2024 MISSISSIPPI
WORKFORCE INNOVATION & OPPORTUNITY ACT
STATE PLAN

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TABLE OF CONTENTS

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

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

In 2020, to drive progress on creating 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 creating 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. It aligns all workforce and WIOA stakeholders around a unified strategy that directly addresses the challenges workers face in gaining 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 serve individuals and businesses better. 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 support 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 and 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, and those pursuing postsecondary education. The system continues to provide wraparound services, addressing needs such as childcare, transportation, and nutrition and offering support for improving basic literacy, numeracy, and English language skills.

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 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 WIOA Combined Plan Partners network 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 allow the state workforce system to assess program effectiveness and pursue a data-driven approach to strategic planning.

5. Conduct continuous research to understand Mississippi's employers' workforce needs 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 shared 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 employers demand. 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 quality opportunities for Mississippians and provide employers with a competitive and capable workforce with 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 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.

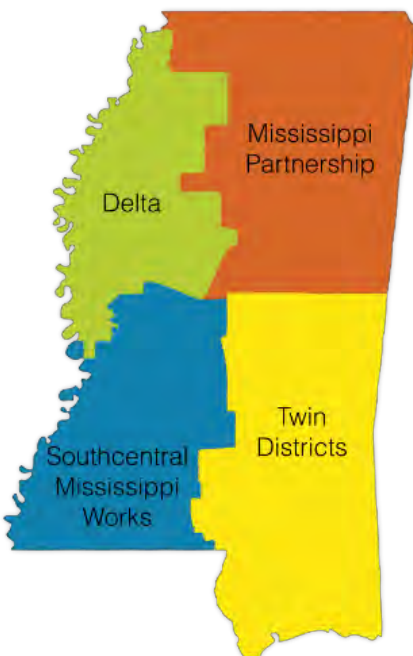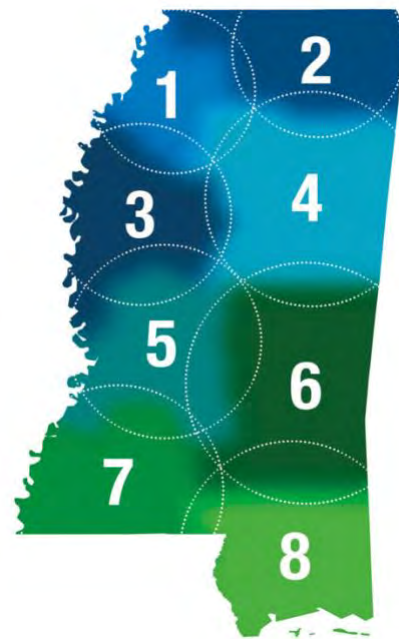Figure 1: Local Workforce Development Areas

Figure 2: Workforce Ecosystems

A. Economic Analysis

The Mississippi economy is currently valued at around $136B. It 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 period). This growth is projected to drive a corresponding increase in employment - approximately .4% per year. The state's top industries are primarily 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 state's Jackson, Gulfport, and Greater Memphis regions.

i. Existing Demand Industry Sectors and Occupations

Mississippi Works Labor Exchange data show that 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 and support 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 Services	40,796.00	3.6	$ 67,390	9,878.00
Other Services (except Public Administration)	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 Enterprises	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	2022-2032 % Job Change	Avg Earnings Per
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
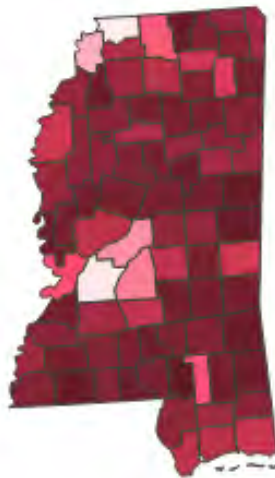
Source: Lightcast Datarun, 2023

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
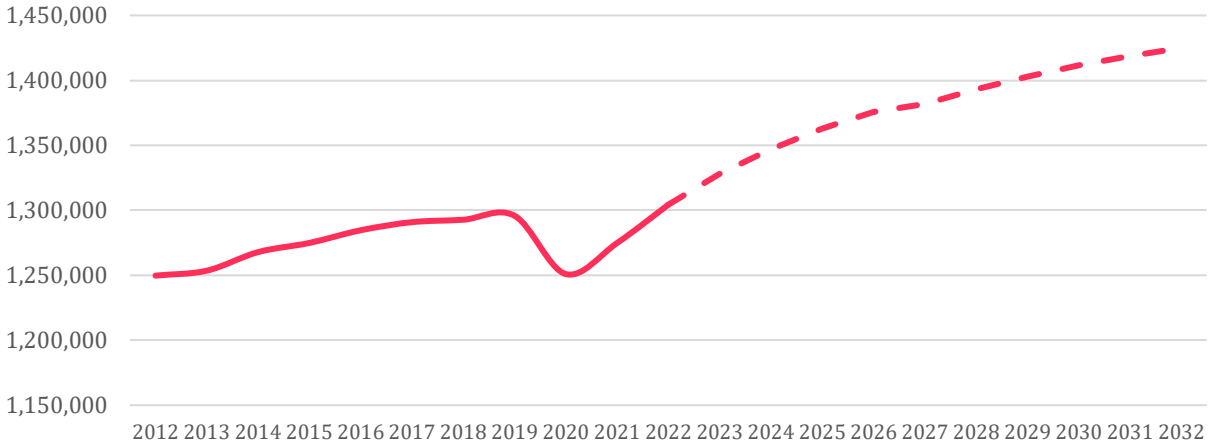
Source: Lightcast Datarun, 2023

Growth will be distributed unevenly 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, transportation equipment, 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 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 is a healthcare hub for the entire state. The presence of oil and natural gas deposits in the region gives 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 compared to the three other LWDAs. Core economic activities include manufacturing, healthcare, and tourism. Top manufacturing 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 reinforces a strong defense presence in the area and supports 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 the 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 Mississippi's top ten crop-production counties. 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 drives 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 of 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

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. Without strategic intervention to drive economic growth in knowledge—and/or technology-intensive sectors, this mix of employment and 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 for Mississippi's successful meeting of the needs of existing and emerging businesses and growing the economy.

Table 6: Employer Need by Education Level
Source: Lightcast Datarun, 2023

Education Level	2022 Jobs	2032 Jobs	2022 – 2032 Job Change	2022 – 2032 % Job Change	US % Job	Avg Hourly	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
Total Across All Occs	**1,287,882**	**1,408,714**	**120,832**	**9%**	**11%**	**$27.25**	

Job posting data aligns with 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 Postings	Software Skills	% of Postings
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

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 the 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
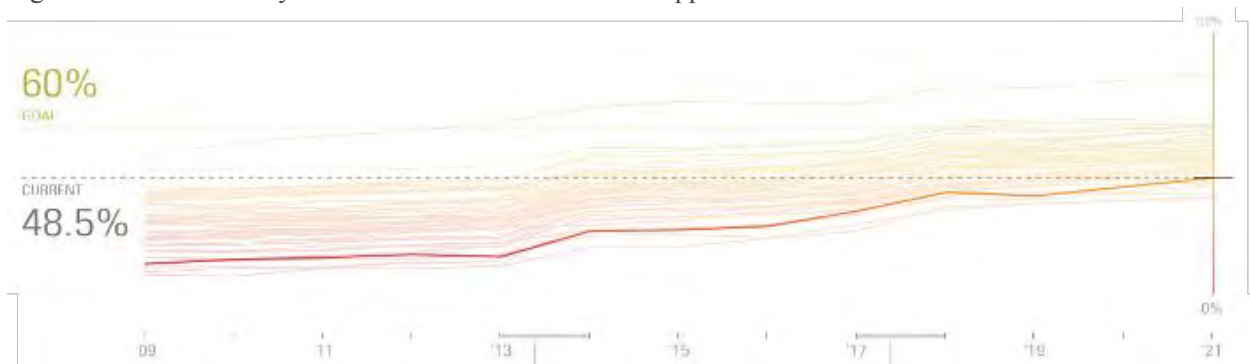
Source: Lumina Foundation, 2021

i. Employment and Unemployment

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
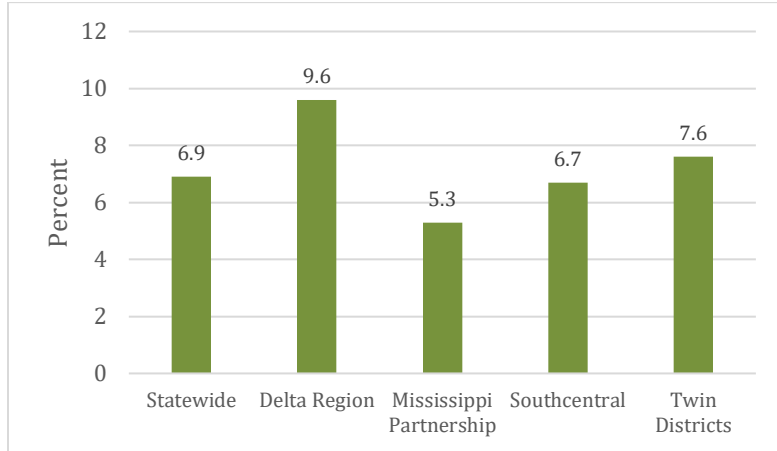
Source: Lightcast Datarun, 2023

The state's overall Labor Force Participation Rate has largely trended downwards since 2019. It 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. Th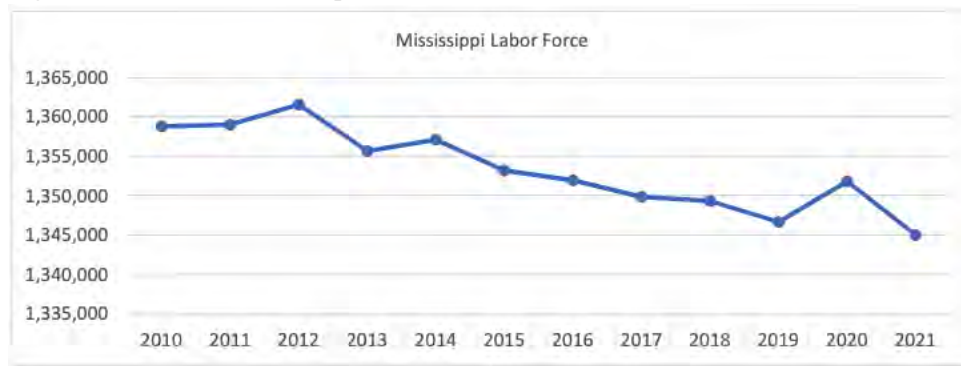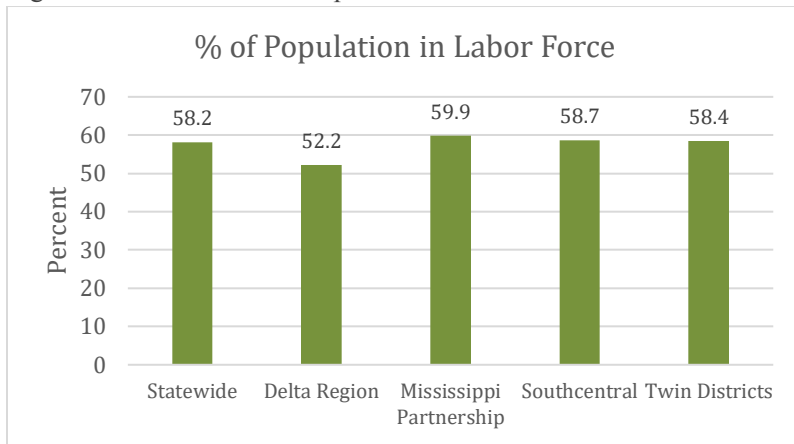e bulk of the state's most educated workers are employed in an occupation for which the typical level of education required is less than that attained by the individual. This aligns with data from the job market, which indicates that only 23% of jobs in the state require a bachelor's degree or higher.

Figure 9: State Underemployment
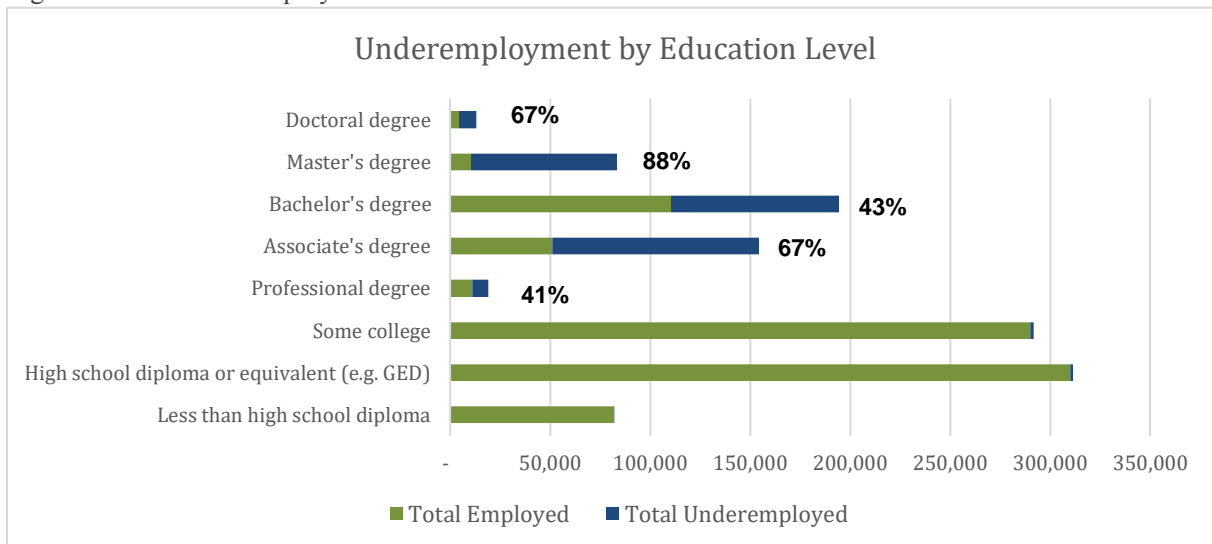
Source: Lightcast analysis of ACS data, 2017-2021 5 Year Estimates

