"/> Examples of assessments used and how they inform instruction</p>				
<p>30. Describe how your program embeds College and Career Readiness Standards (CCRS), contextualized instruction, and evidence-based components of reading in all instructional practices.</p> <p><input type="checkbox"/> Examples of rubrics, outcomes, or syllabi/lesson plans</p> <p><input type="checkbox"/> IET Single Set of Learning Objectives (SLOs)</p> <p><input type="checkbox"/> STAR participation</p>				
<p>31. Explain how your program offers sufficient rigor, intensity, and duration for participants to achieve substantial learning gains in basic skills, IET/IELCE, and ESL programs.</p> <p><input type="checkbox"/> Integrated with training and civics</p> <p><input type="checkbox"/> IET included in IELCE</p> <p><input type="checkbox"/> Use occupationally relevant instructional materials</p> <p><input type="checkbox"/> Specific adult education content</p> <p><input type="checkbox"/> IET Single-set of Learning Objectives (SLOs)</p> <p><input type="checkbox"/> Workforce preparation activities (Smart Start)</p> <p><input type="checkbox"/> Workforce training competencies</p>				
<p>32. How does instruction provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement?</p> <p><input type="checkbox"/> Activities, programs, or services that are designed to help an individual acquire a combination of basic academic skills, critical thinking, digital literacy, and self-management skills</p> <p><input type="checkbox"/> Course schedules/syllabi/lesson plans</p> <p><input type="checkbox"/> Employability skills that address competencies in using resources and information, working with others, understanding systems, and obtaining skills necessary to successfully transition to and complete postsecondary education, training, and employment</p> <p><input type="checkbox"/> IET Single Set of Learning Objectives (SLOs)</p> <p><input type="checkbox"/> Other employability skills that increase an individual's preparation for the workforce</p> <p><input type="checkbox"/> Job readiness training</p> <p><input type="checkbox"/> On-the-job training</p> <p><input type="checkbox"/> Programs that combine workplace training with related instruction, which may include cooperative education programs</p> <p><input type="checkbox"/> Skill upgrading and retraining</p> <p><input type="checkbox"/> Entrepreneurial training</p>				
<p>33. How does the single set of IET learning objectives identify specific adult education content, workforce preparation activities, and workforce training competencies</p>				
<p>34. Describe the literacy, English language, and IELCE instruction.</p>				

<input type="checkbox"/> Include instruction in literacy and English language acquisition <input type="checkbox"/> Include instruction on the rights and responsibilities of citizenship and civic participation <input type="checkbox"/> Delivery in combination with the IET activities <input type="checkbox"/> 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 <input type="checkbox"/> Integrate with the local workforce development system and its functions to carry out the activities of the program				
35. Provide a list of software programs purchased with adult education funds and explain how the software is used to differentiate instruction. <input type="checkbox"/> Document student usage from July to June (if applicable)				
<b>Section 5 – Fiscal Review (State Plan Goals 1, 4, &amp; 6, NRS)</b>				
Questions	Compliant			Comments
	YES	NO	N/A	
36. Obtain and Review the Program's most recent financial audit (if applicable). <input type="checkbox"/> Identify any findings or other issues noted that are relevant <input type="checkbox"/> Review Program Response and documentation to determine whether appropriate corrective action has been taken to resolve findings and questioned costs				
37. Is the budget set up in the WESS system for financial reporting required by the MS Office of Adult Education?				
38. Does the Program Director work with the Financial Officer in preparing the budget for the next fiscal year to include program's host institution match? <input type="checkbox"/> Examples of braided funding sources <input type="checkbox"/> Negotiated indirect funds <input type="checkbox"/> Verified allowable costs to the AEFLA grant				
39. Have allowable Career and Training Services expenditures been identified and reported properly?  <input type="checkbox"/> Verified allowable costs to the AEFLA grant for outreach, assessment, referral and coordination activities with core partners and eligible providers, and barrier elimination activities by navigator or transition specialist, and IETP.				
40. Indicate from the following list the journals and ledgers, etc. used in the Subgrantee's accounting system. These will need to be available during the review. <input type="checkbox"/> General ledger <input type="checkbox"/> Cash receipts journal <input type="checkbox"/> Cash disbursements journal <input type="checkbox"/> General Journal <input type="checkbox"/> Payroll register <input type="checkbox"/> Career Services expenditures (Attachment 7- Table C of OCTAE Program Memorandum 17-2 <input type="checkbox"/> One Stop Infrastructure costs <input type="checkbox"/> Accounts receivable ledger <input type="checkbox"/> Account payable ledger <input type="checkbox"/> Purchase Journal <input type="checkbox"/> Travel expenditures <input type="checkbox"/> Obligation control ledger				
41. Are separate, accurate, and complete accounting records kept for adult education funds? <input type="checkbox"/> All budget requests and expenditures for FY ___ and ___ documented. <input type="checkbox"/> Personnel files for those paid with AE grant funds. <input type="checkbox"/> Time and Effort reports for all staff paid with AEFLA grant funds <input type="checkbox"/> Approved Grants and modifications for FY __ and __.				
42. Written procurement procedures are followed. <input type="checkbox"/> Requisition – dated prior to purchase order; <input type="checkbox"/> Purchase order – dated prior to invoice and payment; <input type="checkbox"/> Invoice – approved by program director; <input type="checkbox"/> Record of payment				
43. Has the charge been properly allocated to the appropriate budget category, or in the case of charges shared between programs, to the appropriate program? <input type="checkbox"/> Integrated English literacy and civic education (IELCE)				

<input type="checkbox"/> <i>Integrated education and training (IET)/MIBEST</i> <input type="checkbox"/> <i>Basic Skills</i> <input type="checkbox"/> <i>ESL</i> <input type="checkbox"/> <i>Drop Out Recovery</i> <input type="checkbox"/> <i>Other</i>				
44. Who are authorized signatory officials? <input type="checkbox"/> <i>Copy of fidelity bond and listing of authorized signature(s) for purchases, disbursements, and cash receipts</i>				
45. An updated equipment list maintained that includes a description, serial number, acquisition date, funding source, purchase price, location use and condition. <input type="checkbox"/> <i>Updated inventory list</i>				

Student Records Review Checklist (2020-2025)											
Record #	1	2	3	4	5	6	7	8	9	10	
<i>Marks: Yes = Y; No = N; Not Applicable = N/A</i>											
Is student record Federally Reportable (FR)?											
General Release of Information Forms											
Technology Acceptable Use Policy											
Copy of state-issued picture I.D.											
Verification of Withdrawal											
Student Success Plan											
TABE Profile or Educational Plan											
Student Work Samples											
Smart Start Student Record/Syllabus											
Documentation of accommodations											
<b>Is data reported in DATA MANAGEMENT SYSTEM identical to program records in the following areas :</b>											
<i>Marks: Does Not Match = N; Provided/Matches = Y; Data Missing from Both Areas = O; Not Applicable = N/A</i>											
Complete Data Form											
TABE Pre/Post											
Smart Start Credential or Certificate											
Career Readiness Transcript or Certificate											
High School Equivalency Transcript											
<i>Attendance Hours by Type-</i>											
Total AE Instructional Hours											
Total Smart Start Hours											
Distance Education Hours											
Record #	Notes										



Student Smart Start Records Review Checklist (2020-2021)										
Record # (AE & WD)	1	2	3	4	5	6	7	8	9	10
Name										
<i>Verification of the following in folder:</i>										
Smart Start Student Record (Instructor sign & date)										
Registered in MS Works										
Professional Email										
ACT WorkKeys <sup>®</sup> Pretests										
ACT WorkKeys <sup>®</sup> Summary Report										
Activity – Career Cluster Survey										
Activity – Career Cluster Res & Job Profile										
Activity – Career Pathway										
Activity – Resume										
Career Awareness Post-Test										
Financial Awareness Post-Test										
Necessary Skills Post-Test										
Data Usage Report										
Students' Canvas Gradebook (if applicable)										

Class Roster									
Instructor Certification Statement									
ACT WorkKeys <sup>®</sup> Summary Report									
Students' Canvas Gradebook									
SS Credential/Certificate									
Resume (if DE/DC)									
Is data reported in DATA MANAGEMENT SYSTEM identical to program records in the following areas :									
<i>Marks: Does Not Match = N; Provided/Matches = Y; Data Missing from Both Areas = O; Not Applicable = N/A</i>									
Is data reported in DATA MANAGEMENT SYSTEM identical to program records in the following areas :									
<i>Marks: Does Not Match = N; Provided/Matches = Y; Data Missing from Both Areas = O; Not Applicable = N/A</i>									
SS Credential/Certificate – Education Tab									
ACT WorkKeys <sup>®</sup> Scores – Outcomes Tab									
NCRC – Education Tab									
Attendance Hours by Type-									
Total Smart Start Hours									
SS Distance Education Hours									
Less than 30 Hours (Approval from OAE)									
Smart Start Student Record Checklist July 2021 to June 2025									
Class Roster									
Instructor Certification Statement									
ACT WorkKeys <sup>®</sup> Summary Report									
Students' Canvas Gradebook									





## Section 15. Vocational Rehabilitation Assurances

15A. VR/VRB Policy 1.4 – Public Hearing Proceedings on Proposed Policy Changes that Substantially Impact Service to Clients

### **1.4 PUBLIC HEARING PROCEEDINGS ON PROPOSED POLICY CHANGES THAT SUBSTANTIALLY IMPACT SERVICES TO CLIENTS**

**1. Scope.** - The following policy and procedures apply to all public hearings held for the purpose of providing the public with an opportunity to make oral presentations on proposed new policies and amendments to existing policies before the Department (MDRS) that substantially impact services to clients.

2. **When Public Hearing Proceedings will be Scheduled on Proposed Policies.** The Department will conduct a public hearing proceeding within thirty (30) days after the first notice of public hearing is run in certain regional and statewide newspapers on proposed policy or amendment to existing policies that substantially impact services to clients.

3. **Requested Format.** Each request to comment must be printed or typewritten, or must be in legible handwriting. Each request to comment must be submitted on standard business letter-size paper (8-1/2 inches by 11 inches). Requests to comment may be in the form of a letter addressed to the MDRS Executive Director and signed by the requestor(s).

4. **Notification of Public Hearing Proceedings.** The date, time and place of all public hearing proceedings will be announced via notice in certain regional and statewide newspapers, public service announcements via Mississippi Public Radio, notice on the MDRS website, and press releases to numerous consumer organizations who represent or serve people with disabilities. The public hearing proceeding will be scheduled within thirty (30) days after the first notice of public hearing is run in certain regional and statewide newspapers.

5. **Presiding Officer.** The Executive Director, or his/her designee, who is familiar with the substance of the proposed policy, shall preside at the public hearing proceeding on a proposed policy.

6. **Public Presentations and Participation.**

(a) At a public hearing proceeding on a proposed policy, persons may make oral statements and make documentary and physical submissions, which may include data, views, comments or arguments concerning the proposed policy.

(b) Persons wishing to make oral presentations at such a proceeding shall notify the Department at least one business day prior to the proceeding and indicate the general subject of their presentations. The presiding officer at his or her discretion may allow individuals to participate that have not previously contacted the Department.

(c) At the proceeding, those who participate shall indicate their names and addresses, identify any persons or organizations they may represent, and provide any other information relating to their participation deemed appropriate by the presiding officer.

(d) The presiding officer may place time limitations on individual oral presentations when necessary to assure the orderly

and expeditious conduct of the public hearing proceeding. To encourage joint oral presentations and to avoid repetition, additional time may be provided for persons whose presentations represent the views of other individuals as well as their own views.

(e) Persons making oral presentations are encouraged to avoid restating matters that have already been submitted in writing.

(f) There shall be no interruption of a participant who has been given the floor by the presiding officer, except that the presiding officer may in his or her discretion interrupt or end the participant's time where the orderly conduct of the proceeding so requires.

## 7. Conduct of Oral Proceeding.

(a) Presiding officer. The presiding officer shall have authority to conduct the proceeding at his or her discretion for the orderly conduct of the proceeding. The presiding officer shall (i) call proceeding to order; (ii) give a brief synopsis of the proposed policy, a statement of the statutory authority for the proposed policy; (iii) call on those individuals who have contacted the Department about speaking on or against the proposed policy; (iv) allow for rebuttal statements following all participant's comments; (v) adjourn the proceeding.

(b) Questions. The presiding officer, where time permits and to facilitate the exchange of information, may open the floor to questions or general discussion. The presiding officer may question participants and permit the questioning of participants by other participants about any matter relating to that policy-making proceeding, including any prior written submissions made by those participants in that proceeding; but no participant shall be required to answer any question.

(c) Physical and Documentary Submissions. Submissions presented by participants in a public hearing proceeding shall be submitted to the presiding officer. Such submissions become the property of the Department and are subject to the Department's public records request procedure.

(d) Recording. The Department may record oral proceedings by stenographic or electronic means.

**1.1**

**General Policies**

**All policies in this manual were reviewed by the State Rehabilitation Council in accordance with the Rehabilitation Act of 1973, as amended in the 2014 Workforce Innovation and Opportunity Act (WIOA), and with applicable federal regulations.**



**1.1.9 Agreements with Other Agencies and Organizations, including the Mississippi Workforce Investment System**

Counselors shall comply with the provisions of agreements between MDRS and other agencies and organizations; including those in the Mississippi Workforce Investment System. These agreements provide for interagency cooperation which may include establishing interagency working groups; coordinating policies, practices, and procedures; identifying available resources; setting up a comprehensive information and referral system; and defining the financial responsibility of each agency for paying for necessary services and resolving disputes. (Section 101(a)(11) of the 1998 Rehabilitation Act Amendments)

The Mississippi Department of Rehabilitation Services will make available an information and referral system adequate to ensure that individuals with disabilities, including eligible individuals who do not meet the Agency's order of selection criteria for receiving vocational rehabilitation services if the Agency is operating on an order of selection, are provided accurate vocational rehabilitation information and guidance (which may include counseling and referral for job placement) using appropriate modes of communication to assist them in preparing for, securing, retaining, or regaining employment; and will refer individuals with disabilities to other appropriate Federal and State programs, including other components of the statewide workforce investment system.

In making these referrals, MDRS will refer the individual to Federal or State programs, including programs carried out by other components of the statewide workforce investment system, best suited to address the specific employment needs of an individual with a disability, and provide the individual who is being referred—

1. A notice of the referral by MDRS to the agency carrying out the program;
2. Information identifying a specific point of contact within the agency to which the individual is being referred; and
3. Information and advice regarding the most suitable services to assist the individual to prepare for, secure, retain, or regain employment.

In providing the information and referral services under this section to eligible individuals who are not in the priority category or categories to receive vocational rehabilitation services under an order of selection, if one is in effect, MDRS will maintain and report data on the number of eligible individuals who did not meet the Agency's order of selection criteria for receiving vocational rehabilitation services and did receive information and referral services.

4. MDRS shall maintain a list of interpreters fluent in languages spoken by the targeted populations.
5. District Managers shall maintain formal relationships with historically Black Colleges and Universities in their service area by assigning a liaison person(s) to encourage referrals, job placement, training, outreach, and recruitment.

MDRS has an agency-wide Cultural Diversity Committee that is responsible for the following:

1. developing strategies for outreach in the district offices to be implemented by the staff designated outreach workers;
2. establishing reporting formats for each district office to summarize outreach activities, which occurred during the quarter;
3. reviewing the quarterly outreach reports and submitting a summary to the MDRS Executive Director; and,

**1.1.1 Nondiscrimination**

**No individual or group of individuals is excluded or found ineligible on the basis of sex, age, race, creed, color, religion, or, national origin, type of disability, duration of residence in Mississippi, public assistance status, citizenship, type of expected employment outcome, source of referral, particular service needs or anticipated costs of services required, or income level of an applicant or applicant's family. This applies to all locations in which rehabilitation services are provided by this agency, including one-stop centers.**

## **SERVICES**

## **Section 08**

### **08.0 Services**

#### **Substantiality of Services Policy:**

The definition of substantiality of services includes all the needs that should be met in the IPE, its amendments, and otherwise in the case record. These needs should include both those pertaining to the vocational abilities of the individual and those relating to the barriers to employment posed by the disability or disabilities. Substantial services are those services that address an individual's major needs as identified in the assessment process or later in the case record that the counselor and the client agree have to be met in order for the individual to achieve an employment outcome consistent with that individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. The services required to meet the needs of an individual should be planned on the IPE and/or its amendments, regardless of the source of payment or service provider. The source of payment and service provider must be listed on the IPE for each service.

**Specific Vocational Rehabilitation Services** are any services described in an Individualized Plan for Employment (IPE) necessary to assist an individual in preparing for, securing, retaining, advancing in, or regaining an employment outcome that is consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual, including:

1. **Assessment for determining eligibility and priority for services by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;**
2. **An assessment for determining vocational rehabilitation needs by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;**
3. **Vocational rehabilitation counseling and guidance, including information and support services to assist an individual in exercising informed choice as defined in the OVR/OVRB Resource Guide, Section 4.4;**
4. **Referral and other services necessary to assist applicants and eligible individuals to secure needed services from other agencies, including other components of the statewide workforce development system and to advise those individuals about Client Assistance Programs (OVR/OVRB Policy Manual Section 1.1.9 & 1.3; OVR/OVRB Resource Guide**

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**Section 4.4 & Form MDRS-VR-02, Information and Referral located on Connect;**

- 5. Physical and mental restoration services, to the extent that financial support is not readily available from a source other than the Agency (such as through health insurance or a comparable service or benefit);**
- 6. Vocational and other training services, including the provision of personal and vocational adjustment, advanced training in a field of science, technology, engineering, medicine, law, business, or mathematics including computer science, books, tools, and other training material, except that no training services provided at an institution of higher learning shall be paid with funds under this title unless maximum efforts have been made by the counselor and the individual to secure grant assistance, in whole or in part, from other sources to pay for such training;**
- 7. Maintenance for additional costs incurred while participating in an assessment for determining eligibility and rehabilitation needs or while under an IPE as defined in the *OVR/OVRB Resource Guide, Section 4.4*;**
- 8. Transportation, including adequate training in the use of public transportation vehicles and systems, that is provided in connection with the provision of any other service described in this section and needed by the individual to achieve an employment outcome as defined in the *OVR/OVRB Resource Guide, Section 4.4*;**
- 9. Vocational rehabilitation services to family members of an applicant or eligible individual if necessary to enable the applicant or eligible individual to achieve an employment outcome;**
- 10. Interpreter services, including sign language and oral interpreter services, for individuals who are deaf or hard of hearing and tactile interpreting services for individuals who are deaf-blind provided by qualified personnel;**
- 11. Reader services, rehabilitation teaching services and orientation and mobility services for individuals who are blind;**
- 12. Supported employment services in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4*;**

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13. **Personal assistance services in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4*;**
14. **Post-employment services in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4*;**
15. **Occupational licenses, tools, equipment, and initial stock and supplies;**
16. **Rehabilitation technology services including vehicular modifications, telecommunications, sensory and other technological aids and devices in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4 & Section 3.2*;**
17. **Transition services for students and youth with disabilities, that facilitate the transition from school to postsecondary life, such as achievement of an employment outcome in competitive integrated employment, or pre-employment transition services for students.**
18. **Technical assistance and other consultation services to conduct market analysis, develop business plans, and otherwise provide resources, to the extent such resources are authorized to be provided through the statewide workforce development system, to eligible individuals who are pursuing self-employment or telecommuting or establishing a small business operation as an employment outcome;**
19. **Business development services, community based job tryout, on-the-job training, Work Opportunity Tax Credit, and employability skills training as addressed in the *OVR/OVRB Resource Guide, Section 3.11*;**
20. **Customized employment in competitive integrated employment based the individual's unique strengths, needs and interests, designed to meet the specific abilities of the individual and the business needs of the employer by customizing a job description based on current employer needs or on previously unidentified and unmet employer needs.**
21. **Other goods and services determined necessary for the individual with a disability to achieve an employment outcome.**

**(Authority: Section 103(a) of the Act; 29 U.S.C. 723(a))**

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## **FINANCIAL ACCOUNTABILITY**

## **Section 09**

### **09.0 Financial Accountability Policy Statement**

The Mississippi Department of Rehabilitation Services is committed to ensuring all funds are handled using sound financial management and proper accounting practices. These practices should facilitate the goals and objectives of the program. Only those funds necessary for diagnostic, evaluation and other services, which lead to the attainment of a vocational goal, should be expended.

Authorizations and expenditures for services will be made in accordance with all applicable Agency fee schedules; Agency operating agreements and contracts; State contract rates; vendor's usual and customary charges; and state/federal laws, regulations, policies, and procedures. Rates of payment for services provided in agency-operated facilities shall be determined by the Agency's facility cost reporting system.

Documentation supporting the decision to obligate funds, change amounts obligated, and recommended payment must be present in the case file.

### **09.1 Financial Needs Tests / Comparable Services and Benefits**

MDRS chooses to consider the financial need of clients or applicants who are receiving services through Trial Work Experiences or during an Extended Evaluation for purposes of determining the extent of their participation in the costs of vocational rehabilitation services, other than those services identified below. The *OVR/OVRB Resource Guide* explains the method for determining the financial need of an eligible individual; and specifies the types of vocational rehabilitation services for which MDRS has established a financial needs test;

Policies are applied uniformly to all individuals in similar circumstances. Policies do not require different levels of need for different geographic regions in the State, and policies ensure that the level of an individual's participation in the cost of vocational rehabilitation services is:

1. reasonable;
2. based on the individual's financial need, including consideration of any disability-related expenses paid by the individual; and,

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3. not so high as to effectively deny the individual a necessary service.

MDRS does not apply a financial needs test, or require the financial participation of the individual as a condition for furnishing the following vocational rehabilitation services:

1. assessment for determining eligibility and priority for services, except those non-assessment services that are provided to an individual with a significant disability during either an exploration of the individual's abilities, capabilities, and capacity to perform in work situations through the use of Trial Work Experiences or an Extended Evaluation;
  - a. assessment for determining vocational rehabilitation needs;
  - b. vocational rehabilitation counseling and guidance;
  - c. referral and other services;
  - d. interpreter services;
  - e. reader services;
  - f. job-related services;
  - g. personal assistance services; or
2. as a condition for furnishing any vocational rehabilitation service if the individual in need of the service has been determined eligible for Social Security benefits under Title II or Title XVI of the Social Security Act.

Comparable Services and Benefits are defined in the *OVR/OVRB Resource Guide*.

In all cases full consideration will be given to any comparable services and benefits available under any other program including those of other workforce agencies. This includes maximum utilization of public or other vocational/ technical training facilities to meet, in whole or part, the cost of any vocational rehabilitation service(s) provided to the individual. MDRS cannot supplement

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payments from any other source(s) in excess of the prevailing fee for services being purchased.

Appropriate comparable benefits must be used when purchasing services, as long as the determination of whether comparable services and benefits are available under any other program would interrupt or delay:

1. the progress of the individual toward achieving the employment outcome in the individualized plan for employment of the individual;
2. an immediate job placement; or,
3. the provision of such service to any individual at extreme medical risk.

Exceptions are as follows:

1. assessment for determining eligibility and vocational rehabilitation needs by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;
2. counseling and guidance, including information and support services to assist an individual in exercising informed choice;
3. referral and other services to secure needed services from other agencies including other workforce agencies through cooperative agreements, if such services are not available through this agency;
4. job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services;
5. rehabilitation technology, including telecommunication, sensory, and other technological aids and devices; and,
6. post-employment services consisting of the aforementioned services (in items 1– 5 in this list.)

