



STATE OF MISSISSIPPI

# **WORKFORCE INNOVATION & OPPORTUNITY ACT**

Mississippi Works Smart Start Career Pathway





# STATE WORKFORCE INVESTMENT BOARD

OFFICE OF THE GOVERNOR

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## Overview

The state of Mississippi has opted to submit a Combined Plan to meet the requirements of the Workforce Innovation and Opportunity Act. This Combined Plan is built around the commitment made by the Office of the Governor that the state's workforce system should ensure there is a job for all Mississippians so they can live here, raise families, and grow the state. Fulfilling this pledge requires a clear understanding of the opportunities and challenges that workers face in an increasingly globalizing and rapidly changing economy that places pressure on the current and prospective workforce to gain more academic credentials and higher levels of skill. This pledge also calls for a clear understanding of the opportunities and challenges businesses face to remain competitive.

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 implementation of WIOA has been transformative for the state. Mississippi's original 2015 WIOA plan articulated a vision of cooperation between workforce stakeholders to ensure that all state resources would be marshalled to improve workforce participation in the state, meet the recruitment needs of current and prospective businesses, and connect job seekers in real time with resources necessary for success. A key concern of the original plan was closing the gap between the demand and supply of workers with specialized skills beyond high school. In the five years since the original plan's approval and implementation, Mississippi's WIOA partners have succeeded in transforming the state's entire workforce delivery system around a focus on improving the skills of workers to connect them with high-demand jobs. Mississippi's adult education providers have embraced the Smart Start Career Pathway model in all education and training activities by integrating a focus on necessary skills and industry recognized credentials into high school equivalency, literacy, and other programs. Adults, including senior citizens, youth, SNAP and TANF recipients, workers with disabilities, and those from other vulnerable populations are being connected with training and workforce services at the local level by Local Workforce Development Areas (LWDAs) and vocational rehabilitation partners that have aligned their training around high-demand industry sectors. The four agency partners responsible for WIOA Training programs, workforce services, supportive services like TANF and SNAP, adult education, and vocational rehabilitation are now connected electronically. A first-in-the-nation case management referral hub allows staff from any WIOA partner agency to refer participants electronically to ensure they are connected with the mix of services required to pursue a high-quality career pathway. In addition to advances in how partners connect with one another to provide the services their clients need, the state's physical infrastructure for workforce delivery has been transformed through the addition of comprehensive One-Stop centers in which staff members representing each WIOA partner are collocated in a single center. The effects of Mississippi's WIOA transformation have become evident as Mississippi's workforce continues to grow and underemployment has been nearly cut in half.

The foundation for Mississippi's Combined Plan was rooted in the economic and workforce analysis prescribed by WIOA. Mississippi continues to have a positive economic outlook. Data from the Bureau of Labor Statistics (BLS, 2019) reveal several encouraging facts. The unemployment rate has declined from 10.4 percent in 2010 to an average of 5.2 percent in 2019. Similarly, underemployment reached a peak of 17.6 percent in 2011 but has been cut nearly in half, reaching 8.9 percent in 2019. Mississippi has experienced rapid growth in its number of new businesses, with more than 2,100 new establishments in the last three years alone. The current economic environment is creating opportunities for the establishment of new and better jobs. Data from the Mississippi

Works Labor Exchange show that manufacturing was the biggest job creator in the state, with more than 31,750 job openings during the period September 2018 through August 2019. Advanced manufacturing and healthcare support are also emerging sectors in the state. Together, they had thousands of job openings in 2019.

Economic and workforce analysis clearly shows that the state is in an excellent position to improve its total workforce participation rate by increasing worker skills that are in demand by employers. Mississippi's workforce participation rate is 56.2 percent. 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 that pay at least \$18 per hour within five years of the completion of training. This combination of formal training and industry credentials, coupled with practical experience and necessary (soft) skills, is the new workforce currency that will ensure success for Mississippians seeking to fill the tens of thousands of openings available. Providing Mississippians with training and education opportunities aimed at closing the skill gap will improve their ability to pursue jobs that better match their credentials and full-time employment aspirations. This approach will also provide employers with a workforce that possesses the skills and core competencies required for businesses to remain competitive in a global economy.

The state's strategic vision is to continue to nurture a workforce system that acts and functions as an ecosystem where all parts are connected and line up to achieve common goals so that every Mississippian has the opportunity to be work- or career-ready and to secure his or her dream job right here at home. Currently, the complexity of Mississippi's workforce system and the sheer number of education, training, and employment support service activities geared to address barriers to employment pose a challenge to the state. Under Mississippi's Combined Plan, from the moment one enters the education and workforce system, he or she will be presented with the necessary tools to choose and pursue a career pathway that is relevant to current and future labor markets. Similarly, from the moment current and prospective businesses enter into a partnership with Mississippi's education and workforce system, resources will be immediately aligned to cultivate the sustainable, high-performance workforce critical for maintaining and expanding businesses' long-term economic viability, in turn creating better and more sustainable employment opportunities for Mississippians.

The state's primary strategy is a career pathway model that facilitates the integration of programs and improvement of efficiency in service delivery across partners. This model is known as the *Mississippi Works Smart Start Career Pathway Model*. The state has reimagined its One-Stop workforce delivery system to create 1) Comprehensive One-Stop Centers, 2) Affiliate One-Stop Centers, 3) Virtual Access One-Stop Centers, and 4) Call Center Support. A fifth One-Stop type, *Sector Training Plus Comprehensive*, is currently in the planning stages. Policies and regulations have been established for the new WIOA Combined Plan Partners' workforce ecosystem along with improved technology integration that leverages the state's nation-leading longitudinal data system.

Operationally, the state will continue to undertake the following activities to implement its Mississippi Works Smart Start Career Pathway Model:

1. Align WIOA Combined Plan Partners in state education, training, and workforce around the Mississippi Works Smart Start Career Pathway Model, a data-driven roadmap designed to guide Mississippians from any state of work-readiness into gainful employment.
2. Build on the state's current information technology infrastructure to coordinate and align the case management activities of all WIOA Combined Plan Partners in education, training, workforce, and supportive services to realize greater efficiency in service delivery, reduce duplication of effort, and ensure that every Mississippian receives the highest level of coordinated assistance in connecting to the labor market.
3. Build on the state's current physical network of WIOA Combined Plan Partners in workforce, education, and supportive service partner offices to ensure that every Mississippian has access to staff members who understand the Mississippi Works Smart Start Career Pathway Model and take a job-focused approach to case management.

4. Develop performance measures and other measures of socioeconomic mobility that give the state workforce system the ability to assess program effectiveness and pursue a data-driven approach to strategic planning.
5. Engage in continuous research to understand the workforce needs of Mississippi's employers in the context of local and regional economic sectors, making the results of this analysis available for economic development and other strategic workforce planning purposes.
6. Provide a common vision for WIOA Combined Plan Partners for state workforce, training, education, and supportive services through coordinating entities such as the State Workforce Investment Board and Mississippi's four local workforce development boards.

Leadership from the Office of the Governor will continue to allow the state to develop and implement the most comprehensive WIOA workforce system in the country. Mississippi's system serves people from all walks of life with any work experience and skill needs, such as individuals who seek training after being laid off for several years, those who are preparing for their first job or postsecondary education, and people who pursue training during or after work to improve their skills. The system will also continue to serve those in need of help with childcare or transportation, as well as those who need to acquire basic literacy and numeracy skills or improve their English language skills.

## **WIOA State Plan Type: Combined**

The state of Mississippi has opted to resubmit a Combined Plan. The plan includes the six required state programs, 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). The main focus of the plan is to improve the economic opportunities of all job seekers, especially those with low skills.

Mississippi is in an excellent position to continue implementation of a Combined Plan. Over the last decade or so, the state has created a cultural and political environment that fosters cooperation and integration across education and workforce programs. In 2004, the state passed the Mississippi Comprehensive Workforce Training and Education Consolidation Act. The main goal of the act was to reduce fragmentation and duplication of services and to promote performance-based management. The state has developed and implemented one of the country's most integrated technology-based workforce systems, commonly known as Mississippi Works. The system fully integrates UI, TAA, Adults, Dislocated Workers, Youth, Veterans, and the Work Opportunity Tax Credit (WOTC). SCSEP is tracked using an external system. Mississippi Works is fully interoperable with other case management systems, such as those for Rehabilitation Services, Adult Education, and TANF. The state has also developed and implemented one of the most comprehensive and advanced integrated data systems in the country: LifeTracks. The development of this system began in 2005, and the system has been fully operational for the last seven years. In 2012, the Mississippi Legislature created the State Longitudinal Data System (SLDS) Governing Board 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 LifeTracks and ensure data integrity, security, confidentiality, and privacy(see Appendix B).

Mississippi's plan includes two major components: 1) Combined Plan programs and 2) Strategic programs, which will increase the impact of the Combined Plan. As shown in Tables 1 and 2, these various programs are administered by the Mississippi Department of Employment Security (MDES), the Institutions of Higher Learning (IHL), Mississippi Community College Board (MCCB), Mississippi Department of Rehabilitation Services (MDRS), Mississippi Department of Human Services (MDHS), Mississippi Department of Education (MDE), Mississippi Development Authority (MDA), and Mississippi Department of Corrections (MDOC).



Table 1: Combined Plan Programs

Agency	Program
<b>MDES</b>	<ul style="list-style-type: none"> <li>– Adult, Dislocated Worker, and Youth Programs (WIOA Title I)</li> <li>– Wagner-Peyser Act Program (Wagner-Peyser Act, as amended by WIOA Title III)</li> <li>– Trade Adjustment Assistance for Workers Program (authorized under Title II-Chapter 2 of the Trade Act of 1974)</li> <li>– Jobs for Veterans State Grants Program (authorized under Chapter 41 of Title 38 United States Code)</li> <li>– Unemployment Insurance Programs (authorized under state unemployment compensation laws)</li> <li>– Senior Community Service Employment Programs (authorized under Title V of the Older Americans Act of 1965)</li> </ul>
<b>MCCB</b>	– Adult Education and Family Literacy Act Program (WIOA Title II)
<b>MDRS</b>	– Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973, as amended by WIOA Title IV)
<b>MDHS</b>	– Temporary Assistance for Needy Families (TANF)

Table 2: Strategic Programs

Agency	Program
<b>MDHS</b>	<ul style="list-style-type: none"> <li>– Employment and training programs under the Supplemental Nutrition Assistance Program (authorized under section 6(d)(4) of the Food and Nutrition Act of 2008)</li> <li>– Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008</li> <li>– Employment and training activities carried out under the Community Services Block Grant Act</li> </ul>
<b>MDE &amp; MCCB</b>	– Career and technical education programs authorized under the Carl D. Perkins and Technical Education Act of 2006
<b>MDA</b>	– Employment and training activities carried out by the Department of Housing and Urban Development
<b>MDOC</b>	– Reintegration of Ex-Offenders Program (authorized under Section 212 of the Second Chance Act of 2007)

## Mississippi Local Workforce Development Areas

Mississippi has four designated local workforce development areas (see Figure 1) that are generally aligned with the planning and development district structure in the state in accordance with 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 aligned with the areas and local programs and activities as delivered by the One-Stop employment and training system.

In accordance with WIOA requirements (Section 106) and Mississippi's Local Workforce Development Area Designation Policy (see Appendix C), the Governor of Mississippi received and approved requests for initial designation from the four local workforce development boards: Delta, Mississippi Partnership, Southcentral Mississippi Works, and Twin Districts. Prior to submitting the initial designation requests, the boards posted the requests on their websites for a public comment period. These areas met the three criteria for initial designation: (1) they were designated as local areas for the purposes of the Workforce Investment Act of 1998 prior to the two-year period preceding the date of enactment of WIOA; (2) they have performed successfully; and (3) they have sustained fiscal integrity. Subsequent designation of local workforce development areas and the definition of regions will take place according to Mississippi's Local Workforce Development Area Designation Policy in compliance with all relevant sections of WIOA.

Figure 1: Local Workforce Development Areas



In 2017, the State Workforce Investment Board invested in the development and implementation of regional sector strategy plans. Local Workforce Development Boards were awarded funds to form a public/ private partnership and develop a plan that addresses the workforce needs in their respective regional economies. A skilled and educated workforce was the prevailing need identified in the planning process. Each LWDB selected target sectors and developed goals and activities to implement the plans.

## Mississippi's Economic and Demographic Regions

### Local Workforce Development Areas as Regions

The four local workforce development areas (LWDAs) in Mississippi were originally defined by the State Workforce Investment Board (SWIB) by direction of the Governor following the guidelines set forth in the Workforce Investment Act of 1998, Section 116. These boundaries, however, are not simply jurisdictional; they follow significant demographic and economic boundaries. Each LWDA contributes to Mississippi's economic sector goals, identified by the Mississippi Development Authority's (MDA) primary and secondary target industries. While local areas assist MDA in pursuing economic development activities in all ten of its target sectors, Table 3 shows the relationship between MDA's sector targets and the particular sector targets articulated by Mississippi's LWDAs.

*Table 3: Mississippi LWDA Overlap with MDA Target Industries*

MDA Target Industry	MDA	Delta	MS Partnership	Southcentral MS Works	Twin Districts
<b>Advanced Manufacturing</b>	Target	Target	Target	Target	Target
<b>Aerospace</b>	Target		Target		Target
<b>Agribusiness</b>		Target		Target	
<b>Automotive</b>	Target			Target	
<b>Data Centers and Information Technology</b>	Target	Target	Target		
<b>Transportation, Distribution, Logistics, and Warehousing</b>	Target		Target		
<b>Forestry, Energy, Chemical</b>	Target		Target	Target	Target
<b>Healthcare</b>	Target	Target	Target	Target	Target
<b>Shipbuilding</b>	Target				Target
<b>Tourism, Leisure, Accommodation, Film</b>	Target				

\*Note: MDA Targets Tourism, Leisure, Accommodation, and Film as a statewide initiative with support from local workforce areas.

The Delta LWDA is known for its agricultural production. Analyzing jobs in Mississippi by location quotient (the concentration of jobs in a geographical area relative to the national average of jobs in this industry), 10 of the 13 top crop production and food manufacturing counties in Mississippi during 2018 are in the Delta LWDA.

While the fertile land of the Delta that supports agribusiness defines the Delta LWDA, the area is also diversifying in healthcare with service providers like Mid-Delta and pharmaceutical manufacturers/preparers such as Baxter and PharMEDium. In addition, Delta LWDA is pursuing Information Technology as a target sector. For example, Automation Anywhere is training Delta residents to do Robotic Process Automation (RPA) for major companies throughout the United States.

The Mississippi Partnership LWDA is known as a manufacturing hub. Six of the top 10 manufacturing counties in Mississippi are in the Mississippi Partnership LWDA. Industries like plastics and rubber manufacturing, transportation equipment manufacturing, and furniture manufacturing are growing and shifting from low-skill manufacturing to middle-skill, advanced manufacturing operations in this LWDA. Large manufacturing employers such as Cooper Tires, Yokohama, Toyota, Stark Aerospace, Airbus Helicopters, Aurora Flight Sciences, Ashley Furniture, and Lane Furniture all have locations in the Mississippi Partnership LWDA.

The Southcentral Mississippi Works LWDA includes the state capital and is known for its presence in sectors such as healthcare, energy, and agribusiness. Six of the top 20 Mississippi counties for forestry and logging; wood product manufacturing; oil and gas extraction; hospitals, nursing, and residential care facilities; and social assistance fall within the Southcentral Mississippi Works LWDA. Because of a strong hospital system and medical education focus, the Southcentral Mississippi Works LWDA serves as a healthcare hub for the entire state. The presence of oil and natural gas deposits in the southwestern part of Mississippi give Southcentral Mississippi Works its strength in the energy sector. The Southcentral Mississippi Works LWDA is also 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, is successful in several sectors, including manufacturing, healthcare, and tourism. Within manufacturing, top industries in this LWDA include transportation equipment manufacturing, shipbuilding, and electrical equipment, appliance, and component manufacturing. The combination of Stennis Space Center and military installations including Keesler AFB, Naval Construction Battalion Center, Meridian Naval Air Station, and Camp Shelby Joint Forces Training Center reinforce a strong military presence in the area and contribute to the presence of advanced manufacturing in shipbuilding and aerospace. The top industry within the agribusiness sector in the Twin Districts LWDA is forestry and logging. Within the tourism sector, many are employed in the amusement, gambling, and recreation industries in this area. The presence of the Gulf Coast as a tourist attraction and hub of international business and the Pine Belt in southern Mississippi help give the Twin Districts LWDA its unique economic identity.

## Sub-Regions within the Four Local Workforce Development Areas

While each of the four WIOA LWDAs has a strong overall economic identity, some economic and demographic variability exists *within* these areas (see Table 4) relevant to any training or supportive efforts.

Within each of the four LWDAs, entities such as economic development councils (EDCs) and public utilities also manage target industry regions. With vital information on available sites, buildings, and workforce demographics, EDCs assist companies considering Mississippi as a potential location. The presence of EDCs can be useful in identifying subtle differences of economic or industry focus within an LWDA. In addition, one of Mississippi's utility companies, Mississippi Power, manages a target industry region within a single LWDA, Twin Districts.



Table 4: Economic Variability within LWDAs by EDC and Public Utility Industry Focus

MDA Target Industries								
	Delta	MS Partnership			Southcentral MS Works	Twin Districts		
	Delta Council Development Department, Delta Strong	North MS Industrial Development Association	Golden Triangle Development Link	Greater Jackson Alliance	Southwest MS Partnership	MS Gulf Coast Alliance	Mississippi Power	Mid-Mississippi Development District
<b>Advanced Manufacturing</b>		X	X	X	X	X	X	X
<b>Aerospace</b>	X	X	X			X	X	
<b>Agri-business</b>	X	X	X	X	X			
<b>Automotive</b>	X	X	X					
<b>Data Centers and Information Technology</b>				X			X	
<b>Transportation, Distribution, Logistics, and Warehousing</b>	X			X	X		X	
<b>Forestry and Energy</b>		X	X			X	X	
<b>Healthcare</b>				X				X
<b>Shipbuilding</b>						X		
<b>*Tourism and Film</b>								

Delta Council - <https://www.deltastrong.ms/targeted-industries>; North MS Industrial Development Association - <http://nmida.com/>; Golden Triangle Development Link - <https://gtrlink.org/>; Greater Jackson Alliance - [http://www.greaterjacksonms.com/index.php/industry\\_information](http://www.greaterjacksonms.com/index.php/industry_information); Southwest MS Partnership - [http://www.swmiss.us/#section\\_6](http://www.swmiss.us/#section_6); MS Gulf Coast Alliance - <http://mscoastalliance.com/target-industries/>; Mississippi Power - <https://www.mississippipower.com/business/economic-development/target-industries.html>; Mid-Mississippi Development District - [https://www.mmdd.org/workforce\\_profile.html](https://www.mmdd.org/workforce_profile.html). \* The film industry is served statewide by the Mississippi Film Office of the Mississippi Development Authority.

It is also important to capture social differences along with economic differences throughout the regions of the four LWDAs, best measured by the presence or absence of metropolitan and micropolitan areas. The Office of Management and Budget (OMB) describes a metropolitan statistical area as an urbanized area of 50,000 or higher in population with an adjacent territory that has a high degree of social and economic integration with the core. Micropolitan statistical areas are defined by OMB as having at least 10,000 but less than 50,000 in population in addition to an adjacent territory that has a high degree of social and economic integration with the core area through commuting. By examining metropolitan and micropolitan areas, regions can be defined by the social and economic importance of a municipality.

## Delta Local Workforce Development Area

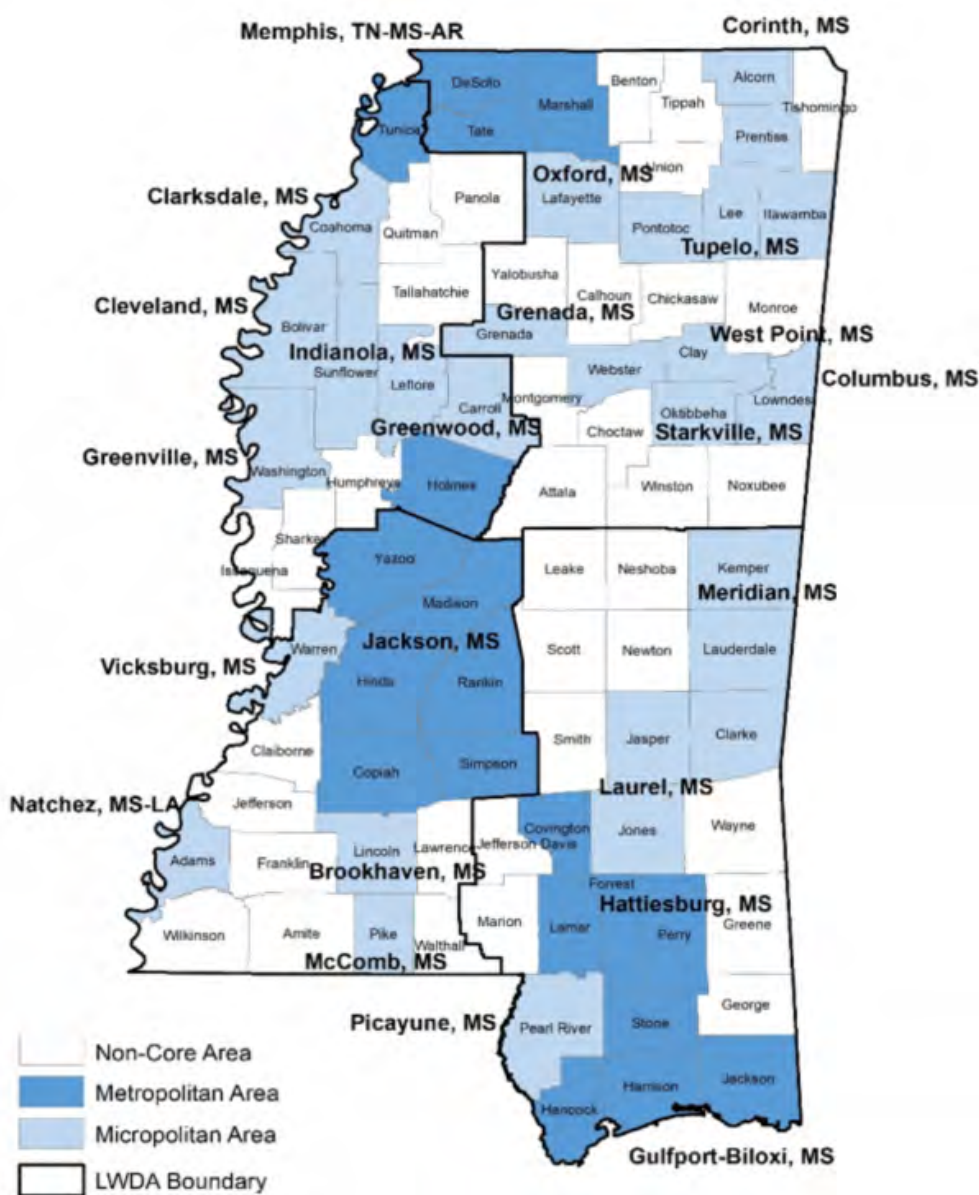
The Delta LWDA, encompassing 14 counties, serves as a connection to three of Mississippi's regional neighbors: Tennessee, Arkansas, and Louisiana. Within the Delta LWDA, Tunica County represents part of the Memphis metropolitan statistical area, which spans the three states of Mississippi, Tennessee, and Arkansas (see Figure 2). Tunica County represents a region of the Delta that has a growing connection to Memphis within the Delta LWDA. As of 2018, 62.3 percent of Tunica county residents remain in the county for work, a drop from 79.2 percent in 2014. Workforce connections to Memphis are growing appreciably.

Within the Delta, there are also five micropolitan areas representing six counties. In these counties, more than 70 percent of residents remain in their county for work. These counties also draw non-core residents for work. Delta residents living in non-core areas (i.e. outside of metropolitan or micropolitan counties) leave their county for work at a rate of 45.02 percent.

The Delta represents an area of sparse population relative to other Mississippi LWDA's. For example, Tunica County has a population density of 22.7 people per square mile, compared to the Mississippi average of 64. The micropolitan areas in the Delta have a higher population density (40.5 people per square mile, down slightly from 42.8 in 2014), and the non-core areas have the lowest population density (22.9 people per square mile, down from 27.3 in 2014).

In sum, the Delta LWDA is driven by an economic goal of supporting agriculture and agribusiness in order to support the area, as led by the Delta Council and Mississippi Delta Developers Association. In the northern part is Tunica County, the one of two metropolitan counties in the LWDA, in which nearly 63 percent of residents work in the county. In the northern and central portion of this LWDA are five micropolitan areas covering six counties with the highest average population density and more than 70 percent of residents that work in the county. In the northeast (three counties) and southern (three counties) portions of this

Figure 2. Mississippi's Metropolitan, Micropolitan, and Non-Core Areas



LWDA are six counties that fall into a non-core classification, with more than 45.2 percent of residents commuting outside their county for work. Holmes county, is the second metropolitan county in the LWDA, and is part of the Jackson metropolitan area.

### **Mississippi Partnership Local Workforce Development Area**

The Mississippi Partnership LWDA is home to diverse economic sectors: healthcare, information technology, energy, advanced manufacturing, and logistics. Being the largest LWDA (27 counties), uniquely positioned bordering three other states, this area is rich in economic opportunity and growth.

Within the Mississippi Partnership LWDA, are specialized hubs of concentrated industry. In the northeast part of the state sits the Chickasaw Trail Industrial Park. This park is home to many newcomers to the state of Mississippi including: Amazon, Nike, Cooper Tire & Rubber Company, Niagara, Asics and Volvo. In addition, this industrial park is the collocation of the Marshall County Workforce Training Center. Strategically, the Mississippi Partnership LWDA is adamant about workforce and technical training juxtapose industry such as manufacturing and logistics, thus the initiative to collocate these training resources near to the demand of these jobs.

Over 40% of Mississippi's manufacturing industries are located in the Mississippi Partnership LWDA. The manufacturing economy is vast consisting of but not limited to: aerospace, electronics/computer, automotive, furniture, chemical and metal fabrication. To meet the needs of some of the world's most technically advanced manufacturers, East Mississippi Community College created the EMCC Center for Manufacturing Technology Excellence 2.0, also known as the Communiversity. The Communiversity's 145,638 square-foot facility sits in the Golden Triangle Regional Global Industrial Aerospace Park in Lowndes County, born from strong partnerships between K-12, the community college, the technological university and area industry. The goal of this facility is to provide a consistent stream of highly specialized and technically competent individuals to work at advanced manufacturers in Mississippi.