ACS data of the LFPR by education level and age demonstrates that Mississippi lags slightly behind the nation. The participation rate in education increases with overall attainment, with the highest levels of participation seen in individuals with a bachelor's degree or higher and the lowest 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
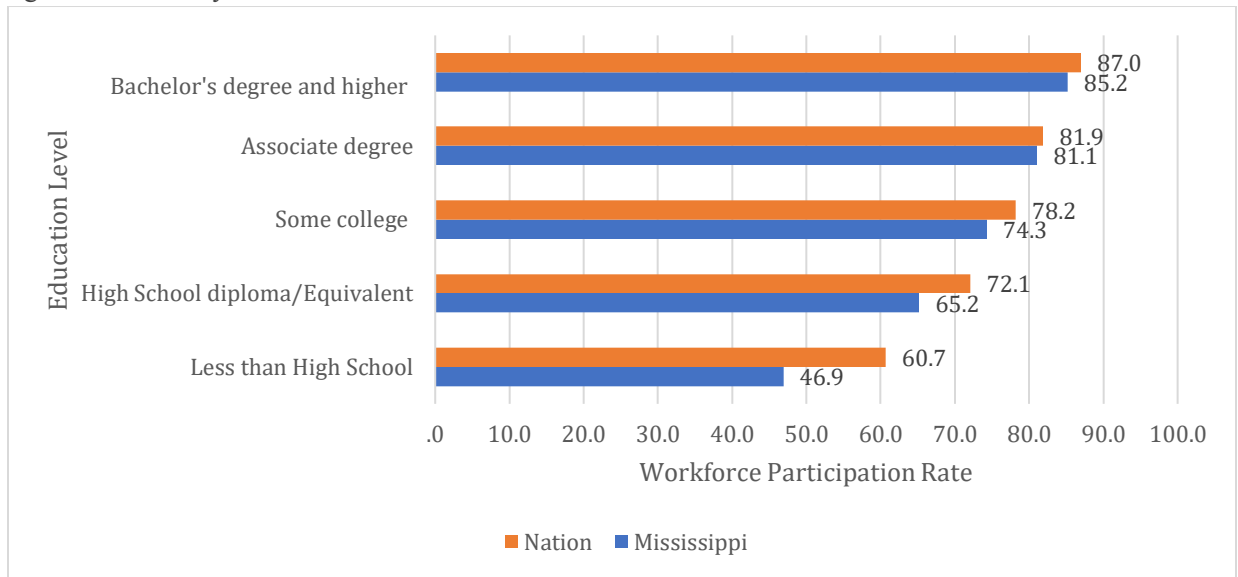
Source: ACS data, 2017-2021 5 Year Estimates

Figure 11: LFPR by Age
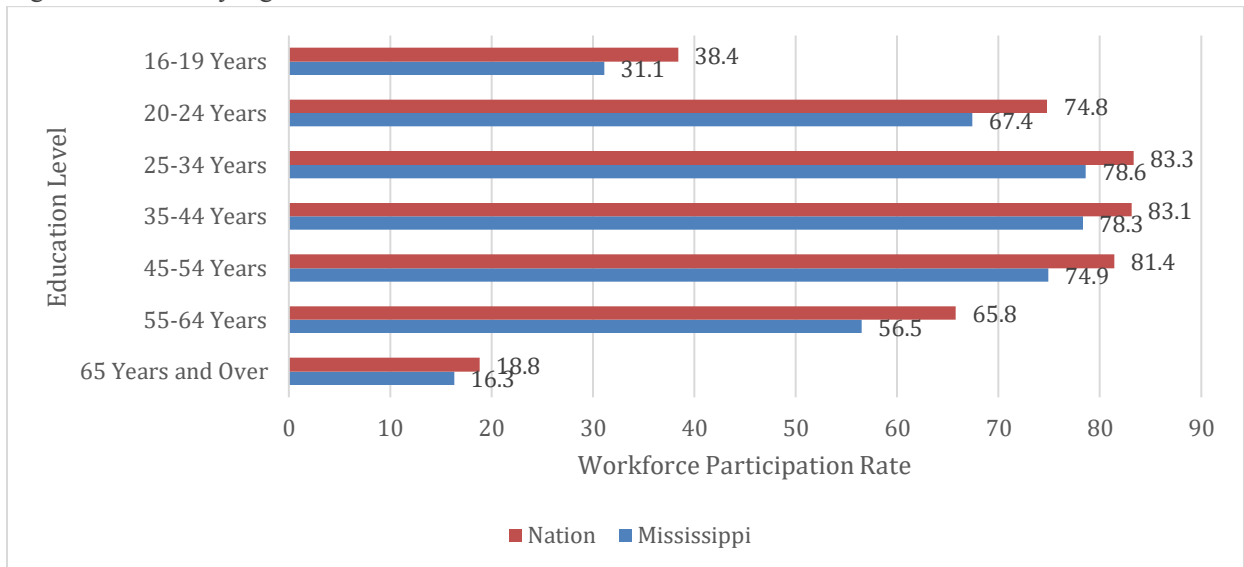
Source: ACS data, 2017-2021 5-Year Estimates

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

Sources: American Community Survey, 2021 5-Year Estimates;[1]Mississippi Department of Corrections, 2023; [2]Mississippi Department of Education, 2023; [3]U.S. Department of Health & Human Services, Administration for Children & Families, Children's Bureau, 2023; [4]Adult Basic Education, 2023 [5]U.S. Department of Agriculture, 2017; [6]Mississippi Department of Human Services, 2023; [7]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
Veterans	
Unemployment Rate	4.2
Workforce Participation Rate	44.5
Disabled	
Unemployment Rate	3.2
Workforce Participation Rate	17.7
Low Income	
Unemployment Rate	13
Workforce Participation Rate	28.5
Native American/Hawaiian	
Unemployment Rate	0
Workforce Participation Rate	43.7
Age 16-19 (Overall)	
Unemployment Rate	2.3
Workforce Participation Rate	28.4
Age 16-19 Not enrolled in School	
Unemployment Rate	2.3
Workforce Participation Rate	79.8
Age 16 and over with a Disability	
Unemployment Rate	0
Workforce Participation Rate	14

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

ii. Labor Market Trends

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 the 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 maintaining the status quo and will change in response to economic factors.

Simultaneously, the workforce is increasing rapidly in educational attainment, the number of people with post-secondary credentials in the state is growing, and underemployment is driving increases. 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

According to Lumina Foundation data, Mississippi currently ranks 44th in the nation as measured by workforce education levels. 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, a 6.2% increase in workers with some college or an associate degree, 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. Significant increases in the graduation rates of high school, community college, and university students are driving this progress.

Figure 12: Mississippi Population – Percent Change by Educational Attainment
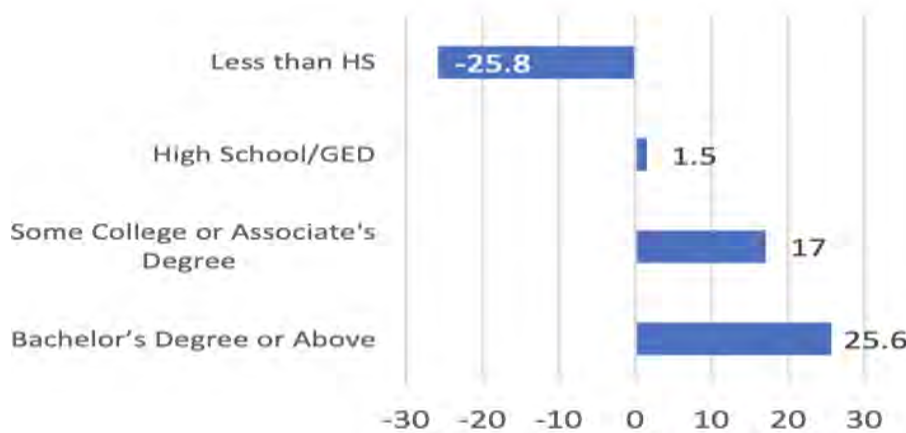
Source: Mississippi Population and Labor Force Profile, 2023 Report, Mississippi State University National Strategic Planning and Analysis Research Center

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 four-year degree. Currently, the state's workforce exceeds the 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 is required 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 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
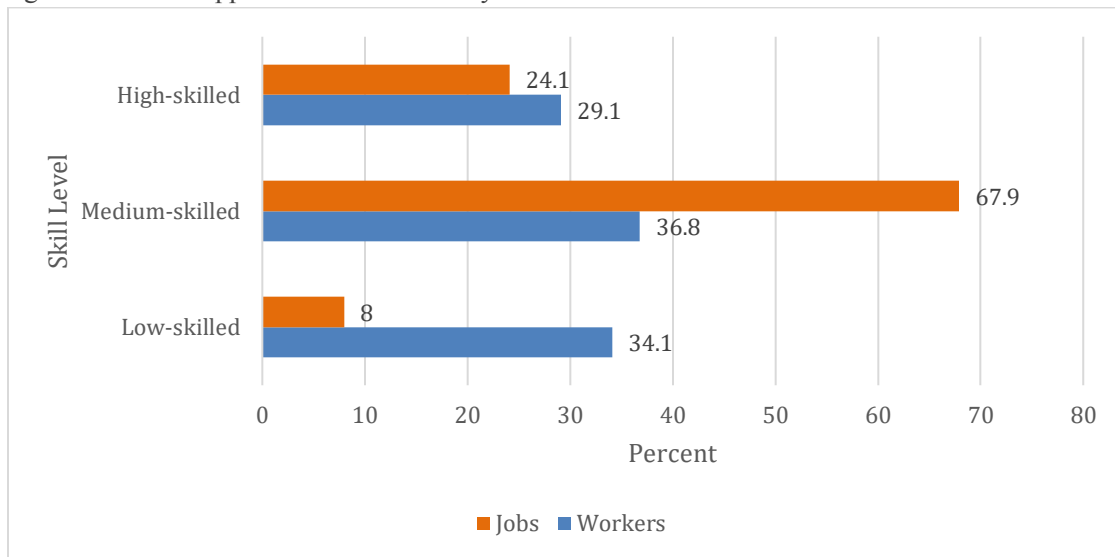
Source: U.S. Bureau of Labor Statistics, OEWS, 2022; ONET, 2023; U.S. Census Bureau, American Community Survey, 2021 5-Year Estimates.

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

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 (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. 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 supplying 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.

Local community-based organizations, LWDBs, and educational institutions provide WIOA Youth services. 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 al 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-Leve; Career Pathway Options.

During the program year 2022-2023, Title II programs served 6,403 individuals, of whom 1,585 received their high school equivalency diplomas.

Title III—Wagner-Peyser: Wagner-Peyser funds are administered by MDES. The Wagner-Peyser Employment Service program provides various services, including job search assistance, job referrals, and placement assistance for job seekers. From July 1, 2021, through June 30, 2022, MDES received 238,598 job orders totaling 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) 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 housed within the Benefits Department. This voluntary program is designed for unemployed individuals interested in starting their own businesses. Eligible claimants who meet specific 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 partner with external resources such as governmental organizations and businesses 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 developing a business venture that may lead to a new business in the state, boosting 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 encouraged with 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 due to 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 will be laid off from a business covered under a Trade petition from DOL and still within their 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.

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 the 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 needs 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 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%, adversely impacting service delivery.

Ineffective Outreach and Underutilization of Workforce Services: The 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 a lack of exposure to employment pathways and mobility, a lack of knowledge about educational requirements and credential value, and a lack of professional preparation.

Barriers to Accessing Training: 1) Financial challenges, including the inability to afford tuition or forgo 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 must earn some income (that does not require them to relinquish public assistance benefits immediately). 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 must 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 maintain employment successfully.

C. State Workforce Development Capacity

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, Governor Reeves and the Mississippi Legislature established the new Office of Workforce Development (AccelerateMS) to promote additional improvements in workforce training and education initiatives. 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 workforce development, and serve as the coordinating entity for all workforce development stakeholder agencies in Mississippi.

Technology and Data Capacity: 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 that provides labor exchange services to job seekers and employers and allows 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 all WIOA Title I and Title III programs. The system integrates unemployment insurance, trade adjustment assistance, adult, 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 access points 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, including education and training for workers, human resource assistance for businesses, and information for economic developers. In support of Mississippi businesses, WIN Job Centers offer many 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 overseeing the counties within each region. At the state office, staff support 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 Mississippi's low- and medium-income individuals and families. 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.

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

1. VISION

The state's strategic vision is to create a world-class workforce aligned with Mississippi's unique economic portfolio and labor market, which drives increased and sustained individual, community, and statewide prosperity. This vision will be attained by developing 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, one will be presented with the necessary tools to choose and pursue a career pathway 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, 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

WIOA Combined Plan Partners will realize this vision by achieving seven goals focused on developing an educated and skilled workforce that is aligned with employers' needs.

1. Jointly develop policies to 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.

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 before 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. The 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 recommends comprehensive, results-oriented measures that will apply across Mississippi's workforce development system. Mississippi continues to invest in the SLDS to support these measurements, 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 on AccelerateMS' state workforce development strategy. This strategy will ensure that workforce development activities and funds are used efficiently and to maximum effect, streamlining services, enhancing communication and networking between partners, and boosting results for participants. By creating 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

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 Employer*s. 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

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.

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

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 records 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 needs and education/training pathways. Employer needs will be measured through labor market analysis of demand by occupation. These needs will be compared to the labor supply pipeline from secondary, post-secondary, and workforce training providers. Gaps in supply will be identified, and this assessment will inform the efforts of policymakers, educators, and employers to address progress toward 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 individual performance measures, the state calculates the number of referrals passing between partners using WIOA Referral Hub technology. AccelerateMS plans 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 achieving Goal 5 will be accomplished by introducing a maturity model for WIOA. AccelerateMS is responsible for recommending 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, which is 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 developing a more quantitative approach to measuring the extent to which employers and participants feel they are being served by an approach that presents a unified vision and message.

c. State Strategy

Defined and 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, and 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 a 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 program was funded by expanding 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 support students' pursuit of pathways leading to quality careers through job shadowing, internship opportunities, connections, 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 funding for four Registered Apprenticeship (RA) Grant cycles 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. Each college's College and Career Navigator receives training about the navigation role, regularly interfaces 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. In partnership with Local Workforce Development Boards, the project 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 program participants' transportation obstacles, 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 Mississippi's defense sector's capacity, capability, and resilience.

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 LWDAs 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 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.

   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 a trained counselor who may assist if necessary but is not required to provide one-on-one support. Affiliate centers may also include computer stations to facilitate self-service access. Self-service access requires internet access and does not include the assistance of trained counselors or staff.

3. **Virtual Access One-Stop Center**—Virtual access is a key mode of service delivery. In line with the concept of a universally accessible workforce system, virtual access provides participants with access to an MDES staff person. As long as an individual has internet access, he or she can directly access 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. Implementing digital offices is expected to yield several benefits, including reduced infrastructure cost, optimized staffing requirements, increased accessibility, and improved coordination of services.

   Appointments will be offered to enhance the user experience and 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 and 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 must 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

The Governor appoints Mississippi's SWIB chair, 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 uses 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 the 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.