## **09.2 Fee Schedule**

The Agency has established a Fee Schedule that represents the Department's "*maximum allowable fee*" for medical services,

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equipment, supplies, and the like. The Fee Schedule Manual offers guidelines on authorizing for these types of services and must be adhered to when the Agency is providing these services.

**09.3 State Vendor Contracts**

The State of Mississippi enters into contracts with vendors for certain goods and services on an annual basis. When State contracts are in effect, these items must be obtained from the vendor indicated on the contract. No bids are required.

**09.4 State Purchasing Regulations**

Items not covered by the Agency Fee Schedule or a State Contract are subject to the Mississippi Public Purchases law. This law requires the following for all client service purchases authorized by the counselor:

1. Purchases of \$5,000.00 or under, exclusive of freight or shipping charges, may be authorized to any vendor with no bids or approval required (except for Computer /telecommunication related purchases).
2. Purchases over \$5,000.00, but not in excess of \$25,000.00, exclusive of freight or shipping charges, require at least two written quotes or certification that the vendor is a single source\*. The Request for Purchase form (DRS-FIN 1) or client authorization and quotes or certification are to be submitted to the District Manager. Purchases will be made from the lowest and best overall quote that meets the specifications. **DO NOT ISSUE AUTHORIZATIONS UNTIL NOTIFIED OF APPROVAL.** After receiving written approval, the Authorization and Statement of Account may be issued. A copy of the approval document and quotes must be attached to the Statement of Account when submitted to the Finance Office for payment.

*\*Single source vendor considerations - Do other companies make similar commodities that will do the same job or meet the same goals? If so, why is this commodity unique from all others? What can it do that the others can't? Is there a*

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copyright or patent on this commodity? Will the company write a letter certifying this to be true? Are there distributors outside of Mississippi or will the manufacturer give you a quote?

3. For purchases over \$25,000.00, exclusive of freight and shipping charges, you must send the specifications for the items being purchased or construction projects being proposed to the District Manager, who will then submit the request to the Finance Office. (See *Section 6.2.7* of the *OVR/OVRB Resource Guide* for requirements for AT related purchases). **IT IS UNLAWFUL TO SPLIT A PURCHASE TO CIRCUMVENT THE REQUIREMENTS FOR ADVERTISING.** The Finance Office will arrange for the advertising in the newspaper, provide guidance in obtaining the bids, and obtain approval from the Bureau of Purchasing (P-1). Purchases will be made from the lowest and best overall bidder that meets the specifications. **AUTHORIZATIONS SHOULD NOT BE ISSUED UNTIL NOTIFICATION IS RECEIVED.**

#### **09.5 Purchase of Computer/Telecommunication Equipment and/or Services**

The Mississippi Department of Information Technology Services (ITS) governs the acquisition of any computer/telecommunications equipment, word processing equipment, computer software, or computer/telecommunications services. Requests for purchase of any of the above for clients, regardless of cost, must be sent to the District Manager, prior to submission to the Agency's Office of Management Information Services (MIS). Approval from MIS must be secured before further action is taken.

#### **09.6 Purchase of Drugs**

Drugs and medication may be authorized when necessary for the treatment of a condition that affects the rehabilitation program. They may also be provided as part of a broader physical rehabilitation program.

The Agency will approve drugs that comply with rates established by the State Division of Medicaid. If a prescription is not on the Medicaid Formulary, the authorization will be based on the pharmacist's usual and customary charge. Similar benefits must be considered before the Agency can pay for this type of service.

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**09.7      Authorizations**

Authorizations will be issued only after a case has been placed in application status. A written authorization for services shall be made either before or at the same time as the purchase of the services. After eligibility has been determined, in emergency situations that might cause extreme medical risk or loss of placement, or like circumstances, an authorization may be made orally. In such instances there must be prompt documentation and the authorization must be confirmed in writing and forwarded immediately to the provider of the services.

**09.8      Statement of Accounts**

Payment of a valid obligation may be approved when the authorized goods or services have been received by the client or authorized agency personnel and the vendor has signed, returned our Statement of Account and supplied an invoice when required. State purchasing law requires payment within 45 days of receipt of authorized goods and services.

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## **IPE**

## **Section 07**

### **07.0 Individualized Plan for Employment (IPE)**

#### **07.1 IPE Policy Statement**

The Mississippi Department of Rehabilitation Services is required to initiate an Individualized Plan for Employment, periodically update it, and conduct an annual IPE review for each eligible individual being provided services. Vocational rehabilitation services must be provided in accordance with the IPE. The IPE sets forth the specific employment outcome, services to be provided, time frames, service providers, evaluation criteria, and dates of review. The client will have informed choice throughout the vocational rehabilitation process including selecting a specific employment outcome, specific vocational rehabilitation services, and the provider and methods by which these services will be provided.

#### **07.2 Scope of the IPE**

The intended purpose of the IPE is to document and describe the required rehabilitation services necessary for the client to prepare for, secure, retain, or regain employment. It shall be presumed that an individual can benefit in terms of a specific employment outcome through specific vocational rehabilitation services provided under the IPE, unless the Agency can demonstrate by clear and convincing evidence documented in the case file that the individual is incapable of benefiting from services in terms of a specific employment outcome due to the severity of the disability of the individual.

Each IPE shall be designed to achieve the specific employment objective chosen by the individual, consistent with his/her unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice. Clients will be active and full partners in the vocational rehabilitation process, making meaningful and informed choices during assessments for vocational rehabilitation needs and in the selection of specific employment outcomes, services needed to achieve the outcomes, entities providing such services, and the methods used to secure such services. Eligible individuals will be informed about their options for developing an IPE, including the option for the individual to develop an IPE on agency forms without assistance from anyone.

#### **07.3 Initiation of the IPE**

The IPE must be initiated after eligibility determination by a qualified rehabilitation counselor has occurred. The Agency shall determine whether an individual is eligible for vocational rehabilitation services within a reasonable period of time, not to exceed 60 days after the individual has submitted an

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application for services. The eligibility determination period may be extended if: (a) exceptional and unforeseen circumstances beyond the control of the Agency preclude the making of the eligibility determination within 60 days and the Agency and the individual agree to a specific extension of time, or (b) if the Agency is exploring an individual's abilities, capabilities, and capacity to perform in work situations through the use of Trial Work Experiences. Such experiences should be of sufficient variety and over a sufficient period of time to determine the eligibility of an individual.

#### **07.4        Development of the IPE**

When an individual is determined to be eligible for vocational rehabilitation services, the IPE shall be completed. An IPE shall be a written document prepared on current forms provided by the Agency as outlined in Section 361.45(b)(2) of the 1998 Rehabilitation Act Amendments regarding general requirements.

The eligible individual or his/her representative will be provided information, in writing and in an appropriate mode of communication, regarding the individual's options for developing an IPE including:

1. information on the availability of assistance, to the extent determined to be appropriate by the eligible individual, from a qualified vocational rehabilitation counselor in developing all or part of the IPE for the individual, and the availability of technical assistance in developing all or part of the IPE for the individual;
2. a description of the full range of components as defined in Section 361.48 that shall be included in an IPE; and,
3. as appropriate--
  - a. an explanation of Agency guidelines and criteria associated with financial commitments concerning an Individualized Plan for Employment;
  - b. additional information the eligible individual requests or the Agency determines to be necessary;
  - c. information on the availability of assistance in completing designated Agency forms required in developing an IPE; and,
  - d. a description of the rights and remedies available to such an individual including, if appropriate, a description of the availability of a Client Assistance Program and information about how to contact the CAP.

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**An IPE for a student with a disability receiving special education services is developed--**

- a. In consideration of the student's IEP; and**
- b. In accordance with the plans, policies, procedures, and terms of the interagency agreement between MDRS and the local school district.**

**In planning transition services for students, the IPE for a student determined to be eligible for vocational rehabilitation services must be developed and approved (i.e., agreed to and signed by the individual and the counselor) before the student leaves the school setting and as early as possible during the transition planning process.**

#### **07.5 Informed Choice**

**An IPE shall be developed and implemented in a manner that affords eligible individuals the opportunity to exercise informed choice in selecting a specific employment outcome, the specific vocational rehabilitation services to be provided under the plan, the entity that will provide the vocational rehabilitation services, and the methods used to procure the services. Informed Choice implies that the specific employment outcome be both realistic and achievable for the individual.**

**The specific employment outcome should be based upon an objective assessment of specific vocational rehabilitation needs and reflecting the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice. The IPE should reflect specific vocational rehabilitation services necessary to achieve the individual's chosen employment outcome and the case file should reflect how the client was informed about and involved in choosing among alternative services. All available comparable benefits should be applied toward each service.**

**Information regarding available vendors, certified/licensed vendors, cost and duration of all planned services, and like information, shall be provided to the client in the appropriate accessible mode of communication. Accessibility of the vendor's location will be discussed with the client. All rehabilitation services will be provided in the least restricted and most integrated setting compatible with the client's interest and abilities.**

#### **07.6 Individualized Plan for Employment Form Completion**

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The IPE is organized into the following sections--

**Part 1      General Information**

This section includes the plan number, general plan type (i.e. training, physical restoration), the client's specific employment outcome/objective, and the anticipated date for achievement of the employment outcome.

**Part 2      Planned Services**

This section describes services needed, dates of initiation, provider(s) of choice, and the estimated costs for each service and the total plan (including comparable benefits).

**Part 3      Participant Responsibilities**

This section will include a list of the client's responsibilities toward completion of the plan; including any financial responsibilities.

**Part 4      Plan Documentation**

This section must contain the agreed-upon criteria for evaluating progress toward the goal.

**Part 5      Terms and Conditions**

This section contains post-employment services and the identification of the extended services provider for Supported Employment cases only.

**Part 6      Statements of Mutual Understanding**

The counselor will complete the information under Review Process and Client Assistance Program. The counselor will review all information in this section in detail with each client and/or his/her representative.

**Part 7      Plan Certification**

The IPE is finalized and signed by the client or his/her representative and the counselor prior to service(s) being initiated.

**07.7 Basic IPE Contents**

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Regardless of the approach selected by an eligible individual to develop an Individualized Plan for Employment, an IPE shall, at a minimum, contain mandatory components consisting of--

1. a description of the specific employment outcome that is chosen by the eligible individual, and, to the maximum extent appropriate, results in employment in an integrated setting and for which the individual is compensated at, or above, the minimum wage;
2. a description of the specific vocational rehabilitation services that are-
  - a. needed to achieve a specific employment outcome, including, as appropriate, provision of assistive technology devices and services, and personal assistance services, including training in the management of such services;
  - b. provided in the most integrated setting that is appropriate for the service involved and is consistent with the informed choice of the eligible individual; and,
  - c. time lines for the achievement of the employment outcome and for the initiation of the services;
3. a description of the entity chosen by the eligible individual or, as appropriate, the individual's representative, that will provide the vocational rehabilitation services, and the methods used to procure such services;
4. a description of criteria to evaluate progress toward achievement of the employment outcome;
5. the terms and conditions of the IPE, including, as appropriate, information describing;
  - a. the responsibilities of the Agency;
  - b. the responsibilities of the eligible individual, including--
    - i. the responsibilities the eligible individual will assume in relation to the employment outcome of the individual;
    - ii. if applicable, the participation of the eligible individual in paying for the costs of the plan;
    - iii. the responsibility of the eligible individual with regard to applying for and securing comparable benefits; and,

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- c. the responsibilities of other entities as the result of arrangements made pursuant to comparable services or benefit requirement;
- 6. for an eligible individual with the most significant disabilities for whom an employment outcome in a supported employment setting has been determined to be appropriate, information identifying--
  - a. the extended services needed by the eligible individual; and,
  - b. the source of extended services or, to the extent that the source of the extended services cannot be identified at the time of the development of the IPE, a description of the basis for concluding that there is a reasonable expectation that such source will become available; and,
- 7. as determined to be necessary, a statement of projected need for post-employment services.

#### **07.7.1 Amendments to the IPE.**

The IPE is amended, as necessary, by the applicant or client or, as appropriate, his or her representative, in collaboration with a representative of MDRS or a qualified vocational rehabilitation counselor (to the extent determined to be appropriate by the individual), if there are substantive changes in the employment outcome, the vocational rehabilitation services to be provided, or the providers of the vocational rehabilitation services.

Amendments to the IPE do not take effect until agreed to and signed by the applicant or client or, as appropriate, his or her representative and by a qualified vocational rehabilitation counselor employed by MDRS.

#### **07.8 Conclusion**

The Individualized Plan for Employment should include the appropriate outcomes and services necessary to achieve the individual's specific chosen employment outcome. Outcomes and services should be consistent with the client's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice. No service(s) that is a part of the client's IPE should be initiated until the plan has been finalized and signed by the client and counselor.

Each IPE should include time frames for employment outcome completion and service initiation. Additionally, the IPE should include use of all available comparable benefits. Even with careful evaluation and planning, circumstances may occur which precipitate a need for additional outcomes, evaluation criteria, or services. In such cases, a plan amendment should be considered.

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**A qualified rehabilitation counselor shall furnish a copy of the IPE and plan amendments to the individual with a disability or, as appropriate, a parent, other family member, guardian, advocate, or other authorized representative of the individual.**

**The counselor and client or, as appropriate, the client's representative shall review the IPE at least annually.**

### **1.1.2 Informed Choice**

**MDRS provides applicants and clients with opportunities to exercise informed choice throughout the VR process, including making decisions about the employment goal, VR services, service providers, settings for employment and service provision, and methods for procuring services.**

**To enable an individual to make such decisions, MDRS provides information, support and assistance needed by the individual. MDRS has implemented policies, procedures, and practices and developed resources that enable applicants and clients to exercise informed choice throughout the entire VR process; these policies, procedures, and practices are consistent with Federal statutory and regulatory requirements.**

**Specifically, MDRS ensures that the individual, or if appropriate, the individual through his or her representative:**

- makes decisions related to the assessment process and to selection of the employment outcome and the settings in which employment occurs, vocational rehabilitation services, service providers, the settings for service provision, and the methods for procuring services;**
- has a range of options from which to make these decisions or, to the extent possible, the opportunity to create new options that will meet the individual's specific rehabilitation needs;**
- has access to sufficient information about the consequences of various options;**
- has skills for evaluating the information and for making decisions, or, to the extent possible, the opportunity to develop such skills or support and assistance in carrying out these functions;**
- makes decisions in ways that reflect the individuals strengths, resources, priorities, concerns, abilities, capabilities, and career interests; and**
- takes personal responsibility, to the extent possible, for implementing the chosen options.**

**For individual Areas of Responsibility, see the *OVR/OVRB Resource Guide*.**

5. **Each district shall provide in-service training periodically to increase awareness, sensitivity, and attitudinal shift or change on multi-cultural issues for counselors and support staff.**
6. **MDRS shall recruit qualified staff of various ethnic origins to fill professional staff vacancies.**

**1.1.8 Services to American Indians Who Are Disabled**

**MDRS will provide vocational rehabilitation services to American Indians with disabilities residing in the State to the same extent as the State provides such services to other significant segments of the population of individuals with disabilities residing in the State. Vocational rehabilitation services will continue to be provided, including as appropriate, services traditionally used by Indian tribes, to American Indians with disabilities on reservations eligible for services by special tribal programs under other sections of the Rehabilitation Act. (Section 101(a) (13) and 130 of the 1998 Rehabilitation Act Amendments)**

**1.1.12 Establishment and Construction Authority**

**MDRS through its Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind officially exercises the option of Establishment or Construction Authority as provided for in the 1998 Amendments to the Rehabilitation Act. In utilizing such special authority, MDRS will adhere to all applicable rules and regulations as set forth by the State of Mississippi, the Rehabilitation Services Administration, and the U.S. Department of Education.**

**MDRS will use this authority for the establishment, development, or improvements of community rehabilitation programs, including, under special circumstances, the construction of a facility and the provision of other services (including services offered at community rehabilitation programs) which promise to contribute substantially to the rehabilitation of a group of individuals but which are not related directly to the individualized rehabilitation program of any one individual with a disability. Such programs will be used to provide services that promote integration and competitive employment. (Section 103(b)(2) and Section 104 of the 1998 Rehabilitation Act Amendments)**

## **5.5 Comprehensive Assessment**

**A comprehensive assessment shall be performed, to the extent necessary, in the most integrated setting possible consistent with the individual's needs and informed choice, to determine eligibility for and the scope of, vocational rehabilitation and supported employment services. The assessment shall be sufficient to determine, and the case record shall document, whether an individual has a physical or mental impairment that for the individual constitutes or results in a substantial impediment to employment. The assessment will include an appraisal of the individual based, to the extent possible, on available medical information, and, as appropriate, evaluation by qualified personnel of the potential to benefit from rehabilitation services.**

**To the extent additional data is necessary to make a determination of the employment outcomes, and the objectives, nature, and scope of vocational rehabilitation services, to be included in the individualized plan for employment of an eligible individual, a comprehensive assessment will be conducted.**

**The comprehensive assessment may include:**

- 1. Diagnostic testing;**
- 2. The provision of rehabilitation technology services;**
- 3. The assessment of an assortment of work-related factors in "real job" situations where possible and/or appropriate to determine the unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice, including the need for supported employment of the eligible individual.**
- 4. To the degree needed, an assessment of the personality, interests, career choices, interpersonal skills, intelligence and related functional capacities, educational achievements, work experience, vocational aptitudes, personal and social adjustments, and employment opportunities of the individual, and the medical, psychiatric, psychological, and other pertinent vocational, educational, cultural, social, recreational, and environmental factors, that affect the employment and rehabilitation needs of the individual;**
- 5. To the degree needed, an appraisal of the patterns of work behavior of the individual and services needed for the individual**



to acquire occupational skills, and to develop work attitudes, work habits, work tolerance, and social behavior patterns necessary for successful job performance, including the utilization of work in real job situations to assess and develop the capacities of the individual to perform adequately in the work environment.

6. An exploration of the individual's abilities, capabilities, and capacity to perform in work situations, which shall be assessed periodically during Trial Work Experiences, including experiences in which the individual is provided appropriate supports and training.

In all cases of mental or emotional disorders an examination will be provided by a physician skilled in the diagnosis and treatment of such disorders, or by a psychologist licensed or certified in accordance with state laws and regulations. Any assessment to determine eligibility for supported employment must be supplementary to an assessment to determine eligibility for vocational rehabilitation services. Whether performed to ascertain the scope of rehabilitation services or to determine eligibility, a comprehensive assessment is limited to information necessary to identify the rehabilitation needs of and develop the Individualized Plan for Employment.

<b>OVR/OVRB RESOURCE GUIDE</b>
<b>Case Services/Programs</b> <span style="float: right;"><b>Section 3</b></span>

### **3.19 SUPPORTED EMPLOYMENT PROGRAM**

Supported Employment (SE) is a specialized placement and training program for the most significantly disabled individual.....the individual for whom competitive employment has not traditionally occurred due to the severity of his/her disability.

The program is a cooperative effort between the Agency, community programs, agencies, and individuals called "third parties" with which the Agency has signed agreements for referrals and the provision of extended services.

If it is determined that the individual's disability is such that he/she needs on-going support services in order to maintain employment, consideration should be given to the Supported Employment program. Supported Employment clients are eligible for any of the traditional vocational rehabilitation services available to other Agency clients.

#### **3.19.1 SE TERMINOLOGY**

**Competitive Employment** means work---

- (i) In the competitive labor market that is performed on a full-time or part-time basis in an integrated setting; and
- (ii) For which an individual is compensated at or above the minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals who are not disabled.

Supported Employment requires no more than eight individuals with disabilities be clustered in an employment setting.

**Extended Employment** means — work in a non-integrated or sheltered setting for a public or private nonprofit agency or organization that provides compensation in accordance with the Fair Labor Standards Act. Extended employment may also be used as a support service to enable an individual to continue to train or prepare for competitive employment, unless the individual through informed choice chooses to remain in extended employment.

**Extended Services** are on-going supports which are provided to an individual who is successfully rehabilitated into employment. These services are provided by third-party entities, and they are needed in order to support and maintain an individual with a most significant disability in supported employment.

**Integrated work setting** means job sites where most co-workers are not disabled and individuals with disabilities are not part of a work group of other individuals with disabilities.

Supported Employment services will include placement in an integrated work setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice of individuals with the most significant disabilities.

**Job Trainers** provide one-on-one intensive job skills training and support, both on and off the job, for individuals with mental retardation, severe learning disabilities, cerebral palsy and other developmental disabilities and mental illness. This training includes social skills, along with other training that would be essential to a person with a most significant disability obtaining and maintaining a job. Job trainers are hired on a part-time, temporary, as needed basis.

**Natural Supports** are those formal and informal mechanisms existing in a work environment that can be drawn upon to increase and sustain an employee's performance through the use of active assistance and/or approval or sanctioning of a worker's achievements.

**Person Centered Planning (PCP)** is a process of profiling and planning with an individual in order to increase self-management opportunities, community involvement and life satisfaction for the individual. A plan of action is adopted in order to determine and achieve goals by addressing the needs, strengths and experiences of the individual.

**Successful Rehabilitation** occurs when the individual maintains a supported employment placement for 90 days after making the transition to permanent employment.

**Support** means any appropriate service such as job site training, short-term transportation assistance, family support, or any other service necessary for job success, throughout the "term of employment".

**Supported Employment** means competitive work in an integrated work setting for individuals with the most significant disabilities.

**Transitional Employment** is a series of temporary job placements in competitive work, in integrated work settings with on-going supports until job permanency is achieved for individuals with Serious Mental Illness.

**Vocational Training Instructors (VTI)** are responsible, in coordination with the supported employment counselor, for job development and placement for supported employment eligible clients. Although the supported employment counselor has the primary responsibility of securing a trainer, VTIs primarily handle the hiring of trainers and day-to-day management of the placement and trainer.

### **3.19.2      SERVICES**

Supported Employment services mean on-going support and other appropriate services needed to support and maintain an individual with the most significant disability in employment.

Person-centered planning should be considered for every Supported Employment client as a possible means for providing both the client and the counselor with additional information. This information can be utilized for a number of purposes, e.g., as a means of gathering additional information for eligibility determination, for development of a plan for employment, for determining support needs that will require referral to other agencies or organizations, and to map out future career options, etc..

Supported Employment services are generally provided for a period not to exceed 18 months, unless due to special circumstances a longer period is necessary to achieve job stabilization. This must be jointly agreed to by the individual and the rehabilitation counselor and established in the Individualized Plan for Employment (IPE) before an individual with the most significant disabilities makes the transition to extended services. Counselors should carefully document the cases when joint agreement arrangements are finalized to go beyond the 18-month period of time. If a longer period of time is warranted, the following should be given consideration: only when the client has made substantial progress toward meeting the hours-per-week work goal provided for in the IPE, the client is stabilized on the job, and extended services are available and can be provided without a break in services.

The use of a Job Trainer at the work site is an integral part of supported employment services. This individual is responsible for learning the job prior to the client coming to work, then teaching the job to the client. The trainer not only teaches the work skills needed at the job site but will help the client become adjusted to the new work environment. The trainer will help the client develop relationships with co-workers and supervisory staff. The trainer will also identify and promote the utilization of natural supports in the work environment. If the client cannot meet production standards, the trainer is there to ensure the employer that the work will be done to the business' quality and quantity standards. As the client becomes more independent at the work site and is able to perform most of the job tasks with minimum intervention by the trainer, the trainer will fade assistance until the case can be closed.