The Mississippi Partnership LWDA emphasizes in-school youth programs, technical training and industry recognized apprenticeship programs. There are four industry recognized apprenticeship programs in the Mississippi Partnership LWDA. Industry specifically in the advanced manufacturing, information technology, and logistics sectors have grown to depend on these programs as part of their recruitment and training methodology. Mississippi Partnership LWDA industry recognized apprenticeship program partners include but are not limited to: APM, Cyient, Syntron Material Handling, Southern Motion, TAG Truck Center, Keytronics, Moore Engineering and Toyota.

The Mississippi Partnership LWDA is home to the North Mississippi Medical Center, the state's largest, private, not-for-profit hospital in Mississippi and the largest non-metropolitan hospital in America. Combined with other hospitals in the Mississippi Partnership LWDA, there is a large demand for medical professionals. Community colleges in North Mississippi offer various technician degrees and certifications to meet this demand.

Within the Mississippi Partnership LWDA, there are numerous partners such as the North Mississippi Industrial Development Association (NMIDA), the Golden Triangle Development Link, Innovate Mississippi, and other county specific economic development communities such as The Alliance (Alcorn County), the DeSoto County Economic Development Council, the Winston Partnership, and the Community Development Foundation (CDF).

### **Southcentral Mississippi Works Local Workforce Development Area**

The Southcentral Mississippi Works LWDA encompasses 17 counties and is served by two EDCs that divide the area into two nearly separate regions within southwest Mississippi: the Greater Jackson Alliance (GJA) and Southwest Mississippi Partnership (SWMSP). GJA is a regional alliance organized to develop and implement a marketing strategy to promote Greater Jackson and to enhance cooperation between the various governmental



jurisdictions in Greater Jackson. This area is focused on its strongest industry, healthcare, and interested in expanding into new industries. SWMSP unites 10 counties in southwest Mississippi toward a regional economic development vision. SWMSP has targeted metal fabrication, plastics, contact centers, and food processing as key industries. Metal fabrication could help support some new industries in Mississippi, such as semiconductor manufacturing. It is also worth noting the division of the Southcentral Mississippi Works LWDA by metropolitan and non-metropolitan areas.

The Southcentral Mississippi Works LWDA serves as a major connection point to Louisiana. The Jackson metropolitan statistical area consists of six counties in the northeastern part of this LWDA. The presence, size, and expansion of this metropolitan area are represented in its population density (122.7 people per square mile, up from 116.8 people per square mile in 2014), with nearly 55.6 percent of residents remaining in their county for work (down from 56.3 percent in 2014). There are also four micropolitan statistical areas that help define this region, with a lower population density (72.7 people per square mile, up from 53.3 people per square mile in 2014) but a higher percentage of residents who stay in their county for work (76.9 percent, up from 68.5 percent in 2014). Additionally, there are seven non-core counties clustered in the southeastern and southwestern parts of this LWDA. The lack of metropolitan and micropolitan areas in these counties leads to higher percentages of residents leaving their county for work (37.6 percent, down from 38.6 percent in 2014), with long average commute times (31.9 minutes). Many people in these counties are likely to commute to border metropolitan or micropolitan counties for work or training.

In sum, the Southcentral Mississippi Works LWDA sees a strong regional divide in terms of economic focus, as evidenced by regional boundaries that show minimal overlap, and of demographics, as evidenced by the range between population densities in the metropolitan and non-metropolitan areas. Within the Jackson area, there is a strong focus on healthcare and technology, while there is a strong focus on food processing and manufacturing in the more sparsely populated areas of southwest Mississippi.

### **Twin Districts Local Workforce Development Area**

The Twin Districts LWDA, encompassing 24 counties, differs from the other LWDAs in that there are counties not served by a regional EDC. The Twin Districts sector strategy includes advanced manufacturing, energy, chemicals and healthcare as their target industries, with information technology emerging in their area. There are two main EDCs that serve nine counties in the Twin Districts LWDA: the Mississippi Gulf Coast Alliance for Economic Development, which is comprised of the three coastal counties, and the Mid-Mississippi Development District (MMDD), which serves six counties in the central part of the LWDA. The Mississippi Gulf Coast Alliance for Economic Development has identified target industries that align well with those of MDA. The alliance's target industries are aerospace, defense, advanced materials, and energy. MMDD is focused on advanced manufacturing and healthcare.

The Twin Districts LWDA is also unique from the other LWDAs in that there are two metropolitan statistical areas in this LWDA. The Twin Districts LWDA serves as a connection to Alabama and Louisiana as well as an international port along the Gulf Coast. The two metropolitan statistical areas, Gulfport-Biloxi and Hattiesburg, have a growing, very high population density (134.9 people per square mile, up from 129.8 in 2014). 36.6 percent of residents of these counties leave their county for work (up from 34.8 in 2014). The proximity of employment leads to a shorter average commute time (26.8 minutes) compared to the other counties in this LWDA. There are three micropolitan areas in this LWDA (Picayune, Laurel, and Meridian), with a percentage of residents leaving their county for work (35.9 percent, up from 33.7 percent in 2014) and average commute time (29.1 minutes) similar to those of the LWDA's metropolitan areas. There are also 10 non-core counties spread throughout the Twin Districts LWDA. These non-core areas form a cluster in the southeast and make up the entire western border of the LWDA. Counties in the non-core areas of the Twin Districts LWDA have the lowest population density (35.7 people per square mile, down from 37.9 in 2014), highest percentage of people leaving their county for work (40.5 percent, down from 40.9 percent in 2014), and the longest average commute time

(31.7 minutes, up from 30.13 minutes in 2014). Other than population density, the variation among metropolitan, micropolitan, and non-core areas is relatively small.

The economy of the Twin Districts LWDA relies on several industries, with a strong focus on advanced manufacturing and energy, particularly along the coastal part of the LWDA. In the growing area of clean energy, a 450-acre, 52-megawatt solar farm came online in 2017 near Hattiesburg, MS capable of powering 6,500 homes. The metropolitan, micropolitan, and non-core areas show less variation than those in other LWDAs in terms of commuting times and residents leaving their county for work.

Finally, the state has also classified regions that cross LWDA boundaries in efforts to make larger impacts across Mississippi.

## Regions Crossing Local Workforce Development Area Boundaries

### **Economic Development Councils**

Within the Delta and Mississippi Partnership LWDAs, there are three Economic Development Councils (EDCs) that serve more than one LWDA and sometimes spill into three LWDAs. Within the Delta LWDA, there are two EDCs that spill beyond the Delta LWDA and cover 20 counties in northwest Mississippi: the Mississippi Delta Developers Association (MDDA) and the Delta Council (DC). These EDCs share a goal of increasing economic development in northwest Mississippi and helping to solve common problems in this area. The MDDA aids the Delta LWDA by assisting with relocation for companies, including listing available buildings and sites, transportation maps, incentives at local, state, and federal levels, financing programs, and labor and training information. The DC serves 18 counties in the Delta region by providing a nexus for collaboration for agricultural, business, and professional leadership and solving common problems experienced in the area by way of several economically focused committees, including committees for aquaculture, ginning and cotton quality improvement, and rice and small grains, among others. All of the committees reflect the Delta LWDA's commitment to agribusiness, which is a target industry of the MDDA.

North Mississippi Industrial Development Association (NMIDA) is the largest of the three EDCs, with an area that surpasses the Mississippi Partnership LWDA boundaries in order to serve the Tennessee Valley Authority (TVA) territory in Mississippi. NMIDA serves 29 of the 36 counties within the TVA territory. NMIDA helps companies looking to locate businesses in Mississippi through services such as providing information on available sites and buildings, transportation, and incentives. NMIDA mainly targets advanced manufacturing with a few other targets, such as aerospace, forest products, and agribusiness.

Two of Mississippi's utility companies, Tennessee Valley Authority (TVA) and Entergy, manage target industry regions spanning several LWDAs. Entergy spans the Delta and Southcentral Mississippi Works LWDAs. TVA covers the Delta and Mississippi Partnership LWDAs and parts of the Twin Districts LWDA.

### **Mississippi Community College Consortia**

Mississippi's Workforce Enhancement Training (WET) fund derives from employer unemployment insurance taxes and is a state funding source for workforce training. In order to establish wide-ranging consortia to encourage collaboration among community colleges in the areas of workforce education and training, a portion of the WET fund transferred in 2013 was allocated to establish a collaborative consortia grant. In 2013, House Bill 932 created an \$8,000,000 transfer to the WET fund, and \$1,500,000 of that transfer was allocated to the collaborative consortia grant. For each approved consortium, there would be \$500,000 available. Three consortia have been recommended and approved by workforce directors on the Mississippi Community College

Board: the Southern Mississippi Alliance for Workforce Solutions, Mississippi Corridor Consortium, and the Crossroads. These three consortia marshal community college resources to provide training and education to Mississippians within the districts of the collaborating community college and, in some cases, to give focus to specific industries important to a consortium's region.

The Mississippi Corridor Consortium is led by Itawamba Community College (see Figure 3), with the top priority of training residents of these areas to address the transitional condition of the area's workforce needs as determined through relationships with local businesses. Regionally, workforce opportunities continue the transition from low-skill manufacturing jobs to middle-skill advanced manufacturing and technology-related occupations.

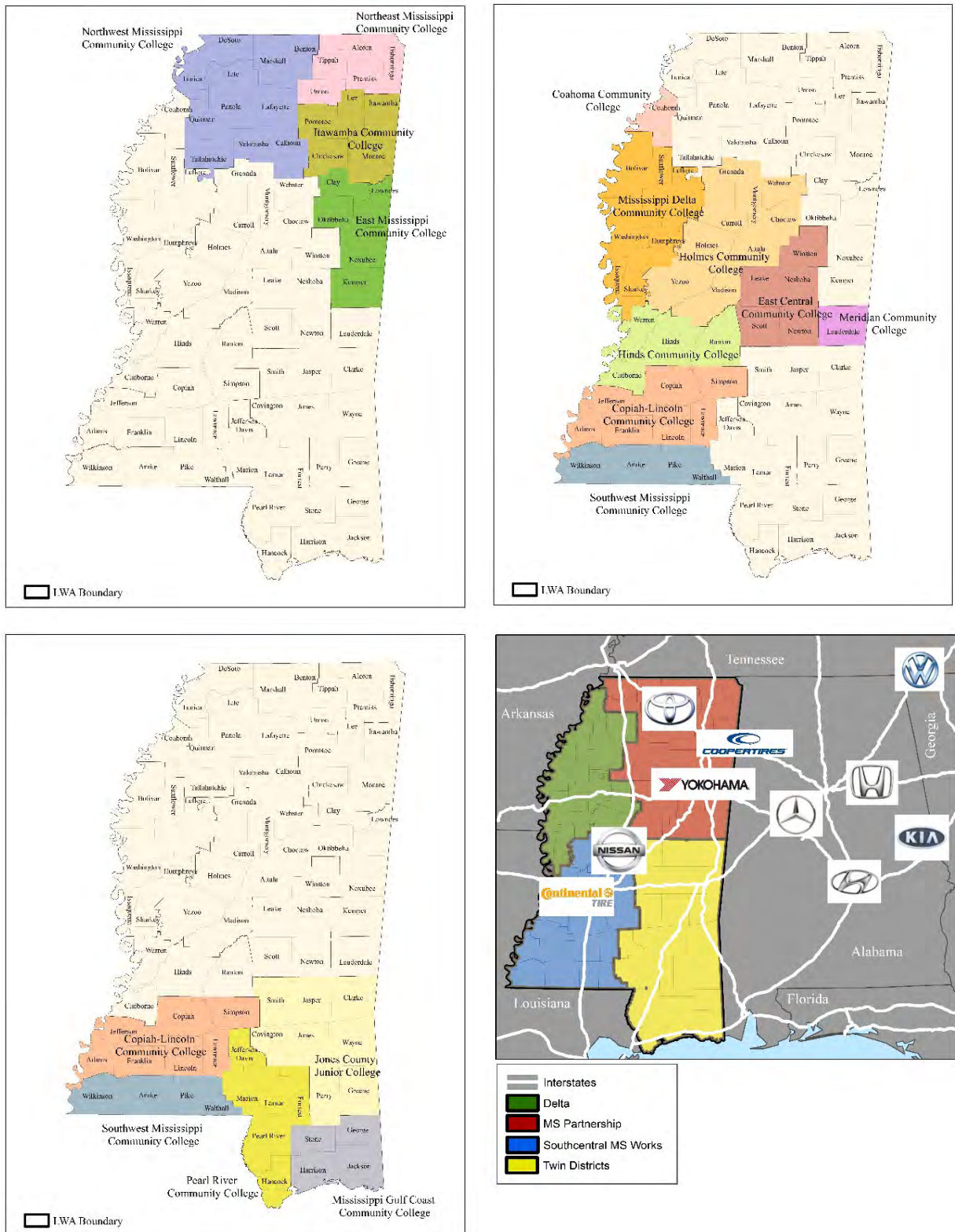
The Mississippi Crossroads Consortium is led by Holmes Community College and committed to assisting with the development of a population of potential employees for employers who are looking for individuals who can demonstrate skills, keep up with the fast pace of change, and show dedication to lifelong learning. In order to help train job seekers in the area of healthcare, the Mississippi Crossroads Consortium is seeking healthcare-related training aids, which will be identified by East Mississippi Community College. This focus on healthcare as well as advanced manufacturing follows the state trends as well as MDA target industries.

The South Mississippi Alliance for Workforce Solutions has set a mission of investigating, developing, and delivering education and training for citizens and industries in the five community college service districts through demand-driven, innovative, traditional, and non-traditional formats to advance the South Mississippi workforce. Industries specified by this consortium are manufacturing and healthcare, with the goal of developing credentials in each of these industries specific to this consortium area.

### **The Southern Automotive Corridor**

There is a growing presence of automotive manufacturing throughout southern states, such as Mississippi, Alabama, and Georgia, with large employers, like Toyota, Nissan, and Honda, employing many Southerners. This corridor speaks to the business-friendly climate of Mississippi and the South in general and to a commitment to middle-skill careers.

Figure 3. Cross-Area Regions in Mississippi



In Figure 3, The Mississippi Corridor Consortium is top left, the Crossroads Consortium is top right, and the Southern Mississippi Alliance for Workforce Solutions is lower left. In the lower right is the Southern Automotive Corridor.

## Strategic Planning Elements

### A. Economic, Workforce, and Workforce Development Activities Analysis

#### Economic Analysis

##### Mississippi Population Trends

Mississippi is a state of approximately three million people and has experienced an average annual population growth of 0.6 percent since 1950 (see Figure 4). Of the four LWDAs, the Delta area is the least populated and, over the last decade, was the only area that experienced significant population decline. In contrast, the Twin Districts is the most populated area with more than 1 million residents. The second most populous area is the Mississippi Partnership with approximately 900,000 residents, followed by Southcentral Mississippi Works with approximately 800,000 residents. In the last decade, the Southcentral Mississippi Works area experienced the fastest population growth at 9.1 percent. The populations of the Twin Districts and Mississippi Partnership areas grew by approximately 4.0 percent over the same period.

According to the American Community Survey, 58.8 percent of the state population is white, and 37.6 percent African American. Asians, American Indians, and other races account for the smallest share of the population (3.6 percent collectively). Within these categories, approximately 3 percent are of Hispanic or Latino ethnicity. Of the four LWDAs, the Delta and Southcentral Mississippi Works areas have the largest representations of African-American residents at 67.3 and 49.1 percent, respectively. In the Twin Districts and Mississippi Partnership areas, African-Americans account for 27.4 percent and 29.4 percent of the population, respectively. The Twin Districts and Mississippi Partnership areas are home to more Hispanics than the other two areas with 3.8 percent and 3.0 percent, respectively.

##### Current Industry Structure

Table 5 reports the employment numbers for Mississippi's current industry structure. Healthcare and Social Assistance is the largest sector and employs over 179,000, accounting for almost 16 percent of total employment, followed by Wholesale and Retail Trade, which employs over 172,000 or 15.3 percent of total employment. Manufacturing employs approximately 145,000 individuals, accounting for 12.9 percent of total employment.



Table 5: Employment by Industry

Industry	Total	Percent	Earnings	Establishments
<b>Healthcare and Social Assistance</b>	179,578	15.9	\$43,079	7,519
<b>Wholesale/Retail Trade</b>	172,889	15.3	\$32,378	16,543
<b>Manufacturing</b>	145,328	12.9	\$49,375	2,427
<b>Accommodation/Leisure</b>	138,119	12.2	\$17,694	6,549
<b>Educational Services</b>	109,728	9.7	\$40,351	1,415
<b>Public Administration</b>	70,749	6.3	\$41,620	1,455
<b>Administrative and Waste Services</b>	67,465	6.0	\$26,775	4,334
<b>Transportation and Warehousing</b>	53,622	4.7	\$44,965	3,261
<b>Construction</b>	43,969	3.9	\$50,309	5,791
<b>Financial Activities</b>	43,817	3.9	\$53,145	8,083
<b>Professional, Scientific, and Technical Services</b>	34,812	3.1	\$60,907	7,439
<b>Other Services (except Public Administration)</b>	21,374	1.9	\$34,458	4,686
<b>Natural Resources</b>	16,235	1.4	\$46,982	2,152
<b>Information</b>	12,248	1.1	\$46,596	1,142
<b>Management of Companies and Enterprises</b>	11,427	1.0	\$85,553	625
<b>Utilities</b>	9,355	0.8	\$77,504	591
<b>Totals</b>	1,130,715	100.0	\$39,747	74,012

Source: Bureau of Labor Statistics, 2019.

More significantly, Mississippi Works Labor Exchange data show that in 2019 manufacturing was the largest job creator in Mississippi with 30,602 job openings. Manufacturing not only provides the largest number of job opportunities but also offers high-wage opportunities; these jobs pay an average of \$49,375.

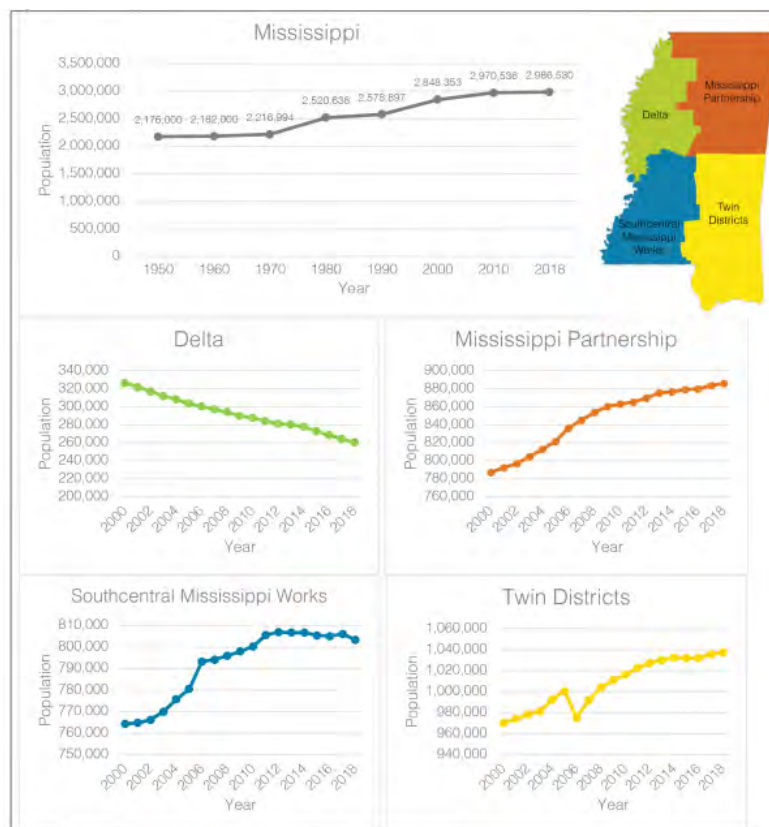
Table D2 (Appendix D) reports a detailed description of subsectors in manufacturing. Transportation equipment is the largest subsector with more than 27,800 people employed, accounting for 19 percent of total employment in manufacturing. This subsector includes major employers such as Toyota, Nissan, and Ingalls. The next largest subsector is food manufacturing with more than 24,100 people employed. Furniture is the third largest subsector with more than 18,400 people employed. Machinery, fabricated metal, and wood products each account for more than seven percent of total employment in manufacturing. Combined, these six manufacturing subsectors account for more than 70 percent of total employment in manufacturing. Of the four LWDA, Mississippi Partnership and Twin Districts have the largest numbers of manufacturers in the state, with 42 percent and 31 percent of total employment in manufacturing, respectively.

As a sector, wholesale and retail trade employs over 172,000 people in Mississippi, which accounts for 15.3 percent of total state employment (see Table 5). Within this sector, more than 36,000 are employed in general merchandise stores, followed by approximately 18,000 in food and beverage stores. Table D1 (Appendix D) reports subsector details for this industry.

Healthcare and accommodation/leisure are two of the largest sectors in the state, accounting for approximately 16 and 12 percent of total state employment, respectively (see Table 5). Combined, these two sectors provide economic opportunities to more than 317,000 people in the state. Healthcare opportunities are most prevalent in the Southcentral Mississippi Works area, which accounts for 27.4 percent of the sector's employment in the state. The Mississippi Partnership and Twin Districts areas account for 26.2 and 40.6 percent of healthcare employment in the state respectively; the remaining of state healthcare jobs are in the Delta area. The largest number of opportunities for accommodation/leisure is in the Southcentral Mississippi Works area, which accounts for almost 35.3 percent of all jobs in this sector, followed by the Twin Districts (34.1 percent), Mississippi Partnership (22.2 percent), and Delta (8.4 percent) areas.

Natural resources accounts for 1.4 percent of total state employment and supports approximately 9,000 new job openings annually. This sector is most prevalent in the Twin Districts area, which accounts for 33.2 percent of all natural resources jobs in the state. The Southcentral Mississippi Works and Delta areas account for 22.1 percent and 27.7 percent of all natural resource jobs in the state, respectively. The Mississippi Partnership area accounts for 16.9 percent of state employment in this sector. Detailed descriptions of the healthcare, accommodation/leisure, and natural resources subsectors are reported in Tables D3-D5 (Appendix D).

Figure 4: Mississippi Population Trends



## Current Occupations

The top 10 occupations in **wholesale and retail trade** account for approximately 73 percent of all jobs in this industry (see Table D6, Appendix D). Retail salespersons is the occupation with the largest demand in the sector. Currently, more than 41,000 individuals are employed in this occupation. Cashiers represent the next largest occupation in the wholesale and retail trade sector with more than 28,900 employed. More than 15,200 individuals are currently employed as stock clerks and order fillers.

The top 10 occupations in **manufacturing** account for more than 37 percent of all jobs—more than 54,000—in this industry (see Table D7, Appendix D). Material movers is the occupation with the largest demand in the sector. Currently, more than 5,000 individuals are employed in this occupation. Meat processing represents the next largest occupation in the manufacturing sector with almost 5,000 employed. Approximately 8,000 individuals are currently employed as inspectors, testers, sorters, samplers, and weighers or as welders, cutters, solderers, and brazers.

The top 10 occupations in **accommodation/leisure** account for approximately 70 percent of all jobs in this industry (see Table D8, Appendix D). The typical occupations in this sector are waiters and waitresses, food preparers and servers, and fast food and restaurant cooks.

The top 10 occupations in **healthcare** account for more than 43 percent of all jobs in this industry (see Table D9, Appendix D). The vast majority of the top jobs are in nursing, including Registered Nurse (RN), Licensed Practical Nurse (LPN), and Certified Nursing Assistant (CNA). An appreciable number of jobs in the sector are also in home care and childcare.

The top 10 occupations in **natural resources** account for 67 percent of all jobs in this industry (see Table D10, Appendix D). The top occupation in this sector is farmworkers and laborers.

## New and Emerging Sectors

There are three major sectors that are clearly emerging in the state: **advanced manufacturing**, **healthcare support**, and **tourism** (the full analysis is reported in Tables D11-13, Appendix D). Advanced manufacturing accounts for approximately 87,000 jobs in the manufacturing sector as a whole. Of those, more than 28,000 are in transportation, including automotive, and are concentrated in the northeastern and central areas of the state. Other top subsectors in advanced manufacturing include furniture, machinery, electrical, and chemical. These subsectors are primarily concentrated in the eastern part of the state.

The healthcare support sector accounts for approximately 19,000 jobs that are primarily concentrated in the western half of the state. There are more than 750 establishments in the state that support this industry, including facilities for general warehousing and storage, medical equipment and supply wholesale, pharmaceutical preparation manufacturing, and surgical appliance and medical instrument manufacturing.

The tourism sector provides economic opportunities to more than 202,000 people in the state. This industry covers the entire state and is supported by approximately 10,000 establishments. Mississippi has truly become a tourist attraction and is providing economic opportunities in areas such as the Delta, one of the richest historical regions in the country.

## Occupations in Emerging Industries

The top 10 occupations within advancing manufacturing account for approximately 40 percent of all jobs in the industry (see Table D14, Appendix D). Of all occupations, assemblers and fabricators are at the top with more

than 12,000 employed, followed by welders, cabinetmakers, and first line supervisors that, combined, employ almost 11,000 people.

The top 10 occupations within healthcare support account for 60 percent of all jobs in the industry (see Table D15, Appendix D). Of these, laborers and industrial truck and tractor operators account for approximately 20 percent of the industry's occupations.

The top 10 occupations within tourism account for approximately 52 percent of all jobs in the industry (see Table D16, Appendix D). Food preparers and cooks are the largest occupation, accounting for approximately 13 percent of all occupations in the industry, followed by waiters and waitresses that, combined, account for 11 percent of the sector's occupations.

## Employers' Employment Needs

As a part of initial WIOA planning in 2014, information on employers' employment needs was derived from three sources of data. First, as part of the effort to acquire input from the business community, a focus group was conducted with representatives from established and emerging industries. More than 20 employers participated in the focus group. Second, information was gathered from hundreds of employers as part of the Priority One project, which was administered by the Mississippi Development Authority. The third source of data was the state's wage and benefits survey that asks employers questions about the skills and knowledge required for the business to succeed.