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 the workforce, Core Partners will:

   - Modify the Mississippi Works Labor Exchange to generate a Work-Ready Report Card based on workforce profile information, labor market information, and sector analysis data. The Work-Ready Report Card will enable the 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 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

Mississippi Combined Plan Partners include workforce, education, and human services partners linked by a common data system. Even One-Stop Centers and Youth operators in Mississippi use the Mississippi Works Labor Exchange to align with programs not explicitly included in the Combined Plan. This means that most alignment is achieved 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- 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 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), operated by MDES' Office of Apprenticeship. MAP helps companies create or grow apprenticeship programs and has administered state funds to grow and sustain RAPs since 2016.

C. Coordination, Alignment, and Provision of Services to Individuals

MDES plays a key role in developing and maintaining this coordinated system. It took the lead in developing the WIOA Referral Hub and training One-Stop Centers 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. MDES provides job search, referral, and placement services through Wagner-Peyser 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). LVER staff work directly with businesses to fill job openings, 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 a proper 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, a Combined Plan Partner program, benefits 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 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. If those services are not provided at their offices, these offices refer participants to other services in their local area.

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

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 setting 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 indicate 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 that recruits 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 the need for open positions. MDRS uses this information to combine 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 allows 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 can 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 the system captures records of these labor matches and thus available to inform ongoing labor market research.

E. Partner Engagement with Educational Institutions

MDES - MDES has begun creating a job-driven education and training system by aligning its training services 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 before 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

MDES - MDES supports the work of LWDAs 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 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 few eligible providers are not public institutions, private providers that deliver training, such as commercial driving instruction, are valued partners. Coordination between One-Stop staff, participants, and the provider at the local level 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 LWDAs 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 LWDAs' regular meetings, the MCCB member colleges have the opportunity to develop relationships with representatives from the LWDAs' 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 needs 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

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 an area's targeted needs and the number of people without a high school diploma. AE programs are funded through a competitive grant award 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 can 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 better to 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

The number of jobs requiring at least some postsecondary education or training is growing. Strategies to improve access to postsecondary credentials are organized by agency partners below. LWDBs will identify strategies for

credential attainment based on 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, complete- or part-time employment, or additional occupational training
- Provision of a national DOL certificate of completion that follows apprentices anywhere in the United States
- **Provision of Registered Apprenticeship certificate of completion.**

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 refer the participant for workforce evaluation at a One-Stop Center or Youth Provider to help further develop the participant's Individualized Success Plans 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 help recipients earn high school equivalency, Career Readiness Certificates, or other AE credentials. Supportive services provided under SNAP will 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 coordinating with MDES through the Mississippi Works Labor Exchange to provide Adult, Youth, and Dislocated Worker training.

Launched in 2017, the educational program Complete 2 Compete aims to increase the number of Mississippians with postsecondary credentials by identifying students who have completed enough credits to qualify for an associate degree or are on the cusp of finishing 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 for an associate degree without further education or training.

In October 2020, the Mississippi Education Achievement Council adopted a post-secondary attainment goal for the state. This initiative, Accent 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 improve 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

AccelerateMS: AccelerateMS will lead all activity by developing 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 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).

Mississippi's Combined Plan Partners currently use various 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, which 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 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 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

Integrating partner systems within the WIOA Referral Hub will accomplish data collection for all programs and activities. Real-time data sharing from partner systems to the WIOA Referral Hub will automate the sharing of case management data and allow for real-time labor market analysis.

Under the leadership of AccelerateMS, agencies will continue to 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 to 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 involving data from multiple state agencies are sent to the entire SLDS governing board through an expedited or standard review process. In the case of WIOA federal reporting, these requests often involve aligning participant data from agency administrative data with outcomes in education 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 governing board approves the methodology for creating federal reports that require data sharing once and then carries 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.

The state has developed policies that outline legislative, regulatory, and service quality requirements within Mississippi's workforce system to guide the establishment, implementation, and maintenance of quality workforce development services. 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, which guide the implementation process at the LWDA level. The state will continue to encourage coordination among the 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 the partnership 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) and ensuring 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 Appendix N or at the link: WIOA-2022-Appendix-N-Policy-16-One-Stop-Certification.pdf (acceleratems.org) .

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 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 LWDB 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 per 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 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

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 creating and supporting 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 has appointed the executive director of the Office of Workforce Development, AccelerateMS.

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

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, which are 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
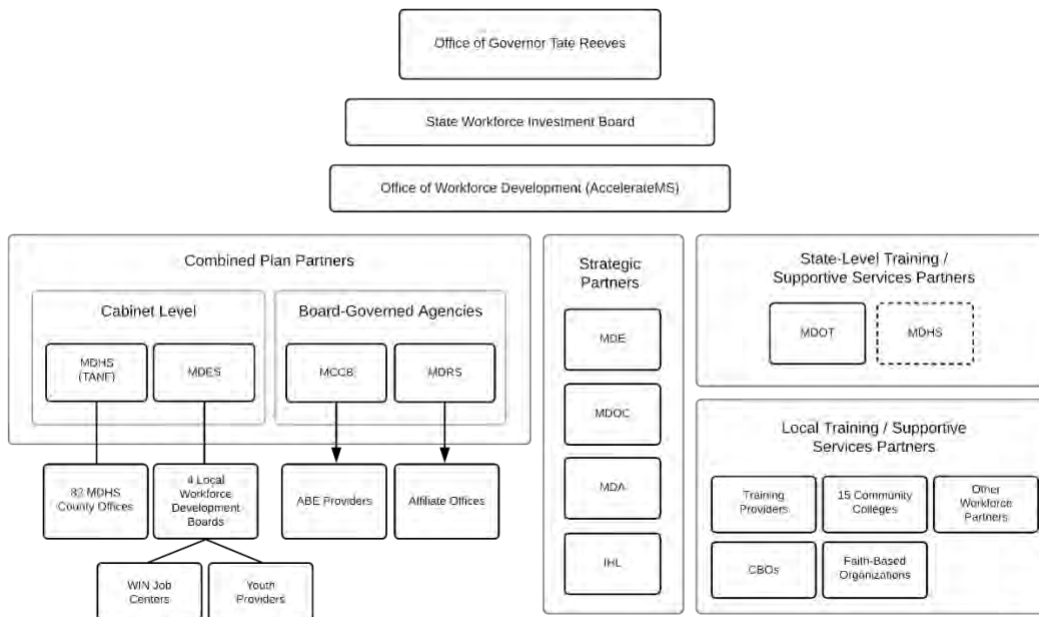
B. State Board

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

Category	Board Member	Organization	Title
Governor or Designee	Kristen Windham	Office of the Governor	Director of Policy
Business	Patrick Sullivan, Chair	MS Energy Institute	President
Business	Scott Waller	MS Economic Council	Executive Director
Business	John McKay	MS Manufacturer Assoc.	President
Business	Jim Flanagan	Desoto Co. EDA	President/CEO
Business	Bobby Morgan	Atmos Energy	Vice President
Business	Fontaine McNair	Priority One Bank	President
Business	J. R. Jones	Sanjo Security	President
Business	Frank Howell	Delta Council	President
Business	John Brent Swanson	Empire Trucking	Director, Organizational Devp.
Business	Monica Harrigill	The Sunray Companies	Managing Member
Business	Jan Collins	Madison Business League	Executive Director
Youth Services	Jacqueline Beasley	MINACT, Inc.	Senior Vice President

Community Services	Kristi Luse	CREATE Foundation	Vice President
Apprenticeship	Sondia Christian	Ingalls	Director, Business Integration
Labor Rep	Darius Johnson	International Longshoreman	President
Supervisor	Trey Baxter	Madison County	County Supervisor
Mayor	Carolyn McAdams	City of Greenwood	Mayor
MDHS	Bob Anderson	MDHS/TANF	Executive Director
MDES	Bill Ashley	MDES	Executive Director
MDRS	Billy Taylor	MDRS	Executive Director
MDE	Lance Evans	MDE	Executive Director
MDA	Bill Cork	MDA	Executive Director
MCCB	Kell Smith	Title II/AEFLA	Executive Director
MACC	Valmadge Towner	Southwest MS CC	President
IHL	Al Rankins	Institution of Higher Learning	Commissioner
Business	Pablo Diaz	Vicksburg Warren Economic Development Partnership	President
Business	Nic Parish	Burns Dirt Construction	Vice President
Business	Brad Bounds	Working Solutions	President
Senator	Daniel Sparks	Senate	State Senator
Representative	Donnie Bell	House of Representatives	State Representative

ii. Board Activities

The SWIB holds yearly face-to-face meetings and conducts additional business electronically. The SWIB has tasked AccelerateMS to implement and modify Mississippi's Combined Plan and convene 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.

The SWIB serves as an overall policy and advisory board to the Governor specifically charged with a mandate to develop a comprehensive plan for a statewide vision that integrates education, workforce, and economic development efforts by the WIOA. SWIB's advisory structure includes an executive committee that provides strategic direction and guidance to the board and hires the Executive Director of AccelerateMS to serve as the Board's staff. The executive committee is comprised of five representatives from business and industry. Additionally, ad hoc committees are convened to address specific issues within the workforce landscape. These ad hoc committees focus on key areas, such as performance and metrics, policy, and operations, to ensure that SWIB's initiatives are effectively implemented and aligned with the overarching goals of WIOA.

The executive directors of the agencies administering each of the WIOA core programs are represented on the SWIB. Their SWIB participation and contributions are explicitly focused on their respective core programs,

ensuring dedicated and specialized attention to each program's unique needs and objectives. This includes aligning WIOA core program partner programs with stakeholders from business, labor, public education, higher education, and economic development. The MCCB executive director's participation and contribution are solely focused on the Title II program and do not represent the MCCB on any other matters.

To this end, Mississippi created the State Office of Workforce Development, AccelerateMS, in 2020 to serve as the SWIB board staff. This goal is to align WIOA, state, and other funds with Mississippians' economic development needs and ensure continuous system improvement as it becomes broader and more far-reaching. AccelerateMS works with WIOA core partners, public education, non-profits, and economic development to ensure the state's workforce development efforts are leading the state forward by reviewing data to identify gaps and prioritize state and federal funds to create appropriate training programs necessary to close these gaps. These gaps are now identified and labeled 'Priority Occupations', which the SWIB formally approves each year. This allows available dollars to be positioned to close identified gaps in specific areas and streamline workforce development in Mississippi. Additionally, recommendations stemming from AccelerateMS work with and for the SWIB reach beyond basic WIOA dollars to ensure state and other federal dollars are being leveraged appropriately to support Mississippians as opportunities for work and training become available.

As part of the process, AccelerateMS staff distribute priority occupation information, among other vital workforce development information to workforce partners throughout the state annually through eight regional meetings known as Ecosystem Table Meetings. These meetings convene various stakeholder groups, including LWDA, Core Program directors, and leadership staff, to address critical issues, including:

- Analyzing regional talent supply and demand dynamics.
- Evaluating the performance of the overall workforce delivery system.
- Determining optimal strategies to stimulate economic growth in Mississippi.

These meetings allow locals to travel potentially short distances to receive updates on Mississippi's Workforce Development System and provide direct feedback to AccelerateMS and, ultimately, the SWIB. These meetings occur in May each year, and the primary target for attendance is private industry. This year, industry members made up approximately 30% of all attendees. Staff used this opportunity to gather direct feedback on what is needed by local industry partners, especially small to medium-sized employers who aren't easily accessed. Also, non-profits attended each meeting around the state to help build an understanding of their efforts and where gaps exist in serving the populations we are attempting to pull into the labor force due to historically low labor force participation rates as a state. A major issue identified is simply the lack of people engaged with the workforce post-COVID. To address this, the SWIB, through AccelerateMS, will make available state funding to local workforce development areas to complement WIOA funding and provide additional access to training programs in priority sectors and occupations throughout the state where the industry is actively hiring. This funding will allow for student registration fees, training stipends, and on-the-job training, as we have seen a significant decrease in federal WIOA funds. Yet, the need has increased, especially in our poorest regions, which also exist in some level of an opportunity desert. These state funds will complement WIOA but also allow for any Mississippian willing and able to work to be trained in a quality occupation paying wages that are considered living wage or above without having to choose between work or training.

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 combined plan partners 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, to assist 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 currently manages Mississippi's online SLDS reporting system (www.lifetracks.ms.gov). All data are stored in a state-of-the-art data center 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

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, 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 it contributes to overall state goals.

All Combined Plan Partners provide the 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 multiple WIOA core programs. 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

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

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 the 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

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.

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.

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 LWDAs 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.

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 LWDAs 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).

B. For Title II Programs

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.

The MCCB OAE will fund, at a minimum, one (1) grant per workforce area. Applicants may elect to serve an entire workforce area or selected counties within a workforce area. Applicants must serve entire county(ies) and ensure all county residents have access. If an applicant elects to serve more than one workforce area, an explanation must be provided.

As required by WIOA, funding is prioritized for the following applicants:

- who have demonstrated effectiveness in improving the literacy of eligible individuals, especially; with respect to eligible individuals, who have low levels of literacy;
- whose services are aligned with local workforce strategies, priorities, and partners; and
- whose services are responsive to the needs of persons with barriers to employment.

The MCCB, OAE reserves the right to allow multiple providers in a geographical workforce region and distribute those funds in that service area at its discretion. Not all geographic areas of service in a region are guaranteed federal adult education funding. The state also reserves the right to offer award amounts that differ from the applicant's request, or the available funding listed for the RFP.

According to Title II Section 241(a), funds made available for adult education and literacy activities under Title II must **supplement,** and not **supplant** other state or local public funds expended for adult education and literacy activities. Supplement, not supplant means the federal funds are intended to augment or increase, not replace, monies that would have been used if the federal funds had not been available.

Applicants must demonstrate a match of 25% of the funds requested. Federal funds may not be used for matching funds. Matching funds may include both in-kind and cash matches. The matching funds can come from state dollars, local dollars, private dollars, or in-kind support. (*State Requirement*)

The OAE anticipates making multiple awards as a result of the RFP process. Award amounts will depend upon available funding. An applicant must be determined an eligible provider and receive sufficient points to be awarded. (*State Requirement*)

The OAE reserves the right to award grant funds in amounts different than the applicant's budget request and the suggested award amount. Such adjustment may be based on how the proposed budget and budget narrative will cover program expenses and whether the requested amount is appropriate, proportionate to the participants served, based on previous performance, and reasonable, as determined by the OAE. (*State Requirement*)

The OAE employs a competitive Request for Proposal (RFP) process to identify, assess, and award multi-year grants to eligible providers. The OAE uses the same application process for all eligible providers which includes Adult Education (Section 231), Corrections Education and other Institutionalized Individuals (Section 225), and Integrated English Literacy and Civics Education (IELCE) (Section 243).

Eligible providers may include:

- Local education agency
- Community-based or faith-based organization
- Volunteer literacy organization
- Institutions 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
- A partnership between an employer and an entity described above

Eligible individuals include those who have attained 16 years of age; are not enrolled or required to be enrolled in secondary school under the State law; and are basic skills deficient, do not have a secondary school diploma or its recognized equivalent, or are English language learners.