Personal assistance services (PAS) enable the employee to perform the daily living activities on or off the job that the individual would typically perform without assistance if the individual did not have a disability. Examples of these services are job functions such as activities of daily living aid, business travel companion, office services specialist or meeting assistant. The services must be necessary to the achievement of an employment outcome and may be provided only while the individual is receiving other vocational rehabilitation services. They are not to be construed to be supports that are considered a reasonable accommodation and therefore paid for by the employer or supports considered personal in nature and funded by Medicare or other

funding sources. PAS are to be authorized for in the same manner as that a job trainer. In some instances, it may be possible for the job trainer to also perform the duties of the personal assistant. The same fee schedule used in paying job trainers will be utilized in paying for the PAS. In developing the IPE, an agreement will be made addressing each of the following issues:

- The name of the extended service provider -- specifically addressing the provision of Personal Assistant Services to be provided following VR case closure (If no extended service provider has been identified at the time of the development of the IPE, refer to the Flow Chart for SE Services - I.B.4.and III.B.5);
- The specific Personal Assistant Services that will be provided;
- The duration of the provision of Personal Assistant Services by VR

### **3.19.3 FLOW-CHART FOR SE SERVICES**

#### **I. Referral**

##### **A. Referral received from Third-Party Agency**

1. Schedule appointment for application.
2. Conduct interview, advise client of services available and discussion of client's informed choice in these services; get client release form to obtain records from other sources, (mental health center, state hospital, physician/hospital, etc.).
3. Conduct evaluation for VR services, authorizing for services or information not available through other agencies.

##### **B. Referral received from General VR program, Deaf Services, Deaf/Blind or Transition counselor.**

1. General VR or Specialty counselor staffs the case with the SE counselor.
2. SE counselor assesses the case for eligibility for SE services. If the two counselors agree that SE should serve the case, the case will be transferred to the SE counselor using the established case transfer procedures. Cases transferred from any specialty area, for example, Deaf/Blind program, if determined eligible for SE services should be retained by the SE counselor. The Specialty counselor and the SE counselor should work closely on the case and the Specialty counselor should provide technical assistance to the SE counselor to ensure the client receives appropriate services.

3. If any questions arise about the eligibility of the client for SE services, the two counselors will refer the case to their respective supervisors who will, together, determine the feasibility of the client for SE, the adequacy of the evaluation process, need for additional evaluating information, etc., and decide how the case will be handled.
4. In those cases when a client needs Supported Employment services but is not being served by a third-party, the SE counselor will explain the SE Program, services and options to the client as soon as possible after the referral has been made to the SE Program. The SE counselor will also, advise the client about the availability of third-party resources in that area. The counselor will assist the client with obtaining a third-party sponsor for extended services and must include on the IPE the source and description of the on-going support needed by the client to maintain the employment. Third-party agreements will be initiated by the SE counselor and negotiated at the local level regardless of whether there is a Cooperative Agreement with the Parent State Agency. Third-party agreements will be finalized by State Office staff. If no third-party can be located who is willing to provide needed services, the case may be closed as Unsuccessfully Rehabilitated after staffing with the District Manager. The SE counselor will document the attempts to assist the client in this way in the closure letter.

C. Referral received from VRB counselor:

Generally, it is appropriate for all SE eligible individual's cases to be handled by the SE counselor. In specialty areas, such as deaf, deaf/blind and blind, the case is handled with consultation from the appropriate specialty disability counselor on specific issues related to the individual's needs. However, in those instances where it is advisable, and is the client's choice, for their case to be retained by the VRB counselor for the receipt of supported employment services, the SE counselor will work closely with the VRB counselor to advise and consult on matters related to the use of SE funds for the hiring, managing and paying for job trainers and any other procedural matters related to SE services. The decision to transfer the SE case to the VRB counselor should be made after staffing with the District Manager. Upon transfer of the SE case to the VRB counselor, the State Coordinator for Supported Employment will be notified by the District Manager, and an allotment of SE funds will be made to the VRB counselor who will handle the case.

**NOTE:** After any referral to supported employment, the counselor should check the appropriate place on the Special Programs page in AACE indicating this is now a supported employment case. (In the instance of a transferred case,

where the IPE has already been developed, the IPE should be amended with the client to reflect appropriate SE services; the counselor should record this as an SE case on the IPE and also on the Special Programs page in AACE.)

## II. ELIGIBILITY

Individuals with severe disabilities who are appropriate to receive supported employment services must meet the eligibility requirements established for the VR program and meet the Order of Selection, Category I –

- A. Be an individual who has never been competitively employed; and/or
- B. traditional competitive employment has been interrupted or intermittent as a result of a severe disability; and
- C. who, because of the nature and severity of the disability, needs intensive on-going support services that may include job trainer services, in order to obtain and maintain competitive employment, and
- D. who, because of the nature and severity of the disability needs extended services that continue after VR services ends, in order to maintain successful employment.

## III. IPE DEVELOPMENT

- A. IPE Meeting - At the time of the IPE development the SE counselor should meet either individually or jointly with the following entities:
  - 1. Client and, if necessary, client's parents or guardian, advocate or representative.
  - 2. If possible, a representative from the source who will be providing and/or funding the extended services.
  - 3. Representative(s) from the Mental Health Center who will be providing Transitional Employment/Supported Employment services.
- B. Writing of the IPE.
  - 1. The SE counselors need to utilize the information from assessments, including information gathered from Person Center Planning, and input from the client in establishing a vocational goal. The IPE should include a brief rationale as to the reason that the particular vocational goal was selected. The SE counselor, along with the client, will estimate an anticipated time during which the client is expected to reach the goal.

2. Each service that will be provided will be listed. These services should include all the supports needed by the supported employment client in order to reach the stated goal and should include at a minimum, two of the following:
  - a. Placement Services
  - b. Training: Supportive Services (inc. Job Coach)
  - c. Counseling and Guidance
  - d. Extended Employment
  - e. Extended Services (this service may be listed under "Other Goods and Services" and then customize the service by specifying Extended Services.
  - f. Other appropriate services

**Every Supported/Transitional Employment IPE should include Extended Services and Rehabilitation Counseling.**

3. The source of funding for each service, the estimated cost of the service(s) or the utilization of comparable benefits must be listed.
4. Information should be included which indicates any understandings and responsibilities between the client and the SE counselor or any other individual or entity deemed critical to the success of the vocational program.
5. Extended Services, which are on-going services, should be indicated as such on the IPE. A Memorandum of Understanding-Extended Services Agreement should be developed for each Supported/Transitional Employment client and a copy should be kept in the client's file. These agreements should be coordinated through the State Office. Extended Services can be provided by more than one source. Sources for Extended Service provision may include:
  - a. state agencies,
  - b. private non-profit organizations,
  - c. employers, co-workers, families or friends,
  - d. any other appropriate resource not funded by the Agency.

Counselors have the primary responsibility for negotiating these agreements; however, they must be formalized and signed by the Director of the Agency. Telephone or write the State Coordinator for Supported Employment to obtain copies of the agreements and to obtain details on putting these agreements in place. The beginning date for extended services should coincide with the date of movement of the case into employed status. Generally it is best to have these agreements in place at the time of the IPE development, or before, however they are required before closure of a successfully rehabilitated case and a copy of said



signed Extended Service Agreement should be placed in client's file upon closure as successfully rehabilitated. If it is not possible to identify the source of the extended service provider at the time the IPE is developed, a statement describing the basis for concluding that there is a reasonable expectation that such sources will become available, should be addressed in the IPE.

#### IV. PLACEMENT

The responsibility for placement of SE clients lies primarily with the SE counselor with assistance by the Vocational Training Instructors (VTIs). The decision to place a client into a TEP versus a permanent employment situation will be done after careful consideration of the client's condition and with input from the third party representative. The decision to place a client in a particular job must be based on an assessment and documented in the case file.

#### V. TRAINING

- A. Securing Job Trainer, as well as overseeing work performance of the trainer regarding the actual knowledge and implementation of training, will be the primary responsibility of the SE counselor. However, the VTI will need to be responsive to the day-to-day management of the placement, contacting the SE counselor assistance when needed.
- B. The SE counselor, with assistance of the VTI, will be responsible for ensuring that all trainers are adequately educated in how to provide appropriate training.

#### VI. AUTHORIZATIONS FOR TRAINER SERVICES

- A. The vendor for all job trainer authorizations will be AbilityWorks - Jackson-Reimbursement
- B. The following forms should be completed and mailed to Pen Mayfield, MDRS Finance Department, P. O. Box 1698, Jackson, MS 39215-1698 - upon appointment of a Job Trainer to work with a client:
  - 1. Application for Employment
  - 2. I-9 form, with copies of driver's license and social security card. (The Counselor should sign the I-9 Form under Section 2 "Signature of Employer or Authorized Representative).
  - 3. W-4 Federal Withholding Form
  - 4. State Withholding Tax Form
  - 5. Drug-Free Workplace Form

**These forms may be sent either in advance of, or along with the initial Authorization for Services for a Job Trainer. It should be noted that a copy of the Workers' Compensation Notice of Coverage should be furnished to the Job Trainer when hired.**

- a. After authorizing for a planned service indicate the Job Trainer's name in the General Comments – Section 3 of the Authorization.
- b. A 13.57 percent processing fee to AbilityWorks – Jackson-Reimbursement should be added to the unit cost (per hour rate) for job trainers and added to the total estimated cost for job trainer services. The processing fee should be calculated in the following manner:

$$\frac{(\text{per hour rate}) \times 13.57\%}{(\text{hourly service fee}) \times (\text{no. of hours})} = \frac{(\text{processing fee}) + (\text{per hour rate})}{(\text{total service cost})}$$

- c. The procedures for processing payments through AbilityWorks - Jackson-Reimbursement are as follows:

**Step 1:** Upon completion of a work period (2 weeks in most instances) the SE counselor will obtain signatures of the Job Trainer and the client on the Job Trainer Time Sheet. The Time Sheet should also be verified for accuracy and signed by a VR/SE staff member. After checking the Job Trainer Time Sheet for accuracy, a Statement of Account should be prepared that matches the amount of the Job Trainer Time Sheet. If the original Authorization does not match the amount to be paid indicated on the Job Trainer Time Sheet, the Authorization should be modified to agree with the amount on the Job Trainer Time Sheet.

**Step 2:** The SOA should be completed indicating the type, the amount and dates of service. Then the SOA should be approved for payment in AACE, signed by the approving SE counselor, attached to the Job Trainer Time Sheet and mailed as previously instructed (mail only one Authorization/SOA, and one original Time Sheet per client).

**Step 3:** Finance will write the check to the Job Trainer based on the information they receive after checking it for accuracy, (if errors are found by Finance they will mail the documents back to the counselor for corrections, delaying payment to the Job Trainer).

**Finance will process payments to job trainers on Thursday of each week. All Authorizations/SOAs received by 10:30 a.m. on Thursday will be processed and**

**mailed by 5:00 P.M. that day. Authorizations/SOAs received after noon on Thursday will be held over to the next Thursday for processing.**

#### VII. STATUS MOVEMENT

Supported Employment cases should be moved through the VR case statuses as indicated below:

- A. After eligibility determination is completed place the case in eligibility status.
- B. After the IPE is planned, developed, and signed, the case will be moved to service status.
- C. The case is moved to employment status when the client meets the criteria for movement into extended services and the Job Trainer has faded completely. This occurs when the client has demonstrated that he/she can perform the job to the employer's expectations. Also, there should be a concurrent agreement between client, counselor, VTI, job trainer and extended service provider that the client can perform the essential functions of his job with the provisions of extended services. This agreement should be the outcome of a meeting between the above parties and any other appropriate parties. Also, at this time, if the Extended Service Agreement has not been previously executed, it can be executed by the appropriate parties and placed in the file. In every instance, a copy of the Extended Service Agreement should be placed in the client's file upon being determined successfully rehabilitated.
- D. The case is closed rehabilitated when the client has been in employed status for at least 90 days and continues to perform the job with minimal assistance from the extended service provider and is considered successful by the employer.

#### VIII. SUPPORTED EMPLOYMENT CLOSURES

The following Supported Employment special outcome criteria must be met in order to close a case rehabilitated in Supported Employment:

- working in the competitive labor market;
- working in an integrated work setting; and
- receiving extended services at the time of closure.

It is an integral part of the closure process that the SE counselor ensures that the client is transitioned to the appropriate third party for on-going support services. The case file will be well documented showing this effort.

**NOTE:** When supported employment cases are closed in AACE, the counselor needs to be sure the SE outcome is completed correctly on the closure page.

#### **3.19.4 SE Clients in Community Rehabilitation Programs**

VR clients who are determined to be eligible for supported employment while receiving services of a CRP should be referred to the appropriate Supported Employment counselor (The SE counselor should be involved in routine staffing at AbilityWorks when informed by the vocational evaluator that Supported Employment is being considered as a service option for a client). When the supported employment counselor determines that the client is eligible, the case should be transferred to a Supported Employment caseload. The client should be fully informed about the Supported Employment Program before the case transfer is made. The client should be informed whether continued evaluation at the CRP is needed. If the placement is not appropriate the client should be terminated from the CRP before or simultaneously with transfer to the SE caseload.

Generally, placement at a CRP is not appropriate for a SE client because it is not consistent with the place/train model, however in some instances placement of a SE client at a CRP may be appropriate for a particular assessment to, for example, observe behaviors, work habits, build rapport with the client, etc., or in rare instances remediate functional limitations. This may be done while the case is in eligibility status for the purpose of gathering information for IPE development, or in service status to provide specific training for remediation of functional limitations discovered after a client has been in a regular supported employment job and it has been determined that the CRP is the **only suitable environment** in which this remediation can take place.

The decision to refer a client to a CRP should be made in consultation with the District Manager. An assessment or remediation plan should be developed that is specific to address the needs of the client and should coincide with the time limitations which apply to all CRP referrals. The client should be fully informed of the reason for the referral and that the placement is not a permanent job. Since the client is SE eligible a job trainer will be provided while in the CRP to assist the client and the CRP staff in the assessment. It is expected that referrals of SE clients to CRPs will be limited and should be made only when placement in a competitive, community based job is not a timely and feasible option.

To refer a client to a CRP follow the procedures outlined in the CRP section of this manual that describes the referral process. Referral of a SE client to a CRP requires District Manager review.

### 3.19.5 TRANSITIONAL EMPLOYMENT

Under the definition of Supported Employment, **Transitional Employment** is an allowable service option for individuals with **Serious Mental Illness (SMI)**. Transitional Employment is a series of temporary placements in competitive work, in integrated work settings, with on-going support services. In transitional employment, the provision of on-going support services must include **continuing sequential job placements until job permanency is achieved**.

Transitional employment may be the best service option for an individual with chronic mental illness whom:

- is uncertain about choosing an appropriate vocational goal,
- is fearful or tentative about his/her abilities to maintain employment, and/or,
- is an individual for whom traditional work adjustment services would have been considered the best pre-employment preparation service.

If a permanent job is not procured before the end of the 18-month period of VR time limited services, the extended services provider is responsible for procuring and maintaining the permanent job placement. There are few vocational services for individuals with mental illness (outside of the services offered through the Agency) that can fund job development or placement activities. Consequently, counselors should encourage permanent placement for most individuals prior to case closure, to ensure that the individual has access to funding for permanent job placement.

Generally, individuals who are motivated to work and have clear ideas regarding the type of work they would like to do should be treated as regular Supported Employment placements.

## Section 16. Jobs for Veterans State Grants Requirements

### 16A. Addendum for Mandatory Training Requirements

JVSG Personnel as of 25 JAN 2022 Authorized for FY 22: <b>25</b> (17 DVOP–8 LVER)				National Veterans' Training Institute – REQUIRED (VPL 05-18)				
	Name	Location	Position	Day-Life #9635	Legal Guide #9636	Gap #9637	DVOP Core #9608	LVER Core #9609
1	Griffiths, Kris	State Office	SVC	Completed	Completed	Completed	Completed	
2	Taylor, Kelvin	Clarksdale	DVOP	Completed	Completed	Completed	Completed	N/A
3	Brown, Calvin	Greenville	LVER	Completed	Completed	Completed	N/A	Completed
4	Forest, Riley	West Point	LVER	Completed	Completed	Completed	Completed	Completed
5	Morrison, William	Mayhew	DVOP	Completed	Completed	Completed	Completed	N/A
6	Smith, Johnny	Tupelo	LVER	Completed	Completed	Completed	N/A	Completed
7	Davis, Bradley	Tupelo	DVOP	Completed	Completed	Completed	Completed	Completed
8	Stuck, Gregory	Grenada	DVOP	Completed	Completed	Completed	Completed	N/A
9	Petro, Marvin	Vicksburg	DVOP	Completed	Completed	Completed	Completed	N/A
10	Robinson, Lawrence	Gulfport	DVOP	Completed	Completed	Completed	Completed	N/A
11	Cannon, Gloria	Pascagoula	LVER	Completed	Completed	Completed	N/A	Completed
12	Kaster, Christopher	Pascagoula	DVOP	Completed	Completed	Completed	Completed	N/A

Section 17. Unemployment Insurance Program Specific Requirements

17A. Unemployment Insurance Transmittal Letter



**Mississippi Department of Employment Security**

**Phil Bryant**  
Governor

Jacqueline W. Turner  
Executive Director

September 27, 2021

Ms. Lenita Jacobs-Simmons  
Acting Regional Administrator  
U. S. Department of Labor/ETA  
Atlanta Federal Center  
61 Forsyth Street, S. W., Room 6M12  
Atlanta, Georgia 30303-3104

Dear Ms. Lenita Jacob-Simmons:

Please find attached the Fiscal Year 2022 Unemployment Insurance State Quality Service Plan (SQSP) for the State of Mississippi.

If you have any questions regarding this report, please contact ~~Tarunna~~ Johnson at 601-321-6005.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Rush".

Timothy Rush  
UI Deputy Executive Director, Office of Reemployment Assistance





WORKSHEET UI-1		UI STAFF HOURS			
State	Fiscal Year	Date			
MS	2019	9/11/2018			
Annual Hours Per Staff Year and Quarterly Distribution					
Hours Per Staff Year	Annual	First	Second	Third	Fourth
a. Hours Worked	1758.27	439.57	439.57	439.57	439.56
b. Hours Paid	2088.00	522.00	522.00	522.00	522.00
Comments					

9/11/18  
A

**STATE QUALITY SERVICE PLAN  
STATE PLAN NARRATIVE  
MISSISSIPPI Fiscal Year 2024**

**Overview**

The Mississippi Department of Employment Security (MDES) is dedicated to improving the Unemployment Insurance (UI) program to provide superior service to our customers. Mississippi has included a Corrective Action Plan for First Payment Promptness percent of all 1<sup>st</sup> payments within 14/21, First Payment Promptness 14/21 days Intrastate, First Payment Promptness 14/21 Interstate, First Payment Promptness 35 days Intrastate, First Payment Promptness 35 days Interstate, Nonmonetary Determination Timeliness, Nonmonetary Determination Quality-Separations, Lower Authority Appeals Time Lapse-30 days, Lower Authority Appeals Time Lapse-45 days, Improper Payment Measure, Overpayment Recovery Measure, BAM Operations Compliant, Detection of Overpayments, Data Validation-Benefits and Data Validation-Tax. Mississippi addresses National priorities, State priorities, past and future performance, Intrastate Payments Promptness, Detection of Recoverable Overpayments, Employer Tax Liability Determinations and UI Reporting Requirements, and other initiatives.

The Mississippi Department of Employment Security, the state's workforce agency, has a straightforward mission, "Helping Mississippians Get jobs." Our goal is to expand employment, improve workforce skills and enhance productivity in our state. This is inclusive of all Mississippians who are seeking an opportunity to help bridge the gap between employment and unemployment.

In an effort to achieve our goal, Mississippi implemented a robust Unemployment Insurance (UI) system which is consistent across the Benefits, Tax and Appeals System platform. It is recognized as one of the very few successful comprehensive reengineered systems in the nation as ReEmployMS. Built with the ability to add additional states, Mississippi is the lead state which formed ReEmployUSA consortium. The UI system is now fully live and operational in the cloud with three states, Mississippi, Maine, and Connecticut. Connecticut's development has been completed. This has created new opportunities to build upon the micro service architecture and improve the outdated self-service screens and interface including the redesign of the claimant portal and the entire claims intake module fully integrated for disaster claims and any special pandemic type claims in the future. It is of paramount importance that the technology is not only scalable to meet demands of acute unemployment, but also be simplistic and user friendly to be capable of taking a high majority of the claims via self-service without the need for the state staff to be involved in the process. Moving forward in the direction of utilizing bots to further catapult the agency into newer and more innovative processes, Mississippi will always be on the cutting edge of technology.

## National Priorities

**Rebuilding and improving program performance by addressing the significant increased workload experienced in recent years, the agency continues to make strides in improving customer experiences and system performances.**

Mississippi plans to continue improving performance which includes all of the following:

- Redesigning and simplification of the claimant interface including claim filing, weekly certification, work search, appeal filing, scheduling, messaging, and helper text.
- Implementation of informational chatbot & IVR systems. Planned expansion to allow for various claimant self-service options.
- Universal claimant correspondence redesign.
- Streamlining identity verification for all claimants. Outsourced to a third-party vendor that meets all federally required security standards.
- Robotic Process Automation (RPA) has been implemented for routine processes, wage verification, name mismatch wage records, Interstate claim responses, employer claim responses, fraudulent claim masking, etc.
- Developed an employer upload process for mass layoffs.
- Developed upload process for claimant document submission; proof of employment / earnings, ID verification, and direct deposit.
- Developed an auto-scheduler for claimant work search audits.
- Developed UI system components into micro-services. This creates flexibilities for future system changes.
- Developed quick links to streamline claimant responses to specific high-volume pandemic program requirements.
- All new claimant facing systems and correspondence is being developed with plain-language and simpler terminology.
- Engaging ETA Tiger Team to facilitate review of current processes and solicit suggestions for improvements.

### **Focusing on improving the timely delivery of benefit payments and the reduction of the UI adjudication and appeals backlogs.**

There have been some improvements since 2022 in first payment timeliness. An analysis of the first, second, third and fourth quarters of 2022, has shown some noticeable improvement and reduction in backlog in appeals has improved first payment promptness. This also displayed an increase in appeal reversals at that time. Some of the backlog in the investigations case aging occurred because of surges in the workload and continued loss of experienced investigative staff. Efforts are being made to leverage the technology of the UI system for eligibility determinations in accordance with ETA requirements, in hopes this will help expedite a timely determination process. The Contact Center and Benefits Department continue to collaborate in an effort to find ways to improve methods from the intake process to determination. This will help optimize timeliness and efficiency. A primary strategy of ensuring quality, correctness and accuracy on the front end will foster timely decisions and reduce adjudications and appeal backlogs. Also incorporated in this process is continued training and remediation with staff. Management and staff continue to work together to determine best practices in terms of both productivity and quality. Ongoing analysis

and adjustments will continue to adapt to the changing workloads and improve first payment time lapse.

### **Ensuring equitable access to UI programs**

Mississippi has recognized opportunities to further improve customer service and broaden outreach to some underserved populations, such as individuals who face technological challenges (both access and knowledge), older workers, individuals who have literacy or language challenges, low wage earners, and claimants who reside in rural areas. In order to address some of these issues MS have identified the following projects to broaden the reach and address inequities. All projects requested within this grant will be built as consortium core where possible, however Mississippi's unique needs will require state-specific development of portions of the below projects. The following projects will be developed jointly with ReEmployUSA consortium member states which includes the states of Maine and Connecticut. Mississippi was awarded the grant and plans to implement the following:

- Enhanced Contact Center Solution
- Redesign Forms and Correspondence
- Nano Videos
- Design Interactive Communications Platform
- Business Process Analysis for Equity
- Offline Application
- Mobile Unit
- Customer Self-Scheduler

### **Supporting the Reemployment of UC Claimants through Reemployment Services and Eligibility Assessment (RESEA)**

Mississippi created a no-wrong-door WIOA strategy to ensure coordinated delivery of all workforce training and supportive services necessary to achieve occupational goals. To operationalize this strategy, Mississippi developed an innovative, real-time data hub that shares information between approved workforce partners. RESEA participants enter the workforce system when filing an initial claim and being selected for the RESEA program. Services and activities to help participants return to work are recorded in the MS Works data system and can be shared across multiple programs. Also, participant success plan is added to MS Works. The success plan will help RESEA case workers visualize the pathway to a career goal and to align services to a participant's barriers and challenges.