Based on these three sources of data, the initial planning found a consensus that businesses were expected to grow and that recruitment and retention of qualified workforce was a critical issue for sustainability, viability, and growth. On the whole, businesses reported needing workers with labor and trade skills and those with basic work skills (e.g., reading, writing, appropriate workplace conduct). The consensus among businesses in 2014 was that employees, across the board, lacked core competency skills such as:

- **Critical Thinking/Problem Solving** – Exercise sound reasoning and analytical thinking; obtain, interpret, and use knowledge, facts, and data; demonstrate originality and inventiveness.
- **Oral/Written Communication** – Articulate thoughts and ideas clearly and effectively; demonstrate public speaking skills; communicate new ideas to others through writing and editing.
- **Teamwork/Collaboration** – Build collaborative relationships; work in team structure; negotiate and manage conflicts.
- **Information Technology Application** – Select and use appropriate technology; apply computing skills to problem solving.
- **Leadership** – Leverage the strengths of others; use interpersonal skills and emotions effectively; organize, prioritize, and delegate work.
- **Professionalism/Work Ethic** – Demonstrate personal accountability, effective work habits, integrity, and ethical behavior; act responsibly; learn from mistakes.
- **Career Management** – Identify and articulate skills, strengths, and experiences; identify areas for professional growth and self-advocacy; explore job options and pursue opportunities.

Specifically, when asked about the competencies desired in a potential employee at low-, middle-, and high-skill levels, 93 percent rated dependability and reliability as the most important qualities for low-skill employees, 77.6 percent reported that initiative and a willingness to learn were the most important qualities for middle-skill

employees, and 72 percent of participants specified leadership, communication, and interpersonal skills as the most important qualities for high-skill employees.

Employers also indicated that they were not fully aware of the resources and services available to them. Thirty-nine percent of employers stated that their employees receive training from community colleges, technical schools, or vocational schools; 37 percent reported that their employees receive training from universities; and the remainder indicated that their employees receive external training from other federal programs. Mississippi employers would like to expand their use of community colleges and universities in the delivery of training for basic trades and skills along with fundamental competency skills for low-, middle-, and high-skill workers.

Based on these results, Mississippi's Smart Start Pathway Model focused on the need to build foundational skills necessary to meet employer needs. Since the initial WIOA plan, Mississippi's Adult Education providers have focused on a basic skills curriculum to provide trainees with intensive instruction in basic skills and a focus on helping workers attain an industry recognized credential such as the Career Readiness Certificate that signifies to employers the extent to which the worker possesses the aptitudes required by a modern workplace. In addition, workforce training administered through WIOA Title I and other programs has been transformed around industry sector strategies to ensure alignment between supply and demand of technical skills.

Organizationally, to provide a sustainable response to employer needs, representatives of manufacturing and other businesses have been further engaged in the State Workforce Investment Board processes to ensure that state workforce training system partners continue to address employer concerns (See the State Workforce Investment Board membership roster on page 87).

Finally, Mississippi has made use of workforce data to assist incumbent businesses to grow or build sustainable workforce pipelines and to attract prospective businesses by demonstrating both the availability of labor and the systems that are in place to provide ongoing training to meet workforce needs.



## Workforce Analysis

A review of workforce indicators was conducted in early 2020. Changes in unemployment, population trends, and workforce participation rates were noted. The changes further reinforce the state's goals and strategies outlined in the plan.

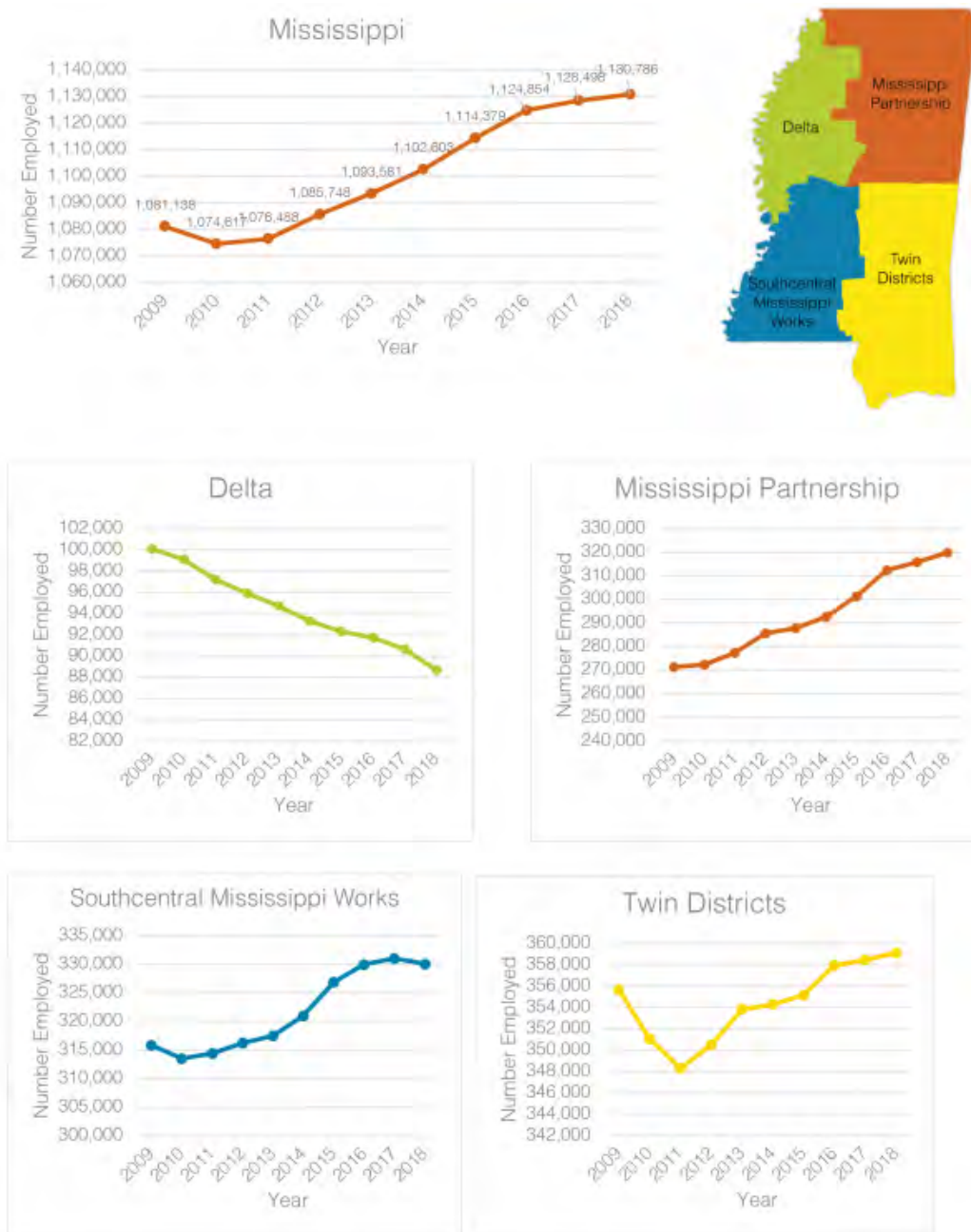
After struggling with a high unemployment rate, Mississippi has experienced a recovery that offers new economic opportunities for workers and job seekers. According to data from the Bureau of Labor Statistics, Mississippi's unemployment rate has dropped from 10.4 percent in 2010 to a historic low of 4.8 percent in 2018, before rising slightly to 5.5 percent by November 2019. Figure 6 presents annual unemployment trends from 2009-2018 (2019 annual numbers were not published by BLS at time of writing). The unemployment rate across all four of Mississippi's LWDAs has declined significantly since the end of the great recession. The unemployment rate in the Mississippi Partnership area was the lowest in the state in 2018 at 4.3 percent. The Southcentral Mississippi and Twin Districts areas had unemployment rates similar to the state-level statistic at 4.6 percent and 4.9 percent, respectively (*BLS 2020; Local Area Unemployment Statistics*). Clearly, these three trends represent a stronger economic climate in Mississippi.

Despite an improved economic outlook, Mississippi faces some vulnerabilities that provide challenges for its progress. As is the case in other states, the long-term unemployed in Mississippi become discouraged and drop out of the workforce, contributing to the decline of workforce availability in the state (see Figure 7). In the Twin Districts area, the workforce participation rate has remained fairly constant at 54 percent. The Mississippi Partnership and Southcentral Mississippi Works areas have workforce participation rates of 55 percent and 51 percent, respectively. The Delta area has the lowest workforce participation rate at 49 percent.

Data show that those with less than a high school education are the most vulnerable and most likely to become discouraged workers. Those with any credentials beyond high school in Mississippi, as in the rest of the country, are more likely to be attached to the labor market (see Figure 8).

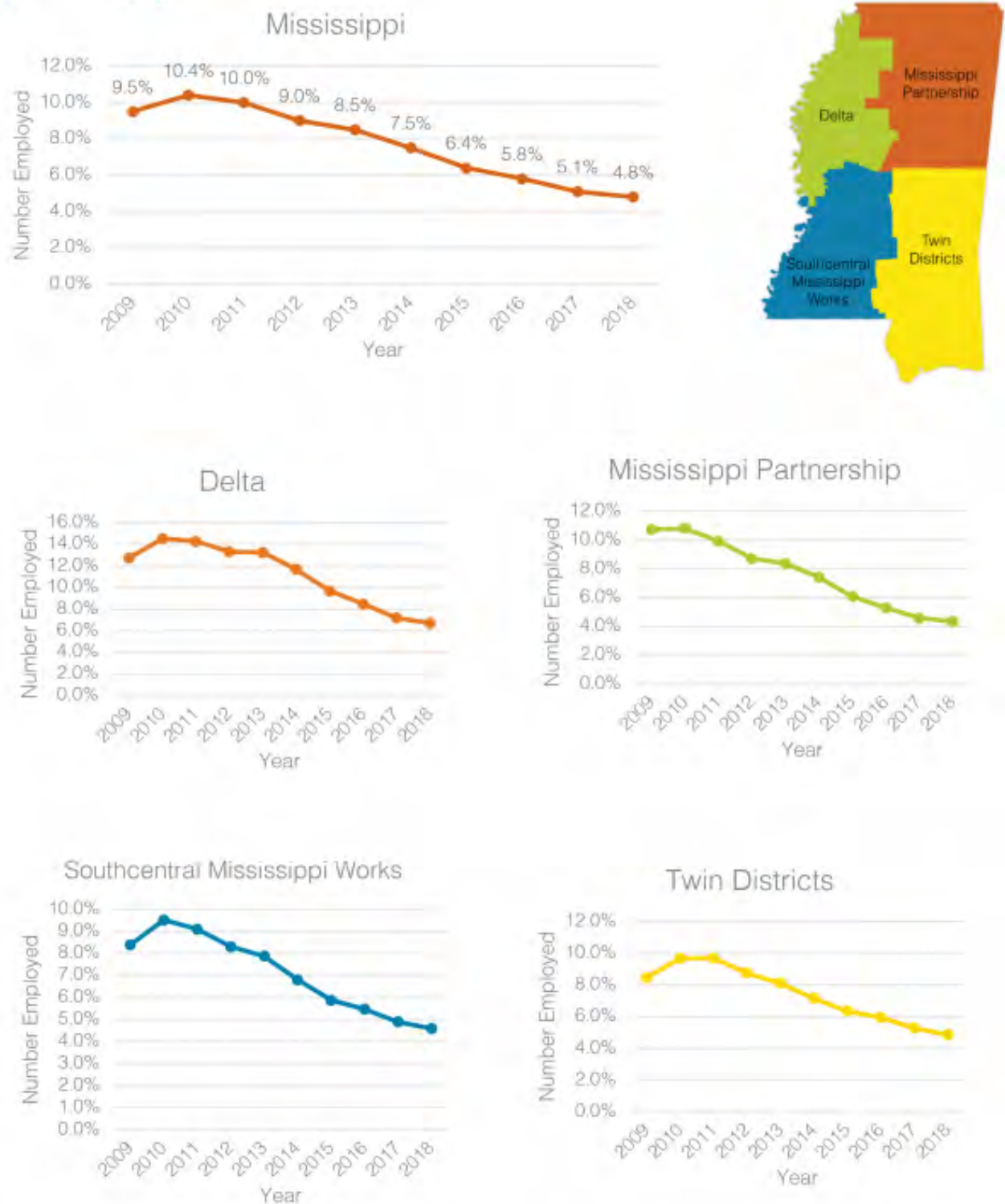
Additionally, the workforce participation rate varies by age group. In Mississippi, youth (ages 16 to 19) have one of the lowest workforce participation rates at 25.4 percent, while young adults (ages 20 to 24) have a 64.2 percent workforce participation rate (see Figure 9). For the majority of millennials and persons at the mid-point of their working life, Mississippi's workforce participation rate is on-par with national trends.

Figure 5: Number Employed



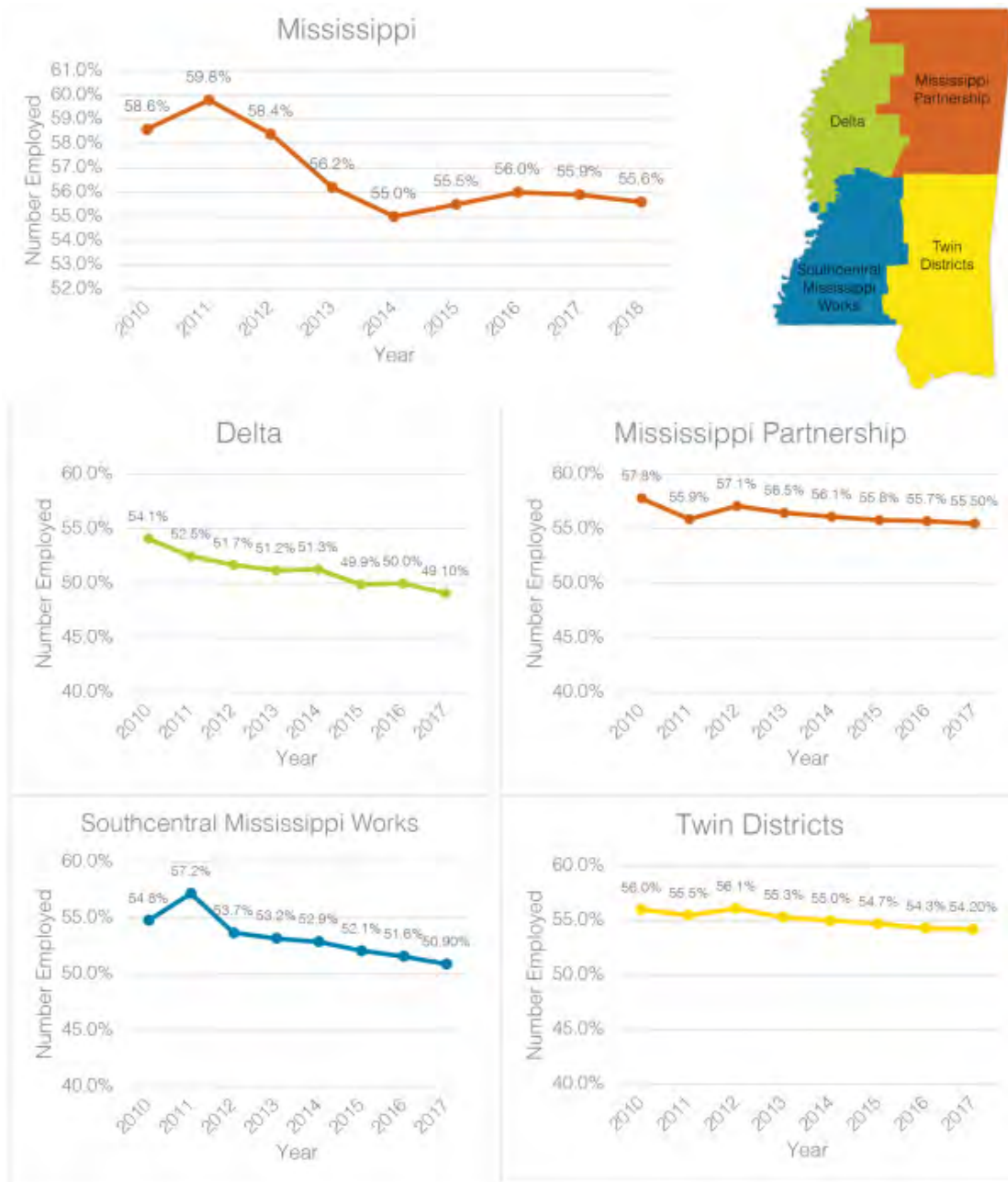
Source: Bureau of Labor Statistics, 2019.

Figure 6: Unemployment Rate



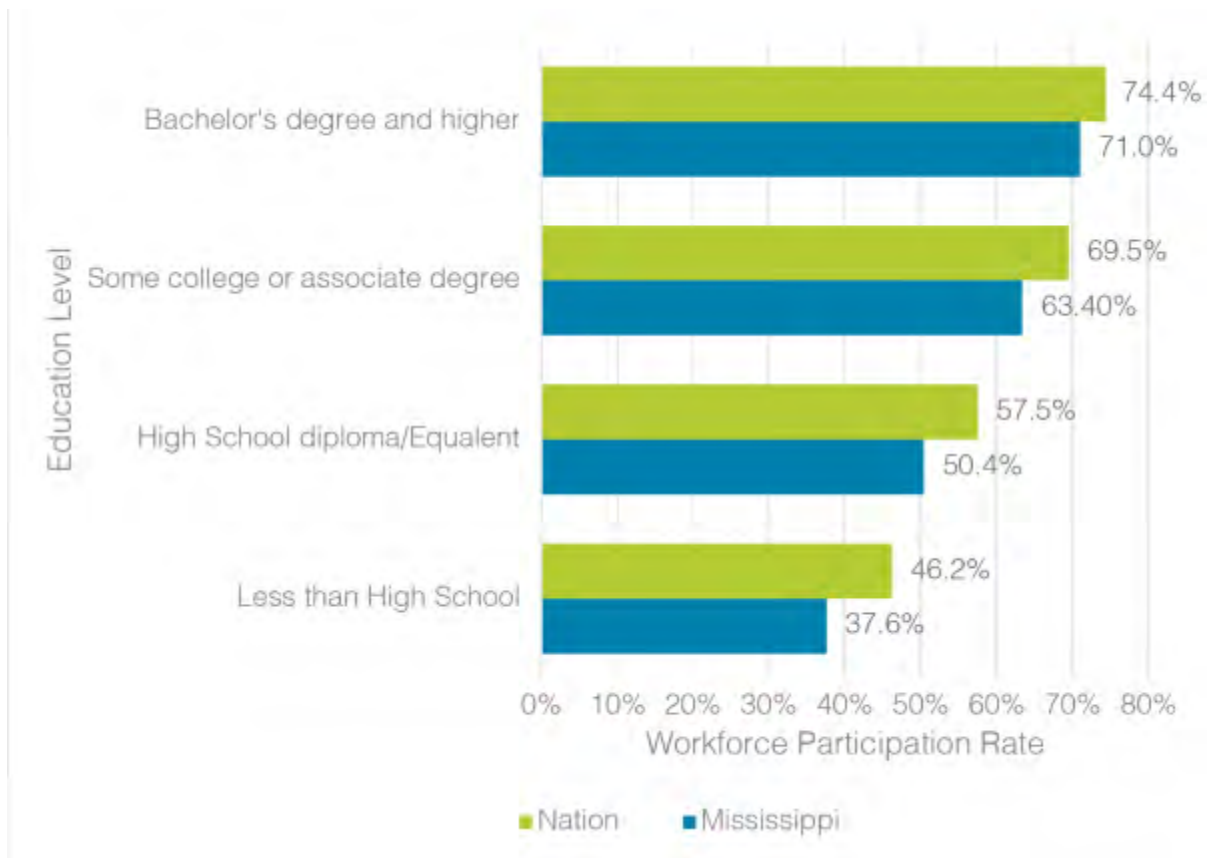
Source: Bureau of Labor Statistics, 2019.

Figure 7: Workforce Participation Rate



Source: Bureau of Labor Statistics, 2019.; Census Bureau, 2019. Note: 2018 county-level workforce participation rates are not yet available.

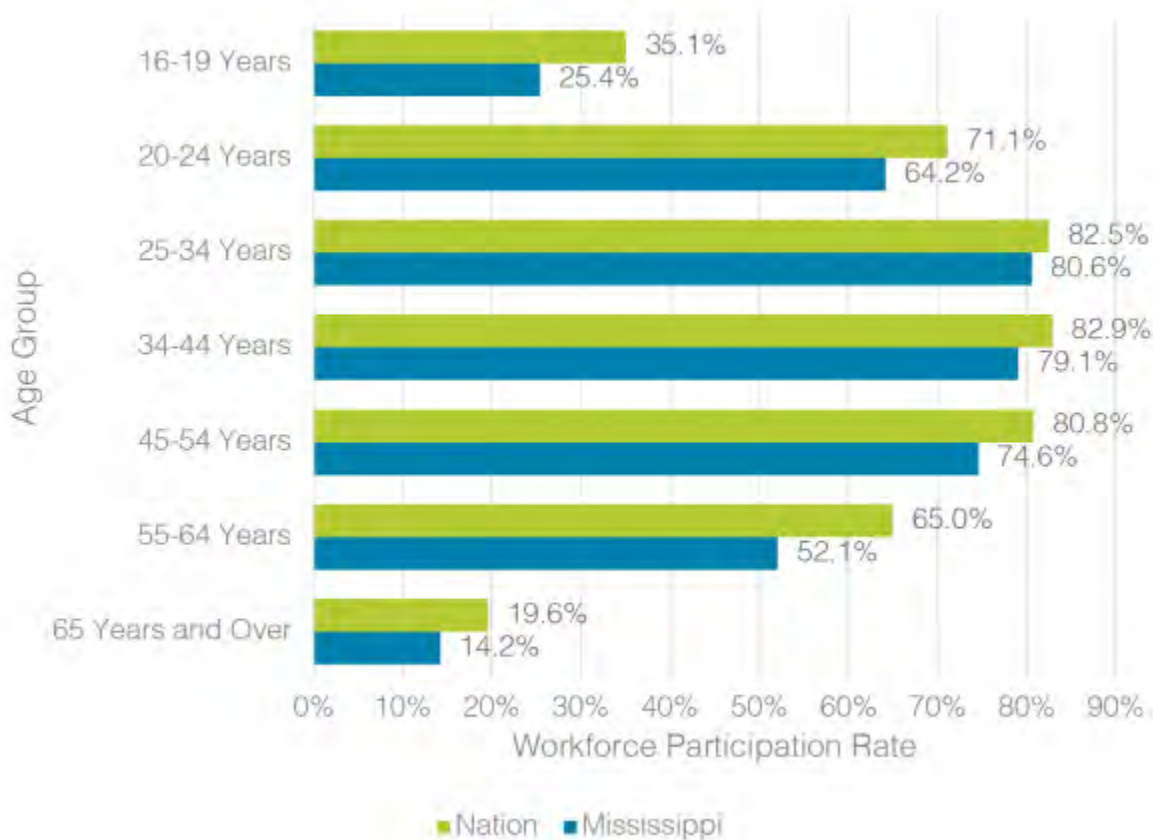
Figure 8: Workforce Participation Rate by Education



Source: U.S. Census Bureau, Current Population Survey, 2019.



Figure 9: Workforce Participation Rate by Age



Source: U.S. Census Bureau, Current Population Survey, 2019.

Tables 6 and 7 provide figures on individuals with barriers, as defined by WIOA, who are at risk of being underemployed. Tables E1-E4 in Appendix E provide more detail on individuals who face different employment barriers, including those with disabilities, those receiving TANF, those receiving SNAP, and ex-offenders. Individuals with disabilities have an 84 percent employment rate and face the reality of earning inadequate incomes. As of state fiscal year 2019, there are only 16,000 individuals on TANF. Of those, almost 3,000 are work eligible, and their employment rate is about 75 percent. TANF recipients who transition into the workforce have median annual earnings of \$10,000. There are almost 240,000 work-eligible SNAP recipients. Their employment rate is approximately 53 percent, and their median earnings are approximately \$15,000 annually. There were almost 9,000 individuals released from the correctional system in 2018. Almost 36 percent of ex-offenders were able to find employment within one year of their release. Their median annual earnings were approximately \$16,000. Further analysis also shows that ex-offenders who fail to find employment within one year are likely to reenter the correctional system within three years.

Table 6: Populations with Barriers to Employment

Group	Number
Low-Income Individuals(18-64)	348,508
American Indians/Alaska Natives/Native Hawaiians	13,855
Individuals with Disabilities(18-64)	260,350
Older Individuals(>=65)	423,885
Older Individuals, Low-Income	55,525
Ex-Offenders (18-64) <sup>1</sup>	8,618
Homeless children and youth <sup>2</sup>	16,497
Children in Foster care <sup>3</sup>	4,703
English Language Learners with Low Level of Literacy <sup>4</sup>	9,930
Migrants or Seasonal Farmworkers <sup>5</sup>	3,530
Individuals within 2 Years of Exhausting TANF Eligibility <sup>6</sup>	1,357
Single Parent Households	251,730
Single Mother Households	197,432
Single Fathers Households	54,298
Disconnected Youth <sup>7</sup>	15,000

Sources: American Community Survey, 2013-2017 5-Year Estimates. 1Mississippi Department of Corrections, 2019. 2Mississippi Department of Education, 2019. 3U.S. Department of Health & Human Services, Administration for Children & Families, Children's Bureau, 2019. 4Adult Basic Education, 2019. 5U.S. Department of Agriculture, 2017. 6Mississippi Department of Human Services, 2019. 7National Kids Count Data, 2017. Disconnected youth are teenagers between age 16 and 19 who are not enrolled in school and not employed.

Table 7: Unemployment & Workforce Participation Rates of Vulnerable Populations

Group	Percent
Veterans	
<b>Unemployment Rate</b>	6.3
<b>Workforce Participation Rate</b>	72.2
Disabled	
<b>Unemployment Rate</b>	16.5
<b>Workforce Participation Rate</b>	33.7
Low Income	
<b>Unemployment Rate</b>	28.9
<b>Workforce Participation Rate</b>	46.9
Native American/Hawaiian	
<b>Unemployment Rate</b>	3.3
<b>Workforce Participation Rate</b>	67.6
Age 16-19 (Overall)	
<b>Unemployment Rate</b>	30.2
<b>Workforce Participation Rate</b>	30.3
Age 16-19 Not enrolled in School	
<b>Unemployment Rate</b>	34.9
<b>Workforce Participation Rate</b>	55.6
Age 16 and over with a Disability	
<b>Unemployment Rate</b>	15.7
<b>Workforce Participation Rate</b>	23.0

Source: American Community Survey, 2013-2017 5-Year Estimates.