Anticipating the multi-year award period from July 1, 2025, through June 30, 2030, the OAE follows the following process in awarding grants or contracts to eligible providers:

- The OAE will award competitive multiyear grants or contracts to eligible providers within the State to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the State.
- The OAE will require each eligible provider to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently.
- The OAE will ensure that all eligible providers have direct and equitable access to apply and compete for grants or contracts; the same grant or contract announcement and application processes are used for all eligible providers in the State.
- The OAE will ensure 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 to support and provide 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 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 will ensure all eligible providers identify how they will address 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).

The open competition is consistent with the standards of 34 CFR Part 463 Subpart C. The grant competition is publicized through a variety of print and electronic media throughout the state as well as on the MCCB website. MS will run all of its competitions (225, 231, and 243) in accordance with 34 CFR Part 463 Subpart C. This ensures all applications are evaluated using the same rubric and scoring criteria.

Applicants are evaluated using a scoring rubric that includes:

- The thirteen considerations
- Alignment to the local workforce development board (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 and regional-specific labor market information, setting new enrollment targets for applicants. The application process strongly emphasizes 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.

The OAE recognizes organizations that demonstrate effectiveness in providing adult education activities as eligible providers. To meet the standard of demonstrated effectiveness and be considered eligible, an applicant must provide evidence of demonstrated effectiveness by providing 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 this application for funds.

To be considered eligible, an applicant must also provide information regarding the outcomes for participants related to employment, attainment of a secondary school diploma (or its recognized equivalent), and transition to postsecondary education and training. See WIOA Final Rules Subpart C, §463.24.

Applicants applying as a consortium must provide evidence of demonstrated effectiveness and submit performance data for each consortium member entity.

There are two ways an eligible provider may meet the requirements of demonstrated effectiveness:

- Applicants previously funded under WIOA Title II must submit performance data required under Section 116 to demonstrate past effectiveness
- Applicants not previously funded under WIOA Title II, must provide performance data to demonstrate past effectiveness in serving basic skills deficient eligible individuals, including evidence of success in achieving outcomes

Applicants applying as a consortium must submit demonstrated effectiveness data for each consortium member to determine if each member is an eligible provider of demonstrated effectiveness.

Each applicant requesting funds must 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. Section 427 of the GEPA highlights six 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 activities and services to learners meeting the statutory definition of an eligible individual as defined in Section 203. Adult education and literacy activities and services as defined in Section 203 include adult education, literacy, workplace adult education and literacy activities, family literacy activities, English Language Acquisition (ELA) activities, Integrated English Literacy and Civics Education (IELCE), workforce preparation activities, and Integrated Education and Training (IET).

Furthermore, providers are required to implement evidence-based 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 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 increases 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 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

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
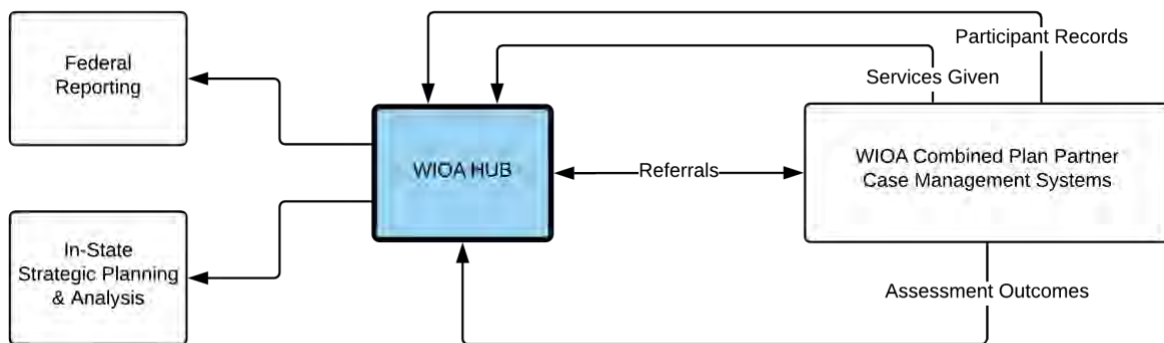
Each Combined Plan Partner conducts intake and assessment. Participant data such as participant records (basic information), information on services given to the participant, information on assessment outcomes, and referrals to partner programs is collected and maintained in the combined plan partner's case management system . These data items are passed from Combined Plan Partner systems to the WIOA Referral Hub. In addition, Combined Plan Partners will receive referrals submitted by other Plan Partners. The Combined Plan Partners record participant services in their respective systems.

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

The Technology Data Workgroup has been tasked with conducting an assessment, providing data integration recommendations, and identifying funding sources to implement the recommended data integration solutions.

FIGURE 16: Conceptual Model of Agency Integration
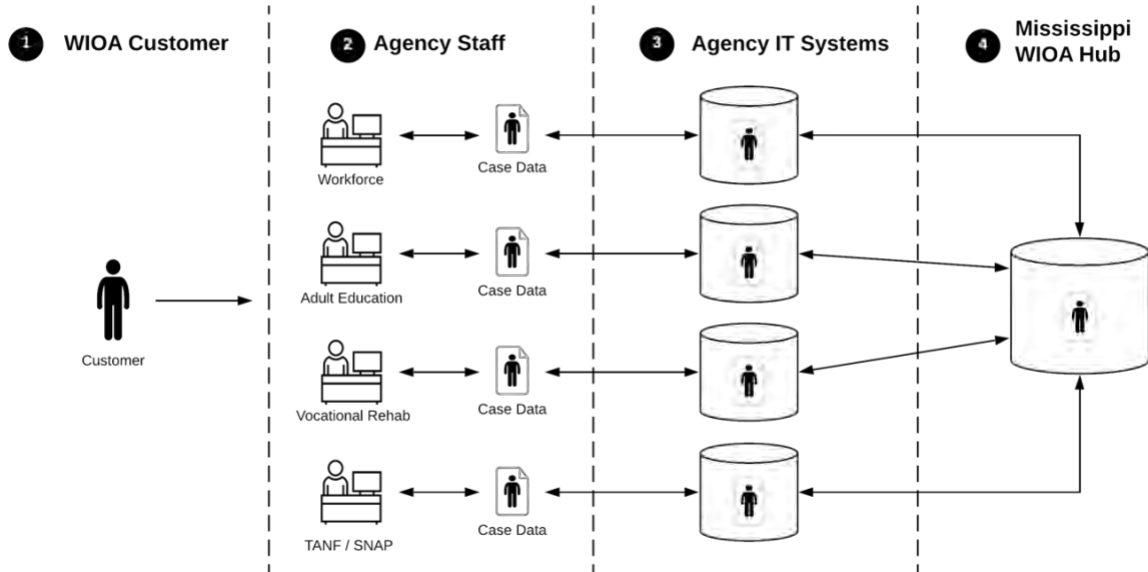
ii. Describe the State's Plans to Integrate Data Systems to Facilitate Streamlined Intake and Service Delivery to Track Participation Across All Programs Included in this Plan

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 enabling agencies 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 system's ongoing evolution and support cross-agency coordination of case management.

Agency-to-agency referrals are electronic records created in the WIOA Referral Hub to connect a participant receiving services from one WIOA Combined Plan Partner to another. 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 referral status 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 in the Smart Start Career Pathway Model
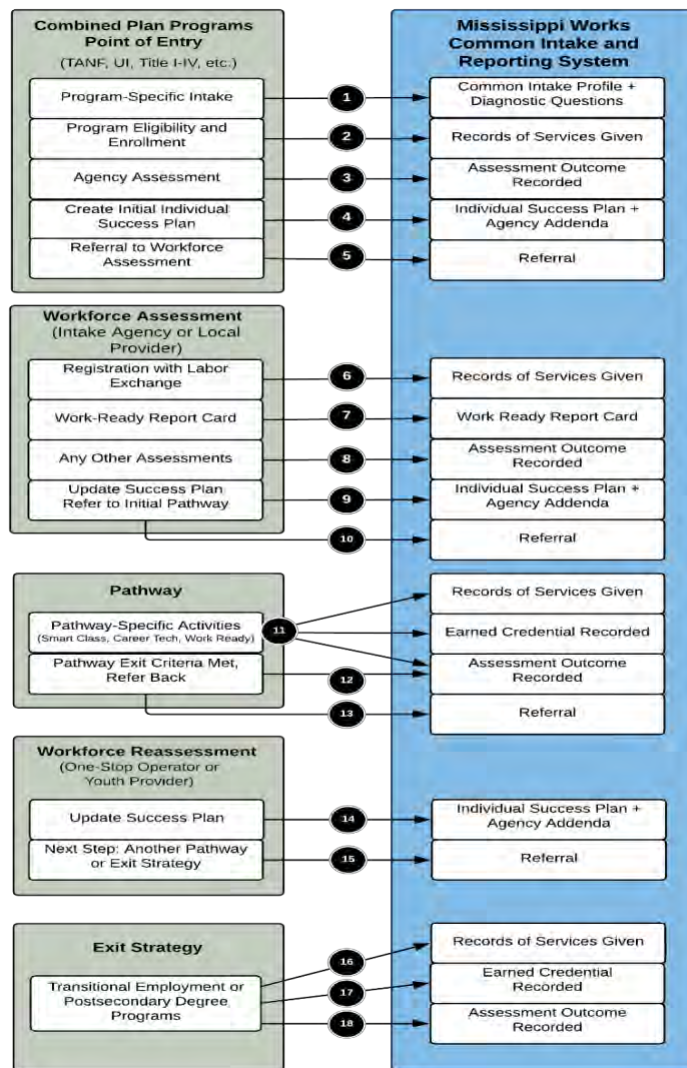
The SLDS Governing Board, consisting of representatives from all state data-contributing agencies, will continue to work with the SWIB to conduct data analysis and performance assessments and assist with federal reporting.

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 the 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 to 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 with WIOA partners, who use it to calculate performance measures and produce reports 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.

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

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

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 to the State Data Clearinghouse, where the clearinghouse's data science professionals can securely align the wage records and program participation data. After aligning wage records and participation data, additional education and demographic information is integrated from SLDS. This process creates a comprehensive dataset containing the participant, employment, education, and demographic data necessary to complete the reports 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

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

Mississippi uses quarterly wage record information to measure progress on state and local performance measures. 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 an 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

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

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:

- Refer qualified veterans to new job openings, especially Federal Contractor job orders, before all non-veteran job referral activity
- Refer qualified veterans to new job openings, especially Federal Contractor job orders, before all non-veteran job referral

MDES management monitors the priority of service by reviewing quarterly performance reports, manager reports, and MS Works reports. MDES management will monitor the priority of service in covered programs at two levels. WIN Job Centers will continue to use the 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, VA VR & E Chapter 31 veterans, Native American Veterans, other groups targeted for special consideration as appropriate or if eligible for priority of service, 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 as appropriate or if eligible for priority of service.

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 and assessment of need. 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/Appendix-K-WIOA-Priority-of-Services.pdf

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

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 consider 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

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

Planning Workgroups

For the 2024 WIOA Combined State Plan revision, AccelerateMS convened a series of five interagency meetings, beginning in the Fall of 2023, to bring together all WIOA strategic and core partners along with representatives of all local workforce areas. Partners reviewed progress towards implementing 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 on the strategic and operational aspects of the workforce plan, and a focus group was conducted to gather input from the business community.

Throughout the process, LWDAs 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
● Planning and Communication Workgroup	● One-Stop Operations Workgroup
● Aligned and Integrated Technology Workgroup	● Career Pathways and Assessment Workgroup
● Sector Strategies Workgroup	● Performance and Accountability Workgroup

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 were shared with the SWIB and all members of the other workgroups.

State Workforce Investment Board (SWIB) Website

The SWIB website (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 into the final plan prior to submission. Each combined plan partner 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 (Appendix I) 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	Yes

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

Program-Specific Requirements for Core Programs

Title I-B

a. General Requirements

The State has re-designated four local workforce development areas. Each of the four local workforce development areas hasalso been identified as a region. 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, communing 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.

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 forpublic 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 complete 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.local designation.

Before 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 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.

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 Local Workforce Development Area Designation Policy in Appendix C provides specific appeals process information.

State entities responsible for administering Adult, Disabled 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 infrastructure costs. The State created 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 reachan 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. Failure to agree on additional costs amongst partners will not be considered an impasse, nor will it trigger the state funding mechanism.

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 administering state workforce investment board business, grants related to training, and other projects as determined appropriate by the state workforce investment board.

WIOA provides the Governor's set-aside funding 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, and each is validated and entered into the MIS system. Then, 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 automating the obligations of the Individual Training Account (ITA) and the ITA payment system (expenditures). It allows the local workforce development areas and one-stop operators 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 the MS Works System, and all programs are monitored on-site.

Any expenditures from the Governor's Set Aside Funding will comply 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 about non-WARN events from the media, partner agencies, local economic development offices, WIN Job Center local workforce area staff, businesses, affected workers, community college, rapid response coordinators, and other local sources.

Within 24 hours of receiving 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. As soon as possible, an electronic briefing or an on-site visit with the company representative and, when appropriate, the union or employee representative is scheduled.

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.Rapid Response services are delivered on-site before layoff, at the company, and on company time whenever possible. Providing on-site services depends on the company's willingness to allow workers to attend sessions during workhours and meeting space availability 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 employee completes the survey as part of the on-site session, which is 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 with local workforce development boards, chief elected officials, and other stakeholders todetermine 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 an annual Layoff Aversion Plan to MDES's Office of Grant Management that describes its strategies to assist employers and avert layoffs. Each LWDA has designated staff to carry out the plan within the area.

Because MDES serves as the state's lead agency for Rapid Response, it is uniquely positioned to provide mandated services in the case of natural disasters. As the MDES Continuity of Operations Plan outlines, the Rapid Response staff are part of the agency's disaster response team. Staff assists in identifying businesses adversely affected and workers who lost jobs due to the disaster. This information is important for developing 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 federalagencies to develop strategies for addressing natural disasters to ensure rapid access to a 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 ofemployers and employees. It allowed employers to file one mass Unemployment Insurance (UI) claim for all its employeessimultaneously.

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 before 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 work together 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 allow the workers 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 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.

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

An increasing number of job opportunities and low unemployment rates mean 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. Apprenticeships in Mississippi are 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 four Apprenticeship grants and created new partnerships under the Mississippi Apprenticeship Program's (MAP) leadership. 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 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 future jobs.

Training Provider Eligibility Procedure

The State will continue to use its current web-based Eligible Training Provider List (ETPL) system for the registration, initialeligibility, 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 links to the MDES Eligible Training Provider List System page. The policy may be found by selecting the "Training Provider/System Administrator" option and then selecting "Resource Menu". The link provided is intended to provide persons interested in the ETPL with all the resources to be successful.