### **Robust Work Search Activities**

Some of the challenges encountered previously with work search were improper payments. This was due to claimants being paid for the week prior to the work search audit being conducted. With our new process implemented, claimants are randomly selected and notified of the week for which they are being audited. The claimants are instructed to complete specific requirements before their audit appointment. Once the claimant has completed their audit successfully, they will receive payment for that week. By auditing the claim prior to payment the number of improper payments has been reduced resulting in the number of inadequate work search issues. The new work search enhancements went into effect June 20, 2022. The ultimate goal was to conduct the

audits prior to claimant receiving payments to decrease the number of overpayments which were a result of inadequate audits. Claimants performing adequate work search activities can strengthen the overall goal of claimants becoming reemployed.

**Combatting fraud; strengthening identity verification; improving prevention, detection, and recovery of improper and fraudulent overpayments; and reducing the UI improper payment rate.**

Mississippi will continue the utilization of ID.me along with training staff to reduce and recover the fraudulent payments, overpayments, and improper payments. Detection of fraud are also determined by determined by utilizing Incarceration crossmatch, Department of Motor Vehicle (DMV) crossmatch, Social Security Administration (SSA) crossmatch, National and State Directory of New Hire, and Quarterly Wage Records crossmatch. These tools are also effective in minimizing overpayments, as well.

The ReStartMS was designed to provide employers with information on employees presently filing or who have previously filed for Unemployment Insurance benefits. Utilizing this system will aid in the prevention of improper unemployment payments and assist in getting the workforce back to work sooner. The Integrity Data Hub (IDH) is an additional tool used to detect identity theft/fraudulent claims in Mississippi as well as other states. The participation in monthly meetings with NASWA in groups with other states learning, discussing, and increasing knowledge about prevention, detection and recovery of improper payments and fraudulent claim activities. Other tools used to prevent and detect fraud are NASWA fraud alerts, new hire reports, ID.me reports where claimant did not consent to complete the ID.me process and where the social security number is found in a different state. The ID.me fraud report is a report of any suspicious findings which would require further review. All fraud reports are to prevent and detect fraud and improper payments. The daily fraud reports are used as a tool for data analysis, crossmatch of information with other states, detection of fraud trends and major indicators. To reduce the overpayment rate Benefit Payment Control (BPC) unit has modified quarterly crossmatches to identify those claimants who are likely to have overpayments.

**Tiger Team Grant Funds and Consultative Assessments-**

MDES has secured approximately \$2,981,800 in federal funding to assist in these efforts. MS focus will be on the following areas: 1) preventing, detecting, and recovering funds from fraud; 2) promoting equitable access; and 3) ensuring the timely payment of benefits, as well as activities to reduce workload backlogs, for all UC programs. Possible recommendations may include, but are not limited to: redesign of critical process work flows; implementation and enhancement of identity proofing tools; enhancements to reduce manual work processes where appropriate; Retooling of claimant and/or employer communications (e.g., state workforce agency website or outgoing correspondence) to improve clarity, incorporate behavioral insights, and promote plain language; implementation of automation tools; developing and hosting training for staff as new processes, tools and/or strategies are developed; strengthening recovery efforts through forfeiture and financial institution coordination; and developing and executing communication plans to educate the public as new processes, tools, and/or strategies are implemented.

**Workforce Innovation and Opportunity Act, WIOA**

Mississippi’s strategic vision continues to support a workforce system that acts and functions as an ecosystem where all parts are connected to achieve common goals. This system gives every Mississippian the opportunity to be work- or career-ready and to secure his or her dream job right here at home. Under Mississippi’s Combined Plan, from the moment one enters the education and workforce system, he or she will be presented with the necessary tools to choose and pursue a career pathway that is relevant to current and future labor markets. Similarly, as soon as current, and prospective businesses enter into a partnership with Mississippi’s education and workforce system, resources will be aligned to cultivate the sustainable, high-performance workforce critical for maintaining and expanding businesses’ long-term economic viability. This partnership creates better and more sustainable employment opportunities for Mississippians. Mississippi’s Combined Plan includes the six required state programs — the Adult Program, the Dislocated Worker Program, the Youth Program, the Adult Education and Family Literacy Act Program, the Wagner-Peyser Act Program, and the Vocational Rehabilitation Program—along with Temporary Assistance for Needy Families (TANF), Unemployment Insurance (UI), Trade Adjustment Assistance (TAA), Jobs for Veterans State Grants Program (JVSG), and Senior Community Service Employment Program (SCSEP). To help sustain this partnership and provide the necessary tools for our partners, Mississippi has designed and developed a data system called the WIOA Hub. A key goal of WIOA is to ensure that a Mississippian is connected to all services they need to connect to a job. Services from Mississippi’s WIOA partners help remove barriers to work such as childcare needs, lack of transportation, lack of a high-school diploma, help searching for a job, or help to overcome a disability. The Hub allows agencies to work together to ensure that customers get connected to the mixture of services they need to succeed. A key activity of WIOA implementation in Mississippi was creating a comprehensive dictionary of all the services provided by WIOA partners.

.....

## **Federal Emphasis (GPRA Goals):**

### **Percent of Intrastate Payments Made Timely**

The GPRA goal for intrastate first payments made timely within 14/21 days is 87.0%. Mississippi achieved a level of 82%. First payment timeliness has improved through monitoring of pending investigation workload and adjustment to investigation processes. Management and staff continue to work together to determine best practices for productivity and quality. Ongoing analysis and adjustments will continue to adapt to the changing workloads and improve the first payment time lapse. A review of potential options to expedite employer requests for information to maximize efficiency. The options being reviewed involve processes, correspondences, and advanced technology. Monitoring of pending investigation workload is ongoing in an effort to resolve eligibility issues within ten (10) days of detection.

### **Percent of Employer Tax Liability Determination Made Timely**

For the performance year ending March 31, 2023 (April 1, 2022 - March 31, 2023), Mississippi achieved an overall score of 82.57%, which is 7.43% less than the established goal of 90.0% and 1.43 % less than the previous fiscal year’s performance. Below are factors that impacted our performance of this measure.

Employee Staffing Vacancies - During the performance period there were fluctuations in staffing levels. Staffing vacancies included one (1) Status Supervisor, one (1) FEIN Specialist, one (1) SUTA Dumping Specialist, and two (2) Status Deputies. We have hired a status supervisor as of 6/1/2023. We are in the process of hiring the other positions. The FEIN Specialist will join our current FEIN Specialist to work on the IRS extract to assist in identifying new businesses to register. The Status Deputies will be used to complete registrations that are submitted online. The SUTA dumping Specialist will focus solely on working the MS SUTA Dumping work items to determine proper transfer of employment rates under MS law. Employer Education – Employers’ awareness and understanding of their responsibilities related to unemployment tax reporting is vital to the timely registration and compliance of new employers. Process improvement is ongoing in the development of new internal practices and employer notifications. Ongoing training staff training includes focuses on employer liability education and determinations.

**Detection of Recoverable Overpayments**

The GPRA goal is 57.5% of the estimated detectable, recoverable overpayments. For the performance period ending March 31, 2023, the estimated amount is 426.61%. Benefit Year Earnings continue to be a large percentage of the improper payment rate. The parameters used for the quarterly crossmatch are regularly adjusted to increase the number of hits and to identify a larger number of potential overpayments. MDES UI staff is continuously reminded to be alert for possible unreported earnings issues and notify the Benefit Payment Control Department so these issues can be investigated earlier in the claim series. Although the agency receives information from the State Directory of New Hires and acts on that information to reduce potential fraud, this information is usually received weeks after the claimant has started working. MDES can be more efficient and effective by receiving the information earlier. MDES will increase claimant and employer messaging to provide awareness on properly reporting earnings and timely submission of new-hire reporting. MDES will continue to look for innovative ways to reduce unreported wages and prevent and detect fraud.



**Assurances:**

- 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.
  - Provide the most recent dates for the following:
    - Information Technology (IT) Contingency Plan Implemented: *June 2022*
    - IT Contingency Plan Reviewed/Updated 1: *January 2023*
    - IT Contingency Plan Tested 2: *January 2024*
- i. Assurance of Conformity and Compliance.
- j. Assurance of Automated Information Systems Security.
  - Provide the most recent dates for the following:
    - Risk Assessment Conducted: *October 2022*
    - System Security Plan Reviewed/Updated 3: *January 2023*

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<sup>1</sup> At a minimum, an IT Contingency Plan must be reviewed and/or updated annually.

<sup>2</sup> At a minimum, an IT Contingency Plan must be tested annually.

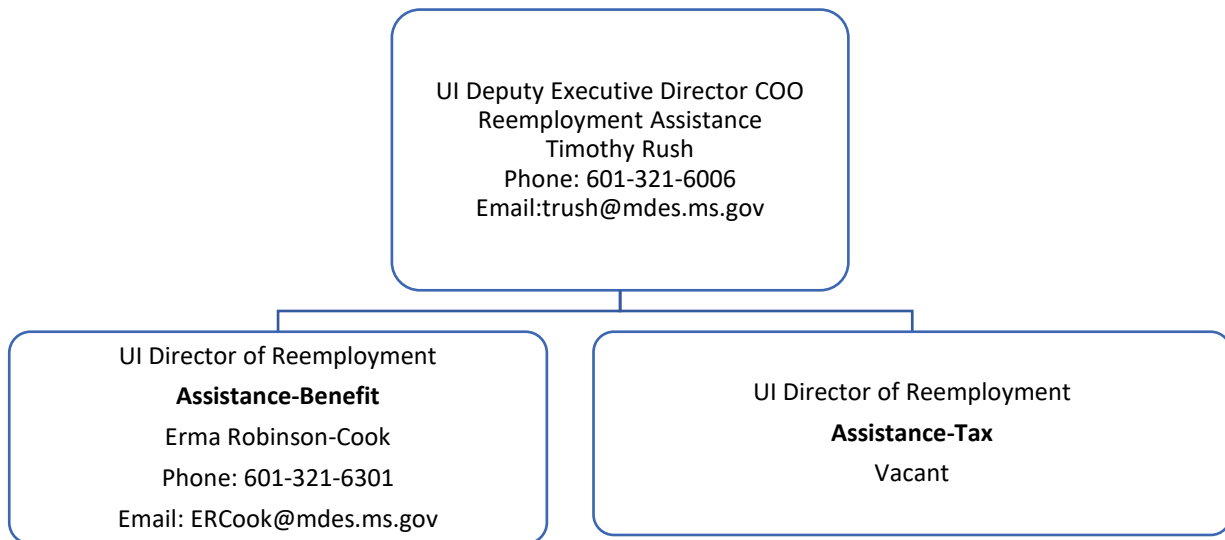
<sup>3</sup> At a minimum, a System Security Plan must be reviewed and/or updated annually.





- k. Assurance of Confidentiality
- l. Assurance of Disaster Unemployment Assistance
  - Conducted Annual DUA Training for DUA Staff  Yes  No  
Provide the date of the training: March 27, 2023
  - Developed and/or Maintained a Standard Operating Procedures for use during a major disaster declaration  Yes  No

**Unemployment Insurance Department Organizational Chart**



Department Chief  
**Benefits**  
Christina Granderson  
Phone: 662-244-5206  
Email: cgranderson@mdes.ms.gov

Department Chief  
**Tax**  
Anna Wallace  
Phone: 662-244-5205  
Email: awallace@mdes.ms.gov

Department Chief  
**Benefit Payment Control**  
Tarvose Johnson  
Phone: 601-321-6005  
Email: tajohnson@mdes.ms.gov

Department Chief  
**Compliance & Policy**  
Vacant

**Appeals Department**

UI Deputy Executive Director  
Office of Legal Affairs  
John Garrett  
Phone: 601-321-6072  
Email: jgarrett@mdes.ms.gov

Attorney  
Board of Review  
Paul Kimble  
Phone: 601-321-6499  
Email: pkimble@mdes.ms.gov

Department Chief  
Appeals  
Gary Holmes  
Phone: 601-321-6128  
Email: gholmes@mdes.ms.gov

**RESEA**

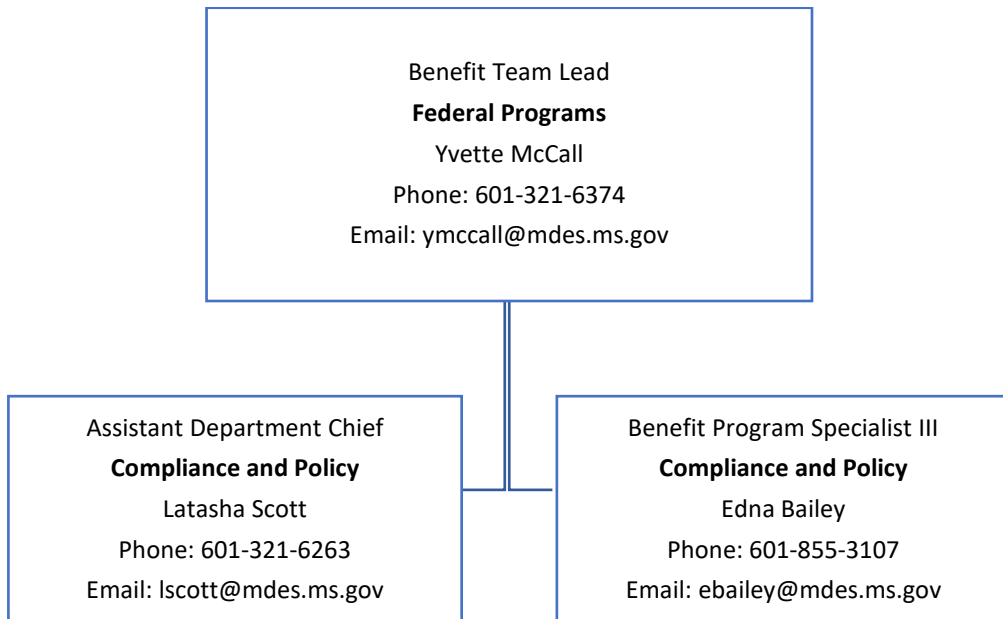
Department Chief Workforce Services  
Marcus Estes  
Phone: 601-321-6455  
Email: mestes@mdes.ms.gov

**Fiscal/Finance Department**

Deputy Executive Director CFO  
Guy Martin  
Phone: 601-321-6113  
Email: guymartin@mdes.ms.gov

Acct/Aud/Bureau Director  
Tyler Berch  
Phone: 601-321-6214  
Email: tberch@mdes.ms.gov

**Disaster Unemployment Assistance (DUA)**



**DATA VALIDATION**

**BENEFITS/ TAX**

Assistant Department Chief

**Compliance and Policy**

DV-Benefit

Latasha Scott

Phone: 601-321-6263

Email: [lscott@mdes.ms.gov](mailto:lscott@mdes.ms.gov)

Benefit Program Specialist II

**Compliance and Policy**

DV-Tax

Victoria Bell

Phone: 601-321-6517

Email: [vbell@mdes.ms.gov](mailto:vbell@mdes.ms.gov)



17D. SQSP CAPs and Quarterly Report

Benefit Accuracy Measurement (BAM)													
State: Mississippi					Federal Fiscal Year: 2021-2022 SQSP Corrective Action Plan & Progress Report								
<a href="#">Back to Biennial Overview 2021</a>	<a href="#">Back to Alternate Overview 2022</a>				<a href="#">Instructions</a>								
Performance Measures	ALP	CAP Based on SQSP 2021 Performance Level	CAP Based on SQSP 2022 Performance Level	State's Target/Actual Performance	12/31/2020 Quarter 1	3/31/2021 Quarter 2	6/30/2021 Quarter 3	9/30/2021 Quarter 4	12/31/2021 Quarter 5	3/31/2022 Quarter 6	6/30/2022 Quarter 7	9/30/2022 Quarter 8	
BAM Operations Compliant Organization	Pass			Target									
				Actual									
BAM Operations Compliant Authority	Pass			Target									
				Actual									
BAM Operations Compliant Written Procedures	Pass			Target									
				Actual									
BAM Operations Compliant Forms	Pass			Target									
				Actual									
BAM Operations Compliant Paid Investigative Procedures	Pass			Target									
				Actual									
BAM Operations Compliant Denied Investigative Procedures	Pass			Target									
				Actual									
BAM Operations Compliant 60-Day Paid Timeliness	≥ 70%			Target									
				Actual									
BAM Operations Compliant 90-Day Paid Timeliness	≥ 95%			Target									
				Actual									
BAM Operations Compliant 120-Day Paid Timeliness	≥ 98%			Target									
				Actual									
BAM Operations Compliant 60-Day Monetary Timeliness	≥ 60%			Target									
				Actual									
BAM Operations Compliant 90-Day Monetary Timeliness	≥ 85%			Target									
				Actual									
BAM Operations Compliant 120-Day Monetary Timeliness	≥ 98%			Target									
				Actual									
BAM Operations Compliant 60-Day Separation Timeliness	≥ 60%			Target									
				Actual									
BAM Operations Compliant 90-Day Separation Timeliness	≥ 85%			Target									
				Actual									
BAM Operations Compliant 120-Day Separation Timeliness	≥ 98%			Target									
				Actual									



BAM Operations Compliant 60-Day Nonseparation Timeliness	≥ 60%			Target									
				Actual									
BAM Operations Compliant 90-Day Nonseparation Timeliness	≥ 85%			Target									
				Actual									
BAM Operations Compliant 120-Day Nonseparation Timeliness	≥ 98%			Target									
				Actual									
BAM Operations Compliant Paid Comparison Reports	< -10 & > 5%			Target									
				Actual									
BAM Operations Compliant Monetary Comparison Reports	± 15%			Target									
				Actual									
BAM Operations Compliant Separation Comparison Reports	± 15%			Target									
				Actual									
BAM Operations Compliant Nonseparation Comparison Reports	± 15%			Target									
				Actual									
BAM Operations Compliant Paid Sample Selection	480 or 360			Target									
				Actual									
BAM Operations Compliant Monetary Sample Selection	150			Target									
				Actual									
BAM Operations Compliant Separation Sample Selection	150			Target									
				Actual									
BAM Operations Compliant Nonseparation Sample Selection	150			Target									
				Actual									
BAM Operations Compliant Misc. (As Needed)	Pass			Target									
				Actual									
NDNH BAM Compliance	Pass	Pass	Pass	Target									
				Actual									
<b>Regional Office Comments in cell below:</b>													
<b>Corrective Action Plan Summary:</b>													
The Summary must provide:													
<b>Alternate Year Plan Updates</b>													
A. The Reason for the deficiency.													
<p>MDES was granted approval to suspend paid claim investigations for the quarter beginning April 2020 and ending June 30, 2020, from batch 202014 through batch 202026. In addition, the denied claim investigations were suspended beginning with batch 202011 through batch 202126, quarter ending June 30, 2021. Due to the suspensions, BAM failed to sample the annual sample size for UI paid and denied claims fixed by Department of Labor for the calendar year. Mississippi's workloads remained at extraordinary levels due to the effects of COVID-19 during the height of the pandemic. MDES shifted its focus on increased response and reallocation of resources in specific areas of UI activities, which included but are not limited to ensuring program integrity and the prevention and detection of improper payments and fraud across all programs. As MDES continued to administer the CARES ACT and Continued Assistance for Unemployed Workers Act of 2020, managing the investigations associated with return to work, job refusals, able and available issues and job separations required intense focus. In addition, increased levels of initial and additional claims create a steady flow of eligibility issues. As a result, Benefit Accuracy Measurement (BAM) staff were reallocated to assist other critical areas of the agency to help expedite benefit resolutions to those affected by COVID-19, which caused a significant delay in paid and denied case investigation completions.</p>													

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of

Benefit Accuracy Measurement reviewer and supervisor will closely monitor timeliness more frequently by using the PCA and DCA use defined time-lapse reports to review case aging, completion and case flow characteristics. These reports will assist with analyzing and isolating performance problems sooner. MDES is the process of filling the BAM supervisor and investigator positions recognizing it will take time, training and experienced for new staff to reach expected performance levels. With BAM staff returning to their normal duties and filling vacant positions, MDES anticipates this will help improve case completion and timeliness.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

**Alternate Year Plan Updates**

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Mississippi will continue to monitor the time lapse reports to ensure the PCA and DCA investigations are completed timely and that BAM sample the required amount of cases required by DOL

**NOTE:** Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

*(Remaining Major Actions in this cell.)*

Milestones	
1. Monitoring-MDES will continue to monitor case timeliness and completion to ensure cases are sampled correctly and submitted timely.	Completion Date 12/31/2021
Quarter 1 status report (12/31/2020):	
Quarter 2 status report (3/31/2021):	
Quarter 3 status report (6/30/2021):	
Quarter 4 status report (9/30/2021):	
Quarter 5 status report (12/31/2021):	
Quarter 6 status report (3/31/2022):	
Quarter 7 status report (6/30/2022):	
Quarter 8 status report (9/30/2022):	
2. Hiring/Staffing-MDES will fill vacant supervisor and investigator positions.	Completion Date 12/31/2021
Quarter 1 status report (12/31/2020):	
Quarter 2 status report (3/31/2021):	
Quarter 3 status report (6/30/2021):	
Quarter 4 status report (9/30/2021):	
Quarter 5 status report (12/31/2021):	
Quarter 6 status report (3/31/2022):	
Quarter 7 status report (6/30/2022):	
Quarter 8 status report (9/30/2022):	

3. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2020):	
Quarter 2 status report (3/31/2021):	
Quarter 3 status report (6/30/2021):	
Quarter 4 status report (9/30/2021):	
Quarter 5 status report (12/31/2021):	
Quarter 6 status report (3/31/2022):	
Quarter 7 status report (6/30/2022):	
Quarter 8 status report (9/30/2022):	
4. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2020):	
Quarter 2 status report (3/31/2021):	
Quarter 3 status report (6/30/2021):	
Quarter 4 status report (9/30/2021):	
Quarter 5 status report (12/31/2021):	
Quarter 6 status report (3/31/2022):	
Quarter 7 status report (6/30/2022):	
Quarter 8 status report (9/30/2022):	
5. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2020):	
Quarter 2 status report (3/31/2021):	
Quarter 3 status report (6/30/2021):	
Quarter 4 status report (9/30/2021):	
Quarter 5 status report (12/31/2021):	
Quarter 6 status report (3/31/2022):	
Quarter 7 status report (6/30/2022):	
Quarter 8 status report (9/30/2022):	

6. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2020):	
Quarter 2 status report (3/31/2021):	
Quarter 3 status report (6/30/2021):	
Quarter 4 status report (9/30/2021):	
Quarter 5 status report (12/31/2021):	
Quarter 6 status report (3/31/2022):	
Quarter 7 status report (6/30/2022):	
Quarter 8 status report (9/30/2022):	
7. (Enter next milestone here)	Completion Date
Quarter 1 status report (12/31/2020):	
Quarter 2 status report (3/31/2021):	
Quarter 3 status report (6/30/2021):	
Quarter 4 status report (9/30/2021):	
Quarter 5 status report (12/31/2021):	
Quarter 6 status report (3/31/2022):	
Quarter 7 status report (6/30/2022):	
Quarter 8 status report (9/30/2022):	