Preparation for the 2020 state plan included a comprehensive labor market analysis to identify high-demand and high-growth areas in growing and new-and-emerging industries. This analysis used Bureau of Labor Statistics data and Mississippi Works Labor Exchange administrative data to identify the current job openings and the growth that is expected to occur over the next 10 years. Results of this analysis are reported in Appendix F, Tables F1-F5, where it can be seen that jobs in Advanced Manufacturing, Healthcare, Tourism, and Transportation are projected to grow significantly over the next 10 years.

Advanced manufacturing is expected to generate over 2,400 new jobs, mostly for welders; these expected new jobs are in addition to the job openings created as employees move between jobs and employers. In 2018, 4,639 new advanced manufacturing jobs were opened (*BLS Employment Projections: 2018-2028 Technical Note*). Some of

the major employers in advanced manufacturing are Nissan, Toyota, Yokohama, Ashley Furniture, and Howard Industries.

More than 1,000 jobs are expected to be created in the next 10 years in the healthcare support industry; these expected new jobs are in addition to the job openings created as employees move between jobs and employers. Most of these are related to transporting medical supplies. In 2018, 784 new healthcare support jobs were opened. Some of the major employers in healthcare support are Versant, Teleflex, and Anda Pharmaceuticals.

Tourism is expected to have more than 17,000 new jobs over the next 10 years, with the largest demand in food preparation, cooks, and line supervisors; these expected new jobs are in addition to the job openings created as employees move between jobs and employers. In 2018, 17,843 new tourism jobs were opened. Some of the major employers in tourism are Beau Rivage Resorts, Gold Strike Casino Resort, and Horseshoe Casino and Hotel.

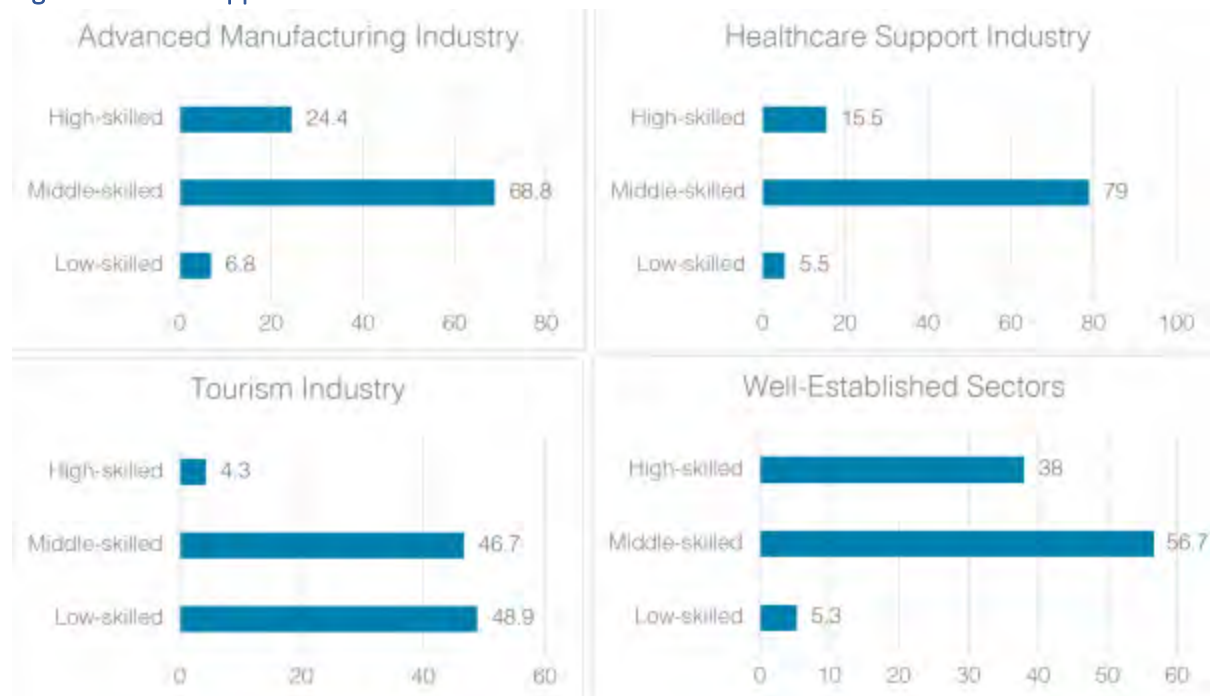
Over the next 10 years, well-established industries in the state are projected to see job growth approaching 30,000 new jobs; these expected new jobs are in addition to the job openings created as employees move between jobs and employers. Of those, more than 20,000 will be filled by the top 20 occupations, including nursing and elementary and postsecondary teachers.

The analysis shows that approximately 70 percent of the jobs created in advanced manufacturing will be middle-skill jobs (see Figure 10). The analysis also shows that approximately 80 percent of the jobs in healthcare support will be middle-skill jobs. Even the established industries will create jobs that will tend to require middle skills (57 percent). In contrast, the vast majority of tourism jobs created are projected to require low skills.

According to the American Community Survey, for the Mississippi population ages 25 and older, 16.6 percent have less than a high school education, 30.4 percent have completed high school, and 22.6 percent have some college. Those with associate and bachelor's degrees account for 9.1 percent and 13.3 percent of the population, respectively. The remaining 8.0 percent have a graduate or professional degree. Of the four LWDAs, the Delta area has the largest segment of the population with less than a high school education (23.7 percent).

Data from the Mississippi Works Labor Exchange reveal that more than 81,000 individuals sought employment assistance in 2018 (see Table 8). Of those, more than 64 percent were low-skill job seekers with high school education or less. Another 17 percent had some college education. An appreciable number of job seekers, about 7 percent, had a two-year associate degree, and approximately 8 percent had a four-year degree. Almost 4 percent had an occupational skills certificate. These data clearly show that a large segment of Mississippi's workforce has low skills and could benefit from skill upgrades.

Figure 10: Mississippi Middle-Skill Demand



Source: Bureau of Labor Statistics, 2019.

Table 8: Education and Skill Levels of Current Job Seekers

Education Level	Number	Percent
High school or less	9,658	11.8
High school diploma/GED	42,653	52.2
Some college	13,773	16.8
Associate degree	5,900	7.2
Bachelor degree or higher	6,534	8
Occupation skills certificate	3,247	4
<b>Total</b>	<b>81,765</b>	<b>100</b>

Source: Mississippi Works, 2019.

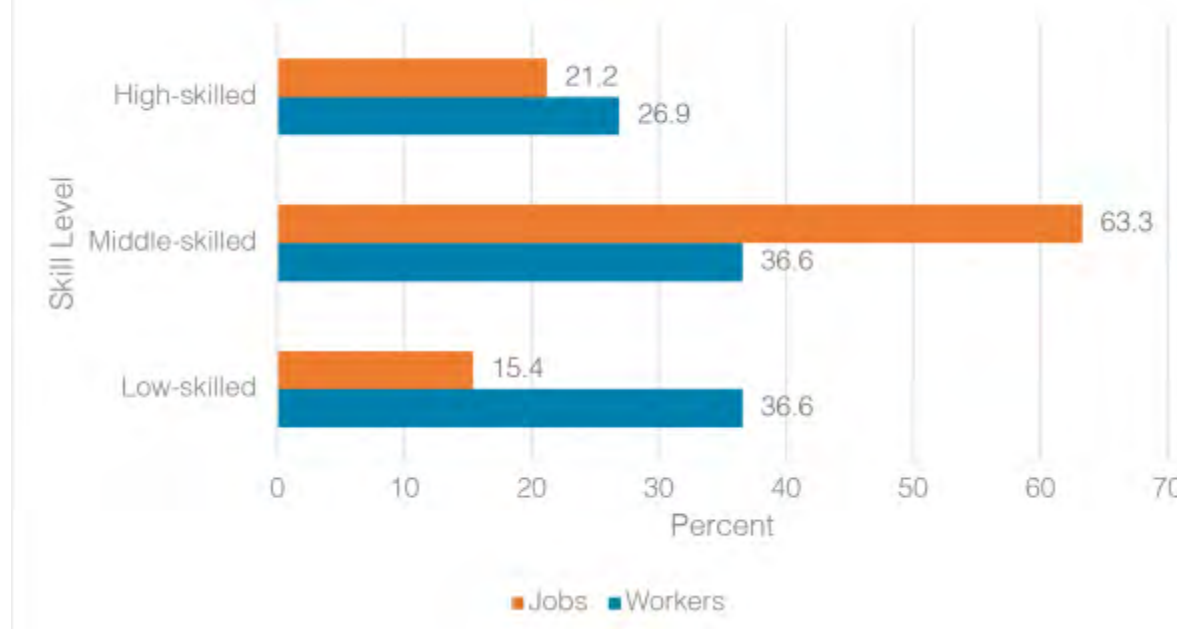
Current data show that 63 percent of jobs in Mississippi fall within the definition of middle-skill, but only 37 percent of the state's workforce has the requirements to fill a middle-skill job (see Figure 11). In contrast, Mississippi has more workers than available jobs in the low-skill category. This oversupply of labor also exists for high-skill jobs that require college credentials and beyond. Given that there is a middle-skill gap, the availability



of such jobs indicates that many Mississippians could attain gainful employment by seeking additional education and training.

A supply and demand analysis reveals that Mississippi has an appreciable skill gap (see Table 9). In fiscal year 2019, there was a demand of almost 30,000 jobs in new and emerging sectors and established high- growth, high-demand sectors. During the same time period, approximately 5,000 individuals were prepared for these middle-skill jobs through the community college system. In fiscal year 2018 the overall skill gap was approximately 25,000.

Figure 11: Mississippi Middle-Skill Jobs



Source: Bureau of Labor Statistics, 2019. ONET, 2019.

Table 9: Gap, Current Supply and Demand for Middle-Skill Occupations in New and Established Sectors

Sector	Supply	Demand	Gap
Advanced Manufacturing Industry	1,877	2,527	650
Healthcare Support Industry	892	1,010	118
Tourism Industry	683	8,129	7,446
Well-Established Sectors	1,570	18,331	16,761
<b>Total</b>	<b>5,022</b>	<b>29,997</b>	<b>24,975</b>

Sources: Bureau of Labor Statistics, 2019; Mississippi Works, 2019; Mississippi Community Colleges, 2019.

## Implications of Economic and Workforce Analysis

The preceding economic and workforce analysis provides a solid direction for developing strategies to improve the economic opportunities for those who have become discouraged from entering into the labor force and for those who have entered the workforce but struggle to cross over the poverty line. The analysis suggests that

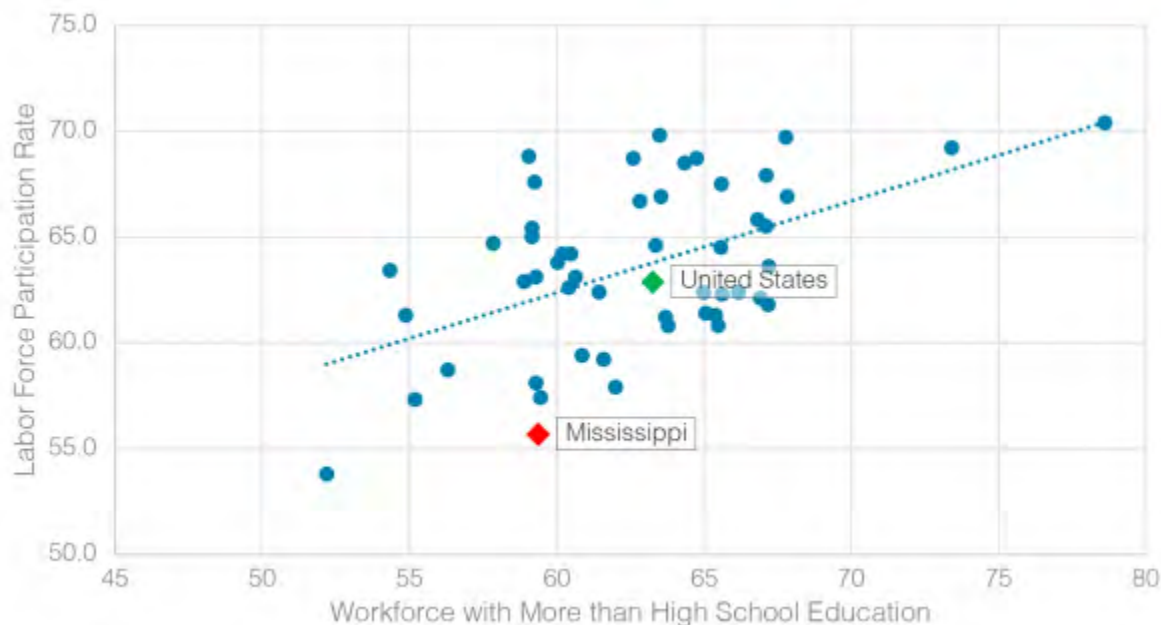
discouraged workers must overcome two challenges to lessen the likelihood of dropping out of the workforce. First, they have to obtain the credentials needed to secure a good job. Second, they have to be able to develop necessary (soft) skills along with their competencies to meet employer expectations of a workforce willing to learn.

To meet these challenges, learning about life skills and work environment expectations is the first step to moving successfully into the workforce. In this regard, the state developed mechanisms to assess when it is appropriate for job seekers to enroll in an eight-week intensive Smart Start Pathway Class (this class is fully described below under step three of “Goal 2: Strengthen Interagency Partnerships”). Next, the job seeker has the opportunity to be prepared to earn educational credentials or skills necessary to align his or her aspirations with labor market expectations. The analysis also suggests that many will be required to have work experience before they are fully work-ready. A proven strategy for gaining experience is to provide subsidized employment opportunities such as apprenticeships and internships. Similarly, the working poor must be able to upgrade their credentials and improve their skills in order to improve their socioeconomic conditions. A suggested strategy is to engage the working poor in on-the-job training and opportunities for occupational education (e.g., MI-BEST) that are sensitive to the need to balance work schedules with upgrading education and skills.

The analysis also suggests that many of these individuals rely on public assistance programs such as SNAP and TANF and barrier mitigation such as childcare and transportation vouchers. Leveraging public assistance to meet workforce needs requires a great deal of coordination, as many of these services are administered by agencies disconnected from the workforce system. To overcome these barriers, the state developed an overall strategy to engage in common case management aimed at real-time referral. This case management strategy is fully described below under “Goal 2: Strengthen Interagency Partnerships,” and the information technology that makes this strategy possible is described in the section titled “State Operating Systems and Policies.”

To maximize the effectiveness of any strategy aimed at improving the quality of life for low-income individuals, the state recognizes it must engage in systemic change. This change calls for the creation of an ecosystem that aligns resources and services across agencies to achieve system (or statewide) outcomes. The analysis suggests the two most important system outcomes are improving workforce participation rates and increasing the number of people with more than a high school credential. The importance of these system outcomes is shown in Figure 12. This figure provides a national context, showing that states with higher rates of individuals with more than high school credentials also are likely to have higher labor force participation rates.

Figure 12: U.S. Education and Labor Force Participation Rate by State



Sources: Bureau of Labor Statistics, 2019, Census Bureau, 2019.

Mississippi must meet the challenge of an economy that puts, more than ever, an emphasis on attaining more than high school credentials. Our state's current labor force participation rate is not necessarily due to a lack of job opportunities. On the contrary, there are more than 38,000 middle-skill jobs not filled by our current workforce. In order to fill those middle-skill jobs, the state needs to be able to increase the number of people in the workforce who possess middle-skill credentials. Mississippi has a considerably large low-skill workforce that, if adequately trained, could close that gap. Of the state's 673,996 population ages 25-64 with low skills, only about 367,488 have jobs. This suggests that the state has an opportunity to close the gap in its current labor force participation rate of workers age 25 to 64 (71.4 percent) and the national average (77.5 percent) by providing training for in-demand middle skill jobs.

The key strategy outlined in the Mississippi Combined WIOA Plan is to go beyond program-specific performance metrics and use tools that will allow the state to gauge how a change in one program impacts the change of another program. The state will engage in an ongoing evaluation process using specific data tools such as dashboards, pathway evaluators, and supply-demand models. This is fully described under "Goal 4: Develop Cross-Program Performance Metrics."

## Workforce Development, Education and Training Activities Analysis

### Mississippi Workforce Development Activities

#### WIOA Title I Training System

Prior to Mississippi's 2015 WIOA plan, the majority of adult, dislocated worker, and youth training activities in Mississippi provided by the core programs were for jobs in the healthcare sector. While healthcare still receives significant emphasis, in PY 2018 the majority of training was for jobs in production occupations (production workers, assemblers, fabricators, plant operators, and system operators, involving the areas of metal, plastics, wood, textiles, machines, and food processing). This represents better alignment between training and in-demand skills. The second largest education and training activity was for the transportation sector, including truck and

tractor trailer driving. Other significant areas included healthcare and healthcare support; installation, maintenance and repair; and office and administrative support. Individuals received on-the-job training (OJT), internships, externships, and participated in a variety of workforce connection strategies.

### *TANF Education and Training Activities*

TANF Work Program (TWP) activities include vocational education training, jobs skills training directly related to employment, education directly related to employment, and secondary school attendance. These programs are available to each participant. All require supervision by faculty, instructors, or supervisors, and each program has minimum requirements. Each type of training includes monitoring and attendance reporting of participants. Case managers will determine the appropriate amount of face-to-face contact needed. In some cases, if allowable classroom hours are not sufficient to meet the monthly federal participation requirements, actual hours spent in supervised and unsupervised study sessions and assessments will be reported and counted.

Vocational education training 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. Allowable programs include vocational associate degree programs, postsecondary educational programs, instructional certificate programs, industry skill certifications, non-credit course work, WIN Job Center training offerings, short-term and employer-needs training from the Mississippi Community College Board (MCCB), Job Corps training offerings, Basic Skills Education and English as a Second Language (ESL), and distance learning programs. Vocational education cannot exceed a 12-month lifetime maximum.

Job skills training directly related to employment involves training or education for job skills that provide an individual the ability to obtain employment or to advance or adapt to the changing demands of the workplace. Job skills training can include customized training to meet the needs of a specific employer or training that prepares an individual for employment, including literacy and language instruction, if necessary, to enable the participant to perform a specific job or engage in a specific job training program.

Education directly related to employment involves educational activities related to a specific occupation, job, or job offer for individuals aged 20 or older who have not received a high school diploma or a certificate of high school equivalency. These activities may include educational courses designed to provide the knowledge and skills for specific occupations or work settings, Adult Education, ESL, literacy skills, and supervised homework and study activities.

Secondary school attendance involves attendance at a secondary school or in a course of study that leads to a high school equivalency (HSE) diploma. This is an allowable activity for individuals age 20 and older who do not have a high school diploma or an HSE diploma. Participation in this activity is not restricted to individuals for whom obtaining an HSE diploma is a prerequisite for employment. Minor parents (younger than age 20) who have not completed secondary school or received an HSE diploma are encouraged to pursue a diploma.

### *Internships*

In addition to the workforce education and training activities delivered within community college classrooms, transitional programs such as internships and apprenticeships are essential components of the workforce education and training system in the state.

Internships have been identified as one of the most important types of non-credit training that Mississippi job seekers can use to attain the skills for gainful employment. Many of the internship opportunities offered by employers in fiscal year 2018 require middle skills. The number of middle-skill internships could increase in the future with growing relationships between community colleges and employers in Mississippi. Individuals interested in the internship program must be in one of the following categories:

1. Eligible students must be in an approved training program in an allowable pathway.

2. Individuals interested in career exploration or individuals who have been out of the workforce for a period of time.

Staff must complete an initial assessment and have documentation in the participant file to establish internship need. Case notes are imperative for the internship program and must be in place for monitoring.

The Twin Districts Workforce Development Area provides an Internship Program through partnerships with the five community colleges in the workforce area. The objective of this program is to help Adult and Dislocated Workers gain practical work experience while integrating education, job training, labor market information, and personal development. The Internship is a paid, planned, and structured learning experience that takes place in a work setting for a limited period of time. The targeted population is individuals receiving education assistance through individuals training accounts and short-term training in-demand occupations. The long-term unemployed are also eligible for this program. Priority is given to veterans. The 16-week internship includes between 20 and 40 hours per week of paid work experience. The individuals may earn between \$10 and \$15 per hour. The Twin Districts Workforce Development Area has partnered with employers in the area that are willing to give interns meaningful training assignments and effective supervision.

One-Stop Center operators offer an Adult Internship Program in the Mississippi Partnership area that provides interns with practical work experience and leadership skills while they seek full-time employment. The program provides businesses an opportunity to try out potential applicants in real work settings. The program responds to the need of individuals to acquire relevant work experience and interpersonal skills. In addition, some community colleges partner with local businesses to provide specialized training programs that may include a two-year associate degree, a cutting-edge curriculum, and paid work experience. Each of these community college and business partners will vary on the hours per week and the wage provided. However, the paid work experience is at a minimum of three days or 16 hours per week, with wages starting at \$14 per hour and potentially increasing to \$20 per hour. When possible, some community colleges provide interns an eight-hour shift for the purpose of experiencing a full day's work. At the end of the corresponding academic semesters, participating industries are reimbursed approximately \$2,500 per intern to help offset wages. Reimbursement to companies is administered through the corresponding LWDA.

Mississippi Works CTE Scholars Program - The Mississippi Works Career-Tech Scholars Program is established to serve as a state assisted tuition scholarship program for eligible community college students by providing tuition financial assistance to those who enroll in approved Career and Technical Education Certificate and Associate of Applied Science degree programs identified through sector analysis to meet the workforce demands of the state. The program is funded by the Mississippi Development Authority's Mississippi Works Fund. Over 400 students have benefited already from this program.

A final strategy is to connect job seekers and returning citizens with community college programs and potential employers to build a sustainable workforce through the use of apprenticeship and registered apprenticeship programs. The Mississippi Community College Board (MCCB), in collaboration with the Mississippi Department of Employment Security (MDES), houses the Mississippi Apprenticeship Program (MAP), which offers a range of services that help businesses develop, recruit, and retain a highly skilled workforce through highly customizable and effective Registered Apprenticeship (RA) programs. Registered Apprenticeships provide a unique "earn while you learn" opportunity that leads to a national-recognized credential and competitive career in a variety of industries, including advanced manufacturing, healthcare, IT/cybersecurity, transportation, utilities, and hospitality.

Apprenticeship programs, Registered and Non-Registered, provide individuals with an opportunity to acquire the knowledge and skills that lead to high paying jobs while also helping businesses grow their skilled workforce.

MS Works Apprenticeship (MSWA) is a pilot program designed to help decrease critical skill gaps and expand on-the-job training opportunities. The MSWA program is intended to develop or expand traditional Registered or Non-Registered apprenticeship programs. Businesses are encouraged to employ apprentices enrolled in



Career & Technical programs of study which support industries that have been identified by the LWDAs as targeted sectors as well as other growth industries.

### *Special Programs for SNAP Recipients, Seniors, and People with Disabilities*

SNAP Education and Training (E&T) helps eligible SNAP recipients, who are enrolled in a career and technical program or a workforce skills training program at one of Mississippi's participating community colleges, with tuition expenses. Hinds Community College designed a Skills2Work program to meet participant needs through career/technical pathways and a workforce training curriculum. As of December 2019, 553 students have been served. Mississippi's Community Education Center (MCEC) and trucking and logistics company KLLM developed a curriculum to provide training needed for a Class A Commercial Driver's License and the option to participate in a 6-week, on-the-road experience designed to prepare a participant for possible employment with KLLM. As of December 2019, 236 students have been served, 186 have graduated with eligibility to obtain a Class A license, and 106 have passed through the program and have become employed with KLLM upon successful completion of training. The Goodwill Customer Service Program (GCSP) is a short-term credentialed training program designed to help entry-level workers learn the skills necessary for frontline retail jobs or for any industry in which customer service skills are required. As of December 2019, 83 students have been served and each student has the opportunity to earn two credentials. 58 GCSP students received a credential in retail and 46 received a credential in customer service.

The Senior Community Service Employment Program (SCSEP) is a community service and work-based, job-training program for older Americans. Authorized by the Older Americans Act, the program provides training for low-income, unemployed seniors. Participants also have access to employment assistance through American 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 81 counties in Mississippi. Nationally, this program has provided more than 40 million community service hours to public and nonprofit agencies, allowing them to enhance and provide needed services. Participants work an average of 20 hours per week and receive the federal minimum wage, which is currently \$7.25. Also, limited fringe benefits are provided. This training serves as a bridge to unsubsidized employment opportunities for participants. Participants must be at least 55 and unemployed with a family income of no more than 125 percent of the federal poverty level. 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 American Job Center system.

Mississippi Goodworks, of Goodwill Industries, collaborates with the government and industry to provide jobs for people with disabilities or other disadvantages. These services give participants a chance for practical, paid work experience while giving local businesses and government agencies valuable high-quality production services. Additionally, Goodwill Industries has a contract with the Mississippi Department of Rehabilitation Services, OVR, and OVBR to provide job evaluation and training. Through its contracted services, Goodworks has generated approximately \$2.5 million in salaries and payroll taxes annually. It employs 135 people who have barriers to employment, such as those with physical and emotional disabilities, individuals in 12-step programs, and ex-offenders.

### *Dropout Prevention and Recovery*

A special focus of workforce activities is in dropout prevention and dropout recovery, especially in relation to youth. Mississippi is committed to providing comprehensive services to eligible youth, especially individuals with significant barriers to employment or individuals at risk of falling out of the education pipeline. The Mississippi Department of Employment Security (MDES) provides comprehensive services to youth through an integrated system of education, workforce training, skills development, and job-readiness services. These services are

designed to assist eligible youth to receive the educational and employment skills, training, and support needed to achieve academic and employment success as they transition into the workforce and/or postsecondary education.

Dropout prevention activities are also part of youth program efforts in the state. Services to eligible youth are delivered through a network of youth providers. Independent contractors may competitively bid for youth funds and deliver LWDA Youth Program services that include counseling, occupational skills training, leadership development, guidance, follow-up work-readiness training, internships, job placement, pre-employment training, work experience, high school equivalency preparation and achievement, employment referral to on-the-job training, and individual training accounts.