The MDES Office of Apprenticeship will identify Registered Apprenticeship Program (RAP) sponsors. The Local WorkforceDevelopment Areas will contact the Registered Apprenticeship sponsors in their respective areas. The state will ensure that information regarding RAP automatic eligibility is disseminated through various media, including online platforms targeting RAP sponsors statewide.

The state will use the current web-based application processes to register 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 eligibilityrequirements.

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.

In accordance with federal requirements, recipients of public assistance, other low-income individuals, and individuals with basic skills deficiencies must receive priority for career and training services.

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 deficiencies in MSWorks.

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

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

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

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

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 funds need to be transferred 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 guests at the board meetings.

After the board votes on the transfer, the LWDB Chair signs the transfer document. LWDA staff uploads 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 member, who is the 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).

b. Youth Program Requirements

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, including 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.

The State continues implementing a WIOA Common Intake and Reporting System to 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. A career pathway plan must be included in a youth'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 provide work support that leads to high-demand jobs in targeted sectors.

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

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

The Office of Apprenticeship can leverage adult education programs to meet 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

Youthwho 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 current and potential employees have practical and soft skills to succeed in the workplace.

The state includes in Policy Number 13 – WIOA Youth Eligibility a definition for youth requiring additional assistance. A 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 credentials 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 the local board and included in the local plan.

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

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

- Provide academically rigorous preparation for work and post-secondary education;

- Assist with the transition to work and post-secondary education;

- Address the youth's barriers to work and education.

  Some examples include:

- Alternative high schools;

- Juvenile boot camps;

- Wilderness treatment.

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 levelon 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.

c. Single-area State Requirements (D1-D4)

Mississippi is not a single area state.

d. Waiver Request (optional) (e1-e6)

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

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)(l)(C), reserved under section l 28(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 isrequesting that this percentage be lowered to 50 percent.

2. A waiver of the requirement that local funding must meet the 75 percent minimum expenditurerequirement. 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 OSYpopulation. 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 showsthat 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 thepercentage of funding available to In-School Youth (ISY) will open doors to work experience, pre-apprenticeship programs, and career pathways for at-risk students.

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

Goals of the waiver and the expected programmatic outcomes.

Goal 1: Increase access to the MS Smart Start Career Pathway for at-risk youth in local communities based on need and without regard to educational status. 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, 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 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.

Because of the waiver, the quantifiable and measurable outcomes MS Partnership LWDA expects to achieve are increasing the number of students 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 continuing higher education, and they get lost the summer after graduating. Currently, DWDA is finding many of these youths with high school degrees who lack a desire for training in their out-of-school youth programs, perhaps due to a lag. The local area works 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 believe 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 deficient in basic skills.

The WIOA encourages strategies that connect education and training, support work-based learning, and improve job and career results. This waiver request will increase the connection between education and training, provide work-based learning opportunities, including work experience and pre-apprenticeship, and increase access to workforce services for 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.

Approximately three out of every four public school children in Mississippi live below the poverty guidelines. Researchshows 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 will benefit Mississippi's at-risk and disadvantaged youth, employers, parents, service providers, post-secondary institutions, and American Job Centers.

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

The LWDAs will adhere to the budgeted amount and waiver criteria. They will also follow the current MS monitoring policy. Participants will be monitored at least monthly for goal achievements. Finally, the LWDAs 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 the performance outcomes of the four LWDAs 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 on subject matter for LWDAs and subgrantees. Another outcome that MDES intends to track is the WIOA In-School population's dropout rate versus the general population of same-aged students.

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 alllocal workforce development boards. The waiver request is currently posted on our website for comment and review by required partners and the general public.

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

The Mississippi Partnership was the first workforce area in the state to implement the new 50/50 strategy, using the waiver from PY18 to PY20.

Despite the two years of the COVID-19 pandemic hampering all workforce activities and the 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%

Following established strategies, the state will continue to serve out-of-school youth. Adding more in-school youth funding will enhance the total number of youth served, as described by two of the state's local workforce areas.

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 in ISY will not decrease our OSY numbers. Adding more ISY will enhance 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. 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 need additional assistance in determining their career paths. 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 serve 19 out of 27 counties in our workforce area, 392 out-of-school youth, and 270 in-school youth in PY19. Due to Covid, both groups were 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 includes effective social media campaigns that showcase the opportunities offered by the WIOA OSY program and inform 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 has also expanded its OSY program beyond its brick-and-mortar youth programs. It has also 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. 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 internship placement. 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 service 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.

Numerous school districts in the state have limited resources, high poverty rates, low test scores, and basic skills deficiencies.Many at-risk students who need to be served have limited access to online learning. Therefore, we anticipate a rise in the basic skill-deficient students due to the remote/online 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 skillsthat 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 state's overall rural nature as barriers. However, two 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, particularly employment and training program enrollment, appear lower. 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, 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 Southcentral MS Works LWDA counties 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 crimes are committed by individuals under 24, it is reasonable to say that OSYs who are not actively engaged in some 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, 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 to engage them in training. We are heavily involved with economic development efforts in that area in hopes of bringing more employment opportunities to the residents.

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 as 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 businesses and industry.

The waiver was approved in November 2018 for PY18 and PY19. The Mississippi Partnership provides data on its success. The other three workforce development areas were 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-19. 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 directly result from 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 businesses and industries 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 built 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 the 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 140 hours of work-based learning activities. This waiver has helped the Mississippi Partnership LWDA provide work-based learning opportunities and career exploration, 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. SMPDD partnered with the Mississippi Department of Education to provide WIOA youth services to high school career and technical students to achieve the goal. 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 and 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 can connect with all CTE programs in the local area. TDWDA piloted the program with Kemper County High School and Hattiesburg High School. Although they only enrolled 35 in-school youth in the 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 align their funding streams better, reduce duplication, and coordinate services.

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.

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

MDES utilizes a one-hour weekly staff meeting to share information and train staff. Quarterly managers' meetings are held toprovide 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 comprises Self-Awareness, Self-development, Team Development, and Organizational Development courses. In addition, Wagner Peyser staff members attend regional and national workforce training conferences and National Veterans Training Institute courses. Staff attend workforce conferences, including the Southeastern Employment and Training Association (SETA) and the National Association of State Workforce Agencies (NASWA).

All Wagner-Peyser staff are cross-trained to identify Unemployment Insurance eligibility issues and participate in training with WIOA staff. When potential issues are detected, Wagner-Peyser staff members utilize an issue detection worksheet submitted to Unemployment Insurance management. Wagner-Peyser management works closely with unemployment insurance management to train staff continuously on updated policy information.

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 for 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 contact a more knowledgeable Unemployment Insurance staff member remotely to assist customers immediately.

MDES operates the Reemployment Services and Eligibility Assessment (RESEA) program to assist 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.

1. *Coordination of and provision of labor exchange services for UI claimants*

Wagner-Peyser staff will provide staff assisted services to help Unemployment Insurance claimants file online. Resource roomswith 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 contact a more knowledgeable Unemployment Insurance staff member remotely to provide immediate assistance for customers.

WIOA partner staff are trained in many 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 and assist claimantsas 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*

MDES Wagner-Peyser staff are cross-trained and have a process 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.

B. *Agricultural Outreach Plan (AOP).*

1. *Assessment of Need.* 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 beneficial resources are also provided. Farmers and farmworkers with internet capability 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. A need for proper healthcare resources has been observed during housing inspections and monitoring visits. The two most significant barriers to care reported 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*

Due to the small 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 most 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. In its outreach team efforts, MDC has identified that the Delta and semi-Delta counties in the state

are where 90% of MSFWs reside and work. Small pockets of MSFWs throughout the state are 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. When they cannot obtain an adequate workforce, employers turn their focus to hiring migrant seasonal farmworkers. However, when agricultural workers are scarce, they utilize MSFWs and the H-2A and H-2B Foreign Labor programs. 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 and 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*

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 a bilingual staff to assist Hispanic workers.

4. *Outreach Activities :*

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 conduct 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 through 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 teammembers 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.*

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 program.*

Outreach workers are trained on identifying UI eligibility issues. All outreach workers completed Unemployment Insurance (UI) refresher training in 2020. Outreach workers are crossed 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.*

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.*

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,*

Staff in each MDES local one-stop and MDC work cooperatively to ensure information on each agency's services is availableto 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 offerstraining and certification opportunities. MDC also provides pesticide training and farm safety training to MSFW's and makesreferrals 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 requirementsof the agricultural employer. Appropriate referrals of applicants are made to the employer. MDES will continue to work withMDC 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 thelocal offices or while they are conducting outreach throughout the state.

3) *Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers.*

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 andtraining needs of that worker. The MDES self-service system for employment and unemployment opportunities streamlinesthe 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 MFSW 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.

> 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, anycomments 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.

> The plan was posted on the MDES public web site available to the public for review and comment. Althoughsolicited, 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 2024in 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 346interstate 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 ProgramYear 2024 AOP.

Wagner-Peyser Assurances

The State Plan must include	Include
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: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 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.	Yes

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 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 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.

B. Local Activities

Describe how the State will, using the considerations specified in section 231(e).

1.   Purpose of educational and career advancement.

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 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 focusing on the following:

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.

The OAE employs a competitive Request for Proposal (RFP) process to identify, assess, and award multi-year grants to eligible providers. The OAE uses the same application process for all eligible providers which includes Adult Education (Section 231), Corrections Education and other Institutionalized Individuals (Section 225), and Integrated English Literacy and Civics Education (IELCE) (Section 243).

Eligible providers may include:

- Local education agency
- Community-based or faith-based organization
- Volunteer literacy organization
- Institutions 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

Eligible individuals include those who have attained16 years of age; are not enrolled or required to be enrolled in secondary school under the State law; and are basic skills deficient, do not have a secondary school diploma or its recognized equivalent, or are English language learners.

Anticipating the multi-year award period from July 1, 2025, through June 30, 2030, the OAE follows the following process in awarding grants or contracts to eligible providers:

- The OAE will award competitive multiyear grants or contracts to eligible providers within the State to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the State.
- The OAE will require each eligible provider to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently.
- The OAE will ensure that all eligible providers have direct and equitable access to apply and compete for grants or contracts; the same grant or contract announcement and application processes are used for all eligible providers in the State.
- The OAE will ensure 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 and 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 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 will ensure all eligible providers identify how they will address 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).

The open competition is consistent with the standards of 34 CFR Part 463 Subpart C. The grant competition is publicized through a variety of print and electronic media throughout the state as well as on the MCCB website. MS will run all of its competitions (225, 231, and 243) in accordance with 34 CFR Part 463 Subpart C. This ensures all applications are evaluated using the same rubric and scoring criteria.

Applicants are evaluated using a scoring rubric that includes:

- The thirteen considerations
- Alignment to the local workforce development board (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. To meet the standard of demonstrated effectiveness and be considered eligible, an applicant must provide evidence of demonstrated effectiveness by providing 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 this application for funds.

To be considered eligible, an applicant must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma (or its recognized equivalent), and transition to postsecondary education and training. See WIOA Final Rules Subpart C, §463.24.

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

There are two ways an eligible provider may meet the requirements of demonstrated effectiveness:

- Applicants previously funded under WIOA Title II must submit performance data required under Section 116 to demonstrate past effectiveness
- Applicants not previously funded under WIOA Title II, must provide performance data to demonstrate past effectiveness in serving basic skills deficient eligible individuals, including evidence of success in achieving outcomes

Applicants applying as a consortium must submit demonstrated effectiveness data for each member of the consortium to determine if each member is an eligible provider of demonstrated effectiveness.

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 activities and services to learners meeting the statutory definition of an eligible individual as defined in Section 203. Adult education and literacy activities and services as defined in Section 203 include adult education, literacy, workplace adult education and literacy activities, family literacy activities, English Language Acquisition (ELA) activities, Integrated English Literacy and Civics Education (IELCE), workforce preparation activities, and Integrated Education and Training (IET),

Furthermore, providers are required to implement evidence-based 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.

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.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA.

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 outlined 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 from 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 toward adult education programs in their release areas and local community colleges. Participants who are within 12 months of release are also allowed 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 in 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. The primary focus is on the development of new programs tailored to Mississippi's workforce needs, the 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.

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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,

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 from July 1, 2025, through June 30, 2030.

IELCE providers are to ensure English language learners achieve competency in the English language as well as equip them with skills needed to, not only become citizens, but connect them to unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Through English language acquisition classes, instruction focuses on speaking, listening, reading, and writing skills needed for basic English competency. Students acquire an understanding of the American system of government, individual freedom, and the responsibilities of citizenship as well as instruction on the rights and responsibilities of citizenship and civic participation. Classes also include digital literacy and workplace preparation to prepare English language learners for occupations that lead to family sustaining employment.

English language learners have the opportunity to enroll in the Smart Start course, MS' job readiness course, that focuses on job search strategies, financial literacy, and workplace essential skills. Students are introduced to the top job sectors of the state as well as training or education needed to connect to the employers. Once students finish the course, they are eligible to take ACT's WorkKeys assessments leading to the National Career Readiness Certificate which serves as on on-ramp for various pathways.

Programs applying for IELCE funds under Section 243 are required to offer an IET program as well as provide extensive data to demonstrate the need and potential success of IELCE activities in conjunction with integrated education and training in the proposed service area.

Through MS' multi-level career pathway way, IELCE programs collaborate with workforce development and career-technical departments to develop pathways linking basic skills to specific educational or career interests that eventually lead to enrolling in Mississippi's Integrated Education and Basic Training (MIBEST) initiative.

MIBEST allows for students to be concurrently enrolled in adult education and literacy activities while enrolled in workforce or career-technical education, whether at a community college, K-12 system, or community partner. Each IELCE provider employers at least one (1) College and Career Navigator to provide wrap-around support and guidance, as well as coordinate activities connecting students to further educational or training and employment opportunities.

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.

IELCE providers collaborate with the LWDBs in order to ensure alignment between education and training activities support the local area strategic plan. LWDB representatives review applications and provide ongoing collaboration and technical assistance to develop IET programs responsive to local labor market demands. The IELCE provider is to take the LWDBs' recommendations and modify current activities to align with and support the local workforce plan.

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.

E. STATE LEADERSHIP

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

Utilization of State Leadership Funds

In accordance with the directives outlined in Section 223 of the Workforce Innovation and Opportunity Act (WIOA), Mississippi strategically leverages state leadership funds to reinforce its adult education landscape. These funds support initiatives aimed at enhancing the efficiency and effectiveness of workforce development efforts across the state. Through allocation and planning, Mississippi ensures that these resources are maximized to align with both state and local workforce development plans, fostering a collaborative ecosystem that prioritizes data-driven decision-making and evidence-based practices.