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

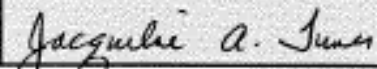
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> <li>1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.</li> <li>2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.</li> <li>3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.</li> <li>4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.</li> <li>5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§472b-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).</li> <li>6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation</li> </ol> | <p>Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.</p> <ol style="list-style-type: none"> <li>7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.</li> <li>8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.</li> </ol> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11968; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Executive Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Mississippi Department of Employment Security	09/27/2021

Standard Form 424B (Rev. 7-97) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application:      * If Revision, select appropriate letter(s): <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision * Other (Specify):
* 3. Date Received: Completed by Grants.gov upon submission		4. Applicant Identifier:
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: Mississippi Department of Employment Security		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 64-6000785		* c. Organizational DUNS: 8791931500000
d. Address:		
* Street1: 1435 Echelon Parkway Street2: * City: Jackson County/Parish: * State: MS: Mississippi Province: * Country: USA: UNITED STATES * Zip / Postal Code: 39213-0000		
e. Organizational Unit:		
Department Name:		Division Name:
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mrs.	* First Name: Lisa	
Middle Name:		
* Last Name: Cook		
Suffix:		
Title: Director, Office of Reemployment Assistance		
Organizational Affiliation:		
* Telephone Number: 601-321-6301		Fax Number:
* Email: lcook@des.ms.gov		

<b>Application for Federal Assistance SF-424</b>			
<b>* 8. Type of Applicant 1: Select Applicant Type:</b>			
A: State Government			
Type of Applicant 2: Select Applicant Type:			
Type of Applicant 3: Select Applicant Type:			
* Other (specify):			
<b>* 10. Name of Federal Agency:</b>			
Employment and Training Administration			
<b>11. Catalog of Federal Domestic Assistance Number:</b>			
17.225			
CFDA Title:			
Unemployment Insurance			
<b>* 12. Funding Opportunity Number:</b>			
ETA-UIPL-25-21			
* Title:			
Fiscal Year (FY) 2022 State Workforce Agency Unemployment Insurance (UI) Resource Planning Targets and Guidelines			
<b>13. Competition Identification Number:</b>			
ETA-UIPL-25-21			
Title:			
Fiscal Year (FY) 2022 State Workforce Agency Unemployment Insurance (UI) Resource Planning Targets and Guidelines			
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b>			
	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
<b>* 16. Descriptive Title of Applicant's Project:</b>			
Fiscal Year 2022 Base UI Allocation			
Attach supporting documents as specified in agency instructions.			
<input type="button" value="Add Attachments"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachments"/>	



Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="Secord"/>	* b. Program/Project: <input type="text" value="all"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="10/01/2021"/>	* b. End Date: <input type="text" value="12/31/2024"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="20,062,159.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="20,062,159.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any recertifying terms if I accept an award. I am aware that any false, flippant, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mrs."/>	* First Name: <input type="text" value="Jacqueline"/>
Middle Name: <input type="text" value="A"/>	
* Last Name: <input type="text" value="Turner"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director"/>	
* Telephone Number: <input type="text" value="601-321-6346"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="jturner@edea.ms.gov"/>	
* Signature of Authorized Representative: <input type="text" value="Completed by Grants.gov upon submission."/>	* Date Signed: <input type="text" value="Completed by Grants.gov upon submission."/>

[View Burden Statement](#)

**BUDGET INFORMATION - Non-Construction Programs**

OMB Number: 4040-0006  
Expiration Date: 02/28/2022

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. FY 2022 UI Base Allocation	17.225	\$	\$	\$ 20,062,159.00	\$	\$ 20,062,159.00
2.						
3.						
4.						
5. Totals		\$	\$	\$ 20,062,159.00	\$	\$ 20,062,159.00

Standard Form 424A (Rev. 7-97)  
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**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1) FY 2022 UI Base Allocation	(2)	(3)	(4)	
a. Personnel	\$ 9,200,000.00	\$	\$	\$	\$ 9,200,000.00
b. Fringe Benefits	3,404,000.00				3,404,000.00
c. Travel	350,000.00				350,000.00
d. Equipment					
e. Supplies	62,000.00				62,000.00
f. Contractual	2,155,807.00				2,155,807.00
g. Construction					
h. Other	2,016,640.00				2,016,640.00
i. Total Direct Charges (sum of 6a-6h)	17,188,447.00				\$ 17,188,447.00
j. Indirect Charges	2,873,712.00				\$ 2,873,712.00
k. TOTALS (sum of 6i and 6j)	\$ 20,062,159.00	\$	\$	\$	\$ 20,062,159.00
7. Program Income	\$	\$	\$	\$	\$

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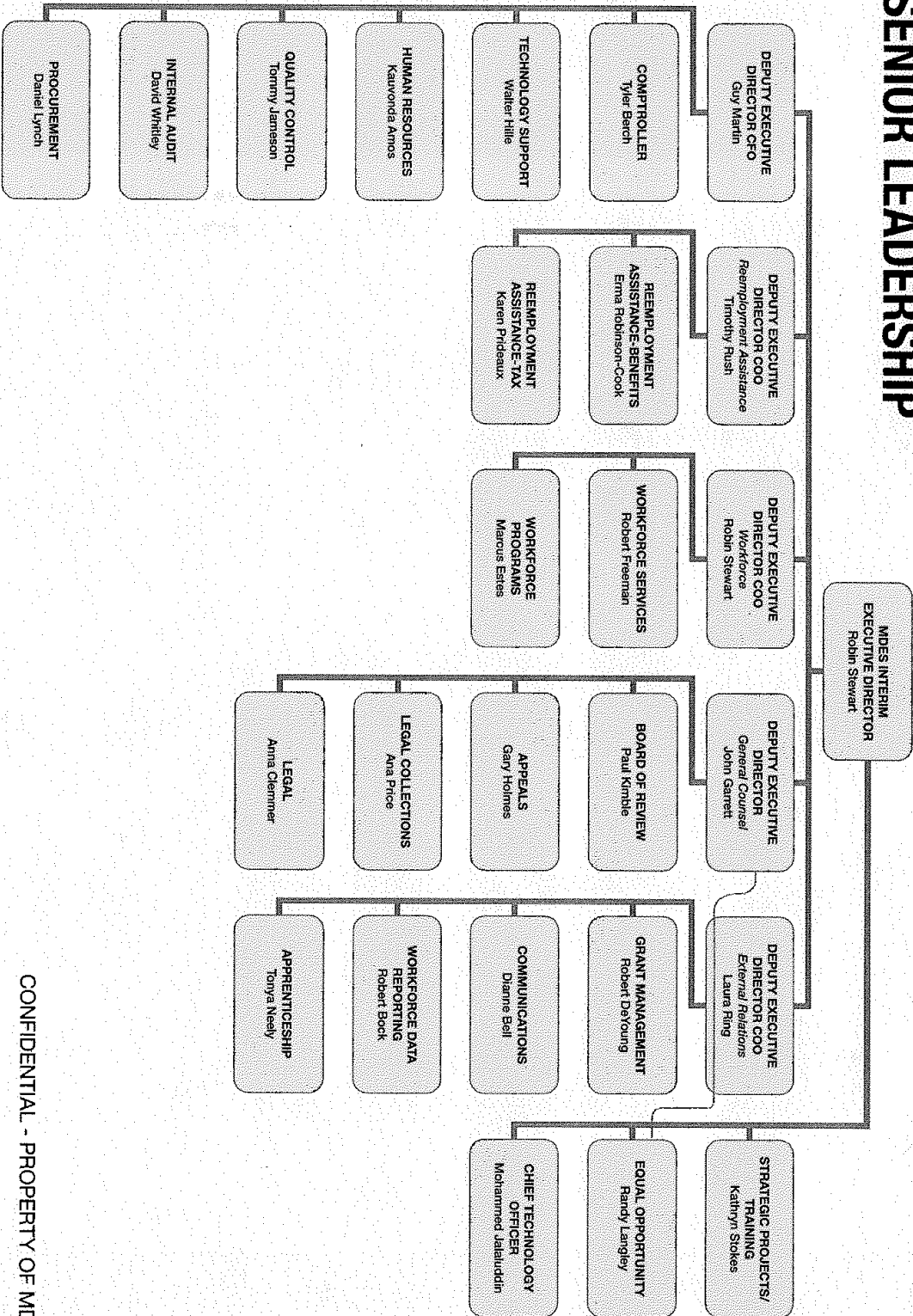
SECTION C - NON-FEDERAL RESOURCES					
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS	
8. FY 2022 UI Base Allocation	\$	\$	\$	\$	
9.					
10.					
11.					
12. TOTAL (sum of lines 8-11)	\$	\$	\$	\$	
SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 20,062,159.00	\$ 5,015,539.00	\$ 5,015,540.00	\$ 5,015,540.00	\$ 5,015,540.00
14. Non-Federal	\$				
15. TOTAL (sum of lines 13 and 14)	\$ 20,062,159.00	\$ 5,015,539.00	\$ 5,015,540.00	\$ 5,015,540.00	\$ 5,015,540.00
SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT					
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)				
	(b) First	(c) Second	(d) Third	(e) Fourth	
16. FY 2022 UI Base Allocation	\$	\$	\$	\$	
17.					
18.					
19.					
20. TOTAL (sum of lines 16 - 19)	\$	\$	\$	\$	
SECTION F - OTHER BUDGET INFORMATION					
21. Direct Charges: 17,188,447	22. Indirect Charges: 2,873,712				
23. Remarks:					

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# FY22 EXECUTIVE AND SENIOR LEADERSHIP

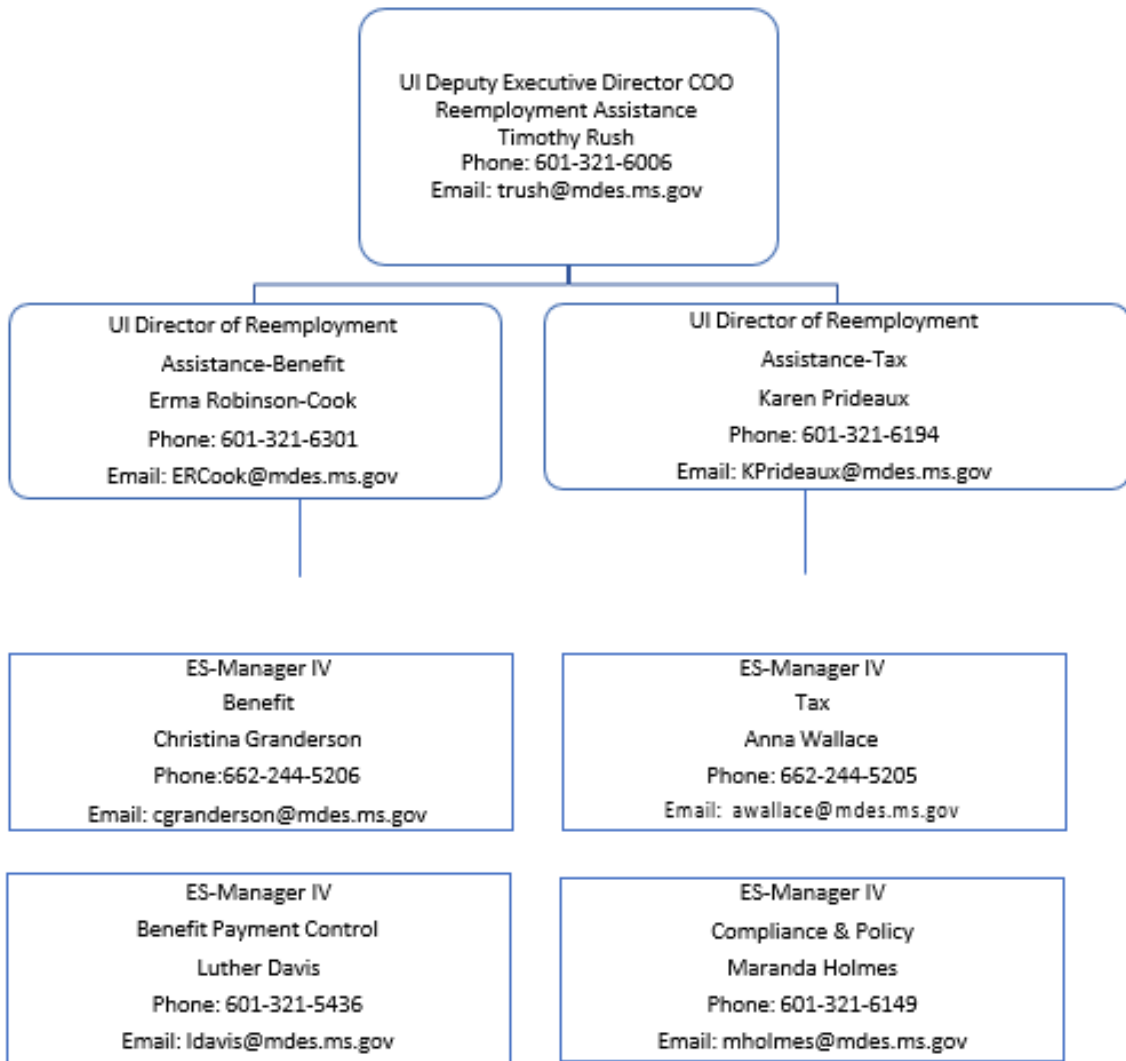
CLICK ON NAME BOXES BELOW FOR OFFICE HOLDER INFORMATION.



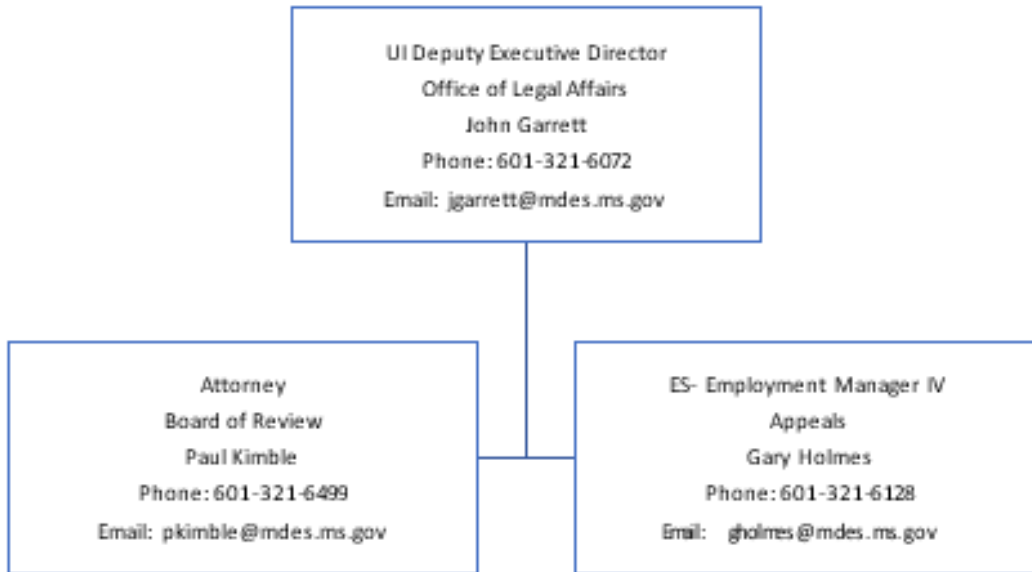
CONFIDENTIAL - PROPERTY OF MD&ES

17H. MD&ES Organizational Chart

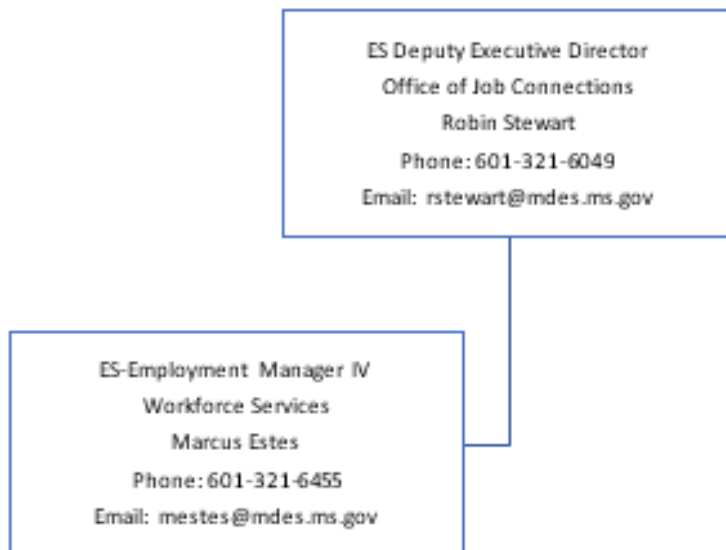
## UI Department



### Appeals Department



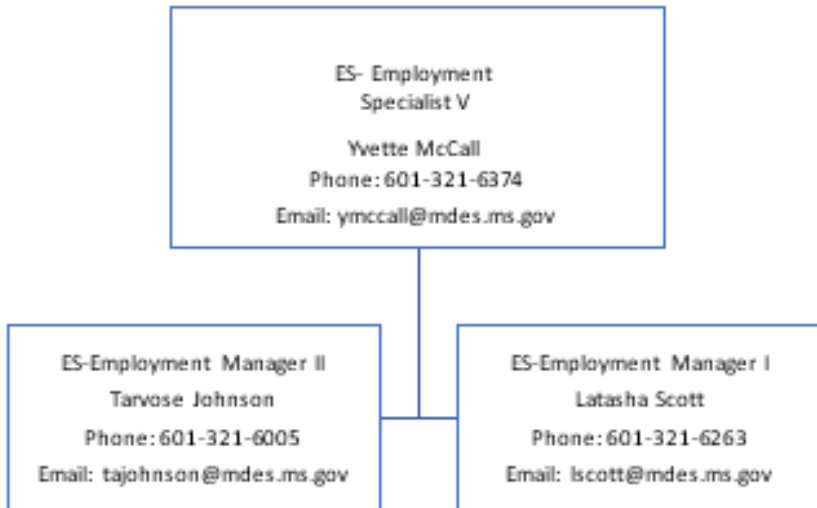
### RESEA



**Fiscal/Finance Department**



**DUA**





**Data Validation**

**Benefit/Tax**

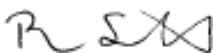
ES-Employment Manager I  
Benefit  
Latasha Scott  
Phone: 601-321-6263  
Email: lscott@mdes.ms.gov

ES-Employment Manager II  
Tax  
Tarvose Johnson  
Phone: 601-321-6005  
Email: tajohnson@mdes.ms.gov

**U.S. Department of Labor  
SQSP SIGNATURE PAGE**

OMB Control No.: 1205-0132

Expiration Date: 02/29/2024

<b>U.S. DEPARTMENT OF LABOR Employment and Training Administration</b>	<b>FEDERAL FISCAL YEAR</b> 2022	<b>STATE</b> MISSISSIPPI
<p align="center"><b>UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE</b></p>		
<p>This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and</p> <p align="center"><u>MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY</u> (NAME OF STATE AGENCY)</p> <p>The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.</p> <p>All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.</p>		
<b>TYPED NAME AND TITLE</b>	<b>SIGNATURE</b>	<b>DATE</b>
Robin Stewart, Interim Executive Director  _____ STATE ADMINISTRATOR (print name)		10-14-2021
_____ DOL - REGIONAL OFFICE APPROVING OFFICIAL (print name)		
_____ DOL - NATIONAL OFFICE APPROVING OFFICIAL (print name) (if required)		

17J. UI Integrity Action Plan (IAP)

Alternate UI Integrity Action Plan (IAP)			
<a href="#">Back to Biennial Overview 2021</a>		<a href="#">Back to Alternate Overview 2022</a>	
State	Federal Fiscal Year	Accountable Agency Official(s): <i>(Enter the name and title of the staff person who is accountable for reducing UI improper payments.)</i>	
Mississippi	2022		
Top Three Root Causes (Calendar Year 2020) <a href="https://www.dol.gov/agencies/eta/unemployment-insurance-payment-accuracy/data">https://www.dol.gov/agencies/eta/unemployment-insurance-payment-accuracy/data</a>		Calendar Year 2019 (% of \$ Overpaid)	Calendar Year 2020 (% of \$ Overpaid)
Root Cause #1:	Benefit Year Earnings	52.18%	33.59%
Root Cause #2:	Separation Issues	36.91%	55.13%
Root Cause #3:	Able+Available	5.71%	0.94%
National Priority Strategies and Additional Strategies			
Tools, Strategies, Process Improvements, Procedural Changes to Combat Fraud and Identity Theft and Enhance Recovery Efforts			
Use of UI Integrity Center Resources			
State and Employer Use of SIDES			
Support Claimant Compliance with State Work Search Requirements			
Overpayment Recovery Efforts (Including High Dollar Overpayments)			
<p><b>Summary:</b> Provide a detailed summary of the integrity plan that the state developed to combat fraud and identity theft; reduce the UI improper payment rate (targeting root causes); improve prevention, detection, and recovery of improper and fraudulent overpayments; and address the current National Priorities and additional strategies outlined in the SQSP UIPL.</p> <p>The Integrity Task Force will meet regularly to identify and implement strategies to prevent improper payments for the three root causes. The taskforce will continue to educate employers and claimants as well as UI and Workforce staff on the importance of properly reporting issues and earnings information. Activities includes the specific strategies to address prevention and detection of fraud and other improper payments in all UI programs, including the CARES Act programs. States must include recovery strategies, including working directly with financial institutions and or law enforcement agencies to recover UC funds held by banks and financial institutions. Actions to address the state's top three improper payment root causes.</p> <p>MDES utilizes specific strategies such as Integrity Data Hub, NASWA fraud alerts, Fraud Report, New Hire reports to prevent and detection fraud and improper payments. MDES will continue to utilize the recovery methods of Tax offsets, Garnishments, Voluntary Repayments and Offsets weekly certifications while working directly with Conduent and financial institutions to recover UC funds.</p>			
<p><b>Six-Month Update (October-March):</b> Provide a progress report on all integrity strategies outlined in the IAP and provide details on any new identity theft and fraud prevention strategies, solutions, and/or activities; changes to existing integrity strategies; plan or strategy delays; positive outcomes; and identified successes.</p>			
<p><b>Instructions for the following section:</b> In each individual section below, provide the state's top three focused strategies that will be employed to correct or reduce the root cause of overpayments or to address the National Priorities. Additional lines are available in each section to include other significant strategies as identified</p>			
Root Cause #1: Benefit Year Earnings			
Strategies	Actions	Targets & Milestones	Resources
1 Employer Education	Mississippi continues to utilize RESTART MS to report return to work, refusals of work, inability to contact ex-employees, job separations and never separated.	On-going	Technology and Human Resources
2 Claimant Education	Ongoing education to claimant through social media, email blast and the MDES website of the importance of properly reporting earnings and return to work dates.	On-going	Technology and Human Resources
3			
Additional:			
Root Cause #2: Separation Issues			
Strategies	Actions	Targets & Milestones	Resources
1 Staff Education	Educate and train staffs to ask specific questions to obtain complete information from claimants/employers so that all separation issues are identified and investigated/adjudicated in a timely manner. Review claimant information to be sure instructions and eligibility requirements are clear. Information provided on claimant dashboard and Chat Bot were used as needed to update/modify information issued to claimants.	On-going	Technology and Human Resources
2 Employer	Use every opportunity to educate employers on the importance of providing separation and refusal information to MDES within the required timeframe through RestartMS and QuickAccess.	On-going	Technology and Human Resources