Innovative approaches used by youth providers include the Counseling to Career (C2C) youth programs, and Career Connections. The C2C program provides one-on-one counseling that helps youth develop a personalized individual service strategy that leads to short- and long-term academic and/or career goals. C2C counselors provide tutoring services to youth in need of basic skill development through reading, math, and language education and develop educational workshops, mock interviews, mentoring, and community service projects. Counselors will also assist youth with finding jobs with local employers and, if applicable, make referrals to additional services.

The primary goal of the Career Connections program is to equip youth with the education and skills needed to take advantage of new job opportunities in high-growth labor markets. Educators partner directly with industries to expand career-specific learning for Career Connections participants in areas such as professional development, mock interviews, resume writing, dual enrollment options, and postsecondary education options.

In addition to the services provided to eligible youth through MDES, the Mississippi Department of Education (MDE) offers several dropout prevention strategies. MDE-approved dropout prevention programs include the following:

- **Career academies** incorporate academic and technical skills, small-size classes, and collaboration among teachers. Currently utilized in nine school districts across the state, these programs allow students to receive industry-recognized credentials at no cost. In some districts, these programs are open to all high school students, while others have been implemented as pocket academies, which accommodate a cohort of students. Key characteristics of the career academy include: 1) a smaller learning community of students linked to a common set of teachers; 2) cohort scheduling and common planning; 3) physical space shared by one academy; 4) integrated curricula focused on the selected academy concept; 5) advisory groups; 6) strong community and industry connections; and 7) dual credit/dual enrollment options.
- **Dual credit/dual enrollment** allows high school students to simultaneously earn college academic or career/technical credit and credit toward a high school diploma. Mississippi Works dual credit/dual enrollment policy—a key element of Governor Phil Bryant's 2012 legislative agenda—provides high school students at risk of dropping out with the opportunity to complete their education while learning a skill or trade. Additionally, Mississippi Code 37-15-38, Section 19, allows the local school districts to work with local community colleges to connect successful students to college-level coursework.
- **Jobs for Mississippi Graduates (JMG)** is a program designed to keep young people in school through graduation and to provide work-based learning experiences that will lead to career advancement opportunities or enrollment in a postsecondary institution. Students receive follow-up services for 12 months after graduation. Students are targeted for services based on a number of barriers to staying in school through graduation and/or transitioning from school to a career. JMG is an affiliate of the Jobs for America's Graduates Program. For 25 years, JMG has worked in partnership with local school districts, area industry leaders, and community colleges to support recent graduates, students at risk of dropping out of high school, and students who need assistance in the transition from school to

work. JMG operates 64 program sites across Mississippi and serves 2,200 individuals per year from 13-24 years of age. Students receiving services from JMG graduate at a rate of 94 percent, enroll in post-secondary educational institutions at a rate of 35%, and are employed directly in the workforce at a rate of 21%.

In addition to JMG, other Community-based organizations are heavily engaged in dropout prevention and recovery.

The Mississippi Scholars program is managed by the Public Education Forum of Mississippi and partners with local business leaders to prepare high school students for a successful transition to college, university coursework, or technical training necessary to compete in the 21st century job market. Since its inception in 2003, the Mississippi Scholars program has recognized more than 46,000 graduating seniors from more than 120 high schools or districts for completing the program. Additionally, the Mississippi Scholars Tech Master program was designed to encourage high school students to pursue a career and technical coursework.

Another dropout prevention strategy focuses on improving college completion rates. In 2014, at Governor Phil Bryant's urging, the Mississippi Legislature passed SB 2563, requiring community colleges and universities to develop plans to address teen pregnancy on their campuses and its associated barriers to education, such as childcare, transportation, and financial aid. Because Mississippi's teen pregnancy rate is highest among girls ages 17 to 19, and because teen pregnancy affects a woman's ability to complete her education, obtain a good job, and earn sufficient family wages, the passage of SB 2563 was a significant step toward increasing college completion rates and the skill level of Mississippi workers. Currently, Mississippi's teen birthrate is 27.8 (per 1000 females aged 15-19). This is a 26.8 percent decrease from the 2014 teen birthrate of 38 and a 54 percent decrease from the 2005 birthrate of 60.5.

Dropout recovery is another element of the strategy to improve economic opportunities for low-skill job seekers. For individuals who became disconnected from the education pipeline and are unable to attach themselves to the workforce, basic skill remediation is often necessary before job placement. It is nearly impossible for individuals lacking proper math, reading, writing, communication, teamwork, and computer skills to be competitive in today's labor market. Adult Education (AE) programs provide adults with the education needed for functional literacy before they move on to employment or additional education and training. AE programs administered through the Mississippi Community College Board (MCCB) are designed to offer opportunities that will enhance the skills and abilities of individuals preparing for the workforce or additional educational activities.

AE provides services throughout the state through local grantees who met the requirements in a competitive grant process. In addition to assessing an individual's educational needs in reading, math, and writing, AE serves as the foundation on which workforce education is fundamentally based. The Office of Adult Education conducts grant competitions for eligible providers under WIOA following the guidelines received from the Office of Career, Technical, and Adult Education (OCTAE). Awards are distributed annually based on funding received from OCTAE.

Building off of the dropout recovery strategies of AE programs, the Mississippi Integrated Basic Education and Skill Training (MI-BEST) initiative led by the Mississippi Community College Board incorporated a career pathway model within the delivery of basic education. MI-BEST primarily targets high school dropouts, low-income individuals, and other students by accelerating their transition from basic skills education to postsecondary programs of study. MI-BEST incorporates contextualized learning by concurrently delivering AE and career and technical education (CTE) classes using a team-teaching approach. In addition, MI-BEST provides low-skill, undereducated, and low-wage workers opportunities to enter career pathways with the appropriate level of instruction, leading to postsecondary degrees and/or credentials and, ultimately, self-sufficiency.

Through MI-BEST, Mississippi joins a growing number of states implementing best practices designed to recover and accelerate postsecondary credential attainment among high school dropouts and other nontraditional students. Participants in the MI-BEST program must earn a Career Readiness Credential at any level, earn a Smart Start Credential, and continue on-the-job training. Upon completion of this program, students have the skills and credentials to enter the workforce at the middle-skill level.

## Employment Services

In addition to the core services administered by Combined Plan Partners, Mississippi's workforce system offers a variety of employment services to ensure all job seekers have the resources and tools to secure gainful employment.

Job search, job referral, and provision of labor market information are the key supportive services offered to all job seekers by the Mississippi Department of Employment Security through the Mississippi Works Labor Exchange, which connects job seekers to employers through both web and mobile applications. Job seekers can 1) build a profile using a wizard-style intake form; 2) automatically generate a resume; 3) search for and apply online to openings; 4) receive emails or text messages when new openings match the job seeker's criteria; 5) receive real-time feedback through an innovative gap analysis that helps a job seeker determine how well matched he or she is for a particular position; and 6) access easy-to-understand labor market analysis. For job seekers who lack computer skills, One-Stop Center staff can also log into the Mississippi Works Labor Exchange to assist job seekers in applying for positions through a "staff-assisted referral" or other Wagner-Peyser services.

Mississippi's higher learning institutions offer career center support on all eight public university campuses: Alcorn State University, Delta State University, Jackson State University, Mississippi State University, Mississippi University for Women, Mississippi Valley State University, The University of Mississippi, and The University of Southern Mississippi. These centers provide students with information about career development, coordinate career fairs, develop partnerships with employers that lead to internships and cooperative education possibilities, and provide instruction in resume creation and interview techniques.

As an extension of campus career centers, the Mississippi Department of Employment Security partners with Mississippi's Institutions of Higher Learning to offer MSGradJobs.com, an online job search application allowing students in all Mississippi postsecondary institutions (public and private universities and community colleges) to receive weekly email messages containing job matches that correlate with the students' academic majors. Students may sign up individually for this service, or they may be connected directly with the system through a growing list of direct university and community college partners. Since the system launch in mid-2013, 3.1 Million emails have been sent to 76,238 registered students representing 41 Mississippi institutions (four-year and community colleges) and over 300 out-of-state institutions in the United States and abroad.

A sister site, MSTechJobs.com, focuses on ensuring that students in Mississippi's community colleges are notified about openings in high-demand, middle-skill occupations.

Another example of coordinated outreach to postsecondary students is Get On The Grid, an initiative led by the Mississippi Energy Institute and made possible by numerous public and private partners. The initiative's purpose is to promote educational and occupational opportunities in the energy and advanced manufacturing sectors. Through its website GetOnTheGridMS.com, students can explore careers through videos and connect with training providers via a searchable database.

To address barriers to employment faced by ex-offenders, the Mississippi Department of Corrections (MDOC) and the Mississippi Department of Employment Security (MDES) partnered to create the "Employment Connections" system that enables an offender to create a pending workforce profile in the Mississippi Works Labor Exchange prior to release. Upon release, this profile goes live, and the offender is given an information sheet containing credentials to log into the system and the address of the nearest job center. MDES operates an

innovative, automated Work Opportunity Tax Credit (WOTC) processing system that enables Mississippi employers to quickly apply for and receive tax credits that encourage the hiring of persons from several at-risk groups, including ex-offenders. In fiscal year 2019, more than 11,400 Mississippi employers took advantage of the WOTC program and hired more than 6,800 Mississippians within targeted populations. MDES also administers the Fidelity Bonding Program that allows employers to hire, with limited liability, justice-involved job applicants such as ex-offenders. Employers are insured for theft, forgery, larceny, or embezzlement by the bonded employee, thus reducing the barriers many employers face in hiring ex-offenders.

MDOC provides a pre-release program for ex-offenders about to be released. The program is designed to reacclimate ex-offenders with working society through monthly counseling sessions, classes to assist them with necessary job skills (e.g., Smart Start), and job development packages that include job referrals and field visits with prospective employers. Participants in the pre-release program are provided a certification of completion, referrals for basic services, and job-assistance follow-up after the first year of release.

## Supportive Services

In addition to employment services, Mississippi's workforce system offers a variety of supportive services to ensure that job seekers who face a wide variety of challenges have the resources and tools to secure gainful employment.

Job search, job referral, and provision of labor market information are the key supportive services offered to all job seekers by the Mississippi Department of Employment Security through the Mississippi Works Labor Exchange, which connects job seekers to employers through both web and mobile applications. Job seekers can 1) build a profile using a wizard-style intake form; 2) automatically generate a resume; 3) search for and apply online to openings; 4) receive emails or text messages when new openings match the job seeker's criteria; 5) receive real-time feedback through an innovative gap analysis that helps a job seeker determine how well matched he or she is for a particular position; and 6) access easy-to-understand labor market analysis. For job seekers who lack computer skills, One-Stop Center staff can also log into the Mississippi Works Labor Exchange to assist job seekers in applying for positions through a "staff-assisted referral" or other Wagner-Peyser services.

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In order to assist job seekers that face the greatest barriers to employment, Mississippi's workforce system offers services to mitigate childcare needs, transportation needs, and needs arising from disability.

- Child care services are provided by the Mississippi Department of Human Services (MDHS) in connection with the Temporary Assistance for Needy Families (TANF) Work Program, and the Child Care Certificate Program. For participants who lose TANF eligibility due to earned income, MDHS also administers the Transitional Child Care Program to mitigate childcare barriers that may otherwise prevent these new workers from succeeding in their attempts to become self-sufficient. MDHS administers an additional federally funded program, the Child Care Certificate Program, which assists parents who meet income and work requirements in paying for preschool tuition. From



October 2018 to September 2019, there are 802 cases with 1,621 children receiving child care assistance in Transitional Child Care program. MDHS Division of Early Childhood Care and Development provided a total of \$5,395,940 for assistance with child care needs.

- Transportation services are provided by MDHS, the Mississippi Department of Rehabilitation Services (MDRS), and the Mississippi Department of Transportation (MDOT). To participants in the TANF Work Program, MDHS provides transportation in the form of a bus pass or monthly work allowance. For participants who lose TANF eligibility due to earned income, MDHS also administers the Transitional Transportation Program. From October 2018 to September 2019, MDHS provided a total of \$1,561,050 to 927 participants in these programs. MDOT's transit programs provide capital assistance, operating assistance, and administration for four Federal Transit Administration (FTA) programs: 1) the Rural Area Formal Grants Program; 2) the Enhanced Mobility of Seniors and Individuals with Disabilities Program; 3) the Job Access and Reverse Commute Program; and 4) the New Freedom Program. These programs address transportation needs for low-income individuals, those living in rural areas, seniors, those needing transportation for work opportunities, and those with disabilities.
- Services to address the needs of those with disabilities are coordinated by MDRS. MDRS's Assistive Technology program assists workers and employers in applying technological solutions that enable MDRS clients to succeed vocationally. Through the Success Through Assistive Rehabilitative Technology (START) program, MDRS operates a device training and loan program and works with the T.K. Martin Center for Technology and Disability at Mississippi State University to apply a multidisciplinary approach to removing barriers that affect individuals with disabilities vocationally. MDRS also assists MDES in ensuring the accessibility of its One-Stop Centers.

### Employer-Focused Activities

The Workforce Enhancement Training (WET) fund, established by the Mississippi Legislature in 2004, provides financial support for community colleges to work collaboratively with state businesses to design and implement specialized short-term training programs to teach the skills that employees need to be productive and up-to-date in their jobs. There are approximately 105,000 participants (who can be enrolled in more than one program), with the Safety and Medical/Healthcare programs each accounting for the greatest share of participants at roughly 24,000 each. The Employability/Remediation programs and Industrial Production also have a large number of participants at approximately 18,000 and 11,000 respectively. These job-training programs include the following:

- **Pre-employment training** allows local community colleges to deliver basic instruction to applicants. During the course of instruction, businesses evaluate the applicants to identify and hire trainees that best meet their needs.
- **Train the trainer** reimburses (limited) travel costs to businesses that send employees for specialty training not currently offered by the state's community college system. Once trained, the employees train other business employees on the learned specialty skills.
- **Applicant assessment** allows community colleges to assist local businesses in evaluating the basic skills of applicants.
- **Customized training** offers the development and delivery of training that meets a specific business need via a community college trainer.

- **Customized industry-based training** allows the community college to assist businesses in identifying and securing a training provider when the training is not provided by a local college.
- **Career readiness certification** confirms to employers that an individual has the basic workplace skills and abilities required for 21st century jobs.

## Public-Private Partnerships

In recent years, partnerships between public and private entities have resulted in many successful career awareness programs. Get On The Grid and Mississippi Scholars are two recent examples.

Get On The Grid, an initiative led by the Mississippi Energy Institute and made possible by numerous public and private partners, promotes educational and occupational opportunities in the energy and advanced manufacturing sectors. Through its website [GetOnTheGridMS.com](http://GetOnTheGridMS.com), students can explore careers through videos and connect with training providers and companies via a real-time database. Get On The Grid also offers educator resources to encourage interactive career exploration in the classroom.

Sponsored by the Mississippi Economic Council (MEC) and the State Chamber of Commerce, Mississippi Scholars is a program that encourages high school students to take a more rigorous course of study, including STEM-focused coursework, to prepare for success in university coursework or technical training necessary to compete in the 21st century job market. Mississippi Scholars is managed by an MEC affiliate, the Public Education Forum of Mississippi, and benefits from partnerships with local business leaders working through local chambers of commerce and other community, business, and economic development organizations. Since its inception in 2003, the Mississippi Scholars program has recognized more than 46,000 graduates from more than 120 schools and/or districts for completing the program.

MEC added a second track, Mississippi Scholars Tech Master, which recognizes high school students who take a specific course of study aimed at more immediate career-readiness. In addition to coursework, Mississippi Scholars Tech Master students must meet attendance and performance standards aimed to prepare them for either direct entry into careers or further study and certification not necessarily requiring a four-year college approach. Mississippi Scholars Tech Master is now offered more than 100 school districts and has recognized more than 1,000 high school graduates in its pilot phase and its first full-year ramp-up. Since its rollout in 2014, over 5,000 graduates have received the Tech Master designation.

During planning in 2014 for the state's first WIOA Plan, after a series of meetings and input from all parties, a consensus was formed that the current workforce system is structured to:

- Deliver education and training to prepare individuals for jobs and careers.
- Upgrade, maintain, and fine-tune the skills of the incumbent workforce.
- Connect individuals to jobs and offer supportive services.
- Support business retention, expansion, and recruitment.
- Maintain and improve integration of education and workforce data in order to produce high-quality labor market information.

There was also clear agreement on the opportunities and challenges facing Mississippi's current workforce development system.

## Strengths, Weaknesses, Opportunities, Threats

### General Strengths Noted in 2014

- Contains all of the necessary elements of a future-ready workforce ecosystem: education delivery services, job placement services, supportive services, and a robust system to collect and disseminate labor market information.
- Recognizes that workforce development is shared responsibility with roles for educational partners, including K-12 schools, two-year colleges, and four-year universities; workforce support services; and public and privately administered programs by employers, business and industry associations, communities, and faith-based partners.
- Provides cross-agency support services that promote education, professional development, and training, especially through the services provided by the Mississippi Department of Education, community colleges, and Institutions of Higher Learning.
- Connects people to jobs through agency services and innovative use of technology.
- Leverages the system of Planning and Development Districts (PDDs) across the state to ensure that projects and programs are developed in line with regional long-range plans.
- Integrates community-based organizations (CBOs) into the slate of statewide services.
- MCCB created a Work-Based Learning Division to expand WBL (co-op and OJT) opportunities with college students, and also has diligently worked to expand both Registered and Nonregistered apprenticeship training programs (which are co-op or WBL).

### Program-Specific Strengths Noted in 2014

- Title I, Title III, UI, TAA, and SCSEP: The Mississippi Department of Employment Security (MDES) administers training funds for Youth, Adult, and Dislocated workers in partnership with community colleges and other training providers managed by an eligible training provider list (ETPL). These services are accessible throughout the state's four LWDA's through a network of local WIN Job Centers operated by local partners or by MDES on behalf of local partners. All case-management activities for the administration of workforce training and employment services are recorded in the Mississippi Works Labor Exchange system, bringing consistency to data collection and performance tracking. MDES provides essential labor market support services through connecting and reconnecting people with jobs. MDES provides the technological platform and expertise to bridge job seekers effectively with employers and other workforce stakeholders. Technologically, MDES leverages the strength of a web-services connection between its Unemployment Insurance case management system, ReemployMS, and its Employment Services system, the Mississippi Works Labor Exchange. The efficiencies realized by this connection between UI and Employment Services has informed the development of the Mississippi Works Common Intake and Reporting Module that will enable all Combined Plan Partners to realize the benefits of electronic referrals and electronically coordinated case management according to a common career pathway model. Another key strength of the MDES technology portfolio is its robust self-service capability that allows participants to access employment and unemployment services through web and mobile applications from any location.
- Title II, Adult Education and Family Literacy Act Programs (AEFLA): The Mississippi Community College Board delivers adult education services through a large, statewide network of contractors

providing literacy, equivalency, and other training to adults in need of a high school education. AE providers work closely with community groups and local job centers to ensure that workforce area residents are aware of class availability. Key to meeting the training needs of Mississippi's workforce, AE programs have the ability to reach into rural communities and provide training toward high school equivalency prerequisites supportive of further training for middle-skill occupations. In addition, AE classes serve as an effective intake for MI-BEST training that combines equivalency training with community college workforce training.

- Title IV, Vocational Rehabilitation Services: The Mississippi Department of Rehabilitative Services (MDRS) assists Mississippians who face barriers to access the labor market through specialized training and workforce supports. MDRS professional staff provide expertise in assisting those with disabilities to enter in-demand occupations, and MDRS already assists other Combined Plan Partners in assessing the accessibility of their respective service delivery systems.
- TANF: The Mississippi Department of Human Services (MDHS) implements programs to assist individuals and families to become self-sufficient. MDHS administration of TANF cash assistance and the TANF work program helps meet the financial needs of vulnerable individuals and families while providing funds for workforce training activities and supportive services such as transportation and child care. In addition, MDHS administers the Supplemental Nutrition Assistance Program (SNAP), a program serving about 20 percent of Mississippi's population. SNAP Education and Training funds provide support for community college training and will provide a key source of additional allocated and matching funds to assist the most vulnerable Mississippians in accessing training for in-demand occupations while providing funds to assist with food security and to overcome barriers such as childcare and transportation.
- Other Supportive Programs: The Mississippi Department of Transportation coordinates a network of public and specialized transportation agencies that help provide access to jobs, education, and training opportunities.

This vision of general and program-specific strengths has remained consistent as WIOA partners gathered in monthly meetings to discuss the 2020 WIOA Plan revision.

## General Weaknesses and Progress Towards Remediation

In addition to strengths, analysis in 2014 identified a number of general weaknesses. The following comparison updates how the state has addressed these general weaknesses.

2014 Weakness	How the Weakness Has Been Addressed
Ineffective matching of incumbent workers and job seekers to career pathways.	To address this weakness, the state's WIOA plan articulated the Smart Start Career Pathway model. Since the initial plan, the model has been put into place to marshal all workforce, training, and supportive services toward a coherent goal of helping Mississippians succeed in the labor market.
Ineffective matching of college students with career-strengthening opportunities, such as experiential education and co-ops.	Mississippi has made great strides toward providing more and better internship and apprenticeship opportunities. See the <i>Internships</i> section above.

2014 Weakness	How the Weakness Has Been Addressed
Suboptimal system coordination to inform training and education programs to keep them on the leading edge of workforce expectations.	Mississippi's training providers at the local level, including Community Colleges and other eligible training providers, Mississippi's Adult Education providers, and its Institutions of Higher Learning are working within established and coherent sector strategies articulated at the state level and by LWDAs. These programs are providing credentials recognized by industry and imparting skills that are in demand by the growing and existing sectors within each local area. Innovative models such as the Golden Triangle Communiversity are bringing state-of-the-art training equipment in coordination with industrial partners who need workers trained on the latest equipment.
Competing visions and interests across sectors, programs, and agencies.	Implementation of the Smart Start Career Pathway model involved all stakeholders in a collaborative process that produced an innovative model of customer service in which each WIOA customer was asked a series of questions designed to route the customer to all relevant agency partners. For example, if a WIOA customer answered that he or she did not have a high school diploma, the electronic WIOA Hub would automatically produce a referral for the customer to a local provider of Adult Education classes. This routing or triage model gave each agency partner the assurance that a real no-wrong-door policy would be put into practice. In addition, staff from all agency partners have been involved in cross-training events, hearing from colleagues at other agencies and providers about the services offered at each. This cross training built an awareness of the big picture and has led to a more unified vision of how Mississippians move through successive waypoints on a career pathway, made possible by education, training, and supportive services from all partners. The success of one program thus became the success of all.

## Program-Specific Weaknesses and Progress Towards Remediation

The state has also addressed many of the program-specific weaknesses identified during initial WIOA planning.

- Title I, Title, III, UI, TAA, and SCSEP: In 2014, these programs, administered by MDES, were administered without the benefit of technology that would allow MDES to directly refer individuals to training providers or to Combined plan partners who provide supportive services. This resulted in service discontinuities that jeopardized the clarity required for career pathways to be navigated from multiple entry and exit points. Further, while certain Title I programs required an individual employment plan, such a plan was not held in common with other state partners, limiting the capacity of the entire workforce and training system to serve participants comprehensively with an overall career goal in mind. To address these weaknesses, Mississippi built the electronic WIOA Hub. This system allows MDES staff, using the agency's case management system, to refer participants electronically to other WIOA partners. An opportunity still exists to automate referrals to all training provider types. To address the lack of a common employment plan, Mississippi's WIOA partners worked together to develop a common blueprint for a WIOA Success Plan. This plan contains an overall employment goal, a list of services needed to help the participant get to the goal, and a list of barriers for which WIOA partners provide supportive services to address. Data structures to facilitate sharing the plan across partner systems have already been implemented in the WIOA Hub and partners are currently modifying their case management systems to process and exchange the plan.



- Title II, Adult Education and Family Literacy Act Programs (AEFLA): In 2014, the state noted that AE resources, administered by the Mississippi Community College Board's network of providers, primarily consisted of instruction and training. AE customers had to be connected with services from other Combined Plan Partner programs, yet there was no electronic way to refer students nor was there a self-service option to access a career plan. As with the similar limitation faced by MDES, this weakness has been addressed as the Mississippi Community College Board has developed a system for managing referrals to and from WIOA partners through the electronic WIOA Hub. This ensures not only that AE can refer participants to other partners for services, but any participant served by a WIOA partner who lacks a high school diploma is automatically referred for Adult Education Services. MCCB continues to add functionality to their case management technology and plans to introduce self-service features in future releases.
- Title III, Wagner Peyser Services: In 2014, the Mississippi Works Labor Exchange was already a mature system that fosters connections between job center staff, participants, and employers, but it was only connected to one other partner system, the MDES Unemployment Insurance management system. Referrals to other Combined Plan Partner services were handled using paper forms, meaning that system-wide analysis of effectiveness in meeting the needs of vulnerable job seekers was difficult to automate. As with Title I, the development of the Mississippi WIOA Hub and the connection of Mississippi Works to the Hub has resulted in the ability for MDES and local workforce center personnel to refer participants to all other WIOA partners.
- Title IV, Vocational Rehabilitation Services: In 2014, as with the other Combined Plan programs, Vocational Rehabilitation's agency-specific case management system did not interface directly with other Combined Plan Partner systems. While MDRS already provided a nearly complete combination of supportive, training, and labor market services to a certain subset of vulnerable workforce participants, there was no technology to support the connection of MDRS participants to TANF, Unemployment Insurance services, or even to the extensive labor market services provided by local WIN job centers. To remedy this weakness, MDRS worked with the vendor of its case management system to connect the system with the Mississippi WIOA Hub. Now, MDRS is able electronically to exchange referrals with all other combined plan partners.
- TANF: In 2014, there was no way for TANF case workers to create a formalized, electronic referral to a local WIN job center. This meant that TANF work requirements were sometimes met without providing candidates with career counseling from local workforce areas that took into account labor market needs or sector strategies. In addition, in 2014 TANF had no resources designed to improve participant soft/necessary skill. Through Mississippi's WIOA implementation, TANF participants now have access to the "Smart Start Pathway Class," managed by adult education providers, to address these barriers to employment. Further, case workers have access to a sophisticated case management tool that allows for the referral of TANF customers to any WIOA partner. As with other WIOA partners, MDHS's integration with the WIOA Hub has made referrals trackable and actionable; procedural gaps are minimized.