(A) Alignment of Activities with Core Programs and One-Stop Partners

In Mississippi, core partners provide ongoing training for state, regional, and local staff to align services and uphold the "no wrong door" policy. The training covers common intake procedures, referral processes, and specific programmatic information. The Office of Adult Education (OAE) facilitates coordination within the one-stop delivery system and appoints staff to represent adult education on the Governor's Job Fair Network Committee, enhancing engagement with employers. Community College Networks (CCNs) and local adult education directors are encouraged to participate in district job fairs.

All Title II-funded programs are mandated to develop written agreements with four Local Workforce Development Boards (LWDBs) to ensure service alignment, promote concurrent enrollment, and meet state-adjusted performance levels. Additionally, adult education providers outline their strategies for fulfilling one-stop responsibilities in their regions, promoting service integration and accountability.

- Collaborative Partnerships: State leadership funds support collaborative efforts with core programs and one-stop partners to ensure seamless service delivery and coordination. These partnerships leverage resources and expertise to better serve adult learners and meet workforce demands effectively.
- Integration of Services: Activities are aligned to integrate adult education services within the broader one-stop delivery system to enhance accessibility and efficiency. This integration streamlines processes and eliminates barriers, providing learners with comprehensive support throughout their educational journey.
- Mutual Agreements: Written agreements are developed with core programs and one-stop partners to outline responsibilities, goals, and strategies for effective collaboration. These agreements establish a framework for coordinated action, fostering a culture of shared accountability and collective impact.
- Career Pathways: Development of sector partnerships and career pathway development remains a priority, focusing on aligning services as students transition from adult education through integrated education and training, thereby advancing their education and employment opportunities.
- Integrated Education and Training (IET): Mississippi concurrently integrates adult education, skills training, and workforce preparation to prepare individuals for high-demand jobs.
- Stackable Credentials: Mississippi supports the acquisition of credentials that concurrently enhance employability.

(B) High-Quality Professional Development Programs

Mississippi dedicates a portion of state leadership funds to cultivate high-quality professional development programs for adult education professionals. Recognizing the pivotal role of continuous learning and skill enhancement, these initiatives aim to empower professionals with the tools and knowledge necessary to navigate the evolving landscape of adult education effectively.

- Targeted Workshops and Seminars: State leadership funds are utilized to conduct targeted workshops and seminars addressing specific needs of adult education professionals. These sessions delve into diverse topics, including instructional techniques, assessment strategies, and learner support services for all English Language Learners and General Education Students seeking a high school diploma. They are tailored annually to meet the varied needs of practitioners.
- Professional development in reading literacy, math literacy, and digital literacy skills equips teachers with strategies to support adult learners in developing these skills.
- The OAE will continue providing specialized training sessions to support adult learners with learning disabilities.
- Separate sessions will address the unique needs of individuals with mental health concerns.
- Additional sessions will cater to the specific challenges faced by ESL (English as a Second Language) students.
- These sessions collectively offer comprehensive guidance and support, fostering an inclusive environment for personal and academic growth.
- Digital literacy is emphasized as a crucial aspect of adult education, essential for workforce engagement and everyday life.
- Reading literacy webinars focus on evidence-based instruction, covering vocabulary, text complexity, and comprehension strategies.

- Diversity, Equity, and Inclusion (DEI) are paramount for cultivating an enriching and effective learning environment. Training is offered annually to promote a more inclusive educational landscape.
- Training sessions are recorded and uploaded to a Canvas course, allowing teachers to access webinars on-demand.
- Research-Based Strategies: Professional development programs focus on research-based strategies and best practices to improve program effectiveness and outcomes. By staying abreast of the latest trends and innovations in adult education, professionals can enhance their instructional practices and better meet the needs of diverse learners.
- Skill Enhancement: Professionals gain skills in areas such as instructional techniques, assessment strategies, and learner support services. Through state-sponsored professional development initiatives, practitioners acquire the competencies necessary to deliver high-quality instruction and support services to adult learners, thereby enhancing overall program quality and effectiveness.

(C) Technical Assistance

Mississippi recognizes the importance of providing technical assistance to adult education programs to enhance their capacity and effectiveness. Through targeted technical assistance initiatives, state leadership funds are leveraged to provide guidance and support in areas such as program improvement, data management, and service delivery.

- Program Improvement Support: Technical assistance is provided to adult education programs to support program improvement efforts, including data management and analysis. This assistance helps programs identify areas for improvement and implement strategies to enhance program effectiveness and outcomes. Assistance and Support are provided through webinars and on-demand training in reading, writing, speaking, mathematics, and English language acquisition.
- Assistance is offered on the role of being a one-stop partner in providing employment, education, and training services.
- Assistance with technology and new trainings on AI support are available.
- Guidance on Service Delivery: Programs receive guidance on service delivery models, intake procedures, and referral processes to streamline operations and improve the overall learner experience. Technical assistance ensures that adult education programs are equipped with the knowledge and resources necessary to deliver high-quality services to learners.
- Resource Allocation: Technical assistance helps programs allocate resources effectively to meet the needs of adult learners and achieve program goals. By providing guidance on resource allocation strategies, technical assistance ensures that programs can maximize the impact of state leadership funds and deliver high-quality services to the community.

(D) Monitoring and Evaluation

To ensure accountability and continuous improvement, Mississippi conducts monitoring and evaluation activities to track the effectiveness of state leadership funds in supporting adult education programs. These activities provide valuable insights into program performance and inform decision-making processes.

- Performance Tracking: State leadership funds support monitoring and evaluation activities to track performance indicators and outcomes. By collecting and analyzing data on program effectiveness, Mississippi can assess the impact of state leadership funds and identify areas for improvement.
- Accountability Measures: Monitoring ensures accountability in the use of funds and compliance with program requirements. By establishing accountability measures, Mississippi can ensure that state leadership funds are used effectively to support adult education programs and achieve program goals.
- Data-Informed Decision Making: Evaluation activities inform decision-making processes, identifying areas for improvement and guiding future investments. By using data to inform decision-making, Mississippi can ensure that state leadership funds are allocated to initiatives that will have the greatest impact on program effectiveness and outcomes.

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

Utilization of State Leadership Funds

Mississippi strategically channels state leadership funds, as outlined in Section 223 of the Workforce Innovation and Opportunity Act (WIOA), to enhance adult education efforts through permissible activities. Through careful allocation and planning, resources are aligned with statewide and local workforce development plans, promoting a collaborative ecosystem focused on data-driven decision-making and evidence-based practices.

(A) The Support of State or Regional Networks of Literacy Resource Centers

The OAE maintains ongoing partnerships with key organizations such as the Barbara Bush Foundation, Literacy Information and Communication System (LINCS), the Coalition on Adult Basic Education (COABE), American Institutes for Research (AIR), and the Adult Literacy and Learning Impact Network (ALL IN).

- Through these collaborations, the OAE aims to strengthen instructors' skills, emphasizing adult literacy initiatives that empower students with essential life skills for everyday situations and employment prospects.
- Additionally, they function as virtual resource centers, providing valuable assistance and guidance to both educators and learners.

(B) Developing and Piloting of Strategies for Improving Teacher Quality and Retention

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.

- The annual New Teacher Academy offers an immersive workshop-style experience for incoming adult education teachers, covering current classroom management strategies and curriculum development techniques.
- The Teachers Mentoring Teachers Institute (TMT) revolutionizes local-level teacher support through an online Canvas course. This program equips Lead/Mentor teachers with essential skills for effectively guiding and supporting new educators.
- Recognizing the significance of personalized mentorship, the TMT Institute aims to enhance the mentorship experience, fostering a supportive environment that promotes teacher growth and retention within the educational community.

f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

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.

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 Certifications

States must provide written and signed certifications that:

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 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

Authorizing or Certifying Representative

CERTIFICATION REGARDING LOBBYING

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

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

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.

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

Section 427 of the GEPA 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.

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

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.

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

The timeline is ongoing. The Mississippi Community College Board is committed to creating and maintaining a workplace in which all employees have an opportunity to participate and contribute to the success of the agency and are valued for their skills, experience, and unique perspectives. This commitment is embodied in the agency hiring policy and the way we serve the citizens of Mississippi at the Mississippi Community College Board and is an important principle of sound resource management.

The MCCB adheres to the principle of equal educational and employment opportunities as mandated by each of the five statutes that the Equal Employment Opportunity Commission enforces to prohibit job discrimination by both private and governmental agencies. The MCCB also adheres to Section 427 of the General Education Provisions Act (GEPA). When hiring, it is important that MCCB staff characteristics reflect the demographics and characteristics of the faculty, staff, and students that we serve. On our website and job applications, you will find the following statements: 1) The MCCB is and Equal Opportunity employer. Minorities, women, veterans, and individuals with disabilities are encouraged to apply, and 2) The Mississippi Community College Board is an Equal Opportunity Employer and does not discriminate on the basis of race, color, national origin, sex, age, disability or veteran status. This information is also in the MCCB Handbook.

The MCCB, OAE, provides technical assistance and professional development sessions to local programs on how to access and utilize the MS Works hub system that connects all core partners and is used to mitigate barriers. Referrals are made in real time to core partners based on the barrier/need of the individual student/s.

Adult Education and Literacy Program Performance Indicators

Performance indicators table

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	57.0%	57.0%	58.0%	58.0%
Employment (Fourth Quarter After Exit)	57.0%	59.0%	58.0%	59.5%
Median Earnings (Second Quarter After Exit)	$4,000	$4,100	$4,100	$4,200
Credential Attainment Rate	40.0%	40.0%	41.0%	41.0%
Measurable Skill Gains	52.5%	56.0%	53.0%	56.5%
Effectiveness in Serving Employers	Not Applicable ↓	Not Applicable ↓	Not Applicable ↓	Not Applicable ↓

A. Input of State Rehabilitation Center

(1) Input provided by the State Rehabilitation Council,;

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 othersinterested 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 theSRC 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 tothose 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 helpedkeep 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 towork 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 ofemploying 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 causedelays in WIPA Services and WIPA Services being less intense than needed when a benefits recipient is making choices aboutwork 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 ofAugust 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 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 afterreferral 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. Itseems 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 thequarterly 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 theprogram. 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 orientationfor 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 toimprove 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 determiningways 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 casesduring the year.

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

The ratings for the various services consumers received are presented below using the average (means) score given to each itemby 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 towork 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 I willassign 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 ofassignment*

- *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 afterreferral 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

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 thequarterly 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, wecontinue 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. Whencaseloads 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 helpimprove 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*

(1) A local public agency will provide the non-Federal share of costs associated with the services to be provided inaccordance 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 approvedunder 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% time spent 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 as 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 madeby 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 agencyfor 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

(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

privateagencies 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 ourState 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 providefurther 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 isactively 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 theprogram 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 inparticipating 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 anddrug 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-levelwork 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 intellectualand 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 andcoordinate 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 theirDistrict 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 specificservices 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

(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

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 disabilitiesfor 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 n 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 ofthe 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 or 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 exists 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 tenRequests 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 ofstudents 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, asadded 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 forspecial 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 tofacilitate 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, asadded 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 underwhich 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 and IPE before the student exists 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 goalis 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 costor 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 mustinclude, 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 fora meeting with the counselor at school during school hours. The parents of the students must be notified of themeeting 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.

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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 ofState, 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

 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 to24 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 anindividual'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 youthwith 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 withdisabilities 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 that 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 ontheir 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 howto 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 apartner 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 ofthe 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 tohire 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

BusinessOffice 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 tothat 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 205, 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 issubmitted 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 initiatesthe 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 mentalillness 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 Counselorsand 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.

I. 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.

Job Title	OVR Filled Positions	OVRB Filled Positions
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.

Job Title	OVR Vacancies	OVRB Vacancies	Current Total Staff Needs
Counselor	13	3	154
Counselor Assistant	17	0	84
Interpreter	3		11
Psychometrist	3		6
Evaluator	7		27
Work Adjustment Instructor	4		40
Job Title	**OVR Vacancies**	**OVRB Vacancies**	**Current Total Staff Needs**
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.

Job Title	Projected Additional Staffing Needs over the Next 5 Years	Total Staff Needed in 5 Years
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

Institutions	Students Enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
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

Institutions	Students Enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
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 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.

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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 ofhigher education and professional associations to recruit, prepare, and retain personnel who are qualified, includingpersonnel 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 requirementsof 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 serves 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 tothe 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 CRCeducational 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 accrediteduniversity 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 mayconsist of any combination of paid educational leave (full-time or part-time) at a maximum salary to be established bythe 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 section101(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 online 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.

The Mississippi VR and VRB programs have 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 the required content elements of WIOA.

VR and VRB have operationalized the transition and youth services program and have 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 work with district staff.

(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 providean 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 maintain momentum, leverage forward-thinking, and continue improving services and outcomes for individuals with disabilities.

Publicly available data sources were used 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 from the 2018 U.S. Census Bureau/ACS reporting and the AACE Case Management System were captured and utilized.

Based on the results of this assessment and information generated from our AACE Case Management system, the number of individuals with significant disabilities and the number of individuals who need supported employment services are projected to 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 unservedindividuals

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

<u>**OVRB Potential Service Population:**</u> 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 inorder 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:

2020	Q1	Q2	Q3	Q4
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	4,21 6	4,095	4,180	4,009
Hispanic/Latino	102	93	99	103
Multiple Races	176	76	75	70

2019	Q1	Q2	Q3	Q4
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 byVR/VRB for 2019–2020 and 2020–2021.

Age (2020)	Q1	Q2	Q3	Q4
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 supportin 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 inorder 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 earnlower 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 mostsignificantly 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 theunique 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

recententry. 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 currentlydoing 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 significantrole 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* is as follows: 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 andStudents by Disability Status:

Characteristic	Disabled		Non-Disabled	
	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
Race				
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
Hispanic Status				
Hispanic	1,907	5.2	19,392	4.4
Not Hispanic	34,515	94.8	423,308	95.6
Educational-Workforce Status (Age 16-24)				
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 11th-12th 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 educationresponses are:

Current

Level of education:	%
7-8th Grade	1.52%
9th-10th Grade	5.30%
11th-12th 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:

2020	Q1	Q2	Q3	Q4
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

2019	Q1	Q2	Q3	Q4
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:

2020	Q1	Q2	Q3	Q4
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 12th 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, individualsparticipate 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 meansthat 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 8th through 12th;

- 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 visiondisabilities.

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

fewerwork 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.

FFY	Number of Clients who will receive services
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 ofservices, we will have to close a priority category. At this time all priority categories are open.

FFY	PC 1 Served	PC1 Cost
2020	4567	22,161,087.01
FFY	**PC 1 Served**	**PC1 Cost**
2021	4439	27,944,912.29
2022	4528	28,503,810.54
2023	4619	29,073,886.75
FFY	**PC 2 Served**	**PC 2 Cost**
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
FFY	**PC 3 Served**	**PC 3 Cost**
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
FFY	**Total Served**	**Total Cost**
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 withdisabilities.