3			
Additional:			
<b>Root Cause #3: Able+Available</b>			
<b>Strategies</b>	<b>Actions</b>	<b>Targets and Milestones</b>	<b>Resources</b>
Training	Provide additional training for staff performing address able and available issues promptly. Staff will be attentive to detecting able and available issues during the work search audit verification and address those issues.	On-going	Human Resources
2			
3			
Additional:			
<b>Tools, Strategies, Process Improvements, Procedural Changes to Combat Fraud and Identity Theft and Enhance Recovery Efforts</b>			
<b>Strategies</b>	<b>Actions</b>	<b>Targets and Milestones</b>	<b>Resources</b>
1 Training	Mississippi has incorporated ID.me identity verification for every applicant to complete in efforts to prevent fraudulent claims paid. Ongoing in-house training and training with NASWA will be provided to the staff to prevent, detect and recover overpayments.	On-going	Technology and Human Resources
2 Messaging	Messaging efforts planned by the state to inform all UI and workforce staff of the state's integrity plan. Hire two additional staff and continue training UI and Workforce staff on MDES's integrity plan for identity verification and the importance of claimants reporting earnings and employers reporting new hire/rehires timely.	On-going	Human Resources
3			
Additional:			
<b>Use of UI Integrity Center Resource</b>			
<b>Strategies</b>	<b>Actions</b>	<b>Targets and Milestones</b>	<b>Resources</b>
1 Training	Training with NASWA will be provided to the staff to prevent, detect and recover overpayments.	On-going	Human Resources
2			
3			
Additional:			
<b>State and Employer Use of SIDES</b>			
<b>Strategies</b>	<b>Actions</b>	<b>Targets and Milestones</b>	<b>Resources</b>
1 Employers SIDES messaging	Explain to employer the importance and benefits of responding timely through E-Response.	On-going	Technology and Human Resources

2 Claimant messaging Additional:	Generate a detail mailer/message alert to claimant after first payment advising them of the requirement and method to properly report earnings and return to work. Include the penalty for failing to do so but emphasize the potential overpayment issue and progression.	On-going	Technology and Human Resources
<b>Support Claimant Compliance with</b>	<b>Actions</b>		
<b>Strategies</b>		<b>Targets and Milestones</b>	<b>Resources</b>
Claimant messaging	Ensuring that Work Search documents communicate clear language and plain instructions on work search requirements.	On-going	Technology and Human Resources
Work Search Audit Review 3	Changes are being made to the audit process to ensure functions are being performed properly in regards to claimant being paid while remaining in compliance with the requirements.	3/31//2022	Technology and Human Resources
Additional:			
<b>Overpayment Recovery Efforts (Including High Dollar Overpayments)</b>	<b>Actions</b>		
<b>Strategies</b>		<b>Targets and Milestones</b>	<b>Resources</b>
1 Integrity Data Hub	MDES utilizes specific strategies such as Integrity Data Hub, NASWA fraud alerts, Fraud Report, New Hire reports to prevent and detection fraud and improper payments.	On-going	Technology and Human Resources
2 3	MDES will continue to utilize the recovery methods of Tax offsets, Garnishments, Voluntary Repayments and Offsets weekly certifications while working directly with Conduent and financial institutions to recover UC funds.	On-going	Technology and Human Resources
Additional:			

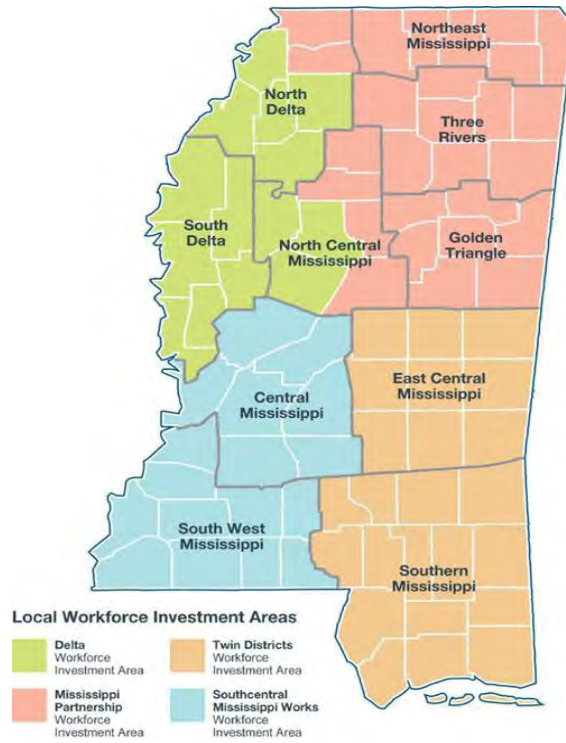
Section 18. Senior Community Service Employment Program Specific Requirements and Assurances

18A. Program Year 2021 Equitable Distribution List by National and State Grantee with Counties

County	MDES State Grant Modified Positions	MDES State Grant Enrolled	MDES State Grant Variance	National Council on Black Aging Modified Positions	National Council on Black Aging Enrolled	National Council on Black Aging Variance	Center for Workforce Inclusion (previously SSAI) Modified Positions	Center for Workforce Inclusion Enrolled	Center for Workforce Inclusion Variance	Institute for Indian Development [Set-Aside] Modified Positions	Institute for Indian Development [Set-Aside] Enrolled	Institute for Indian Development [Set-Aside] Variance
Adams	3	2	-1				5	4	-1			
Alcorn	7	6	-1									
Amite							4	1	-3			
Attala				4	4	0						
Benton				2	2	0						
Bolivar				7	7	0						
Calhoun				4	1	-3						
Carroll				2	1	-1						
Chickasaw				3	1	-2						
Choctaw				2	2	0						
Claiborne							3	9	6			
Clarke							4	2	-2			
Clay				4	5	1						
Coahoma				6	6	0						
Copiah							6	4	-2			
Covington	4	4	0									
DeSoto	5	1	-4	8	4	-4						
Forrest	4	4	0				8	8	0			
Franklin							1	1	0			
George							4	1	-3			
Greene							2	3	1			
Grenada	4	2	-2									
Hancock							9	6	-3			
Harrison	5	2	-3				23	26	3			
Hinds	4	4	0				35	28	-7			
Holmes				6	7	1						
Humphreys				3	3	0						
Issaquena												
Itawamba				4	4	0						
Jackson							18	5	-13			
Jasper							4	2	-2			
Jefferson							3	4	1			
Jefferson Davis	4	6	2									
Jones	4	1	-3				8	5	-3	2	2	0
Kemper							2	0	-2	1	0	-1
Lafayette				5	4	-1						
Lamar							6	3	-3			
Lauderdale	4	4	0				10	14	4			
Lawrence							2	3	1			
Leake				5	4	-1				4	6	2
Lee	13	10	-3									
Leflore				8	8	0						
Lincoln							6	11	5			

County	MDES State Grant Modified Positions	MDES State Grant Enrolled	MDES State Grant Variance	National Council on Black Aging Modified Positions	National Council on Black Aging Enrolled	National Council on Black Aging Variance	Center for Workforce Inclusion (previously SSAI) Modified Positions	Center for Workforce Inclusion Enrolled	Center for Workforce Inclusion Variance	Institute for Indian Development [Set-Aside] Modified Positions	Institute for Indian Development [Set-Aside] Enrolled	Institute for Indian Development [Set-Aside] Variance
Lowndes	9	9	0									
Madison				10	11	1						
Marion							6	7	1			
Marshall				6	6	0						
Monroe				7	8	1						
Montgomery				2	2	0						
Neshoba							6	2	-4	21	17	-4
Newton	4	1	-3							6	11	5
Noxubee				3	4	1						
Oktibbeha				5	5	0						
Panola				6	5	-1						
Pearl River	4	2	-2				5	1	-4			
Perry							3	2	-1			
Pike							11	8	-3			
Pontotoc	6	5	-1									
Prentiss				6	3	-3						
Quitman				2	3	1						
Rankin	4	1	-3				10	0	-10			
Scott							6	3	-3	2	0	-2
Sharkey				1	1	0						
Simpson							7	2	-5			
Smith							3	0	-3			
Stone							3	1	-2			
Sunflower				4	6	2						
Tallahatchie	4	1	-3									
Tate				4	4	0						
Tippah	4	2	-2									
Tishomingo				4	5	1						
Tunica				2	3	1						
Union	3	3	0									
Walthall							5	5	0			
Warren							8	6	-2			
Washington	4	2	-2	7	8	1						
Wayne							4	2	-2			
Webster				2	2	0						
Wilkinson							3	1	-2			
Winston				5	5	0				1	1	0
Yalobusha				2	2	0						
Yazoo				5	4	-1						

18B. Mississippi AAA Map



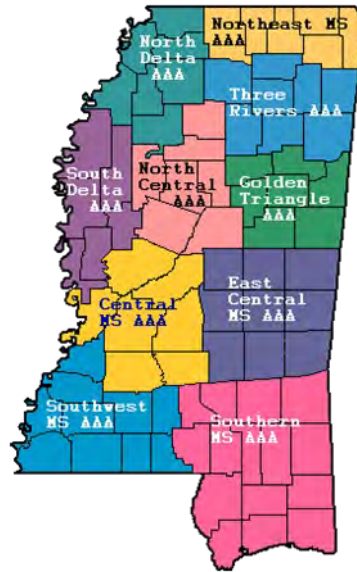
Map of the ten PDDs/AAAs overlaid on the state's four LWDAs.



DOL#	Subgrantee Name	Address	Total Slots	Location of Slots by County		Level of Experience
MS001	North Delta PDD	Post Office Box 1488 Batesville, MS 38606	9	DeSoto	5	20+ Years
				Tallahatchie	4	
MS003	North Central PDD	28 Industrial Park Boulevard Winona, MS 38967	4	Grenada	4	20+ Years
MS004	Golden Triangle PDD	Post Office Box 828 Starkville, MS 39760-0828	9	Lowndes	9	20+ Years
MS005	Three Rivers PDD	Post Office Box 690 Pontotoc, MS 38663	25	Calhoun	4	20+ Years
				Lee	12	
				Pontotoc	6	
				Union	3	
MS006	Northeast MS PDD	619 East Parker Drive Booneville, MS 38829	11	Tippah	4	20+ Years
				Alcorn	7	
MS007	Central MS PDD	1020 Centre Pointe Blvd Pearl, MS 39208	8	Rankin	4	20+ Years
				Hinds	4	
MS008	East Central PDD	Post Office Box 499 Newton, MS 39345	8	Newton	4	20+ Years
				Lauderdale	4	
MS009	Southern MS PDD	10441 Corporate Drive Suite 1 Gulfport, MS 39503	25	Jeff. Davis	4	20+ Years
				Covington	4	
				Jones	4	
				Forrest	4	
				Pearl River	4	
				Harrison	5	
MS010	Southwest MS PDD	100 South Wall Street Natchez, MS 39120	3	Adams	3	20+ Years

## Mississippi's Area Agencies Aging

Area Agencies on Aging were created under the Older Americans' Act of 1965. The overall purpose of an area agency on aging is to develop a comprehensive system of services whereby older adults will be able to remain in their own home as long as possible, thereby avoiding premature institutionalization. Mississippi has ten (10) area agencies on aging and all of them are housed in Planning and Development Districts.



<b>Area Agency On Aging</b>	<b>Directors</b>	<b>Phone Number</b>	<b>Website</b>	<b>Counties Served</b>
Central MS Area Agency on Aging 1020 Centre Pointe Blvd Pearl, MS 39208	Chelsea Crittle	(601) 981-1516 1-800-315-3103	<a href="http://www.cmpdd.org">www.cmpdd.org</a>	Copiah, Hinds, Madison, Rankin, Simpson, Warren, Yazoo
East Central Area Agency on Aging Post Office Box 499 Newton, MS 39345	Rosie Coleman	(601) 683-2401 1-800-264-2007		Clarke, Jasper, Kemper, Lauderdale, Leake, Neshoba, Newton, Scott, Smith
Golden Triangle Area Agency on Aging Post Office Box 828 Starkville, MS 39760-0828	Bobby Gann	(662) 324-4650 (662) 323-2636 (toll free within a 55 mile radius) 1-888-324-9000	<a href="http://www.gtpdd.com">www.gtpdd.com</a>	Choctaw, Clay, Lowndes, Noxubee, Oktibbeha, Webster, Winston
North Central Area Agency on Aging 711 South Applegate Winona, MS 38967	Darlana Allen	(662) 283-2675 (662) 283-2771 (toll free within a 55 mile radius) 1-888-427-0714		Attala, Carroll, Grenada, Holmes, Le Flore, Montgomery, Yalobusha
North Delta Area Agency on Aging Post Office Box 1488 Batesville, MS 38601-1488	Rod Gordon	(662) 561-4100 1-800-844-2433	<a href="http://www.ndpdd.com">www.ndpdd.com</a>	Coahoma, Desoto, Panola, Quitman, Tallahatchie, Tate, Tunica
Northeast MS Area Agency on Aging Post Office Box 600 Booneville, MS 38829	Carla Newman	(662) 728-6248 1-800-745-6961		Alcorn, Benton, Marshall, Prentiss, Tippah, Tishomingo
South Delta Area Agency on Aging Post Office Box 1776 Greenville, MS 38702-1776	Daryl Richards	(662) 378-3831 1-800-898-3055	<a href="http://www.sdpdd.com">www.sdpdd.com</a>	Bolivar, Humphreys, Issaquena, Sharkey, Sunflower, Washington

<p>Southern MS Planning &amp; Development District 10441 Corporate Drive, Suite 1 Gulfport, MS 39503</p>	<p>Patricia Morrison, Economic Workforce Development Manager</p>	<p>(228) 868-2326 1-800-444-8014</p>	<p><a href="http://www.smpdd.com">www.smpdd.com</a></p>	<p>Covington, Forrest, George, Greene, Hancock, Harrison, Jackson, Jefferson Davis, Jones, Lamar, Marion, Pearl River, Perry, Stone, Wayne</p>
<p>Southwest MS Area Agency on Aging 100 South Wall Street Natchez, MS 39120</p>	<p>Yolanda Campbell</p>	<p>(601) 446-6044 1-800-338-2049</p>		<p>Adams, Amite, Claiborne, Franklin, Jefferson, Lawrence, Lincoln, Pike, Walthall, Wilkinson</p>
<p>Three Rivers Area Agency on Aging Post Office Box 690 Pontotoc, MS 38863</p>	<p>Abby Stafford</p>	<p>(662) 489-2415 (662) 489-6911 ( toll free within a 55 mile radius) 1-877-489-6911</p>	<p><a href="http://www.trpdd.com">www.trpdd.com</a></p>	<p>Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc, Union</p>

Chelsea Crittle  
Central MS Area Agency on Aging  
1020 Centre Pointe Blvd.  
Pearl, MS 39208

Carla Newman  
Northeast MS Area Agency on  
Aging  
Post Office Box 600  
Booneville, MS 38829

Rosie Coleman  
East Central Area Agency on Aging  
Post Office Box 499  
Newton, MS 39345

Daryl Richards  
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Workforce Development Manager  
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Rod Gordon  
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Abby Stafford  
Three Rivers Area Agency on Aging  
Post Office Box 690  
Pontotoc, MS 38663



**Mississippi Department of Employment Security  
Senior Community Service Employment Program (SCSEP)  
State Termination Policy**

**I. SCOPE AND PURPOSE**

This policy sets forth the State's procedures for termination of participants in the SCSEP based on the guidance set forth in the Older Americans Act Amendments of 2006 and the SCSEP Final Rule.

**II. PARTICIPANT INVOLUNTARY TERMINATION POLICY**

There are six (6) reasons a participant may be involuntarily terminated from the SCSEP. The reasons are listed below along with an explanation. This Termination Policy will be followed fairly and equitably when involuntarily terminating participants. Participants will not be terminated based on age; 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 Mississippi Department of Employment Security grievance procedure. 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.

**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
2. Being incorrectly determined eligible at enrollment or the annual recertification
3. Being determined no longer eligible at recertification
4. Reaching the maximum 48 months enrollment limit
5. Becoming employed during enrollment
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)

### **1. Termination Due to 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. Termination Due to Being Incorrectly Determined Eligible**

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. Termination Due to No Longer Being Eligible**

Annually, or more frequently if there is a substantial change in circumstances, each participant is recertified 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. Termination Due to 48 Month Participation Limitation**

A participant will be terminated when he or she meets the 48 month maximum participation date. The Mississippi Department of Employment Security's Individual Durational Limit Policy does NOT provide for the issuance of waivers. A waiver factor qualifies the participant for a temporary 12 month extension. When a participant approaches the 48 month maximum participation limit, he or she 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. Termination Due to Becoming Employed During Enrollment**

To qualify for enrollment in the SCSEP, a participant has to 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. Termination for Cause**

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: Refusing to accept a reasonable number of job offers or referrals to unsubsidized employment or for not complying with the Individual Employment Plan (IEP). 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 and/or to follow through with objectives to achieve goals that are based on the IEP. If the participant fails, without good cause, to cooperate fully with the Mississippi Department of Employment Security’s subgrantee staff to accomplish the goals of his or her service strategy, an IEP-related termination “for-cause” may be in order. Examples of lack of cooperation with staff to accomplish IEP service strategies 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 One-Stop/Job Service
  - Refusing to take advantage of WIA 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 training development plan
- Non-IEP related reasons:
  - Refusal to cooperate in recertifying eligibility, for example, refusing to provide required document 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 training description 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 document, or including hours on a time sheet that are not accurate.
- Intentional disclosure of confidential or private information obtained from the host agency, grantee, or local project, 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 MDES subgrant staff member, provided there were no extenuating circumstances and the directions or instructions were reasonable.
- Workplace harassment or discrimination on the basis of 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.
- Non-compliance with the drug and alcohol free policy of the Host Agency, which prohibits participants from 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 their 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.

### **III. Participant Corrective Action and Warning**

A participant will be given an opportunity to correct his or her behavior or conduct, or his or her failure to comply with the IEP requirements, except in cases involving serious harm or imminent threat to health, safety, property, etc. At any point, if a participant makes positive efforts or the participant's lack of action is justified, corrective action will be discontinued. The following steps for corrective action will be taken:

- Step 1: First Formal Warning

If a participant displays behavior or conduct outlined in the reasons for “for-cause” terminations or refuses to comply with the IEP requirements, the participant will be given a verbal warning and counseled to correct his or her actions. Absent extenuating circumstances, the participant will be informed in writing by the State Manager or State Director of the requirement to correct his or her behavior or conduct.

- **Step 2: Second Formal Warning**

When a participant for a second time displays behaviors or conduct outlined in the reasons for “for-cause” terminations or refuses to comply with the IEP requirements, the participant will be verbally warned and counseled to correct his or her actions. Absent extenuating circumstances, the State Director will send the participant a written warning that he or she has 30 days from the date of the letter to correct his or her behavior or conduct. In the case of an IEP violation, the participant may be directed to complete specific IEP-related task. The written warning will include a statement that failure to make improvement or complete the IEP-related tasks will result in termination.

- **Step 3: When a participant does not make improvement in his or her actions or for a third time displays behavior or conduct outlined in the reasons for “for-cause” terminations, a letter will be sent notifying the participant that he or she will be exited 30 days from the date of the letter.**

For example, a participant’s training goal is to become computer literate in preparation for a clerical position. First the Employment and Training Coordinator (ETC) identified a community service assignment at the library but the participant refused it because she wouldn’t have her own cubicle (she would be in an open area) so she turned down that opportunity. Next, the ETC identified a training site in a school, but the participant turned down that opportunity. Finally, the ETC tried the local museum, and the participant refused the training assignment at the museum, too. The ETC spoke with the participant, and she had no legitimate reason for refusing the training offered at various assignments. After the first refusal, the ETC asked the State Director to send the participant the first written warning letter. The State Director sent her the second warning letter stating that she risked being terminated if she continued to fail to follow her IEP or to take corrective action. When Ms. Short turned down a third assignment and there was no extenuating circumstance, the State Director sent a 30-day notification of termination letter.

#### **IV. For-Cause Terminations that Require Immediate Removal from Host Agency and Leave without Pay Pending Termination**

When a participant’s violation of the SCSEP Termination Policy is of a serious nature, immediate action to remove the participant from the host agency may be required. In this case, the participant will be placed on leave without pay and a written 30-day notice of termination sent. Examples of circumstances warranting immediate removal from the host agency and leave without pay include, but are not limited to:

- Gross misconduct such as violating the Host Agency's Drug and Alcohol Policy or intentionally endangering the lives of themselves or others, or
- Violence, including but not limited to physical or extreme verbal violence at the training site.

V. **EFFECTIVE DATE:**

This policy is effective April 1, 2013.

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Community Service Employment Program (SCSEP)**  
**Policy # 3 - Discrimination Complaints**

**I. SCOPE AND PURPOSE:**

This policy sets forth the State's procedures for complaints alleging violations of the discrimination requirements of the Civil Rights Act of 1964. The Act prohibits employment discrimination based on race, color, sex, religion, or national origin. It also prohibits reprisal or retaliation for participating in the Equal Employment Opportunity (EEO) process or for opposing any unlawful employment practice covered by Title VII.

**II. PARTICIPANT'S RIGHT TO FILE A COMPLAINT:**

Participants in Older Americans Act (OAA) programs, including SCSEP, have the right to file complaints regarding specific actions or activities affecting their personal participation in the program. Additionally, participants may file a complaint regarding the conduct of the program as it relates to all participants at a given site or location without fear of reprisal.

**III. REQUIREMENTS:**

- A. Participants must file complaints in writing and within one hundred eighty (180) days of a specific incident.
- B. Presentation of the complaint: An authorized representative, including a caregiver, may present a complaint on behalf of a participant.
- C. Complaints may be filed with the appropriate entity at the following:
- Host Agency: site manager, director, or EO Contact;
  - Subgrantee/Planning and Development District (PDD): Program Director and EO Contact;
  - Grantee: State SCSEP Director or the MDES State EO Officer
  - Civil Rights Center (CRC)
- D. A copy of the complaint must be sent immediately to the State level EO Officer at:

Mississippi Department of Employment Security  
Randy Langley/State EO Officer  
Post Office Box 1699  
Jackson, Mississippi 39215-1699

- E. Planning and Development Districts (PDD) must maintain a complaint log for all EO complaints.
- F. Complaints must be recorded on the Subgrantee PDD complaint log.
- G. Complaints should include the following information:
  - The complete name, current address, telephone number, and social security number of the participant or other affected party filing the appeal;
  - Identity of the individual or entity that you allege is responsible for the discrimination;
  - Brief summary of the facts, grounds for the complaint, any other relevant material or information;
  - Description of the corrective action or remedy sought; and
  - Complaint must be signed and dated by the complainant.
- H. Resolution: Discrimination complaint processing procedures must be completed and a Notice of Final Determination issued within ninety (90) calendar days from the date the written complaint was filed.
- I. A participant may file a complaint with the CRC within thirty (30) calendar days from the date the Notice of Final Action is issued if:
  - You are not satisfied with the written decision or
  - The Notice of Final Determination was not issued within ninety (90) days of the date on which the written complaint was filed.

Civil Rights Center  
U.S. Department of Labor  
Room N-4123, 200 Constitution Avenue NW  
Washington, DC 20210

#### **IV. POLICY AND PROCEDURES:**

Each Planning and Development District (PDD), Host Agency, and State must:

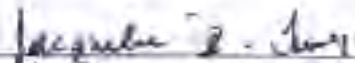
- A. Maintain an office complaint log;
- B. Have a process for addressing complaints from participants and other interested parties affected by SCSEP;
- C. Provide information about the content of the complaint procedures to participants and other interested parties affected by the Senior Community Service

Employment Program (SCSEP), including WIN Job Center partners and service providers;

- D. Require that every entity to which it awards Title V funds must provide information about the content of the complaint procedures to participants receiving Title V-funded services from such entities; and
- E. Make reasonable efforts to assure that the information about the content of the complaint and complaint procedures will be understood by affected participants and other individuals, including youth and those who are limited-English speaking individuals. (OAA Section 306(a)).