## Opportunities Realized

As part of 2014 SWOT analysis, the following opportunities were recorded:

- To develop a responsive and proactive workforce ecosystem built on collaboration between statewide leaders, regional experts, and local developers.
- To dynamically support state and local efforts with regard to business retention, expansion, and recruitment.

- To adapt education and training programs to meet current needs and emerging opportunities.
- To develop cross-program performance metrics to enable improved monitoring of workforce development programs to gauge progress in achieving performance benchmarks.
- To expand technology to meet the unified technology requirements of WIOA and other federal initiatives.

Mississippi's success in expanding technology, the nimble way that partners have adapted education and training programs to address skill gaps, and the deepening collaboration of partners has helped to realize the promise of many of these opportunities. Other opportunities will be forever ongoing - Mississippi continues to work pursue opportunities to leverage workforce data to support business retention, expansion, and recruitment and to increase the prominence of performance metrics used to gauge the success of the workforce system.

## Threats

Threats to success that were identified in 2014 included:

- Too complex and hard to navigate.
- Insufficient feedback mechanism to inform education and workforce partners so that they can adapt to changes in the workforce ecosystem.
- Not nimble enough to adapt to changing federal regulations regarding the development of cross-program, cross-agency performance metrics.

Partnerships established during the WIOA implementation process helped to realize the promise of the Mississippi Works Smart Start Pathway Model without falling prey to the identified threats. Partners did not get bogged down in complexity, but gradually implemented technology, procedural, and policy changes that resulted in increasing maturity in connectivity and effectiveness in service delivery.

## Development Capacity

The state's capacity for effective change rested 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

For more than a decade, the state has worked to create a cultural and political environment to foster cooperation and integration across education and workforce programs. In 2004, the state passed the Mississippi Comprehensive Workforce Training and Education Consolidation Act. The main goal of the act was to reduce fragmentation and duplication of services and to promote performance-based management.

### Technology and Data Capacity

To date, the state has developed and implemented one of the most integrated technology-based workforce systems in the country, commonly known as Mississippi Works. The system fully integrates Unemployment Insurance, Trade Adjustment Assistance, Adults, Dislocated Workers, Youth, Veterans, Work Opportunity Tax Credit, and Senior Community Service Employment Program. Mississippi Works is fully interoperable with other case management systems such as those in use for Rehabilitation Services, Adult Education, and

Temporary Assistance for Needy Families. The state has also developed and implemented one of the country's most comprehensive and advanced integrated data systems, commonly known as LifeTracks, to advance performance-based management. The development of this system began in 2005, and the system has been fully operational since 2009. In 2012, the Mississippi Legislature created the State Longitudinal Data System (SLDS) Governing Board 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 those with barriers to employment has greatly expanded under the Mississippi Works Smart Start Career Pathway Model. In cooperation with the Mississippi Community College Board, all Combined Plan Partners refer participants with the greatest barriers to employment to a "Smart Start Pathway Class" designed to fully assess a participant's work skills and assist the participant to overcome attitudinal or other soft-skills challenges. Further, all partners collect a basic set of diagnostic information from WIOA participants allowing for an automated assessment of participant needs. No longer are participants left to navigate the workforce or social services system alone, responsible to follow up with word-of-mouth referrals to supportive or workforce training programs. 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.

## Physical Infrastructure Capacity

The workforce system also relies on infrastructure with multiple points of access provided by WIOA Combined Plan Partners.

**WIN Job Centers.** American Job Centers in Mississippi have been branded under the Workforce Investment Network (WIN) and are known as WIN Job Centers. There are 45 centers across the state, and most Mississippi residents are within 30 miles of a center. 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. In support of Mississippi businesses, WIN Job Centers offer a vast array of services, including providing E-Verify, hosting job fairs, posting jobs, screening potential workers, communicating meaningful data about Mississippi's labor market, and providing training services — all at no cost to businesses and workers. The "WIN in Mississippi" system gathers and produces meaningful information to identify business needs and employee skill levels.

Beyond its own physical job centers, the Mississippi Department of Employment Security serves workforce customers via e-WIN Access Points. e-WIN Access Points bring workforce services to more people in areas not served by a full-time WIN Job Center. Each location provides at least one public computer with Internet access and a trained e-WIN Access Point Ambassador to assist job candidates. These ambassadors have a personal connection to the nearest WIN Job Center management, staff, and key partners. e-WIN Access Points are available in all Mississippi Department of Human Services county offices, in some correctional facilities, and in other locations such as public libraries.

**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 7 programmatic divisions and has an office in all 82 counties of Mississippi. The 82 county offices are divided among 9 regions. A regional director is responsible for oversight of the counties within each region. At the state office, staff provide support for policy, procedures, training, and technical assistance needed for program administration.

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

MDHS also supports Mississippi Access to Care (MAC) centers. MAC centers are accessible places located throughout the state where older individuals and individuals with disabilities, as well as their families and representatives, can obtain unbiased information and assistance for locating long-term care services and applying for benefits. The centers provide a central source of reliable, objective information about a broad range of programs and services. MAC centers also help people understand and evaluate the various options available, regardless of income or eligibility, for publicly funded long-term care.

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 aide in barrier mitigation. My Resources is available for use nationwide and resides on the MDHS web page and located at <https://myresources.mdhs.ms.gov>.

**Adult Education Access Points.** The Mississippi Community College Board (MCCB) offers Adult Education (AE) through a variety of physical locations, including 15 community colleges, four public schools, one community-based organization, and all correctional facilities.

## State Strategic Vision, Goals, and Strategies

### Vision

The state's strategic vision is to create a workforce system that acts and functions as an ecosystem where all parts are connected and line up to achieve common goals and wherein every Mississippian has the opportunity to be work- or career-ready and to secure his or her dream job right here at home.

From the moment one enters the education and workforce system, he or she will be presented with the necessary tools to choose and pursue a career pathway that is relevant to current and future labor markets.

Similarly, from the moment current and prospective businesses enter into a partnership with Mississippi's education and workforce system, resources will be immediately aligned to cultivate the sustainable, high-performance workforce critical for maintaining and expanding businesses' long-term economic viability, in turn creating better and more sustainable employment opportunities for Mississippians.

### Goals

WIOA Combined Plan Partners will realize this vision by achieving goals to prepare an educated and skilled workforce, including preparing youth and individuals with barriers to employment and other populations, and goals to meet the skilled workforce needs of employers.

1. Work together to develop policies that will coordinate service delivery with all WIOA Combined Plan Partners.
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.
5. Continue to invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives.
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.
7. Draft and communicate a unified vision/message.

Goals 1, 2, 5, and 7 aim at a decrease in programmatic fragmentation in order to serve all eligible individuals in a coherent and productive way. All combined plan partners will be using the same case management playbook (The Mississippi Smart Start Career Pathway Model), backed by a common information technology system, to ensure that individuals seeking a connection to the workforce, as they encounter any WIOA partner, will be met with services and recommendations that help to route individuals to the correct partner. Out-of-school youth, including those who are in or have aged out of the foster care system, will be routed to youth providers and those with barriers to employment will be routed to partners with services that help to overcome specific barriers to training or work. For example, a displaced homemaker or single parent visiting a one-stop job center will be provided not only with work search assistance, but also with referrals to agency partners that provide funds for child care and funds to overcome food insecurity. Low-income individuals and those nearing an exhaustion of TANF will be connected to partners with programs that address economic insecurity while

providing training and work opportunities. Adults and youth with disabilities will be connected to vocational rehabilitation services in addition to other services that increase access to training and employment. Older individuals will be connected to employment services tailored for seniors while also being connected to programs that stabilize households and provide training for a connection to the workforce. Ex-offenders will be connected to employment and training resources as a part of release activities and, during a correctional spell, will be connected to adult education programs designed to ensure a foundation for a strong connection to the workforce. Individuals with barriers to employment because of language ability, low levels of literacy, cultural barriers, and those who lack a high school diploma or equivalent will be connected to adult education programs and immediately invited to an information session at the nearest location. Homeless adults, children, and youth will be connected to appropriate partner programs, many of which provide emergency assistance to help bring stabilizing support to acute economic or food insecurity while planning for a long-term connection to household assistance that enables training and education for work. Single pregnant women are connected to nutritional programs and any other supports necessary to ensure an opportunity for training both now and when child care becomes a barrier to work and further training. Long-term unemployed benefit from training that addresses fundamental work skills along with industry-recognized credentials that increase the possibility of employment by meeting employer needs. Eligible migrant and seasonal farmworkers are connected not only to relevant Department of Labor programs but are referred to partners able to address barriers to work due to language or cultural barriers, economic insecurity, food insecurity, childcare, etc. Coordination between Mississippi's state WIOA agencies and local and tribal organizations ensures that all Mississippians, whether in a tribal jurisdiction, a rural location, or a metropolitan area, are connected to the same resources and have the same opportunities to gain the skills that produce a quality career pathway.

Goals 3 and 6 aim to produce a workforce that meets the needs of Mississippi's existing industry employers and the needs of the employers Mississippi hopes to attract to do business in the state. Mississippi's use of longitudinal data informs its approach to articulate pathways to the workforce. Mississippi's K-12 has created a structure of 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 that students in high school gain credit toward real work-ready credentials prior to graduation and transition to subsequent two-year or four-year programs designed to complete the student's work-readiness in his or her chosen pathway. Mississippi's institutions of higher education have created bachelor's programs in "applied science" that meet the needs of employers to train those with industry-recognized credentials in the advanced skills necessary to ascend to management or leadership positions within organizations. Employer participation in the State Workforce Investment Board provides WIOA partner agencies with a constant source of feedback on the effectiveness of the state's attempt to produce a skilled and educated workforce.

Goals 4, 5, and 6 aim to ensure that Mississippi's attempts to create a skilled workforce are measurable. Investment in 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 in terms of three standards—federally prescribed performance measures, cross-program metrics devised within the state to gauge effectiveness of the state's strategy, and metrics designed to ensure that Mississippi is filling employer needs. To support these measurements, Mississippi continues to invest in its longitudinal data system, LifeTracks, that brings together administrative data from all WIOA partners and educational institutions in a well-governed, secure clearinghouse that enables cohort analysis and strategic planning.

## Performance Goals

In order to assess performance 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:



- **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.
- **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.
- **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.
- **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.

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 the State Workforce Investment Board may establish other metrics to be used internally for strategic planning.

Most performance indicators rely on the concept of the "exit" that, under current DOL regulations, occurs when an active participant goes 90 days without receiving a service under a relevant program. In order to calculate the cross-agency participation periods necessary to determine when an exit occurs for co-enrolled participants, the State Workforce Investment Board maintains a list of standardized services provided by each agency that impact participation periods. This list of standardized services enables the Mississippi Works Common Intake and Reporting Module (hereafter, WIOA Hub) to receive service delivery data from each agency, determine whether a given service is relevant to WIOA reporting, and calculate a revised expected exit date in real time.

## Performance Projections

Appendix G contains projected performance numbers for PY2019 and PY2020.

## Assessment

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

Assessing Goal 1, “Work together to develop policies that will coordinate service delivery with all WIOA Combined Plan Partners,” and Goal 2, “Strengthen interagency partnerships”: Progress towards achieving Goals 1 and 2 will be assessed by system-level analysis to determine whether clear policies exist to coordinate service delivery from all partners to serve individuals. At the individual level, measuring the degree of co-enrollment in programs will be a key way that Mississippi assesses the effectiveness of these policy efforts. System analysis takes place in the context of regular meetings of WIOA partner leadership and regular State Workforce Investment Board meetings that include additional strategic and business partners. These meetings provide the opportunity to gauge whether policies are hindering or helping coordination of service and whether policies are strengthening or weakening the partnerships that ensure workers are connected to education, training, employment, and supportive services necessary for a connection to the workforce. Measuring the degree of co-enrollment of individuals takes place through Mississippi’s WIOA Hub that keeps a record of every partner-to-partner referral and service enrollment.

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

Assessing Goal 4, “Develop cross-program performance metrics”: Measuring progress towards the achievement of Goal 4 is accomplished by noting the presence or absence of cross-program performance metrics and the effectiveness of these measurements in guiding positive system change. Currently, Mississippi uses the WIOA-prescribed individual performance measures described above in II.b.3 across all programs. These measurements are currently calculated even for Mississippi’s human services partner that does not currently have a federal reporting requirement under WIOA that necessitates the creation of a Personal Information Record Layout (PIRL) file. In addition to measures of individual performance, Mississippi’s WIOA partners have, in their regular coordination meetings, been informed by metrics that calculate the number of referrals passing between each partner and electronically recorded in the state’s WIOA Hub technology.

Assessing Goal 5, “Continue to invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives”: Measuring progress towards the achievement of Goal 5 has been accomplished by the articulation of a maturity model for WIOA integration. First, the state created the common case management technology, the WIOA Hub. Then, each agency partner modified its case management system to interact electronically with a central WIOA Hub technology. Each partner measures the maturity of its integration in terms of five levels. Level 1 means that a WIOA partner system is capable of making electronic referrals to other partners and of recording participant responses to a diagnostic questionnaire used to route participants for appropriate services. At Level 2, the partner system is able to send and receive updates to participant profile records. Level 3 adds the ability for the partner system to register any service provided to the participant with the hub. Level 4 means that the partner system can exchange data with the hub relating to assessments administered to the participant and credentials earned by the participant. At the highest level of maturity, Level 5, the partner system is capable of exchanging the participant’s interagency success plan with the interagency hub.

Assessing Goal 7, “Draft and communicate a unified vision/message”: Measuring progress towards communicating a unified vision and message is currently a qualitative, system-wide measurement. At periodic meetings, WIOA partner leadership discuss communication and training strategies to ensure all agency staff understand the unified vision of Mississippi’s WIOA strategy. This helps to inform the scheduling of ongoing cross-agency training. In addition, each WIOA partner makes regular presentations that explain to other partners any new initiatives or terminology that has been adopted by the state agency or prescribed by their federal partner. A future means of measuring whether the WIOA partners have succeeded in creating an ecosystem that presents a unified vision / message will be the use of telephone polling or focus groups of participants and employers to gauge the extent to which they are familiar with Mississippi’s Smart Start Career Pathway model, the model articulated in this WIOA plan and pursued by its partners in all facets of their operations.

### C. State Strategy

#### Work Together to Develop Policies That Will Coordinate Service Delivery with WIOA Combined Plan Partners

Policies are developed to determine functionality of the entire ecosystem. These policies determine the allocation of funding toward shared service delivery and infrastructure costs.

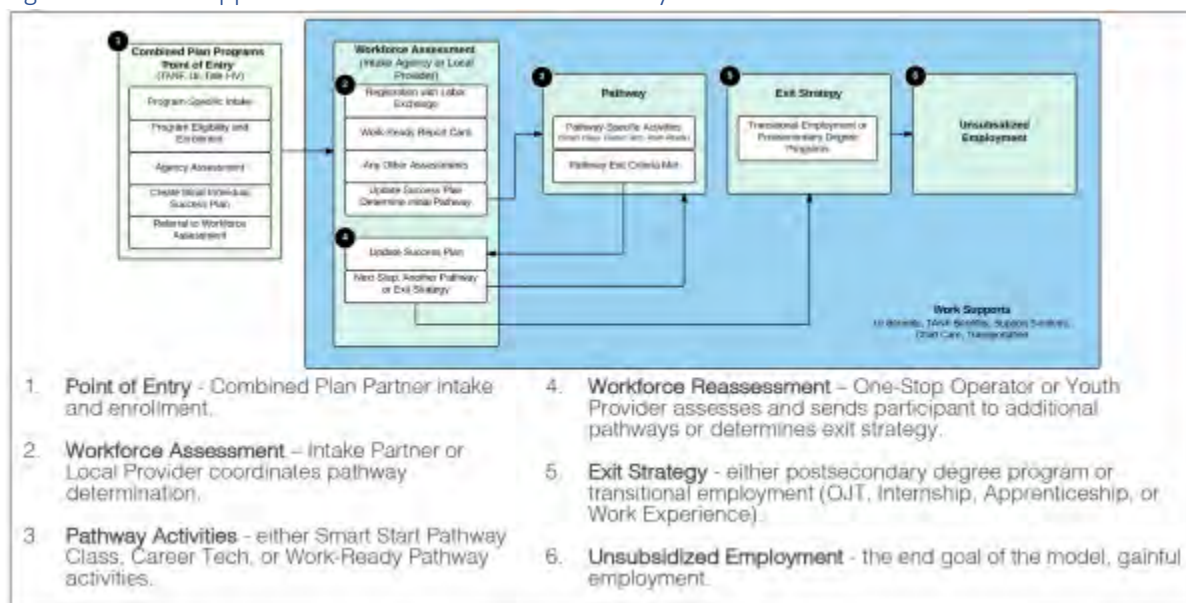
The State Workforce Investment Board (SWIB), through the SWIB WIOA Board Committee, will work with a planning and communications group comprised of executive directors from each of the WIOA Combined Plan Partners identified in this plan and other representatives from the SWIB.

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.

There are two main strategies to address this goal. The first strategy creates career pathways that provide different on- and off-ramps for job seekers with different needs. The second reimagines the state's workforce and supportive services delivery system.

Figure 13 presents the flow of the career pathway model that has strengthened interagency partnerships. This model is known as the Mississippi Works Smart Start Career Pathway Model. The model includes six steps designed to synchronize activities within and between Combined Plan Partners. Operationalizing the model requires the use of a unifying technology infrastructure that allows all agencies to make and receive inter-agency referrals and manage common case data (see "State Operating Systems and Policies" below). The model may be described procedurally as follows:

Figure 13: Mississippi Works Smart Start Career Pathway Model



**Step 1: Point of Entry** - All participants enter the Mississippi Works Smart Start Career Pathway Model through a Combined Plan Partner's intake. For example, a participant may visit a local Mississippi Department of Human Services (MDHS) office and begin speaking with a staff member about the TANF program. Combined Plan Partners perform intake procedures to collect two types of information: (1) basic registration information

used to determine program-specific eligibility and support WIOA reporting and (2) answers to a diagnostic instrument composed of questions submitted by each Combined Plan Partner. Next, the partner performs an agency-specific assessment of the participant's immediate needs and works with the participant to create an initial Individualized Success Plan. This initial Individualized Success Plan outlines the Combined Plan Partner services, describes supportive services, and tentatively identifies the subsequent pathway that will bring the participant from his or her current state of work-readiness to unsubsidized employment. The Individualized Success Plan may contain referrals to other Combined Plan Partner programs or Strategic Partner programs.

A participant becomes part of the Mississippi Works Smart Start Career Pathway Model when a Combined Plan Partner enrolls the eligible participant into a Combined Plan Partner program such as UI benefits or TANF. From that point forward, all the resources of Mississippi's workforce system will be aligned to efficiently support the participant in a process designed to bring the participant through a pathway that leads to a career.

After a participant receives Combined Plan Partner services and is ready to consider work and pathway options, the partner will ensure that the participant receives a workforce assessment that helps the participant align his or her occupational goals to labor market realities. For some partners such as Unemployment Insurance or TANF, enrollment in and referral to workforce assessment will occur in rapid succession. For other partners, such as the Mississippi Department of Rehabilitation Services, agency services may require an extended period of time to bring the participant into a state of readiness for workforce assessments. The Mississippi Works Smart Start Career Pathway Model accommodates the differences between partner agencies necessitated by each partner's mission.

**Step 2: Workforce Assessment** – Once he or she is ready for a workforce assessment, the participant may be referred to a local One-Stop Operator or Youth Provider, or if the intake agency has the internal capacity to provide workforce assessment services, he or she may immediately receive these services from the intake agency. Assessment will include registration into the Mississippi Works Labor Exchange, system generation of a Career-Ready Report Card, and revisiting the participant's Individualized Success Plan in order to specify entry into one of three defined career pathways. This assessment may also include an approved work-readiness assessment instrument as needed.

**Step 3: Pathway Activities** - The Mississippi Works Smart Start Career Pathway Model includes three main pathways:

- **Smart Start Pathway Class** - Participants requiring the most intensive assistance to become job-ready are referred to the Smart Start Pathway Course. The Smart Start Pathway Course is a 45-hour course of study focusing on essential skills needed to become work- or career-ready in middle-skill jobs by addressing the needs identified by employers. The goal of this class is to further identify participant barriers to self-sufficiency. Participation in the Smart Start Pathway Class requires individuals to commit to an assessment process that models a typical work environment and includes an opportunity to develop good workplace habits. Failure to meet program requirements as a result of extenuating circumstances (e.g., drug and alcohol abuse, physical abuse, psychological abuse, etc.) that emerge during the class could cause the participant to exit the Smart Start Pathway by referral to specific treatment resources. The participant may then reenter the Smart Start Pathway after treatment. The Smart Start Pathway Course is also designed to train and educate individuals in need of basic education and job-readiness skills. Pathway activities indicated by the participant's Individualized Success Plan may include Adult Education classes or enrollment in a high school equivalency program. Exit criteria for the Smart Start Pathway Course includes certain scores on approved assessment instruments.
- **Career Tech Pathway** - The Career Tech Pathway is designed to provide technical and career training and education in high-demand job skills or specific job skills that fit the current or future needs of local labor markets. Entry into this pathway is determined by a work-readiness assessment. Based on the assessment, recommended workforce preparation activities for an individual may include enrollment in the Mississippi Integrated Basic Education and Skill Training (MI-BEST) program or in a community

college to work toward a postsecondary degree or credential. Necessary skill attainment activities may also be recommended for individuals in this pathway. Exit criteria for the Career Tech Pathway may include the attainment of certain industry-recognized credentials approved by the State Workforce Investment Board, Mississippi Community College Board, or the Mississippi Department of Education or certain scores on approved assessment instruments.

- **Work-Ready Pathway** - The Work-Ready Pathway is designed for individuals who possess both basic skills and a level of academic and/or technical skill that place them in a position to enter directly into the workforce. These individuals will begin interactive work search immediately after generating an Individualized Success Plan. Other activities available to individuals in this pathway include job referrals, resume preparation, interview techniques, and other professional development training activities.

**Step 4: Workforce Reassessment** - Upon completion of activities in any pathway and meeting the pathway's exit criteria, participants will meet again with either the intake agency or the coordinating One-Stop Center or Youth Provider to reassess the current Individualized Success Plan and determine the participant's next step. Assessment may be conducted using a work-readiness test or by other criteria. Pathway completers are then directed to another pathway (e.g., a participant who completes the Smart Start Pathway Class will often be referred to the Career Technical Pathway) or to an exit strategy that will transition the participant from the Mississippi Works Smart Start Career Pathway Model into unsubsidized work.

**Step 5: Exit Strategy** - Participants who have satisfactorily exited from any pathway, in consultation with the intake partner or the coordinating One-Stop Center or Youth Provider, may then be directed to an exit strategy such as transitional employment programs or postsecondary degree programs. Transitional employment programs such as subsidized work experience, internships, or on-the-job training give participants the work experience that is vital for entering or reentering the labor market. Because the Mississippi Works Smart Start Career Pathway Model aims to be a true K-16 pathway, the model also accommodates exit strategies for participants who emerge as capable of either two- or four-year postsecondary degree work to prepare for in-demand occupations. For example, a youth participant may reconnect with the education and training system via the Smart Start Pathway Class and become ready for further degree work at one of Mississippi's community colleges. Some participants (e.g., those on the Work-Ready Pathway) may be ready to enter unsubsidized employment directly and may not require a transitional exit strategy.

**Step 6: Unsubsidized Employment** - Participants who successfully complete an exit strategy are supported throughout their journey with the Mississippi Works Smart Start Career Pathway Model. They have marketable specialized skills and basic and necessary skills and are ready to work. Their Individualized Success Plans may be revisited at any time, but they will have been reconnected with the incentives and benefits that come through gainful employment.

The Mississippi Works Smart Start Career Pathway Model sets forth the general shape of the coordination of Combined Plan Partner programs and Strategic Partner programs under Mississippi's WIOA implementation. To make this model a concrete reality, the operational section of this Combined Plan details how Mississippi will commit technological, physical, administrative, and financial resources to ensure that partners have a workable operational framework.

**One-Stop Center Delivery System.** The One-Stop Center delivery system is one key to the success of the Mississippi Works Smart Start Career Pathway Model. Mississippi One-Stop Centers are managed by local workforce development boards according to policies set by the Mississippi Department of Employment Security.

The unified intake process of the Mississippi Works Smart Start Career Pathway Model allows for more organized enrollment, formalized referrals to partner programs, and co-delivery of services. The procedures and physical environment of a restructured One-Stop Center model supports the goals of the pathway system and



the needs of each local area and are a physical manifestation of the procedures established for intake and referral in the Mississippi Works Common Intake and Reporting Module.

Three types of caseworkers assist job seekers in the revised One-Stop Center model: cross-trained counselors, walk-around counselors, and partner counselors. Cross-trained counselors received training designed by the State Workforce Investment Board that provides an understanding of the full portfolio of support and training services administered by all Combined Plan and Strategic Partners. Walk-around counselors receive specialized training in how to assist job seekers to use the Mississippi Works Labor Exchange and staff One-Stop resource rooms, monitor participant use of the Mississippi Works Labor Exchange, and offer assistance and guidance as needed. Other Combined Plan Partner counselors correspond to current single-agency counselors who are specially trained to understand the intricacies of individual agency programs.

When a job seeker enters a One-Stop Center, he or she is greeted and directed to an appropriate starting point:

1. New customers are assigned to a computer workstation in the center's resource room. Staff assist the customer with accessing the Mississippi Works Labor Exchange online system, and the customer begins the process of registration and profile creation.
2. Existing customers seeking caseworker assistance are directed to a cross-trained counselor who accesses the customer's account to assess the customer's current status, update the customer's career plan, and collaborate with the customer to help redirect the customer toward reemployment activities or create referrals to partner counselors from other WIOA Combined Plan Partners.
3. Existing customers seeking to use the resource room are assigned a workstation, and walk-around counselors ensure customer activities are likely to result in effective work search.

New customers who have registered, received a Work-Ready Report Card, and created an Individualized Success Plan may then be referred back to a cross-trained counselor who accesses the participant's newly created profile in Mississippi Works and determines next steps based on the participant's Individualized Success Plan.