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 theirreliance 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 disabilitieswho 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 the2019 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 Measuresand 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, with 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 activitiesconducted under section 107.

No additional recommendations or reports were received from the SRC.

M. Order of SelectionDescribe:

(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 exits 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 exits 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 currentlyunder 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 accessto 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 IndividualizedPlan 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 inthe 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 requireSE 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 andorientation 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 studentswith 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 ateach 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 thispopulation.

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 tothe 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. DistrictOutreach 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 withdisabilities 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 waspostponed due to COVID-19.

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 Goalsand Priorities and (n) Goals and Plans for Distribution of title I Funds:

GOAL l : 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 theirreliance 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 benefitfrom 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 disabilitieswho 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 employersin 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 withdisabilities.

 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 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 7th Annual Summer Internship for Students with Blindness was completed in 2019. Fourteen (14) studentsparticipated.

- In 2021, 8th 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 201811,245 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 startedin 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 3rd Annual VR Deaf Pre-ETS Summer Program was held by the Deaf Services Program at Eagle Ridge inJuly 2019. The DEAF Pre-ETS Summer Program was postponed in 2020 and 2021 due to COVID-19.

- In July 2019, the 4th Annual Pre-Employment Transition Camp for Students with Deafness was held. 2020 and2021 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 toother 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, 2022In 2020 -2021, all Memorandum of Agreements with local educationagencies 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 playeda 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 IntegrationContinuum 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 3rd Annual VR Deaf Pre-ETS Summer Program was held by the Deaf Services Program at Eagle Ridge inJuly 2019. In July 2019, the 4th Annual Pre-Employment Transition Camp for Students with Deafness was held.

- 14 Students with Blindness participated in the OVRB 6th Summer Internship Program.

- VR served 3,609 students with disabilities and VRB served 676 students with disabilities for a total of4,285. This in 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-19and 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 withdisabilities.

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 theSpecial 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 andchanges 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 toschool 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 recententry. 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 ofstructured 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 ServicesInclude 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 followingcriteria:

- *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 Coordinatorwhose 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

Wagner-Peyser Program Performance Indicators

Performance Indicators	PY 2021 Expected Level	PY 2021 Negotiated Level	PY 2022 Expected Level	PY 2022 Negotiated Level
Employment (SecondQuarter After Exit)	66.0	66.0	71.0	71.0
Employment (FourthQuarter After Exit)	65.0	66.0	69.2	69.2
Median Earnings (SecondQuarter 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

Performance Indicators	PY 2021 Expected Level	PY 2021 Negotiated Level	PY 2022 Expected Level	PY 2022 Negotiated Level
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

Dislocated Worker Program Performance Indicators

Performance Indicators	PY 2021 Expected Level	PY 2021 Negotiated Level	PY 2022 Expected Level	PY 2022 Negotiated Level
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

Youth Program Performance Indicators

Performance Indicators	PY 2021 Expected Level	PY 2021 Negotiated Level	PY 2022 Expected Level	PY 2022 Negotiated Level
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
Median Earnings (Second Quarter After Exit)	*Baseline*	*2,700.0*	*Baseline*	*2,958*
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

Adult Education Performance Indicators

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	13.0	20.0	13.0	21.0
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1]

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 participatingin 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 assistancepayments (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 whenthe natural or adoptive parent is unemployed. Two-parent families are only eligible if the parent is designated as the "principal wage earner."

   o Meets the state's definition of "unemployed," which means that he or she is not currently working or has notworked full-time for at least thirty (30) days prior to receipt of TANF benefits,

   o Works less than 100 hours per month,

   o Has not refused a bona fide offer of employment or training, without good cause, within

   o 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:

   o 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 allowthese 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 notemployed and do not attend school or an equivalent training program;

  o Minor parents not living in an adult-supervised setting;

  o Minor children 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 unitfails 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 tosubmit 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 madea fraudulent statement or representation, with respect to the individual's place of residence in order to receive TANFassistance 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 willbe 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, learningdisabilities, 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 tocomply 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 fundingfor 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 solong 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 exceedthe 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 thehousehold 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 afamily 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. Thisis 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 theinitial 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 increasedearnings 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, maritalstatus, handicap, or political beliefs. Mississippi will follow the nondiscrimination provisions in Title IV, Section 408, for anyprogram or activity receiving funds under Public Law 104 - 193, provision in State Law and Title IV of the Civil Rights Act of1964, 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/ortransitional 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 processdesigned 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 theact 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 orcertified.

Structured job search and job readiness assistance activities are supervised daily by the case manager, instructor orother 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:

- o   a maximum of 120 hours for a single custodial parent whose youngest child is under age six; and

- o   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 consecutiveweeks 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 notfurnish aid or support to the employer for wages paid to the TANF recipient. Types may include:

- o   Regular and/or contractual employment in the public or private sector for which a person receivesunsubsidized wages on an hourly, weekly, or monthly basis.

- o   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/W2form, 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 asubsidy 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:

- o   Work supplementation where TANF funds that would otherwise be paid as assistance are paid to theemployer;

- o   A third-party contractor, like a temporary staffing agency, serves as employer of record and is paid a fee tocover salary, expenses, and success in placing employees;

- o   Work study programs which involve paid employment provided by an educational institution if thestudent's earnings are subsidized by the educational institution; and

- o   Supported work for individuals with disabilities in an integrated setting, e.g., Vocational RehabilitationAbility 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 orapplied 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 specificallyrefers 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 maybe 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, nonprofitorganizations, 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 willonly 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 theworkplace. 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:

- o increase public awareness concerning the impact of a parent's absence,

- o assist parents in becoming "Team Parents" and to share the legal, financial and emotional responsibilities ofparenthood with the custodial parent of their child(ren)

- o improve the self-image of parents and their families,

- o increase parents' parental involvement in their child(ren)'s education,

- o improve academic performance and graduation rate and reduce the dropout rate of their children,

- o decrease the teenage pregnancy rate,

- o decrease juvenile crime,

- o promote two-parent families and both parents' role in the family, and

- o 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 bereferred to an English as a Second Language (ESL) activity prior to job placement. Case management will also workwith 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:

- o reduce and prevent out-of-wedlock pregnancies,

- o prevent/reduce substance abuse (use of alcohol, drugs and tobacco products), and

- o 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. Byengaging 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:

- o academic tutoring

- o literacy

- o remediation

- o financial literacy

- o science, technology, engineering, arts, or math (STEAM)

- o career exploration

- o life and soft skills

- o leadership and personal development

- o work-based learning

- o teenage pregnancy prevention

- o drug, alcohol, and violence prevention

- o Additional goals include but are not limited to:

- o reducing criminal activity

- o reducing drug and alcohol abuse

- o reducing violence

- o promotion positive family outcomes

- o increase in school attendance

- o 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:

- o Meet a TANF family's ongoing basic needs (i.e. food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses.)

- o 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:

- o Family unit must include an adult and dependent child(ren) under 18 years of age.

- o 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 fromreceiving 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) inthe 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 anaverage 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 relocationexpenses).

h. TANF funds may be used to provide family preservation services to families, with dependent children, earning at orbelow 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 intheir 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 sothat 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 toreduce the overall incidence of poverty, TANF funds may be used for workforce, training and education to provideassistance 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 tomeet 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 therecipient 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 goodcause, 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 effectivecommunication 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

Violation	Penalty
1st Violation	3 Months Minimum or Until Compliance
2nd 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) fortwo-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 thanthe 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 MSState 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 Departmentof 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 form 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 10-19years of age and their families. The SRAE Program, known as The Healthy Teens for a Better Mississippi initiative, provideseducational 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 avoidanceand 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 mayhave committed the crime, may view.

MDHS will use social media platforms to educate the general public on the problem 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 Statues 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 TANFapplicants/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. 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
1st Violation	3 Months
2nd 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 isbeing 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) yearsas 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 theirspouses and unmarried dependent children; and

- Aliens who are lawfully admitted for permanent residence and have worked for 40 qualifying quartersof coverage or can be credited with such quarters, not including quarters beginning January 1, 1997 inwhich 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 maximumsas 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 opportunityfor 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, goodcause, 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 benefitlevel.

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 theindividual 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 90days, 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 thefirst working day following the weekend or holiday.

l. Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v)of the Social Security Act).

1. providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

2. in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, ifso, 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 unmetneed for service personnel.

Mississippi's four local Workforce Development Areas have identified Healthcare in their Sector Strategy Plans to help alignthe 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 ina 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 counttowards the State's MOE:

- State funded scholarship programs for needy families with dependent children that began after 1995. [MississippiCode 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 incomeat 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 percentof 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 whosefamilies are at or below 200 percent of the federal poverty level. However, the Reading and Intervention Program wasestablished 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 awareof 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 ofrelatives;

  - End the dependence of needy parents on government benefits by promoting job preparation and work. Theseprograms 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-relateditems 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 orrequired to participate in TANF Work Program activities;

- State funded administrative expenditures for frontline caseworkers and state level staff which includes salaries, officesupplies, 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

The Jobs for Veterans State Grants (JVSG) program provides federal funding, through a formula grant, to 54 State Workforce Agencies to hire dedicated staff to provide individualized career and training-related services to veterans and eligible persons with significant barriers to employment (SBEs), and by helping employers fill their workforce needs with job-seeking veterans.

The JVSG is funded annually in accordance with a funding formula defined in the statute (Title 38 United States Code (38 U.S.C.) 4102A(c)(2)(B) and regulation and operates on a fiscal year basis. However, performance metrics are collected and reported quarterly (using four "rolling quarters") on a program year basis. Currently, JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. 4102A(b)(5) and 4102A(c), the Assistant Secretary for Veterans' Employment and Training 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 apply for a grant that contains a State Plan narrative, which includes:

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. The Jobs for Veterans State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI, and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis. However, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding,

38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

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 activitieswith 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.

List the populations to be served by DVOP specialist and consolidated DVOP/LVER staff

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:

o A special disabled or disabled veteran, who is entitled to VA compensation or released from active duty because of a service-connected disability.

o Homeless.

o A recently-separated service member who at any point in the previous 12 months has been unemployed for 27 or more nonconsecutive weeks.

o Offender.

o Lacking a high school diploma or equivalent certificate.

o 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:

o Veterans age 18-24.

o Vietnam-era veterans.

o Eligible transitioning service members.

o Receiving treatment at a military treatment facility or warrior transition unit.

o Spouse, or other family caregiver or a caregiver of an eligible veteran.

o 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.

MDES intends to assess the utility of utilizing consolidated DVOP/LVER positions in rural areas of the state.

At the state level, the State Veterans Coordinator 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.

Describe the roles and responsibilities assigned to DVOP specialists and LVER staff and the consolidated DVOP/LVER positions by the state.

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 through a case management framework to veterans experiencing significant barriers (SBE) to employment, with an emphasis on assisting veterans who are economically or educationally disadvantaged.

MDES intends to assess utilizing DVOP Specialists assigned across a workforce area to provide assistance to Veterans receiving services through the Veterans Benefit Administration's Vocational Rehabilitation and Employment program and through the Homeless Veterans Reintegration Program via grantees with assigned areas of performance across the state and other Veterans with SBEs currently receiving services via offices without DVOP Specialists assigned to them. If the assessment warrants this new arrangement, this could further enhance the program by potentially allowing DVOP Specialists a new classification and further enhance their career advancement opportunities.

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 and will be provided through a case management framework.

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 case management 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.

MDES intends to assess utilizing LVER staff assigned across a workforce area to facilitate employment, training, and placement services furnished to veterans across an entire workforce area and not just the local job center. If the assessment warrants this new arrangement, this could further enhance the

program by potentially allowing LVER staff a new classification and further enhance their career advancement opportunities.

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.

Demonstrate the manner in which DVOP, LVER and consolidated DVOP/LVER staff are integrated into the state's employment service delivery system, i.e., AJCs.

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.

Describe the state's performance incentive award program to encourage individuals and employment service offices to improve and/or achieve excellence in the provision of services to veterans.

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.

The nomination and selection process for all performance incentive awards to individuals and employment service offices.

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 Workforce Programs and the Director of the Office of Workforce Services, with input from local management. The incentive program award will be one percent of the initial grant allocation.

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, and or at the end of each quarter as performance warrants.

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.

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) formand 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 staffwill 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 Specialistmay 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 toenroll 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, andface to face office visits.

LVER staff will advocate for all veterans served by the WIN Job Centers with business, industry, and other community-basedorganizations 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 secureemployment 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 BusinessAdministration 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 willcontinue outreach efforts to federal contractors. LVER staff members are active members of the Business Services Team. Theyconduct 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.

a. 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-personworkforce 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.

The approximate number and value of cash awards using the one-percent incentive award allocation.

These awards are intended for the top three recipients selected and in designated amounts by the Director of the Office of Workforce Programs and Director of the Office of Workforce Services not to exceed $3,000 each. Management will determine the appropriate mix of local workforce area and statewide awards to maximize performance. The awards provide will not exceed the 1% identified in the current and subsequent incentive award funding guidance.

The general nature and approximate value of non-cash performance incentive awards to be charged to the base allocation.

Disbursement of any non-cash incentive award will be determined by the Director of the Office of Workforce Programs and Director of the Office of Workforce Services and charged to the base allocation in accordance with the most recent guidance.

Awards options include membership dues, personal services, and travel expenses for conferences, award ceremonies, training, and other items.

Each award winner 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, or similar Veterans related training.

Any challenges the state may anticipate in carrying out a performance incentive award program as mandated by 38 U.S.C. 4102A(c.

N/A

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 inAppendix I7A.

a.2. Budget Worksheets/Forms

Worksheet Ul-1 is provided in Appendix I7B. Worksheet SF 424 is provided in Appendix I7F. Worksheet SF 424A is providedin 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 form 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 claimantsare 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.

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.

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%
Total	**1,136,175**	**1,160,920**	**24,745**	**2.2%**

Source: MS Department of Employment Security, Labor Market Information, QCEW

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.

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

    o White: 57.1 percent

    o Black or African American number: 37.1 percent

    o American Indian and Alaska Native number: 0.4 percent

    o Asian number: 1.0 percent

o Native Hawaiian or Pacific Islander number: less than 0.1 percent

o Some other race number: 1.4 percent

o 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

	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

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.

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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 LWDAs are important partners to SCSEP. The SCSEP Managers rely on MDES and the LWDAs 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

Center for Workforce Inclusion

Joshua Wadsworth, National SCSEP Director

8403 Colesville Road, Suite 200

Silver Spring, MD 20910

jwadsworth@workforceinclusion.org

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

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.