**V. EFFECTIVE DATE:**

This policy is effective July 1, 2019.

  
\_\_\_\_\_  
Jacqueline D. Turner  
Executive Director

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**Senior Community Service Employment Program (SCSEP)**  
**Policy Number 4 - Programmatic Grievances**

**I. SCOPE AND PURPOSE:**

This policy sets forth the State's procedures for grievances, other than those describing discrimination, alleging violations of the requirements of the Older Americans Act of 1965 (OAA) from participants and other interested or affected parties based on the guidance set forth at OAA sections 306(a)(10) and 307(a)(5)(B) and at 20 CFR, 641.910.

**II. PARTICIPANT'S RIGHT TO FILE A GRIEVANCE:**

Participants in Older Americans Act programs, including SCSEP, have the right to file grievances regarding specific actions or activities affecting their personal participation in the program or the conduct of the program as it relates to all participants at a given site or location without fear of reprisal.

- A. Participants may file grievances orally or in writing.
- B. Presentation of the grievance: An authorized representative, including a caregiver, may present a grievance on behalf of a participant. If the client chooses this option, he/she shall accompany the representative to every meeting at which the complaint is discussed.
- C. Resolution: Every effort shall be made to resolve grievances at the lowest level of authority to avoid the creation of burdensome documentation and ineffective use of staff time. Complaints shall be directed as appropriate to the situation to the following authorities in the order indicated:
  - Host Agency: site manager or director or case manager;
  - Subgrantee/Planning and Development District: Program Director;
  - State SCSEP Director or her/his designee.
- D. Grievances relating to alleged violations of a client's rights provided by law may be directed to the Office of Grant Management of MDES, but only after efforts to resolve the matter locally have failed. This does not remove the right of the individual to pursue other avenues of redress, such as filing with the Office of Civil Rights of the U.S. Department of Health and Human Services.
- E. Timeframes for filing: Grievances may be filed at any time. If the issue is related to an event which occurred at a specific time and place, the participant(s) shall notify the site



manager or other appropriate authority within ten (10) days of the event having occurred of the intent to file the grievance.

F. A participant may withdraw a grievance at any time.

### **III. REQUIREMENTS:**

#### **A. General Requirements**

Each Planning and Development District (PDD), State, and direct recipient of funds under Title V of OAA must establish and maintain a procedure for grievances.

Each Host Agency, PDD, and State recipient must:

- 1) Provide information about the content of the grievance procedures to participants and other interested parties affected by the Senior Community Service Employment Program (SCSEP), including WIN Job Center partners and service providers;
- 2) Require that every entity to which it awards Title V funds must provide information about the content of the grievance procedures to participants receiving Title V-funded services from such entities; and
- 3) Make reasonable efforts to assure that the information about the content of the grievance and complaint procedures will be understood by affected participants and other individuals, including youth and those who are limited-English speaking individuals. (OAA Section 306(a)).

#### **B. Host Agency Requirements**

Host Agency procedures must provide:

- 1) A process for addressing grievances from participants and other interested parties affected by SCSEP;
- 2) An opportunity for an informal resolution and a hearing to be completed within sixty (60) calendar days of the filing of the grievance.
- 3) An opportunity for a participant to appeal to a PDD when:
  - No decision is reached within sixty (60) days; or
  - Either party is dissatisfied with the PDD decision.

### **C. Planning and Development District (PDD) Requirements**

Each PDD must:

- 1) Maintain an office complaint log;
- 2) Have a process for addressing grievances from participants and other interested parties affected by SCSEP, including service providers;
- 3) Have a process for resolving appeals from the Host Agency level;
- 4) Provide an opportunity for an informal resolution and a hearing to be completed within sixty (60) days of the filing of the grievance;
- 5) Have a process which allows an individual alleging a labor standards violation to submit the grievance to a binding arbitration procedure, if a collective bargaining agreement covering the parties to the grievance so provides; and
- 6) Provide an opportunity for a participant to appeal to a State entity when:
  - No decision is reached within sixty (60) days; or
  - Either party is dissatisfied with the local hearing decision.

### **D. State Requirements**

State procedures must provide:

- 1) A process for addressing grievances from participants and other interested parties affected by SCSEP;
- 2) A process for resolving appeals from the PDD level;
- 3) A process for remanding grievances related to the local SCSEP programs to the PDD grievance process; and
- 4) An opportunity for an informal resolution and a hearing to be completed within sixty (60) days of the filing of the grievance.

## **IV. POLICY AND PROCEDURES:**

### **A. Host Agency/PDD Level Grievances and Complaints**

The State requires PDDs to establish and maintain a policy and procedure for grievances. The PDD process must allow participants and other interested parties

affected by SCSEP an opportunity for an informal resolution and the option to have a hearing to be completed within sixty (60) calendar days of the filing of the grievance or complaint. The PDDs shall notify MDES of any grievance filed at the PDD/Host Agency level within ten (10) calendar days and provide a copy of the final decision regarding the grievance or complaint to MDES within five (5) calendar days. The decision made at the PDD level may be appealed to the State as described below (C. PDD Level Appeals to the State).

#### **B. State Level Grievances**

- 1) Grievances from participants and other interested parties affected by SCSEP must be made in writing and filed with MDES within ten (10) days of the alleged incident. Grievances should be addressed to:

Mississippi Department of Employment Security  
Office of Grant Management  
WIOA Grievances and Complaints  
P.O. Box 1699  
Jackson, MS 39215-1699

- 2) Grievances should include the following information:
  - a. The name, address, and telephone number of the participant or other affected party filing the grievance or complaint;
  - b. The name and address of the designated State agency to which the grievance or complaint is being submitted;
  - c. A statement documenting the nature of the grievance or complaint and noting all relevant parties; and
  - d. The signature of the complainant and the date on which the document was signed.
- 3) MDES will review the grievance and notify the involved parties within fifteen (15) calendar days of the receipt of the grievance or complaint. MDES will provide the involved parties an opportunity for an informal resolution. If the grievance or complaint cannot be resolved informally, MDES, within thirty (30) calendar days of receipt of the grievance or complaint, will schedule a hearing before a designated Administrative Law Judge (ALJ). MDES will notify the involved parties at least ten (10) calendar days prior to a scheduled hearing.

- a. The hearing notice will include:
  - 1) The date of the notice;
  - 2) The name and address of the participant or other affected party filing the grievance or complaint and all other involved parties;
  - 3) A statement documenting the nature of the grievance or complaint and noting all relevant parties;
  - 4) The date, time, and place of the hearing; and
  - 5) The name, address, and telephone number of the contact person issuing the notice.
- b. The hearing shall be conducted in an informal manner with strict rules of evidence not being applicable.
- c. Parties shall have the right to:
  - 1) Present written and/or oral testimony and arguments;
  - 2) Call and question witnesses;
  - 3) Request and examine records and documents relevant to the issues; and
  - 4) Be represented by a friend, advocate, or attorney at his/her own expense.
- d. The hearing will be recorded electronically. The ALJ shall follow the applicable procedures set forth at Benefit Appeal Regulations, Section 200 of the MDES Regulations.
- e. Following the completion of the hearing, the ALJ will present the findings of fact to the State Review Panel. The State Review Panel shall be made of members designated by the Executive Director or his designee. The State Review Panel will listen to the recording of the hearing and review the findings of fact presented by the ALJ. The State Review Panel may accept, reject, or modify the ALJ's recommendation and shall issue a written decision to the involved parties within sixty (60) days of receipt of the grievance.

- f. Statewide procedures provide for an appeal to the U.S. Department of Labor (USDOL) when:
  - No decision is reached within sixty (60) calendar days; or
  - Either party is dissatisfied with the State hearing process.
- g. Grievances filed at the State level may be remanded to the PDD level if it is determined that the alleged incident is related to the local SCSEP. Once the PDD grievance process has been completed, an appeal of the PDD's decision may be made to the State.

**C. Planning and Development District Level Appeals to the State**

- 1) Appeals must be made in writing and filed with MDES within fifteen (15) calendar days of the receipt of the PDD level decision or fifteen (15) calendar days from the date on which the decision should have been received (sixty (60) calendar days after filing the original grievance or complaint with the PDD). Appeals should be addressed to:

Mississippi Department of Employment Security  
Office of Grant Management  
OAA/SCSEP Grievances and Complaints  
P.O. Box 1699  
Jackson, MS 39215-1699

- 2) Appeals should include the following information:
  - a. The name, address, and telephone number of the participant or other affected party filing the appeal;
  - b. A copy of the original grievance filed at the PDD level, documenting the nature of the alleged incident and noting all relevant parties;
  - c. A copy of the original decision reached at the PDD level, including documentation of the date on which the decision was received;
  - d. The grounds on which the appeal is sought; and
  - e. The signature of the complainant and the date on which the appeal was signed.

- 3) MDES will review the appeal and notify the involved parties within fifteen (15) calendar days of the receipt of the appeal. MDES may affirm, modify, set aside, or remand any decision made at the PDD level or, at its sole discretion, direct that additional evidence be taken.
- 4) If a hearing was held at the PDD level, MDES shall request a record of the hearing. An ALJ will review the record of the PDD level hearing. If the PDD level hearing is determined to be sufficient, a State level hearing will not be held. The ALJ will present the findings of fact to the State Review Panel. The State Review Panel will review the findings of fact presented by the ALJ. The State Review Panel may accept, reject, or modify the PDD's decision and will issue a written decision to the involved parties within sixty (60) calendar days of receipt of the appeal.
- 5) If a hearing was not held at the PDD level, MDES shall instruct the PDD to hold a hearing within thirty (30) calendar days of receipt of the appeal. If the PDD fails to hold a hearing within the required timeframe, MDES will schedule a State level hearing before a, ALJ. MDES will notify the involved parties at least ten (10) calendar days prior to a scheduled hearing.

**D. Fair Hearing**

- 1) The hearing notice will include:
  - a. The date of the notice;
  - b. The name and address of the participant or other affected party filing the appeal and all other involved parties;
  - c. A statement documenting the nature of the appeal, including: information about the original grievance or complaint filed, the original decision reached at the PDD level, and the grounds on which the appeal is being sought;
  - d. The notice. The date, time, and place of the hearing; and
  - e. The name, address, and telephone number of the contact person issuing
- 2) The hearing shall be conducted in an informal manner with strict rules of evidence not being applicable. Parties shall have the right to present written and/or oral testimony and arguments; the right to call and question witnesses; the

right to request and examine records and documents relevant to the issues; and the right to be represented. The hearing will be recorded electronically. The ALJ shall follow the applicable procedures set forth at Benefit Appeal Regulations, Section 200 of the MDES Regulations.

- 3) Following completion of the hearing, the ALJ will present the findings of fact to the State Review Panel. The State Review Panel will listen to the recording of the hearing and review the findings of fact presented by the ALJ. The State Review Panel may accept, reject, or modify the ALJ's recommendation and shall issue a written decision to the involved parties within sixty (60) days of receipt of the appeal.
- 4) Statewide procedures provide for an appeal to USDOL when:
  - No decision is reached within sixty (60) calendar days; or
  - Either party is dissatisfied with the State hearing process.

#### **E. State Level Appeals to the U.S. Department of Labor**

Allegations of violations which are not resolved within sixty (60) days under the grantee's procedures may be filed with USDOL at the following address:

Chief Division of Adult Services  
ETA/U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210


#### **F. Disposition of Grievances**

- 1) If the facts support the grievance, the responsible authority shall, within thirty (30) working days of the receipt of the written grievance, make the changes necessary to resolve the issue.
- 2) If the Host Agency Director's/PDD's response is not satisfactory to the participant, the participant may, within ten (10) working days, take the matter for further consideration to the next higher authority as specified in II.3., relating to resolving issues at the lowest possible level of authority.
- 3) The site manager, host agency, or PDD, and each level of authority at which the grievance remains unresolved, shall within ten (10) working days following receipt of a request (oral or written) for continuing grievance action, develop a memorandum detailing the circumstances of the grievance, attach all pertinent

documentation regarding the findings and actions taken at that level of authority and forward it to the next level) with a request for a meeting of the parties concerned with the issue.

**V. EFFECTIVE DATE:**

This policy is effective July 1, 2019.

  
\_\_\_\_\_  
Jacqueline A. Turner  
Executive Director

18E. Mississippi Individual Duration Limit Policy



**Mississippi Department of Employment Security**  
**Senior Community Service Employment Program (SCSEP)**  
**Individual Durational Limit Policy**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to provide guidance to SCSEP subgrantees and participants concerning the duration of participation in SCSEP.

**II. BACKGROUND**

Section 641.570 (a)(1) of the SCSEP final rules states that SCSEP eligible individuals may participate in the program for a maximum duration (Participant's Individual Durational Limit) of 48 months in the aggregate (whether or not consecutive) from the date of the individual's enrollment in the program.

**Mississippi Individual Durational Limit Policy:**

The state of Mississippi Department of Employment Security implemented a policy in 2012 which states that the individual participant durational limit shall be 48 months without the possibility of extensions. This means that no participant will be offered an extension beyond the 48-month time limit for participation in SCSEP.

**III. IMPLEMENTATION INSTRUCTIONS**

July 1, 2007, changes were implemented which reduce the time a participant may be enrolled in SCSEP. *Individual enrollments must average no more than 27 months in duration. In addition, participants have 48 months life-time to utilize the services of this program. This means that it is imperative that participants find unsubsidized employment as quickly as possible – hopefully within 3 to 9 months of enrollment – allowing for time remaining for additional assistance, should it be needed in the future. This time allowance will be monitored by the DOL SCSEP database, known as SPARQ, and will take into account all work-training time accumulated from all SCSEP providers in the country for each participant. It is vital to the success of each participant in the attainment of their employment goals that they understand these restrictions, and that they work to achieve unsubsidized employment as quickly as possible.*

Subgrantees must inform SCSEP participants of the maximum 48-month time limit for participating in the program at the time of their enrollment in the program. It is imperative that participants receive this information, as they must plan for their lives and incomes after their SCSEP eligibility ends. *To the extent possible, subgrantees must*

*operate the program so that employment in an unsubsidized job within the 27-month average enrollment is the ultimate goal for each enrollee.*

Participants also need to be made aware that there will not be any extension beyond the maximum 48 months. Subgrantees must develop a form that the participant will sign that states that he/she is aware of this durational limit that is mentioned in the SCSEP Participant Handbook. This signed form must be kept in the participant's file.

**Transition Planning:**

Appropriate transition plans must be in place for each participant affected by a durational limit, and will be implemented in a timely manner to ensure the best possible outcome for each participant. Sub-grantees should identify other relevant community partners and should collaborate with SCSEP partners, including WIN Job Centers, to ensure that participants have opportunities during the transition process to use SCSEP partner services. The WIN Job Centers provide employment services, resume writing, interviewing workshops, Career Readiness Certificate testing, and education training opportunities.

Sub-grantees should invite community partners and WIN Job Center partners to meetings to discuss services provided and eligibility requirements and to also introduce participants to the partners prior to exiting the program.

**Participant Notification Requirement:**

Sub-grantees are required to send a 90 day and 30 day notice to participants who are about to reach their durational limit.

**IV. EFFECTIVE DATE:**

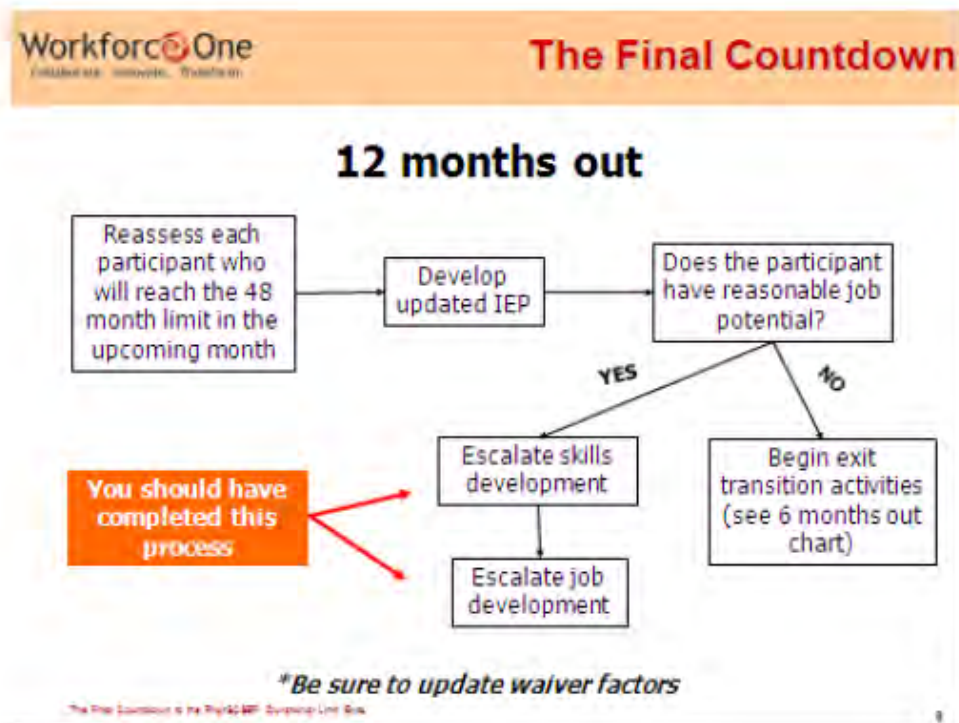
This policy is effective April 2017 until modified or rescinded.

**V. ATTACHMENT:**

Process Chart for Participant Final Year in SCSEP

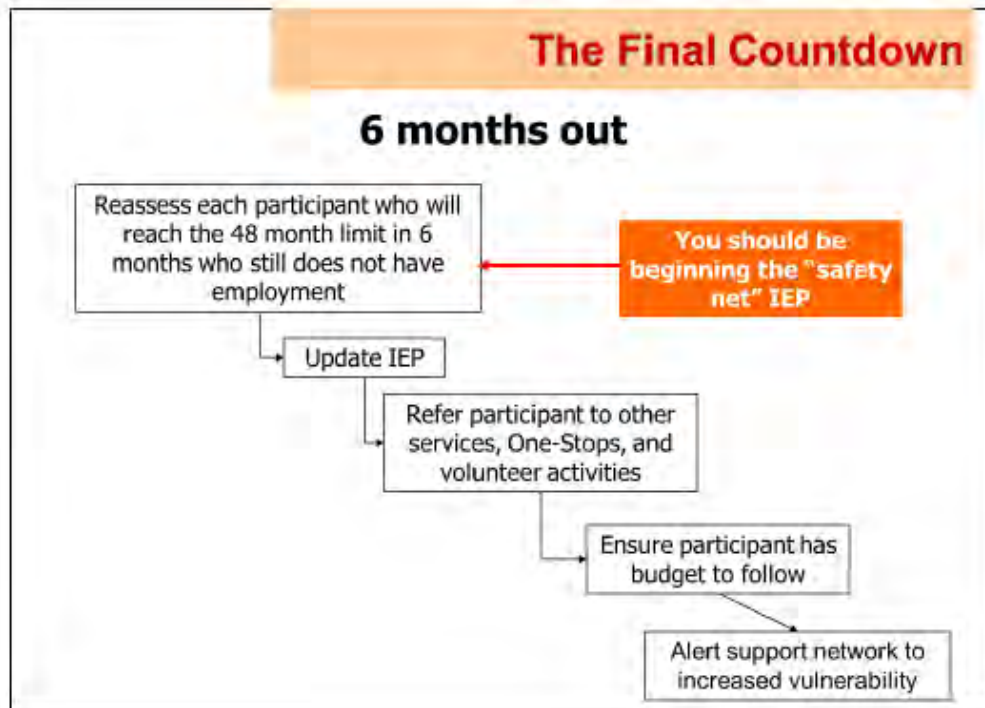
**For participants approaching durational limit in 1 Year:**

You should send a 1 year letter to each participant at the beginning of their 4<sup>th</sup> year. **All participants on current WDL list should have gotten a letter by now.**



***For participants approaching durational limit in 6 Months:***

- 1) Develop transition plans and include those plans in the participants' IEPs.
- 2) Send a letter to the participants to remind them they will be leaving the program in six months. **Call in those participants to discuss their transition plans.**



***For participants approaching durational limit within 30 Days:***

Participants **must** be given 30 days' written notice of their termination and **must** be informed that the termination is subject to appeal under the grantee's grievance policy.

- A copy of the grievance policy should be attached to the written termination notice.
- On the Exit Form, "Durational Limit" should be checked as the reason for exit.

# Appendix J: Local Workforce Development Area Guidelines

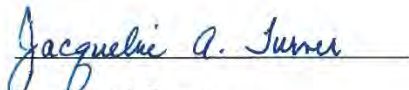


MISSISSIPPI DEPARTMENT *of* EMPLOYMENT SECURITY  
OFFICE OF THE GOVERNOR  
MARK HENRY  
EXECUTIVE DIRECTOR

**WIOA COMMUNICATION NUMBER: 15-014**

**DATE: January 15, 2016**

- I. **SUBJECT:** Local Workforce Development Area Four-Year Strategic Plans
- II. **BACKGROUND:** On July 22, 2014, President Barack Obama signed the Workforce Innovation and Opportunity Act (WIOA), comprehensive legislation that reforms and modernizes the public workforce system. In accordance with WIOA Section 103, the State of Mississippi submitted a combined plan to meet the requirements of the Act. The Plan was submitted to the U.S. Department of Labor on October 30, 2015. A kickoff meeting was held December 10, 2015 to begin the planning process for the local area plans that will align with the State Plan. Each Local Workforce Development Board must develop and submit to the Governor a comprehensive four-year local plan in accordance with WIOA Section 108.
- III. **REQUIRED ACTION AND DUE DATE:** Local area plans should be developed according to the instructions provided in this communication and any subsequent instruction issued by MDES. The local plans should be submitted **by May 31, 2016**, for review by the Office of Governor Phil Bryant, MDES Office of Grant Management, and by Core and Strategic Partners included in the State Plan.
- IV. **CONTACT:** Questions concerning this instruction should be addressed to Laura Ring at 601-321-6017 or [lring@mdes.ms.gov](mailto:lring@mdes.ms.gov) or to Bob DeYoung at 601-321-6477 or [rdeyoung@mdes.ms.gov](mailto:rdeyoung@mdes.ms.gov).
- V. **ATTACHMENTS:** Timeline from December 10<sup>th</sup> Kickoff Meeting  
Local Workforce Development Board Plan Guidelines

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

HENRY J. KIRKSEY BUILDING  
1235 ECHELON PARKWAY • JACKSON, MISSISSIPPI 39213  
TELEPHONE: 601-321-6002 • [mdes.ms.gov](http://mdes.ms.gov)

Workforce Innovation and Opportunity Act

Guidelines for Mississippi Local Workforce  
Development Board Plans

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## **Introduction**

Program Year 2015 marks the first year of the Workforce Innovation and Opportunity Act (WIOA). WIOA requires each workforce development board to develop a comprehensive four-year plan, in partnership with the local chief elected official, and submit to the state. The WIOA four-year plan will be effective July 1, 2016 - June 30, 2020. At the end of each year of the four-year local plan, each local board shall review the local plan and prepare and submit modifications to the local plan to the MDES Office of Grant Management. Modifications should reflect changes in labor market and economic conditions or in other factors affecting the implementation of the local plan.