If the participant's Individualized Success Plan indicates a need for referral to other Combined Plan Partner programs, the cross-trained counselor may assist the participant in connecting directly with relevant partner counselors. Combined Plan Partner counselors receive these referrals via staff dashboards and may act upon referrals by contacting the participant and starting processes that may result in enrolling the participant in additional programs based on agency-specific eligibility determination. Referrals are assigned the status of "pending" upon creation, and all WIOA Combined Plan Partners have the ability to create a referral to another partner. Referrals generated in a One-Stop Center are visible to that center's counselors, and referrals generated automatically through self-service are addressed by the One-Stop Center or Combined Plan Partner office nearest to the participant's address.

After referrals are made, the client meets with case managers from all relevant programs to determine the supportive services necessary to lead the client to gainful employment. Ideally, all meetings with Combined Plan Partners take place in a single visit that begins with registration and ends with a clear sense of how to take the next steps included in the Individualized Success Plan. If meetings must be scheduled on subsequent days, the Mississippi Works Labor Exchange system sends automated reminders to participants about upcoming meetings.

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.

- **Comprehensive One-Stop Centers** - Comprehensive One-Stop Centers physically house the consortium of Combined Plan Partners designated by the State Workforce Investment Board (SWIB) and local workforce development boards (LWDBs). One staff member from each of the Combined Plan

Partners is co-located in each of the comprehensive centers. Each of the four LWDA's 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 be able to provide clients with the information necessary to make informed decisions.

Within a Comprehensive One-Stop Center, cross-trained staff provide fully assisted service to all participants, including but not limited to assisting clients in Mississippi Works Labor Exchange profile development, providing knowledge about individual programs, and referring clients to the appropriate resources. Comprehensive One-Stop Centers also include computer stations that provide virtual, self-service access to workforce and education resources. Additionally, all Comprehensive One-Stop Centers provide career services and access to training services.

All One-Stop Center clients, regardless of core service eligibility, have access to general career services. These services include eligibility of services, outreach, intake and orientation, initial assessment, labor exchange services, referrals to programs, labor market information, performance information, training cost information, supportive service information, unemployment insurance information and assistance, financial aid information, and follow-up services.

Comprehensive One-Stop Centers are also required to provide access to training services aligned with regional sector strategies. These services may include occupational skills training, on-the-job training, incumbent worker training programs that combine workforce training with related instruction, skill upgrading and retraining, entrepreneurial training, transitional jobs training, job-readiness training provided in combination with other training, Adult Education and literacy activities, and customized training.

Additional services may be provided to clients if cross-trained staff determine the services to be appropriate for an individual to obtain or retain employment. These services include comprehensive assessment, individualized career plan, career planning and counseling, short-term prevocational services, internships and work experience, workforce preparation activities, financial literacy training, out-of-area job search, and English language acquisition.

In the time since the WIOA plan was first submitted, all four workforce development areas have successfully established comprehensive centers.

**Affiliate One-Stop Centers** - Unlike the Comprehensive One-Stop Centers, Affiliate One-Stop Centers do not require a staff representative from all of the WIOA Combined Plan Partners. However, each Affiliate One-Stop Center must include staff from at least two Combined Plan Partner programs. The primary purpose of Affiliate One-Stop Centers is to provide the core services that will meet the needs of local areas while maintaining a direct lifeline 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 the presence of a trained counselor who may provide assistance if necessary but who is not required to provide one-on-one support. Affiliate centers may also include computer stations to facilitate self-service access. Self-service access simply requires Internet access and does not include the assistance of trained counselors or staff.

- **Virtual Access One-Stop Centers** - A key mode of service delivery is virtual access. In line with the concept of a universally accessible workforce system, virtual access provides participants with self-service

access to services of the core programs and partners via the Internet. As long as an individual has Internet access through a computer or mobile phone, he or she can connect directly to the services provided through One-Stop Centers.

- **Call Center Support** -For participants who lack computer access, the Mississippi Department of Employment Security operates a call center staffed to assist with most One-Stop services.
- **Sector Training Plus Comprehensive One-Stop Centers** - One aspiration of the Mississippi Works Smart Start Career Pathway Model is the development of Sector Training Plus Comprehensive One-Stop Centers throughout the state that cater, especially to sector-related training needs. These Sector Training Plus Comprehensive One-Stop Centers will provide access to all of the services represented in the comprehensive centers as well as sector-focused workforce training. These centers will be strategically placed according to sector needs across the state, as industry sector labor sheds often overlap the boundaries of workforce areas.

Mississippi's revised One-Stop Center model, and especially the Comprehensive One-Stop Center, serves as a physical expression of the Mississippi Works Smart Start Career Pathway Model, but participants who first encounter the system via self-service, Combined Plan Partner offices, or even through informal referrals from Strategic Partners still receive a consistently high level of service coordinated to produce outcomes with efficiency and without duplication of effort.

**One-Stop Center Staff Training.** Within the reimagined One-Stop Center, employees and staff are required to know 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 were developed and implemented by curriculum experts. Training resources are made available through the Mississippi Works Labor Exchange system to facilitate training at local offices. As programs and policies change, this adaptable online training program provides ongoing training opportunities to staff. This continuing education model, Mississippi Works University, helps maintain an individual staff member's understanding of the Mississippi workforce ecosystem and support his or her growth within the system.

**Additional Physical Access Points.** In order to reach more Mississippians and improve access, Mississippi Department of Human Services county offices and community colleges are used along with existing job centers to provide access to counselors who are familiar with the Mississippi Works Smart Start Career Pathway Model. With the combined network of MDHS county offices, One-Stop Centers, community colleges, and correctional facility access points, no Mississippian is more than 30 miles from a physical location where they may get help in securing gainful employment.

### Developed Defined, Articulated Pathways across Educational Sectors (K-16+) to Create a Pipeline for the Workforce

To effectively define career pathways, Mississippi will pursue sector strategies. The state has identified sectors that fall naturally within geographic regions. All employers in the regions will be enrolled in Mississippi Works so that job postings are made available in real time to education and training providers. The state economic development agency—the Mississippi Development Authority—and the Mississippi Economic Development Council (MEDC) have existing partnerships that bridge employers and education and training providers across the state. Community colleges function as an intermediary to coordinate the alignment of K-16 with employer needs in the region, state, and beyond.

A second strategy to create a pipeline for the workforce is to align job seekers with Registered Apprenticeship Programs (RAPs). RAP is an industry-driven, high-quality, customizable, earn-as-you-learn career pathway training model that includes five key components that differentiate it from other work-based learning career and training services utilized in Mississippi. RAPs require:

1. **Business involvement.** Employers are the foundation of every apprenticeship program and the skills needed by their workforce are at the core. Businesses must play an active role in building the program and be involved in every step in designing the apprenticeship.
2. **On-the-Job Training.** Every program includes structured on-the-job training. Apprentices get hands-on training from an experienced mentor at the job site for typically not less than one year. On-the-job training is developed through mapping the skills and knowledge that the apprentice must learn over the course of the program in order to be fully proficient at the job.
3. **Related Instruction.** Apprentices receive related instruction that complements on-the-job learning. This instruction delivers the technical, workforce, and academic competencies that apply to the job. It can be provided by a community college, a technical school, or an apprenticeship training school – or by the business itself. Education partners collaborate with business to develop the curriculum based on the skills and knowledge needed by apprentices. All partners work together to identify how to pay for the related instruction, including the cost to the employer and other funds that can be leveraged.
4. **Rewards for Skill Gains.** Apprentices receive increases in pay as their skills and knowledge increase. Participants start by establishing an entry wage and an ending wage, and build in progressive wage increases through the apprenticeship as skill benchmarks are attained by apprentices. Progressive wage increases help reward and motivate apprentices as they advance through their training.
5. **National Occupational Credential.** Every graduate of a Registered Apprenticeship program receives a nationally-recognized credential. As apprenticeship programs are developed, they are designed to ensure that apprentices master every skill and have all the knowledge needed to be fully proficient for a specific occupation.

The State has received four cycles of Registered Apprenticeship (RA) Grant funding since 2016. The first two cycles included the Accelerator and Expansion Grants. The Mississippi Apprenticeship Program (MAP) received a third cycle of continuation funding for the State Apprenticeship Expansion Grant (SAE) and also received funding through the Apprenticeship State Expansion Grant (ASE). Through a collaborative effort with the Mississippi Department of Employment Security (MDES), Mississippi Community College Board (MCCB), and the Mississippi Development Authority (MDA), the MAP initiative will continue to expand RAPs in Mississippi. 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 in RA. All RAPs are subject to training provider eligibility procedures.

Another strategy is to align 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. As a result, 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.

An additional strategy is to identify 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.

In addition to existing eligible training provider required reports, three data tools will be developed to fully assess overall performance of the state workforce system: dashboards, pathway evaluators, and supply and demand analysis.

**Dashboards.** Dashboards will help answer questions such as the following: do participants complete skill training? Do they get jobs? How much do they earn? Creating these dashboards will help identify programs that have strong outcomes and warrant expansions as well as those that have weak outcomes and are in need of improvement or reevaluation.

**Pathway Evaluator Tools.** Pathway evaluator tools help answer two important questions. First, do people with different needs have sufficient access to appropriate programs? Second, what pathways achieve the best employment and earnings outcomes for job seekers with different training and educational needs and varying life and work experiences? For example, some individuals who might seek training might have been laid off after several years in the workforce, whereas others might be preparing for their first job or postsecondary education. Still others might be pursuing training during or after work to improve their skills.

Creating these pathway evaluator tools will help identify strategies that will best align supporting services, education, and training to prepare individuals with different needs for middle-skill jobs. Ultimately, this will help determine the extent to which the Mississippi Works Smart Start Career Pathway Model allows programs to work together to help people with different needs.

**Supply and Demand Analysis.** Supply and demand analyses helps 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.

As part of this strategy, the state leveraged existing case management systems in use by agency partners and connected them to a newly-created common data hub to support a common intake profile, catalog of services, interagency case management functionality, and an integrated physical data model for performance measures. In doing so, the state is better able to align programs and services and improve the efficiency of the system as a whole. Mississippi has met its initial WIOA goal of creating a fully integrated state WIOA data hub system that is able to respond in real time and is continuing to add functionality to state systems to take advantage of the common data hub. The state is also pursuing activities that will result in a more real-time approach to performance reporting.

#### [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](#)

The strategy is to capitalize on the State Longitudinal Data System infrastructure 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 will be expanded by identifying critical research areas important to the economic development of the state.

This strategy will include three components. One component is to further develop the "Mississippi Works" branding of the state workforce system as a marketing tool for economic development. The second component

is to improve awareness of the opportunities and resources the system provides to job seekers and employers to increase confidence in the value proposition of the system. The third component consists of creating awareness of career opportunities early in the K-16 pipeline. Combined, these components will create a holistic image of the system through a unified message.

## Operational Planning Elements

### State Board Functions

In accordance with section 101(d) of WIOA, the Mississippi State Workforce Investment Board (SWIB) performs the following services for the Governor:

1. Development, implementation, and modification of the state plan.
2. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers to review statewide policies, statewide programs, and recommendations on actions that should be taken by the state to align workforce development programs in a manner that supports a comprehensive and streamlined workforce development system, including the review and provision of comments on state plans.
3. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers in the development and continuous improvement of the workforce development system in the state, including:
  - Identification of barriers and means for removing barriers to better coordinate, align, and avoid duplication among the programs and activities carried out through the system.
  - Development of strategies to support the use of career pathways for the purpose of providing individuals, including low-skill adults, youth, and individuals with barriers to employment (including individuals with disabilities), with workforce investment activities, education, and supportive services to enter or retain employment.
  - Development of strategies for providing effective outreach to and improved access for individuals and employers who could benefit from services provided through the workforce development system.
  - Development and expansion of strategies for meeting the needs of employers, workers, and job seekers, particularly through industry or sector partnerships related to in-demand industry sectors and occupations.
  - Identification of regions, including planning regions, for the purposes of section 106(a), and the designation of local areas under section 106 after consultation with local boards and chief elected officials.
  - Development and continuous improvement of the One-Stop Center delivery system in local areas, including providing assistance to local boards, One-Stop operators, One-Stop partners, and providers for planning and delivering services, including training services and supportive services, to support effective delivery of services to workers, job seekers, and employers.
  - Development of strategies to support staff training and awareness across programs supported under the workforce development system.



4. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers for the development and updating of comprehensive state performance accountability measures, including state-adjusted levels of performance, to assess the effectiveness of the core programs in the state as required under section 116(b).
5. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers for the identification and dissemination of information on best practices, including best practices for:
  - Effective operation of One-Stop Centers, relating to the use of business outreach, partnerships, and service delivery strategies, including strategies for serving individuals with barriers to employment.
  - Development of effective local boards, which may include information on factors that contribute to enabling local boards to exceed negotiated local levels of performance, sustain fiscal integrity, and achieve other measures of effectiveness.
  - Effective training programs that respond to real-time labor market analysis.
  - Utilize direct assessment and/or prior learning assessment to assess competencies for efficient placement into employment or education pathways.
6. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers for the development and review of statewide policies affecting the coordinated provision of services through the state's One-Stop delivery system described in section 121(e), including the development of:
  - Objective criteria and procedures for use by local boards in assessing the effectiveness and continuous improvement of One-Stop Centers.
  - Guidance for the allocation of One-Stop Center infrastructure funds under section 121(h).
  - Policies relating to the appropriate roles and contributions of entities carrying out One-Stop partner programs within the One-Stop delivery system, including approaches to facilitating equitable and efficient cost allocation in the system.
7. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers for the development of strategies for technological improvements to facilitate access to, and improve the quality of, services and activities provided through the One-Stop delivery system, including such improvements to:
  - Enhance digital literacy skills (as defined in section 202 of the Museum and Library Services Act (20 U.S.C. 9101); referred to in this Act as "digital literacy skills").
  - Accelerate the acquisition of skills and recognized postsecondary credentials by participants.
  - Strengthen the professional development of providers and workforce professionals.
  - Ensure such technology is accessible to individuals with disabilities and individuals residing in remote areas.
8. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers for the development of strategies for aligning technology and data systems across One-Stop partner programs to enhance service delivery and improve efficiencies in reporting on performance accountability

measures (including the design and implementation of common intake, data collection, case management information, performance accountability measurement and reporting processes, and the incorporation of local input into such design and implementation to improve coordination of services across One-Stop partner programs).

9. Development of allocation formulas for the distribution of WIOA Combined Plan program funds to local areas for employment and training activities for adults and youth workforce investment activities as permitted under sections 128(b)(3) and 133(b)(3).
10. Preparation of the annual reports described in paragraphs (1) and (2) of section 116(d).
11. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers for the development of the statewide workforce and labor market information system described in section 15(e) of the Wagner-Peyser Act (29 U.S.C. 491–2(e)).
12. Collaboration with educational boards (MBE, MCCB, IHL), partners, and service providers for the development of other policies that may promote statewide objectives for, and enhance the performance of, the workforce development system in the state.<sup>SEP</sup>

Mississippi's State Workforce Investment Board chair is appointed by the Governor, and the board works through a committee structure. Committees include an executive committee (appointed by the board president), several standing committees, and *ad hoc* committees created to address specific needs. The board conducts three in-person meetings per year and makes use of electronic communication between meetings. Meeting notes are posted on the State Workforce Investment Board website ([swib.ms.gov](http://swib.ms.gov)).

The following sections contain a description of how each Combined Plan Partner will implement Mississippi's seven WIOA strategies.

## State Strategy Implementation

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

The Mississippi Department of Employment Security (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

The Mississippi Department of Employment Security will continue the following activities to implement the state's seven strategies:

1. To work together to develop policies that will coordinate service delivery with WIOA Combined Plan Partners, MDES will participate in shared governance, with regard to WIOA Combined Plan programs, through the State Workforce Investment Board.
2. To strengthen interagency partnerships, MDES will:
  - Adopt the Mississippi Works Smart Start Career Pathway Model in its approach to case management.
  - 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 Hub (hereafter, *WIOA Hub*), in consultation with the State Workforce Investment Board, to coordinate case management data across WIOA partners.
  - Set policies to govern the structure and service delivery model of One-Stop Center operations, as well as create policies to govern the creation and operation of Comprehensive, Sector Training Plus, and Affiliate One-Stop Centers.
  - Conduct staff training to ensure that One-Stop Center staff receive cross training in Combined Plan programs and fully understand the Mississippi Works Smart Start Career Pathway Model.
  - Continue Modifications to the Mississippi Works Labor Exchange to enable participants to access their Individualized Success Plans.
  - Modify the Mississippi Works Labor Exchange to allow staff to edit Individualized Success Plans.
  - Continue to support integration efforts to enable other Combined Plan Partners to interface with the WIOA 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.
  - Continue to staff Comprehensive One-Stop Centers with at least one Rapid Response staff member.
  - Continue to staff Comprehensive One-Stop Centers with at least one staff member from Youth Services.
  - Act upon referrals sent by other Combined Plan Partners through the WIOA Hub to the Mississippi Works Labor Exchange.
  - Share system infrastructure costs.
  - Continue outreach efforts to assist long-term unemployed and newly unemployed individuals.
  - Include engagement with activities of the Mississippi Works Smart Start Career Pathway as an aspect of any Combined Plan program's participation compliance requirements, where applicable.
3. To develop defined, articulated pathways across educational sectors (K-16+) to create a pipeline for workforce, MDES will:

- Modify the Mississippi Works Labor Exchange to be able to generate a Work-Ready Report Card on the basis of workforce profile information, labor market information, and sector analysis data. The Work-Ready Report Card will enable direction of participants toward training aligned with employer labor market needs.
  - Continue to support, develop, and promote MSGradJobs.com and MSTechJobs.com to connect four-year college and community college students, respectively, with work opportunities.
4. To develop cross-program performance metrics, MDES will:
    - Work closely with the Mississippi State Longitudinal Data System Governing Board to provide data necessary for workforce analysis.
    - Ensure that all participants receiving services from MDES will create a profile through the Mississippi Works Labor Exchange.
  5. To continue to invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives, MDES will support maintenance and ongoing development of the Mississippi Works Labor Exchange, the WIOA Hub, MSGradJobs.com, MSTechJobs.com, and the GranTrak financial tracking system.
  6. To 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, MDES will continue to participate in the Mississippi LifeTracks system, contributing workforce data and unemployment insurance wage data necessary to address issues related to the production and valuation of human capital.
  7. To draft and communicate a unified vision/message, MDES will:
    - Participate in system-wide efforts to increase awareness of the Mississippi workforce system among employers and job seekers.
    - Participate in activities designed to market the state to prospective businesses.
    - Participate in efforts designed to make students in K-16 aware of occupations and Mississippi career pathways.
    - Participate in efforts to increase employer awareness of One-Stop Center employer services.

## Mississippi Community College Board-Title II Adult Education

The Mississippi Community College Board (MCCB) administers core programs and services listed in the Adult Education and Family Literacy Act (WIOA Title II). In addition, MCCB provides advisory oversight to Mississippi's 15 community colleges.

The MCCB will undertake the following activities to implement the state's seven WIOA strategies:

1. To work together to develop policies that will coordinate service delivery with WIOA Combined Plan Partners, MCCB will participate in shared governance, with regard to WIOA Combined Plan programs, through the State Workforce Investment Board.

2. To strengthen interagency partnerships, MCCB will:
  - Provide a cross-trained Adult Education (Title II) representative in four Comprehensive One-Stop Centers.
  - Monitor and act upon referrals from One-Stop Centers or Youth Providers to the Smart Start Pathway Class.
  - Refer Smart Start Pathway Class completers back to the referring One-Stop Center or Youth Provider for further workforce assessment and pathway or exit strategy direction.
  - Share system infrastructure costs.
  - Include engagement with activities of the Mississippi Works Smart Start Career Pathway Model as an aspect of any Combined Plan program's participation compliance requirements, where applicable.
3. To develop defined, articulated pathways across educational sectors (K-16+) to create a pipeline for workforce, MCCB will:
  - Align Smart Start Pathway Class curriculum with employer/labor market needs.
  - Partner with K-12 providers to enroll dropouts in high school equivalency classes.
4. To develop cross-program performance metrics, MCCB will:
  - Partner with the Mississippi State Longitudinal Data System Governing Board to provide data necessary for workforce analysis.
  - Interface with the Mississippi Works Common Intake and Reporting Module to transmit all assessment outcome scores and service enrollments, thus enabling the calculation of skill gains and cross-program participation periods.
5. To continue to invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives, MCCB will continue development of the Mississippi Adult Education system to exchange data with the WIOA Hub to share service enrollments, assessment outcomes, modifications to participants' common profiles, and modifications to participants' Individualized Success Plans in compliance with WIOA requirements.
6. To 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, MCCB will continue to leverage the Mississippi LifeTracks system to determine priorities for training and align the Smart Start Pathway Class with labor market needs.
7. To draft and communicate a unified vision/message, MCCB will participate in system-wide efforts to increase awareness of the Mississippi workforce system among employers and job seekers.

## Mississippi Department of Rehabilitation Services – Title IV Vocational Rehabilitation Services

The Mississippi Department of Rehabilitation Services (MDRS) administers core programs and provides services to Mississippians with disabilities under the Rehabilitation Act of 1973 (WIOA Title IV).

MDRS will undertake the following activities to implement the state's seven strategies:

1. To work together to develop policies that will coordinate service delivery with WIOA Combined Plan Partners, MDRS will participate in shared governance, with regard to WIOA Combined Plan programs, through the State Workforce Investment Board.
2. To strengthen interagency partnerships, MDRS will:
  - Adopt the Mississippi Works Smart Start Career Pathway Model in its approach to case management.
  - Continue to interface the AwareVR case management system with the Mississippi Works Common Intake and Reporting Module to coordinate case management data across WIOA partners.
  - Provide a Vocational Rehabilitation services staff representative in the four Comprehensive One-Stop Centers to ensure that Vocational Rehabilitation services are aligned with other Combined Plan programs.
  - Assist One-Stop Center providers with accessibility assessments and train One-Stop Center staff in the use of assistive technologies as needed.
  - Refer work-ready participants for workforce assessment and pathway determination by One-Stop Center operators or Youth Providers.
  - Share system infrastructure costs.
  - Include engagement with activities of the Mississippi Works Smart Start Career Pathway as an aspect of any Combined Plan program's participation compliance requirements, where applicable.
3. To develop defined, articulated pathways across educational sectors (K-16+) to create a pipeline for workforce, MDRS will:
  - Assist eligible students with disabilities to secure assistive technologies or services needed to enable classroom access, as appropriate.
  - Assist graduating secondary students with disabilities to access job transition services.
  - Continue employer outreach activities.
4. To develop cross-program performance metrics, MDRS will:
  - Work closely with the Mississippi State Longitudinal Data System Governing Board to provide data necessary for workforce analysis.
  - Interface with the WIOA Hub to transmit all assessment outcome scores and service enrollments to enable the calculation of skill gains and cross-program participation periods.
5. To continue to invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives, MDRS will interface AwareVR with the Mississippi Works Common Intake and Reporting Module to share service enrollments, assessment outcomes, modifications to participants' common profiles, and modifications to participants' Individualized Success Plans.



6. To 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, MDRS will continue to participate in the Mississippi LifeTracks system, contributing data necessary to address issues related to the production and valuation of human capital.
7. To draft and communicate a unified vision/message, MDRS will participate in system-wide efforts to increase awareness of the Mississippi workforce system among employers and job seekers.

## Mississippi Department of Human Services - TANF

The Mississippi Department of Human Services (MDHS) administers the Temporary Assistance for Needy Families (TANF) program, a Combined Plan Program in Mississippi's WIOA strategy.

MDHS will undertake the following activities to implement the state's seven strategies:

1. To work together to develop policies that will coordinate service delivery with WIOA Combined Plan Partners, MDHS will participate in shared governance, with regard to WIOA Combined Plan programs, through the State Workforce Investment Board.
2. To strengthen interagency partnerships, MDHS will:
  - Adopt the Mississippi Works Smart Start Career Pathway Model in its approach to case management.
  - Interface relevant data systems (e.g., MAVERICS) with the WIOA Hub to coordinate case management data across WIOA partners.
  - Provide a TANF-trained MDHS staff representative in the four Comprehensive One-Stop Centers to ensure that TANF is aligned with other Combined Plan programs.
  - Refer work-eligible TANF participants to MDES affiliates (e.g., One-Stop operators and some Youth Providers) for Wagner-Peyser services through the WIOA Hub.
  - Participate in strategies to leverage TANF transportation and childcare supportive services to enable participation in pathway activities and exit strategy training or transitional work.
  - Include engagement with activities of the Mississippi Works Smart Start Career Pathway as an aspect of any Combined Plan program's participation compliance requirements, where applicable.
3. To develop defined, articulated pathways across educational sectors (K-16+) to create a pipeline for workforce, MDHS will:
  - Refer TANF recipients to a One-Stop Center or Youth Provider who will assist TANF recipients in connecting with training that meets employer labor market needs.
  - Ensure that job matches between area employers and work-eligible TANF or SNAP recipients occur within the Mississippi Works Labor Exchange.
4. To develop cross-program performance metrics, MDHS will:
  - Work closely with the Mississippi State Longitudinal Data System Governing Board to provide participant data necessary for workforce analysis.

- Interface with the WIOA Hub to transmit all assessment outcome scores and service enrollments, thus enabling the calculation of skill gains and cross-program participation periods.
5. To continue to invest in integrated technology to meet the unified technology requirements of the Workforce Investment and Opportunity Act (WIOA) and other federal initiatives, MDHS will interface MAVERICS and other TANF-relevant case management systems with the WIOA Hub to share service enrollments, assessment outcomes, modifications to participants' common profiles, and modifications to participants' Individualized Success Plans.
  6. To 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, MDHS will continue to participate in the Mississippi LifeTracks system, contributing data necessary to address issues related to the production and valuation of human capital.
  7. To draft and communicate a unified vision/message, MDHS will participate in system-wide efforts to increase awareness of the Mississippi workforce system among employers and job seekers.