Mississippi 2024 WIOA Combined Plan   178

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.

he 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	
Total	37	155	242	101	535	100%
Educational Attainment						
8th grade & under	9	4	0	3	16	2.99%
9th grade - 11th grade	8	31	25	2	66	12.33%

High School diploma or equivalent	18	100	89	45	252	47.10%
1 - 3 years college	2	62	80	26	170	31.77%
Post-secondary Certificate	0	2	4	1	7	1.30%
Associate's degree	0	5	20	4	29	5.42%
Bachelor's degree or equivalent	1	24	24	5	54	10.09%
Some graduate school	0	0	0	0	0	0.00%
Master's degree	0	0	7	1	8	1.49%
Doctoral degree	0	0	0	0	0	0.00%
Age						
55-64	5	32	105	56	198	37.00%
65+	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 N).

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

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 transformation 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 sub granted 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 I1B).

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)(l 0) 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%
Totals	1,117,775	1,107,140	-10,635	-1.0%

Source: U.S. Bureau of Labor Statistics, 2021.

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 926,31

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 LWDAs are important partnersto SCSEP. The SCSEP Managers rely on MDES and the LWDAs 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 offersskills 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 andservices 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 andthe 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

Center for Workforce Inclusion

Joshua Wadsworth, National SCSEP
Director8403 Colesville Road, Suite 200

Silver Spring, MD 20910
jwadsworth@workforceinclusion.org
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

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 aremade. 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 tocollaborate 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 thestate;

- the Planning and Development Districts either sponsor or closely partner with the Regional TransportationCouncils.

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 andthe 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 Departmentof Labor for WIOA, Wagner-Peyser, and other DOL-funded workforce programs. The combined plan is centered onan 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 medicalcare will require an increase in the number of healthcare jobs, as evidenced by the national growth in this sector of twenty-onepercent 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, regardlessof 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 tocreate, 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 tolook outside Mississippi for talent;

- An information system that supports data-driven planning and decision making for state and local workforcestakeholders;

- An increase in post-secondary credentials and certifications that help jobseekers access the high-skill, high-growthjobs 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 trainingand retraining.

Each of these five keys is as critical in helping seniors fill a part of the shortage in skilled workforce as they arefor 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, andthe 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 tooffer 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 hostagencies. 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 adviceand 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 ofCommerce 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 subgranteesin 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 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 ofthe 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 thevalue 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 WINJob 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 thecommunity 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.

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 usingelectronic 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 currentand emerging industries that foster economic opportunity, job creation, capital investment and infrastructure development bydeveloping 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 importanceis the retention and expansion of existing industries such as transportation and logistics, agribusiness, tourism; and defense andhomeland 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 skilledworkers, 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 nextten 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

	IID	NCBA	SSA	MS	All Mississippi SCSEP	
Total	45	248	247	101	641	100%
Educational Attainment						
8th grade & under	11	5	2	3	21	3.27%
9th grade - 11th grade	8	40	27	4	79	12.32%
High School diploma or equivalent	22	106	92	45	265	41.34%
1 - 3 years college	3	70	79	31	183	28.54%
Post-secondary Certificate	0	4	2	0	6	0.93%
Associate degree	1	4	23	6	34	5.30%
Bachelor's degree or equivalent	0	18	15	8	41	6.39%
Some graduate school	0	0	3	1	4	0.62%
Master's degree	0	1	4	3	8	1.24%
Doctoral degree	0	0	0	0	0	0.00%

Age						
55-64	35	133	122	56	346	53.97%
65+	10	115	125	45	295	46.02%
Wages & Hours						
Median Placement Wages	$10.00	$9.00	$9.49	$9.18		
Average Hours per Week	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 slotsto 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 transformation 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 granteesin 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 anyreason, 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 standardsaddress 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 sub granted to 10 Planning and Development Districts. The AAAs, which are housed with the PDDs, currently operate the SCSEP andare 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 Chartas 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, approximatelyten 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 byphone 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 throughmonitoring, 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 FederalProject 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 reviewof 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 personnelpolicies 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 agencyhandbook.

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 jobsaccount 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 givebest 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 thatcan 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 providesthe skills training necessary to secure unsubsidized employment in the fields that support the local economy. Additionally, thestate 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 fearof 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 MCCBwebsite 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 0) 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 filledin 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

DOL Negotiated SCSEP Final PY 2020 Grantee Targets and Goals	Mississippi
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 anopportunity 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 ona 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 administrating 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 tobe 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.

	X or N/A	STATEMENT OF ASSURANCE	DOCUMENTATION and COMMENT
1.	X	**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.**	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. The State Plan described how it ensured an open and inclusive planning process with meaningful opportunity for public comment, per 20 CFR 641.350. The State will establish a written policy to ensure compliance with these requirements.

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.

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

9/8/22
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

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
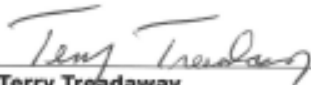
_____
Laura Hipp
Deputy Executive Director, Mississippi Development Authority

_____9-8-22_____
Date

_____
Mitzi Woods
Delta Local Workforce Development Area

_____9.8.22_____
Date

_____
Terry Treadaway
Mississippi Partnership Local Workforce Development Area

_____9-8-22_____
Date

_____
Robin Parker
Southcentral Mississippi Works Local Workforce Development Area

_____9/8/22_____
Date

_____
Allison Hawkins
Twin Districts Local Workforce Development Area

_____9/08/22_____
Date

☐ Integrated education and training (IET)/MIBEST ☐ Basic Skills ☐ ESL ☐ Drop Out Recovery ☐ Other				
44. Who are authorized signatory officials? ☐ Copy of fidelity bond and listing of authorized signature(s) for purchases, disbursements, and cash receipts				
45. An updated equipment list maintained that includes a description, serial number, acquisition date, funding source, purchase price, location use and condition. ☐ Updated inventory list				

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); 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

1

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. 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); 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:

2

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

3

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.

4

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) 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

6

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

8

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.

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

11

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

12

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 statues 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.

13

- 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

14

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.

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

16

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

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.

Yolonda Boone   _3/2/2015_

Director   Date
Office of Grant Management

Appendix D: State and Regional Economic Analysis

Current Industry Structure, 2022

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
Total	**174,684**	**100.0**	**$39,816**	**16,793**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

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
Total	**148,705**	**100.0**	**$57,305**	**2,424**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

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
Total	**135,289**	**100.0**	**$21,606**	**7,252**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

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
Total	**177,230**	**100.0**	**$52,210**	**8,261**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

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
Total	**14,393**	**100.0**	**$54,953**	**2,068**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

Current Occupations, 2022

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
Total	**118,639**	**67.8**	**$9.95**	**$14.77**	**$24.81**

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.
*Percent of all Wholesale/Retail Trade jobs. ** Hourly 10th percentile wage. *** Hourly 90th percentile wage.

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
Total	**55,908**	**37.6**	**$12.72**	**$19.03**	**$27.81**

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.
*Percent of all Manufacturing jobs. ** Hourly 10th percentile wage. *** Hourly 90th percentile wage.

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
Total	**95,070**	**70.3**	**$8.44**	**$10.59**	**$14.89**

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.
*Percent of all Leisure and Hospitality jobs. ** Hourly 10th percentile wage. *** Hourly 90th percentile wage.

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
Total	**93,153**	**52.8**	**$15.80**	**$20.17**	**$26.80**

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 10th percentile wage. *** Hourly 90th percentile wage.

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
Total	**8,432**	**58.5**	**$11.58**	**$18.04**	**$28.01**

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.
*Percent of all Natural Resources and Mining jobs. ** Hourly 10th percentile wage. *** Hourly 90th percentile wage.

New and Emerging Sectors, 2022

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
Total	**89,848**	**100.0**	**$61,395**	**912**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

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
Total	**26,572**	**100.0**	**$54,047**	**985**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

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
Total	**202,102**	**100.0**	**$25,452**	**12,216**

Source: U.S. Bureau of Labor Statistics, QCEW 2022 Annual Averages; Mississippi Department of Employment Security, 2023.

New and Emerging Occupations, 2022

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
Total	**34,424**	**38.2**	**$13.43**	**$20.00**	**$29.71**

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.
*Percent of all Advanced Manufacturing jobs. ** Hourly 10th percentile wage. *** Hourly 90th percentile wage.

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
Total	**18,900**	**71.0**	**$12.39**	**$17.37**	**$26.71**

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.
*Percent of all Healthcare Support jobs. ** Hourly 10th percentile wage. *** Hourly 90th percentile wage.

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
Total	**108,618**	**53.9**	**$8.71**	**$11.04**	**$15.89**

Source: U.S. Bureau of Labor Statistics, OEWS 2022 Data; Mississippi Department of Employment Security, 2023.

Appendix E: Characteristics of Individuals with Employment Barriers

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.*

Characteristics of Temporary Assistance for Needy Family (TANF) Program Work-Eligible Recipients

Statewide		
	Number	Percent
Total TANF Recipients	5,340	-
Total Ages 18-64	558	-
RACE (Ages 18-64)		
Black	506	90.7
White	41	7.3
American Indian	<10	-
Others	<10	-
GENDER (Ages 18-64)		
Female	539	96.6
Male	19	3.4
AGE (Ages 18-64)		
18 - 25	158	28.3
26 - 35	312	55.9
36 - 45	70	12.5
46 - 64	18	3.2
EDUCATION (Ages 18-64)		
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
ECONOMIC CHARACTERISTICS (Ages 18-64)		
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.

Characteristics of Supplemental Nutrition Assistance Program (SNAP) Recipients

Statewide		
	Number	**Percent**
Total SNAP Recipients	570,637	-
Total Ages 18-64	218,532	-
RACE (Ages 18-64)		
Black	132,318	60.5
White	80,608	36.9
American Indian	1,182	0.5
Other	4,424	2
GENDER (Ages 18-64)		
Female	140,161	64.1
Male	78,371	35.9
AGE (Ages 18-64)		
18 - 25	35,074	16
26 - 35	44,467	20.3
36 - 45	50,638	23.2
46 - 64	88,353	40.4
EDUCATION (Ages 18-64)		
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
ECONOMIC CHARACTERISTICS (Ages 18-64)		
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.

Characteristics of Ex-Offenders

Statewide		
	Number	**Percent**
Total Ex-Offenders	5,818	-
Total Ages 18-64	5,674	-
RACE (Ages 18-64)		
Black	2,822	49.7
White	2,773	48.9
American Indian	12	0.2
Other	67	1.2
GENDER (Ages 18-64)		
Female	752	13.3
Male	4,922	86.7
AGE (Ages 18-64)		
18 - 25	472	8.3
26 - 35	1,938	34.2
36 - 45	1,888	33.3
46 - 64	1,376	24.3
EDUCATION (Ages 18-64)		
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
ECONOMIC CHARACTERISTICS (Ages 18-64)		
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

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
Total	**2,440**	**6,406**

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.

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
Total	**2,691**	**315**

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.

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
Total	**13,131**	**11,930**

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.

Job Growth in Well-Established Industries

Occupation	10-Year Projected Openings
Wholesale/Retail Trade	
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
Finance	
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
Non-Advanced Manufacturing	
Fabricated Metal Product Manufacturing	521
Nonmetallic Mineral Product Manufacturing	172
Textile Mills	50
Transportation and Warehousing	
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
Natural Resources	
Crop Production	367
Forestry and Logging	214
Mining (except Oil and Gas)	39
Healthcare	
Ambulatory Health Care Services	2,583
Hospitals	2,728
Nursing and Residential Care Facilities	1,519
Social Assistance	2,124
Education Services	
Education Services	6,025
Total	**26,946**

Sources: Mississippi Department of Employment Security, 2023.

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
Total	**14,108**	**16,216**

Sources: Mississippi Department of Employment Security, 2023; Mississippi Works, Job Openings in FY2023.

Appendix G: Performance Boals for Core Programs

	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:	
	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) 21	74	72	75	73
Employment (Fourth Quarter after Exit)22	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 23	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
1.
2.
3.
4.
5.
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
TOTAL	$ 31,516,031	$ 7,921,991	$ 23,594,040

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.

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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.

WIOA ADULT			
Local Workforce Development Area	Local Allocation	Available July 1, 2023	Available October 1, 2023
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
TOTAL	$ 7,795,707	$ 1,533,217	$ 6,262,490

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.

WIOA YOUTH		
Local Workforce Development Area	**Local Allocation**	**Available April 1, 2023**
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
TOTAL	$ 8,131,324	$ 8,131,324

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:

ALLOCATION FACTOR	WEIGHT ASSIGNED IN FORMULA
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
TOTAL	$ 7,667,009	$1,653,436	$ 6,013,573

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 or Jeffrey Crump at 601-321-5481 or jcrump@mdes.ms.gov.

Robert DeYoung, Director
Office of Grant Management

Appendix I: Assurances/Compliances

I-1. Conflict of Interest Policy - State Policy Number 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.

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

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).

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

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:

- 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.
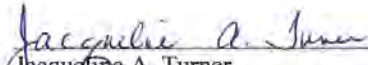
10. **Monitoring Files**

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;

- signed monitoringreport;
- 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

Appendix J: Adult, Dislocated Worker, and Youth Program Requirements and Assurances

J-1. ETPL Certification – State Policy Number 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 retraining;
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 at 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 122, 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.

2. 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 to 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.

1. 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 substantially 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)(I)) 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 in 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 LWDAs 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?usrAction=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.

viii. 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 h) 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.

ix. 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

x. 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, 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 9171. 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.

c. 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://etpl.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;

ix. 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;

x. 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 15th of each year.

   b. Beginning on April 16th 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)-system/ .

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 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 Provider 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.

- Where appropriate, the rates of licensure or certification, attainment of academic degrees or equivalents, or attainment of other measures of skills of the graduates of the program.

b. Outcomes for WIOA participants in each program of study where a participant was granted an Individual Training Account will be provided by the State's ETPL Administrator and staff. (Section K – WIOA Participants)

    i. The number of participants who entered training;

    ii. The number of participants who completed training;

    iii. The number of participants who entered employment;

    iv. The percentage of program participants who are in unsubsidized employment during the **second quarter after exit** from the program.

    v. The percentage of program participants who are in unsubsidized employment during the **fourth quarter after exit** from the program;

    vi. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program.

    vii. 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;

    viii. 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. Percentage who have completed the program and are placed in unsubsidized employment; and

    ix. Information on program costs (e.g., tuition, fees, books, supplies, tools, room and board, personal and transportation) for each program. Each LWDB will determine which elements of program cost, other than tuition and fees, may be covered by an Individual Training Account (ITA).

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 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 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 LWDAs 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 LWDA 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 15th 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 MDES 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 15th 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-(etpl)-system/.
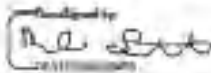
C. Regulatory Requirements

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)(i), 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.

_____   1/28/2022

Robin 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 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.
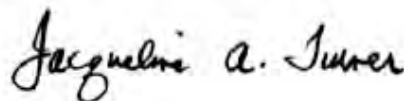
II. **PROCEDURES**

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**

Jacqueline A. Turner

_____

Jacqueline A. Turner
Executive Director