The Mississippi Department of Employment Security (MDES), as designated by the Office of the Governor, is issuing these instructions for local plans. The local plan shall support the alignment strategy described in the state plan in accordance with WIOA Section 102(b)(1)(E), and otherwise be consistent with the state plan. Local Workforce Development Boards may obtain a copy of the Mississippi WIOA Plan from MDES. Workforce Development Boards shall also comply with WIOA, Section 108 in the preparation and submission of the plan. Additional information about the WIOA, Public Law 113-128, enacted July 22, 2014, may be obtained from the U.S. Department of Labor Employment and Training Administration website: [www.doleta.gov](http://www.doleta.gov).

These guidelines have been written to assist the Local Workforce Development Areas (LWDAs) in structuring their workforce plan to meet to federal WIOA regulations and alignment with the overarching workforce goals of the state. Any future advisement will be provided by the Office of Grant Management (OGM) via WIOA communications.

## **Public Comment Requirements**

In accordance with the Workforce Innovation and Opportunity Act, Section 108(d), the Workforce Development Board shall make copies of the proposed local plan available to the public through electronic and other means, such as public hearings and local news media; allow for public comment not later than the end of the 30 day period beginning on the date the proposed plan is made available; and, include with submission of the local plan any comments that represent disagreement with the plan.

## **Submission Requirements**

Local plans must be submitted to the MDES Office of Grant Management no later than 5:00 PM CDT on May 31, 2016. Local plans should be submitted electronically in PDF format and uploaded via JSCAPE with an email notification to [rdeyoung@mdes.ms.gov](mailto:rdeyoung@mdes.ms.gov) that the plan has been uploaded. The original plan and attachments should be retained by each local area.

## Plan Outline

### A. Local Workforce Development Area Overview

The purpose of this section is to provide an overview of the local area and identify the individuals and entities responsible for general operations within the local area.

- A.1. Provide the Local Area's official (legal) name established to administer the Workforce Innovation and Opportunity Act (WIOA). Name document: *"(insert local area name) Re-designation Approval Letter."*
- A.2. Provide the name, title, organization name, address, telephone number and e-mail address of the Workforce Development Director.
- A.3. Provide the name, elected title, local government affiliation, address, telephone number and e-mail address of the Local Area's Chief Elected Official.
- A.4. Provide the name, title, business name, address, telephone number and e-mail address of the individual authorized to receive official mail for the Chief Elected Official, if different than A.3.
- A.5. Provide the name, address, and telephone number of the Administrative/Fiscal Agent responsible for disbursing Local Area WIOA grant funds. This is the entity responsible for the disbursement of grant funds. [WIOA Sections 107(d)(12)(B)(i)(III) and 108(b)(15)].
- A.6. Provide the name, title, organization name, address, telephone number and e-mail address of the Administrative/Fiscal Agent's signatory official.
- A.7. Attach a copy of the Administrative Entity/Local Workforce Development Area/Fiscal Agent's organizational chart with an effective-as-of date. Include position titles of Local Area staff. Name document: *"(insert name of administrative entity name/local workforce development area/fiscal agent name) Organizational Chart."*
- A.8. Provide the Administrative Entity's Data Universal Numbering System (DUNS) number and assurance that the 'System for Award Management' (SAM) status is current. Administrative Entities must register at least annually on the SAM website (<https://www.sam.gov/ccr/>) to receive federal funding [required by Federal Acquisition Regulation (FAR) Section 4.11 and Section 52.204-7].
- A.9. Provide the Local Workforce Development Board (LWDB) Chairperson's name, business title, business name and address, telephone number and e-mail address.
- A.10. Attach the LWDB's Membership List. The first block is reserved to identify the Board Chairperson. Indicate all required representation and indicate if vacant. [WIOA Section 107(b)(2)]. Name document: *"(insert local area name) Local Workforce Development Board Membership List."*
- A.11. Attach the LWDB By-laws including date adopted/amended. Name document: *"(insert local area name) Local Workforce Development Board By-laws."*

**A.12.** Attach a copy of the signed 'Certification Regarding Debarment, Suspension, and other Responsibility Matters-Primary Covered Transactions.'<sup>1</sup> [Required by the Regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, participants' responsibilities.] Document must bear the original signature of the Administrative Entity signatory official. Name document: "*(insert local area name) Debarment Form.*"

**A.13.** The local plan must include the LWDB and Chief Elected Official (CEO) Signatory Submission Page, bearing the original signatures of the Chief Elected Official(s) and the LWDB Chairman. Include a signed copy with the submission of the Local Plan. Name document: "*(insert local area name) Signatory Submission Page.*"

## **B. Regional Strategic Planning**

If the local area is part of a planning region that includes other local areas, the local boards and chief elected officials of the local areas represented shall collaborate to prepare and submit a regional plan as described in Section 106(c)(2).

As outlined in the State Plan, the State Board and the local boards will work together to define regions that occupy space in one or more workforce areas. These regions will be defined according to industry and sector needs and these regional concerns will be taken into account in training and other local administration of WIOA priorities.

For the purpose of this section, regions are currently identified as the Local Workforce Development Areas.

The purpose of this section is to identify businesses and industries that operate within major enterprises that might cross jurisdictional boundaries (e.g., county boundaries, state borders) and might involve multiple LWDAs. Through analysis of the regional needs and market trends, this section is designed to levy the strengths of the local areas in order to create strategies for meeting the needs of employers for in-demand industries across the region.

**B.1.** Include the following statement: For the purpose of this section, regions are currently identified as the Local Workforce Development Areas.

**B.2.** Describe how the regional vision aligns with the "Mississippi Works Smart Start Career Pathway Model" as outlined in the Mississippi WIOA Plan.

**B.3.** Provide an analysis of the regional economic conditions to include: a) existing and emerging in-demand industry sectors and occupations; and, b) knowledge and skills needed to meet the employment needs of employers in those industry sectors and occupations. Include sources used and business involvement in determining needs. [WIOA Section 108 (b)(1)(A)(i)(ii) and (B)].

**B.4.** Provide an analysis of the workforce in the region, including current labor force employment and unemployment data, and information on labor market trends, and the educational and skill

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<sup>1</sup> [https://www.sba.gov/sites/default/files/articles/SBA\\_Form\\_1623\\_Debarment\\_and\\_Suspension.pdf](https://www.sba.gov/sites/default/files/articles/SBA_Form_1623_Debarment_and_Suspension.pdf)

levels of the workforce in the region, including individuals with barriers to employment. [WIOA Section 108 (b)(1)(C)].

**B.5.** Describe strategies to facilitate engagement of businesses and other employers, including small employers and in-demand industry sector occupations. Describe methods and services to support the workforce system in meeting employer needs. [WIOA Section 108 (b)(4)(A)(i)(ii)].

**B.6.** Describe strategies and services used to coordinate workforce development programs and economic development. [WIOA Section 108 (b)(4)(A)(iii)].

**B.7.** Outline regional transportation issues related to workforce development and ways the region is/will address needs identified. Include a description and/or map of the regional commuting patterns. [WIOA Section 108(b)(11)].

**B.8.** Describe how the region coordinates with area secondary education, community colleges and universities to align strategies, enhance services and avoid duplication of services. [WIOA Section 108(b)(10)].

**B.9.** Provide details on how the region addresses workforce issues specifically related to its: a) cities and/or towns; b) suburban areas; and, c) rural areas.

**B.10.** Provide details on how the region connects military skills to occupational demands to serve military veterans and families.

### **C. Local Area Planning**

Mississippi's State Plan includes the Combined Plan Programs and Strategic Programs. The purpose of this section is to explain how the LWDA will prepare and support an educated and skilled workforce for all eligible job seekers. This section includes descriptions of the local workforce development system and the role the local board plays in coordinating with workforce development partners and stakeholders.

**C.1.** Provide a description of the LWDB's strategic vision and goals for preparing an educated and skilled workforce including youth and individuals with barriers to employment. Include goals relating to the performance accountability measures based on primary indicators of performance in order to support regional economic growth and economic self-sufficiency. [WIOA Section 108 (b)(1)(E)].

**C.2.** Taking into account the analyses described in the Regional Strategic Planning section, describe strategies to work with the entities that carry out the core programs that align resources available to the local area to achieve the strategic vision and goals described in C.1. [WIOA Section 108 (b)(1)(F)].

**C.3.** Describe local area's workforce development system, including identifying the programs included in the system, and how the local board will work with the entities administering core programs and other workforce development programs to support alignment and provision of

services, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.). [WIOA Section 108 (b)(2)].

**C.4.** Provide a description of how the LWDB, working with the entities carrying out core programs, will expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. Include how the LWDB will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and improve access to activities leading to a recognized postsecondary credential including a credential that is an industry-recognized certificate or certification, portable, and stackable. [WIOA Section 108 (b)(3)].

**C.5.** Describe the LWDB's use of initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies, designed to meet the needs of employers in the corresponding region in support of the regional strategy to meet the needs of businesses. [WIOA Section 108 (b)(4)(B)].

**C.6.** Describe how the LWDB coordinates and promotes entrepreneurial skills training and microenterprise services. [WIOA Section 108(b)(5)].

**C.7.** Describe how the local board enhances the use of apprenticeships to support the regional economy and individuals' career advancement.

**C.8.** Provide a description of how the LWDB coordinates workforce investment activities carried out in the local area with statewide rapid response activities as described in WIOA Section 134(a)(2)(A). [WIOA Section 108 (b)(8)].

**C.9.** Provide a description of plans, strategies and assurances concerning maximizing coordination of services provided under the Wagner-Peyser Act and services provided in the local area through the WIN Job Center system. Include how improved service delivery and avoidance of duplication of services will be achieved. [WIOA Section 108 (b)(12)].

**C.10.** Provide a description of how the LWDB coordinates workforce investment activities carried out in the local area with the provision of Adult Education and Literacy activities. [WIOA Section 108 (b)(13)].

**C.11** Provide a description of cooperative agreements, as defined in WIOA Section 107(d)(11), between the LWDB or other local entities described in Section 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination. [WIOA Section 108 (b)(14)].

**C.12.** Provide a description of the competitive process used to award sub-grants and contracts in the local area for activities carried out under WIOA Title I. [WIOA Section 108 (b)(16)].

**C.13.** Describe methods used to track Adult, Dislocated Worker and Youth performance measures throughout Program Year 2015 and plans for continuous improvement of performance.

**C.14.** Provide a brief description of the actions the LWDB will take toward becoming or remaining a high-performing board, consistent with the factors developed by the State Board. [WIOA Section 108 (b)(18)].

**C.15.** Describe the role of the local board in coordinating with local economic developers to attract target industries as defined by the Mississippi Development Authority.

**C.16.** Describe the process for preparing and submitting modifications of the plan that reflect changes in local and/or state priorities or target industries on an annual basis.

### **D. WIN Job Centers (One-Stop Delivery System) and Programs**

*Note: Section 121 of the Workforce Innovation and Opportunity Act focuses on the establishment of one-stop centers.*

The purpose of this section is to describe how the job centers in the LWDA will operate and deliver program services.

**D.1.** Provide a brief description of the WIN Job Center system in the local area. [WIOA Section 108 (b)(6)].

**D.2.** Attach the Memorandum of Understanding (MOU) among the local LWDB and partners concerning operation of the WIN Job Center system. [WIOA Section 121(b)(A)(iii)]. Name document: *"(insert local area name) WIN Job Center MOU."*

**D.3.** Describe how WIN Job Centers will use the Mississippi Works integrated, technology-enabled intake and case management information system for programs carried out under WIOA and programs carried out by WIN Job Center partners. [WIOA Section 108 (b)(21)].

**D.4.** Describe how WIN Job Center staff will be trained in integrated services delivery and have appropriate access to Mississippi Works ([wings.mdes.ms.gov](http://wings.mdes.ms.gov)) technology. Include methods and timeline for accomplishing training for both.

**D.5.** Describe the LWDB's method for planning oversight of the WIN Job Center system in the local area, including processes for ensuring quality customer service. Include the review/oversight process and frequency of review. [WIOA Section 121(a)(3)].

**D.6.** Identify WIN Job Center location(s) including Sector Training Plus Comprehensive, Comprehensive, Affiliate, and Virtual-Access sites; program services offered in each; how WIN Job Center operator(s) are designated; provider(s) of WIOA career services and youth services and method of selection. [WIOA Section 121 (b)(1)(A) and (b)(1)(B)]. Name document: *"(insert local area name) WIN Job Centers."*

D.7. Describe the steps that will be taken to prepare for the development and eventual creation of a Sector Training Plus Comprehensive One-Stop Center. [MS WIOA Plan]

D.8. Describe how career services are provided through the WIN Job Centers. [WIOA Section 134(c)(2)].

D.9. Describe the integrated customer service process for participants. Attach a flow chart for services to include initial one-on-one interviews with customers, including Mississippi Works registration, skills assessments, and determination of further services. Name document: "*(insert local area name) Service Flow Chart 2015.*"

D.10. Describe how the LWDB facilitates access to services provided through the WIN Job Center delivery system, including remote areas, through the use of technology and through other means. [WIOA Section 108 (b)(6)(B)].

D.11. Describe how the LWDB uses a portion of funds available to the local area to maintain the WIN Job Center system, including payment of the infrastructure costs of job centers. [WIOA Section 121 (b)(1)(A)(ii) and (h)].

D.12. Describe the roles and resource contributions of the WIN Job Center partners. [WIOA Section 108 (b)(6)(D)].

D.13. Provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area. [WIOA Section 108 (b)(7)].

#### **Youth Services**

D.14. Will the LWDB have a standing committee to provide information and to assist with planning, operational, and other issues relating to the provision of services to youth? [WIOA Section 107(b)(4)(A)(ii)].

If yes, please provide the committee's purpose/vision, planning meeting schedule, and list of members to include members' agency/organization, one of which must be a community based organization with a demonstrated record of success in serving eligible youth. [WIOA Section 107(b)(4)(A)(ii)].

If no, will the LWDB have a formal Youth Council or Youth Advisory group?

Provide a description and assessment of the type and availability of youth workforce activities in the local area, including activities for youth who are individuals with disabilities. Include identification of successful models of such youth workforce investment activities being used and/or planned. [WIOA Section 108 (b)(9)].

Provide the LWDB's approach to meeting the required: a) 75% minimum youth expenditures on out of school youth and include planned program design; and b) required 20% minimum for work experience. [WIOA Section 129 (a)(4)(A) and (c)(4)].

**D.15.** Describe local area strategies and services that will be used to strengthen linkages between the WIN Job Center system and unemployment insurance programs. [WIOA Section 108 (b)(4)(A)(iv)].

**D.16.** Provide a description of how the LWDB coordinates workforce investment activities carried out in the Local Area with the provision of TANF activities.

**D.17.** Describe strategies and services to strengthen K-12 career pathways and expand high school programs to reflect the employment needs of the local area and how these strategies and services will address the findings from the analysis that is required for each local board referenced in Section 108(b)(1)(A-D). Describe how these services and strategies align and support the core strategies of the Mississippi WIOA plan.

**D.18.** Describe how the local area will integrate services for:

- a) persons with disabilities;
- b) veterans;
- c) Temporary Assistance to Needy Families (TANF) recipients
- d) Senior Community Service Employment Program (SCSEP) participants;
- e) individuals with other barriers to employment; and
- f) additional specific populations, if applicable

**D.19.** Describe how entities within the WIN Job Center system, including center operators and partners, will comply with Section 188, if applicable, and provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities. [WIOA Section 108 (b)(6)(C)].

## **E. Sector Strategy Plan**

Sector strategies are regional, industry-focused approaches to building skilled workforces that result in job opportunities for all workers across a range of industries. The purpose of this section is to describe the processes that the LWDA will follow to create a local sector strategy(s) plan that will help existing business and industry prosper and aid in the recruitment of new businesses to the state. This section should include how the local area plans to: 1) engage new and emerging industries along with those already established in the area; and 2) promote the programs and services that better meet the demand of the workforce needs of the industries in the area.

**E.1.** Identify the sectors and their respective supporting industries that best define the current and future economic identity of the local workforce area. Describe how the identified sectors make up the economic identity of the area, why they are relevant for the growth of the area and the region, and how they support the implementation of statewide strategies and support the core strategies State Plan. Clearly identify sectors that are of particular importance to the region versus those that have a more statewide relevance. In this regard, describe how the target industries defined by the Mississippi Development Authority fit within the economic identity of the local area.

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## Guidelines for Mississippi Local Workforce Development Board Plans



**E.2.** Describe the local area plan for engaging local businesses reflective of the main sector(s) along with those supporting the main sector(s) to identify priorities for workforce development. Also include the role state and local economic developers will play in establishing sustainable partnerships with local businesses.

**E.3.** Describe how the local area plans to map local assets including identify critical stakeholders and the roles they will play in the realization of workforce strategies in support of the local economic identity. Stakeholders should include entities and organizations such as the Mississippi Development Authority, local economic developers, foundations, local school districts, community colleges, and community based organizations.

**E.4.** Taking into account the strategies to work with the entities that carry out the core programs, describe the steps the local area will take to increase the awareness of services offered at the WIN Job Center and increase the utilization of the WIN Job Center by the target-industries.

**E.5.** Describe how the local area will meet the training and employment needs of businesses within the target-industries, especially those not currently offered through the WIN Job Center, that emphasizes industry-focused short-term, credential based training programs and two-year degree programs that provide a qualified and quantifiable labor pool.

**E.6.** Describe the steps the local area will take to align basic education credentials with the skills necessary to meet the middle-skill needs of employers in the target-industries. Explain the steps the Local Area will take to objectively assess training and ensure that the skills and credentials earned through training are both portable and stackable.

## **F. Business Plan**

The purpose of this section is to describe how the LWDA will align resources to accomplish the strategies and goals outlined in the overall plan as well as define a timeline for the completion of each component below. The information reported in the business plan will be used as part of each LWDA's annual plan review.

**F.1.** List the workforce goals and intended outcomes for the Local Area, and how they contribute to the primary goals of the State Plan.

**F.2.** Describe how the goals and intended outcomes will be achieved and the proposed activities support the core strategies of the State Plan.

**F.3.** Identify the procedures the local area will take to achieve activities listed in G.2, including specific steps and achievements for planning, implementation, and evaluation.

**F.4.** Provide a timetable of milestones for the duration of the plan that the local area will maintain to ensure timely achievement of the workforce goals and outcomes.

**F.5.** Describe the procedures for reporting progress and performance on reaching the goals and achievements set by the local area including steps to be taken for lack of progress and underperformance in relation to achieving milestones.

**F.6.** Gauge the LWDA capacity to meet the workforce needs of the area and the region. This should take into consideration everything the local area plans to do to support a workforce necessary to maintain and grow economic opportunities in the area. This should include an estimate of the magnitude of the need and the size of the target population to be served. Also describe how the LWDA will achieve the necessary capacity to fully meet local needs.

**F.7.** Map out and provide a matrix of the resources of each stakeholder and describe how these resources can be aligned to achieve the main goals of the local and state WIOA plans.

## **G. Policies**

### **Oversight and Monitoring**

**G.1.** Provide a description of the local area's oversight and monitoring procedures including processes for program and fiscal monitoring. [WIOA Section 107(d)(8)]. Attach a copy of monitoring document(s). Name document: "*(insert local area name) LWDB Oversight and Monitoring PY 2015.*"

**G.2.** Provide a brief description of how the local area will ensure the continuous improvement of eligible providers of services and ensure that such providers meet the employment needs of local employers, workers and jobseekers. [WIOA Section 108 (b)(6)(A)].

### **Equal Opportunity**

**G.3.** Describe processes to ensure individuals are not discriminated against on the basis of age, disability, sex, race, color or national origin. [WIOA Section 188].

**G.4.** Attach the local area's current Equal Opportunity (EO) Complaint Grievance Procedure to address EO requirements [29CFR Part 37.71]. Name document: "*(insert local area name) EO Complaint Grievance Procedure 2015.*"

**G.5.** Describe methods to ensure local Equal Opportunity procedures are updated.

### **Other Policies**

**G.6.** Provide the local area policy(ies) on supportive services for Adults, Dislocated Workers and Youth (i.e., amount, duration, qualifying criteria). [WIOA Section 134(d)(2)]. Name document: "*(insert local area name) Supportive Services Policy.*"

**G.7.** Provide the local area policy(ies) on Needs-Related Payments for Adults, Dislocated Workers and Youth. (i.e., amount, duration, qualifying criteria). [WIOA Section 134(d)(3)]. Name document: "*(insert local area name) Needs-Related Payments Policy.*"

**G.8.** Provide the local area policy for local Incumbent Worker Training.

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## **12 Guidelines for Mississippi Local Workforce Development Board Plans**

The policy should include eligibility and the non-Federal share for employers. The local area may use not more than 20 percent of WIOA Adult and Dislocated Worker funds to pay for the federal share of the cost of training through a training program for incumbent workers. [WIOA Section 134 (d)(4)]. Name document: *"(insert local area name) Incumbent Worker Training Policy."*

**G.9.** Provide the local area policy for local Transitional Jobs. The local area may use not more than 10 percent of Adult and Dislocated Worker funds to provide transitional jobs. [WIOA Section 134(d)(5)]. Name document: *"(insert local area name) Transitional Jobs Plan."*

**G.10.** Describe the local area's planned use of On-the-Job Training (OJT). Provide the local area's On-the-Job Training policy(ies). [WIOA Section 134 (c)(3)(H)]. Name document: *"(insert local area name) OJT Policy."*

**G.11.** Provide the local area's process to meet priority of service requirements and include policy. Name document: *"(insert local area name) Priority of Service Policy."*

**G.12.** Provide the local area's Individual Training Account (ITA) Policy and include the following elements in summary. [WIOA Section 108(b)(19)]. Name document: *"(insert local area name) ITA Policy."*

**G.13.** Provide the local area's process to avoid conflict of interest. Name document: *"(insert local area name) Conflict of Interest Policy."*

**G.14.** Provide the local area's Sunshine Provision Policy. Name document: *"(insert local area name) Sunshine Provision Policy."*

**G.15.** Specify if the Local Area plans to offer incentives for youth. If yes, attach the Youth Incentive Policy to include: a) criteria to be used to award incentives; b) type(s) of incentive awards to be made available; c) whether WIOA funds will be used and d) the Local Area has internal controls to safeguard cash/gift cards. Name document: *"(insert local area name) Youth Incentive Policy."*

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## 13 Guidelines for Mississippi Local Workforce Development Board Plans

## **Local Area Plan Attachment Checklist**

1. Local Area Re-designation Approval Letter
2. Administrative Entity/Local Workforce Development Area/Fiscal Agent Organizational Chart
3. Local Workforce Development Board Membership List
4. Local Workforce Development Board By-laws
5. Local Area Certification Regarding Debarment
6. Local Area Signatory Submission Page
7. Local Area WIN Job Center Memorandum of Understanding
8. Local Area WIN Job Centers
9. Local Area Services Flow Chart
10. Local Area Oversight Monitoring Policies and Tools
11. Local Area Equal Opportunity Procedures
12. Local Area Supportive Services Policy
13. Local Area Needs-Related Payments Policy
14. Local Area Incumbent Worker Training Policy
15. Local Area Transitional Jobs Policy (optional)
16. Local Area OJT Policy
17. Local Area Priority of Service Policy
18. Local Area ITA Policy
19. Local Area Conflict of Interest Policy
20. Local Area Sunshine Provision Policy
21. Local Area Youth Incentive Policy (optional)



STATE OF MISSISSIPPI

# WORKFORCE INNOVATION & OPPORTUNITY ACT

Mississippi Works Smart Start Career Pathway