### Alignment with Activities Outside of the Plan

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

With regard to the few state partners who operate outside of the unifying case management information technology system that links together Combined Plan Partners (e.g., career and technical education), MDES, MCCB, MDRS, and MDHS align with partners at the local level with through participation in LWDBs and at the state level through participation in the State Workforce Investment Board and in the Mississippi 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 Mississippi Department of Corrections (MDOC) to address prisoner recidivism. MDOC operates pre-release and post-release occupational skills training programs to transition ex-offenders to the workforce. The MDOC/MDES partnership created the Employment Connections project designed to allow offenders who are nearing release to create a workforce profile in the Mississippi Works Labor Exchange that "goes live" upon release. As part of reentry activities, offenders 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, such as community colleges and public universities in Mississippi, 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 takes place through the Mississippi Apprenticeship Program (MAP). MAP is a collaborative effort between the Mississippi Department of Employment Security (MDES), Mississippi Community College Board (MCCB), and the Mississippi Development Authority (MDA). MAP helps companies create or grow apprenticeship programs and, since 2016, has administered state funds to grow and sustain RAPs.

## Coordination, Alignment and Provision of Services to Individuals

The Mississippi Works Smart Start Career Pathway Model (described above in "State Strategic Vision, Goals, and Strategies") provides the blueprint for Combined Plan Partner coordination, and the WIOA Hub provides the information technology infrastructure required to ensure that all provided services are aligned to the blueprint.

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

Within the Mississippi Works Smart Start Career Pathway Model itself, MDES-affiliated One-Stop Centers or Youth Providers are the key coordinating entities that receive a referral for workforce assessment. These coordinating entities will contact each participant and set up an appointment so that each participant will execute a full workforce system registration in the Mississippi Works Labor Exchange, generate a Work-Ready Report Card that aligns the participant's expectations to the local labor market, and finalize his or her Individualized Success Plan to choose an initial pathway. If the initial pathway is the Smart Start Pathway Class or the Career Tech Pathway, the One-Stop Center or Youth Provider staff member will create a referral to the partner responsible for the pathway. If the initial pathway is the Work-Ready Pathway, the staff member will coordinate the activities that will be delivered by the designated MDES-affiliated One-Stop Center or Youth Provider responsible for the Work-Ready Pathway in that local area.

Once a participant meets the exit criteria of a given pathway, he or she will be referred back to the MDES-affiliated One-Stop Center or Youth Provider for further evaluation. Staff will reevaluate the participant's Individualized Success Plan, administer any relevant assessments, and either refer the participant to another pathway or designate an exit strategy such as transitional employment or enrollment in an educational institution.

In addition to referrals to pathway programs and exit strategies, MDES-affiliated staff may create referrals to other partners to coordinate supportive services as needed. Because each service enrollment comes from a Common Service Catalog, staff will know whether the participant is already receiving supportive services in a particular category such as childcare or transportation. The Individualized Success Plan itself contains a living list of participant barriers to employment along with prescribed remedies for these barriers through supportive services.

The WIOA services that MDES administers will address the workforce and training needs of every eligible individual. Through Wagner-Peyser services, MDES provides job search, referral, and placement services to all eligible Mississippi workers. MDES funds *adult* training programs administered by local workforce development boards based on the needs of each LWDAs. To serve *dislocated workers*, MDES coordinates Rapid Response services that assist employers and employees affected by layoffs or plant closures. MDES serves *youth* through specially trained Youth Providers who connect youth to targeted youth programs, other eligible core programs, and education and training opportunities based on the specific needs of the individual. In addition, there are two employment outreach groups: Local Veterans Employment Representatives (LVER) and Disabled Veteran Outreach Specialists (DVOP). To fill job openings, LVER staff work directly with businesses, and DVOP staff work directly with unemployed or underemployed *veterans*.

MCCB's Adult Education (AE) services play the key role in establishing and conducting the Smart Start Pathway Course in the Mississippi Works Smart Start Career Pathway Model. This course consists of 45 hours of intensive career development, assessment, and basic skills development. Career enrichment activities are oriented toward in-demand, middle-skill occupations. MCCB and the State Workforce Investment Board established the Smart Pathway curriculum and established pathway exit criteria that may include certain assessment score levels. After participants meet exit criteria from AE classes or complete the Smart Start Course Pathway, MCCB's AE providers will refer participants to a One-Stop Center or Youth Provider to perform workforce evaluation or workforce reevaluation.

As the administrative/fiscal agent for WIOA 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, four public schools, one community-based organization and all state correctional facilities. AE providers identify the most appropriate starting point for the participant.

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

MDRS provides supportive services that will be included explicitly in Individualized Success Plans and coordinated with supportive services offered by other partners to avoid duplication.

MDHS serves individuals and families through several economic assistance programs that address barriers to work such as food security, transportation, and child care.

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

The SNAP Employment and Training (SNAP E&T) program, a Strategic Partner program, was created to provide 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 also administers the Community Service Block Grant that provides core funding to reduce poverty, revitalize low-income communities, and empower low-income families to become self-sufficient.

MDHS administers a key supportive service, early care and learning, through the CCDF. In December of 2016, MDHS and the State Early Childhood Advisory Council of Mississippi released a plan, "A Family-Based Unified and Integrated Early Childhood System" (available at [secac.ms.gov](http://secac.ms.gov)). This document outlines an early childhood system that connects and integrates resources and services for both parents/caregivers and their children in three key areas: (1) early care and learning; (2) health, mental health, safety, and nutrition; and (3) family engagement. The system is designed to place parents on a path to self-sufficiency and their children in child care centers that provide high-quality services and learning experiences. The plan recognizes that the time between 0 and 5 years of age can be chaotic; parents must identify and manage childcare and other needs in the time prior to the availability of public kindergarten. The new integrated approach brings continuity of service to parents and children through a comprehensive intake that fully assesses the needs of parent and child to create a plan with a proximate goal to have the child school-ready by the age of 5 and able to pass all reading requirements by the third grade.

Along with the plan came a restructuring of the Child Care Payment Program (CCPP) system by which child care providers eligible for a voucher are rated. A new system builds quality and safety into every eligible provider at a base level. All providers must meet licensing requirements, professional development of staff, curriculum that is aligned with state guidelines, and must complete an annual assessment to receive a “standard” designation. Providers are further encouraged to seek a “comprehensive” designation that ensures not only quality and safety, but also ensures that the curriculum of the child care center aligns with state K-12 standards to produce a high degree of continuity.

## **Coordination, Alignment and Provision of Services to Employers**

### **MDES: Coordination, Alignment, and Provision of Services to Employers**

The Mississippi Department of Employment Security will coordinate and align its services to employers through outreach efforts by their Business Service Team (consisting of MDES Business Relations staff members, WIN Job Center Managers, Area Directors, WIOA staff, The Local Veterans' Outreach Representatives [LVERs], staff from the Governor's Job Fair Network, and other partner staff as needed) and through the Mississippi Works Labor Exchange technology. The Mississippi Works Labor Exchange system 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. Clicking on a search result brings the employer to a candidate's detail page.

A candidate's detail page maintains the job seeker's anonymity but contains information about the candidate's education, experience, and skills. If an employer is sufficiently interested in a candidate, he or she can issue a “Job-Vite” to the candidate. A Job-Vite is an invitation to apply for a particular position sent by an employer to a promising candidate. Job seekers are notified about Job-Vites by email or text message (SMS) and can decline a Job-Vite or respond positively by simply applying to the position.

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

### **MCCB: Coordination, Alignment, and Provision of Services to Employers**

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 adult education classes.

### **MDRS: Coordination, Alignment, and Provision of Services to Employers**

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

### **MDHS: Coordination, Alignment, and Provision of Services to Employers**

Beyond the alignment with employers made possible by the data analysis and sector strategies of the Mississippi Works Smart Start Career Pathway Model, MDHS staff engage employers directly. This engagement takes the form of direct contact with employers to check on job openings and the efforts of county directors to form relationships with community employers who are able to hire TANF or SNAP recipients with work requirements. MDHS will work with the Mississippi Department of Employment Security to enter local job openings into the Mississippi Works Labor Exchange and refer work-eligible SNAP or TANF recipients to these openings via the system to ensure that records of these labor matches are captured by the system and thus available to inform ongoing labor market research.

Under the Mississippi Works Smart Start Career Pathway Model, TANF or SNAP recipients will be referred to One-Stop Centers or Youth Providers to perform workforce assessment and begin an appropriate pathway strategy.

### **Partner Engagement with Educational Institutions**

Strategies to engage with educational institutions are described below, organized by agency partner.

#### **MDES**

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

#### **MCCB**

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 schools, and the Mississippi Community College Board as a whole, will also continue to work with local Adult Education (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 adult education programs, high school equivalency programs, career and technical education programs, and Career Readiness Certificate (CRC) programs.

#### **MDRS**

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

#### **MDHS**

MDHS works directly with community college providers 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 Adult Education partners, community colleges, public universities, or other training providers.



## Partner Engagement with Other Education and Training Providers

Strategies to engage with other education and training providers are described below, organized by agency partner.

### **MDES**

MDES supports the work of LWDA's by maintaining an electronic Eligible Training Provider List (ETPL) that establishes an approved list of service providers that may receive Title I (Youth, Adult, and Dislocated), TAA, SCSEP, and other training funds to serve customers enrolled in MDES programs. All local One-Stop centers use MDES technology, the Mississippi Works Labor Exchange, to administer training accounts and record training services provided to participants by eligible training providers. In addition, the MDES Mississippi Works Labor Exchange will be modified to provide self-service training discovery to customers, with links to training information for all occupations allowing a participant to see, in the context of viewing a job order, what kind of training courses will be appropriate for the given job. The database supporting this self-service feature will contain all relevant providers, including community colleges, private training institutions (e.g., commercial truck driving training programs), and institutions of higher learning. MDES engages with training providers on the ETPL lists as partners in the state's workforce development ecosystem. Many of the training providers are community colleges and MDES has established affiliate One-Stop centers that enable the provider to deliver workforce services on campus. For private providers on the ETPL list, MDES partners with these training entities to receive quarterly data required to calculate performance metrics. While there are few eligible providers that are not public institutions, private providers that deliver training such as commercial driving instruction are valued partners and, at the local level, coordination between One-Stop staff, participants, and the provider ensure that training needs, driven by the LWDA's sector strategy, are met.

### **MCCB**

In addition to the provision of Adult Education training courses, MCCB member colleges provide training to customers with Individual Training Accounts through Title I, TANF recipients, SNAP E&T participants, and participants receiving rehabilitative services. All MCCB member colleges and AE contractors are listed in the MDES Eligible Training Provider List. MCCB members also assist the training efforts of some larger employers who operate specialized training programs. MCCB member colleges coordinate directly with WIOA partners and with LWDA's. Regular LWDA meetings include representatives from the development area's community colleges and this puts these training and education providers into direct contact with employers, elected representatives, and WIOA agency representatives to ensure that the area's sector strategy, and the occupational demand this implies, 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 Eligible Training Provider List (ETPL) based on labor market needs in each local area. Training funded by PELL, TANF, or other partner funds may come from any provider meeting MDRS policies. MDRS works closely with local community rehabilitation programs that provide vocational assessment, job training, and actual work experience for MDRS customers. These programs build relationships with local employers and then drive training and education activities based on employer need to ensure that trainees gain appropriate skills for employment.

### **MDHS**

MDHS works directly with community colleges and other training providers, including 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 Eligible Training Provider List (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 combines 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.

## Leveraging Resources to Increase Educational Access

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

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

MCCB member community colleges also provide training through the state's Workforce Enhancement Training (WET) fund, a state funding source derived from employer unemployment insurance taxes that also may be used to administer approved workforce-readiness assessment instruments.

MDRS leverages a variety of funds to better serve the training and education needs of clients. Sources of leveraged funds include client 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.

## Improving Access to Postsecondary Credentials

Strategies to improve access to postsecondary credentials are described below, organized by agency partner.

### **MDES and LWDBs**

Local workforce development boards will determine strategies for credential attainment based upon area employer requirements. Once the needs of the employers are identified, pathways to meet those needs are established that include:

- Utilizing the DOL Quick-Start Tool Kit and pre-apprenticeship guide to establish a Registered Apprenticeship Program (RAP) with the employer and foster community support.
- Identify one-stop customers meeting the minimum criteria to immediately be enrolled into a RAP.
- Create success plans for one-stop customers needing soft-skill and pre-vocational training such as the high school equivalency, the National Career Readiness Certificate (CRC), and the Smart Start Credential.
- Facilitate the transition of the one-stop customer from the soft skills and pre-vocational training into a RAP, an employer provided OJT program, full- or part-time employment, or additional occupational training.

### **MDRS**

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 client choice, MDRS will then refer the participant for workforce evaluation at a One-Stop Center or Youth Provider that will help to develop the participant's

Individualized Success Plan further and create a pathway referral to move the participant closer to attaining the credential.

### **MDHS**

Supportive services provided under TANF will enable work-eligible TANF recipients to overcome barriers to training, and will help recipients earn high school equivalency, Career Readiness Certificates, or other Adult Education credentials. Supportive services provided under SNAP will likewise enable work-eligible SNAP recipients to overcome barriers to training and help recipients earn high school equivalency, Career Readiness Certificates, or other Adult Education credentials, as well as career-technical education or workforce skills.

### **MCCB**

Two MCCB member community colleges operate Affiliate One-Stop Centers that coordinate with the Mississippi Department of Employment Security through the use of the Mississippi Works Labor Exchange to provide Adult, Youth, and Dislocated Worker training.

## **Coordinating with Economic Development Strategies**

MDES will coordinate with economic development strategies by supporting the Mississippi Development Authority's 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 Mississippi LifeTracks data clearinghouse to enable sector and pathway analysis that will guide the activities of local workforce development boards to align training goals with regional needs.

MCCB and its member community colleges participate directly in efforts by the Mississippi Development Authority 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 the Mississippi Department of Employment Security to ensure that applicants receive credit for these credentials within the Mississippi Works Labor Exchange when applying to partner employers.

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

MDHS will coordinate with economic development strategies by supporting training and education pathways for TANF and SNAP recipients that meet State Workforce Investment Board sector priorities.

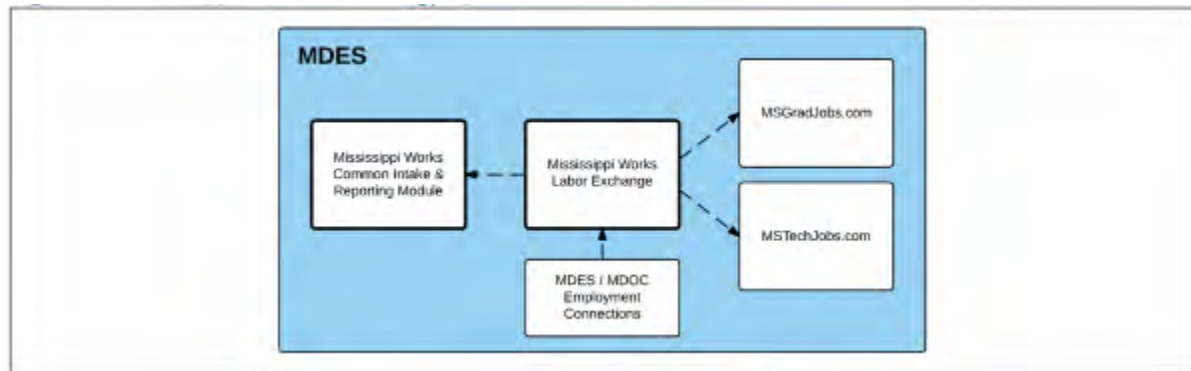
## **State Operating Systems and Policies**

In order to execute the data collection, strategic planning, administration, and coordinated implementation of the Mississippi Works Smart Start Career Pathway Model, Mississippi Combined Plan partners will interface with the Mississippi Department of Employment Security's "Mississippi Works" technology system.

The State operating systems that will support the implementation of the State’s strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.)

Mississippi Works technology consists of several systems with complementary roles. Figure 14 depicts the five main sub-systems.

Figure 14: Mississippi Works Technology System



The five sub-systems of Mississippi Works are:

- **Mississippi Works Labor Exchange** - The Mississippi Works Labor Exchange is an award-winning web and mobile system used by Mississippi Department of Employment Security agency staff, job seekers, and employers to coordinate all Department of Labor programs such as Wagner-Peyser, Youth Services, Adult and Dislocated Worker Services, Trade Adjustment Assistance, and others. In Mississippi’s WIOA implementation, the Mississippi Works Labor Exchange will serve as the web and mobile interface that participants themselves will use to access any documents or plans generated during case management under the Mississippi Works Smart Start Career Pathway Model. The system was developed in Mississippi through a partnership between the Mississippi Department of Employment Security and the National Strategic Planning and Analysis Research Center (NSPARC) at Mississippi State University. 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.
- **MSGradJobs.com** - MSGradJobs.com connects four-year college students who seek career assistance in Mississippi’s university career centers with employers who post jobs in the Mississippi Works Labor Exchange.
- **MSTechJobs.com** - MSTechJobs.com connects community college students who seek career assistance in Mississippi’s community college career centers with employers who post jobs in the Mississippi Works Labor Exchange.
- **MDES/MDOC Employment Connections** - The Employment Connections system allows offenders nearing release from Mississippi Department of Corrections facilities to create a pending workforce profile in the Mississippi Works Labor Exchange that “goes live” when the offender is released. As part of exit activities, the offender’s profile will be injected into the Mississippi Works Labor Exchange, and the offender will be given a flyer detailing his or her Mississippi Works Labor Exchange username and password along with the address of the nearest One-Stop Center.

- **Mississippi Works Common Intake and Reporting Module (WIOA Hub)** - The WIOA Hub is responsible for storing cross-agency data related to:
  - WIOA participant registration.
  - Services rendered to WIOA participants.
  - Referrals created for a participant from one WIOA partner to another.
  - Work search activity records from the Mississippi Works Labor Exchange.
  - WIOA participant Individualized Success Plans.

Of the five sub-systems, the WIOA Hub serves as the data system required to operate Mississippi's pathway model.

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

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

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

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

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

To guide the establishment, implementation, and maintenance of quality workforce development services, the state has developed a number of policies that outline legislative, regulatory, and service quality requirements within Mississippi's workforce system. Core agency policies and systems will comply with data collection, reporting processes, information management, integrated service delivery, and performance management requirements outlined by WIOA and respective federal and state legislation. As the primary developer of WIOA-related state policies, the Mississippi Department of Employment Security (MDES) develops state policies and their related communication plans. MDES disseminates these documents to local workforce development boards where they guide the implementation process at the LWDA level. The state will continue to encourage

coordination among WIOA Combined Plan and Strategic Partner agencies to strengthen the alignment between the Governor's vision and the strategies needed to meet that vision.

The One-Stop Certification Policy includes a checklist that all centers must adhere to including partnerships function at the site and the roles of each core partner. This checklist includes requirements for providing services including enrollment for all available services for which the customer is eligible (i.e., co-enrollment) as well as making certain that regardless of the services requested, that the customer can obtain all eligible services through a single application (i.e., universal intake). The One Stop Certification Policy can be reviewed in its entirety in Appendix IID.

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

### **Infrastructure Funding Agreement**

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

## **State Program and State Board Overview**

### **State Agency Organization**

Workforce development activities in Mississippi have been on a 10-year trajectory toward cooperation and partnership. The Governor's Office has successfully encouraged a unified, jobs-focused approach to workforce and reemployment services by its creation of and support for the Mississippi Works system of technology and services. Many of the agencies that will be WIOA partners are already linked together as "Proud Partners of Mississippi Works." The current agency structure has produced notable agency-to-agency partnerships such as the MDES/MDOC Corrections Connection job search program for ex-offenders. WIOA implementation has provided an opportunity to enrich those connections.

Figure 15 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 State Workforce Investment Board (SWIB).

The Governor appoints the executive directors of Mississippi Department of Corrections, Mississippi Development Authority, Mississippi Department of Human Services, and Mississippi Department of Employment Security.

The Mississippi Community College Board, Mississippi Department of Rehabilitation Services, and Mississippi Department of Education are governed by separate boards that appoint each agency's executive director.



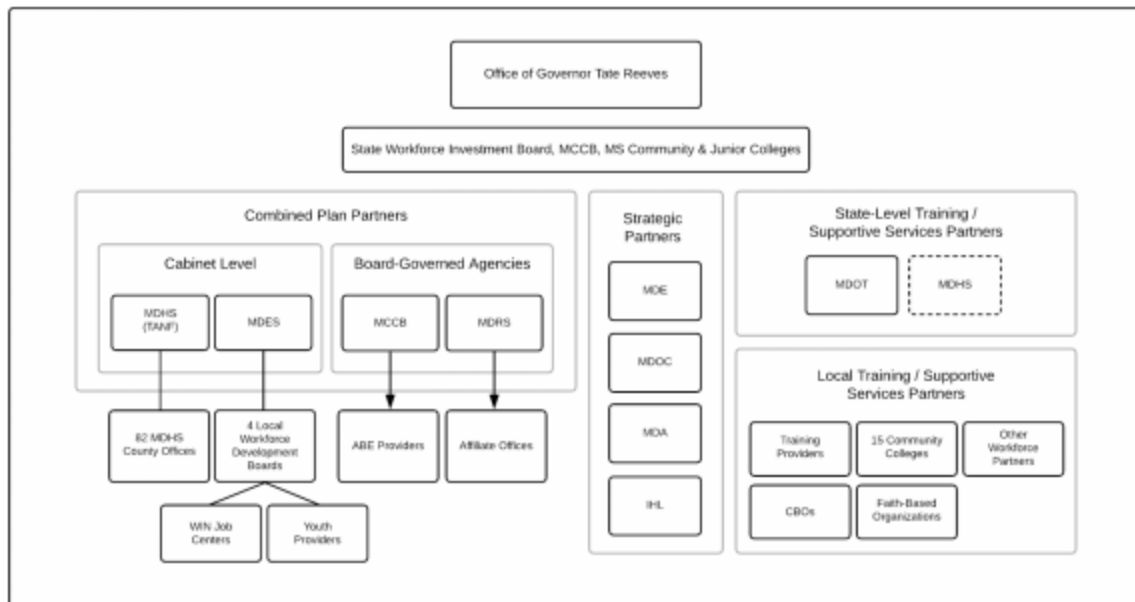
MCCB, Office of Adult Education, offers Adult Education services through its 15 member colleges and local programs approved through a formal request-for-application process.

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

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

MDOC manages a network of state and private correctional facilities.

Figure 15: State Agency WIOA Organization



MDES works closely with local partners, the four LWDA's, and the 10 Planning and Development Districts to deliver services via a network of WIN Job Centers and local Youth Providers.

The Governor, Lieutenant Governor, and Speaker of the House appoint members of the Mississippi State Board of Education, and the board appoints a superintendent to oversee operations of MDE. MDE delivers services through a network of local school districts that operate K-12 schools.

Finally, various community-based organizations such as Jobs for Mississippi Graduates and Goodwill's Mississippi Goodworks specialize in working directly with clients in cooperation with various agencies. These agencies coordinate with Combined Plan Partners through local workforce development boards or through contracts created with Combined Plan Partners.

## State Board

Mississippi's State Workforce Investment Board consults with the Governor's Office to establish and promote state workforce priorities in consultation with Combined Plan Partners. The State Workforce Investment Board is also responsible to ensure that Mississippi's Combined Plan is executed and to review and approve any agency-specific regulations created by partners that may impact WIOA Combined Plan programs.

*Membership Roster*

<b>Member Organization Affiliation</b>	<b>Member Name</b>	<b>WIOA Section 101(b)(1) Requirement</b>	<b>WIOA Section 101(b)(1)(C)(i) Majority Member Requirement</b>	<b>WIOA Section 101(b)(1)(C)(ii) Twenty Percent Requirement</b>
City Mayor	Billy Hewes	C(iii)(I)(bb)		
County Supervisor	Steve Gray	C(iii)(I)(bb)		
Labor Rep Nominated by Labor Federation	Terrance Nellum	C(ii)(I)		X
Labor Rep Nominated by Labor Federation	Darius Johnson	C(ii)(I)		X
Labor Rep from Joint Apprentice Program	To be appointed by Governor Tate Reeves	C(ii)(II)		X
Youth Activities Rep	Jackie Beasley	C(ii)(IV)		X
Youth Activities Rep	Margaret Chapman	C(ii)(IV)		X
Business & Industry	Patrick Sullivan	C(i)(a)	X	
Business & Industry	Brad Bounds	C(i)(a)	X	
Business & Industry	Charles Evers	C(i)(a)	X	
Business & Industry	Scott Waller	C(i)(a)	X	
Business & Industry	Edmond Hughes	C(i)(a)	X	
Business & Industry	Dave Liffbrig	C(i)(a)	X	
Business & Industry	J.R. Jones	C(i)(a)	X	
Business & Industry	Joe Morton	C(i)(a)	X	
Business & Industry	Jeremy Robinson	C(i)(a)	X	

<b>Member Organization Affiliation</b>	<b>Member Name</b>	<b>WIOA Section 101(b)(1) Requirement</b>	<b>WIOA Section 101(b)(1)(C)(i) Majority Member Requirement</b>	<b>WIOA Section 101(b)(1)(C)(ii) Twenty Percent Requirement</b>
Business & Industry	Michael Thomas	C(i)(a)	X	
Business & Industry	John Arledge	C(i)(a)	X	
Business & Industry	Charles Holder	C(i)(a)	X	
ED Employment Security	Jackie Turner	C(iii)(I)(aa)		
ED Rehab Services (Voc. Rehab)	Chris Howard	C(iii)(I)(aa)		
ED Community Colleges	Andrea Mayfield	C(iii)(I)(aa)		
ED DHS	Robert Anderson	C(iii)(I)(aa)		
Governor	Tate Reeves	A		
Senator	Josh Harkins	B		
House	Donnie Bell	B		

**Plan for Filling Roster Vacancies:** To fill the vacancies identified, the Executive Director of the State Workforce Investment Board will supply a list of nominees for the vacant position to the Governor's Workforce Development and Policy Advisor. The Workforce Development and Policy Advisor will work closely with the Governor to vet all nominations. Upon selection and appointment of a nominee, the Workforce Development and Policy Advisor will communicate the Governor's decision to the Executive Director of the State Workforce Investment Board and the WIOA committee roster will be updated. All vacancies will be filled prior to implementation of Mississippi's 2021 WIOA Plan.

#### *Board Activities*

The State Workforce Investment Board conducts in-person meetings three times annually and conducts other business through electronic means. The board is responsible for the development, implementation, and modification of Mississippi's Combined Plan and for the convening of meetings with all relevant programs, required partners, and stakeholders. The board consults with the Governor to ensure that Mississippi's Combined Plan is carried out in a transparent manner and in consultation with representatives of local boards, chief elected officials, businesses, representatives of labor organizations, community-based organizations (CBOs), adult and youth education and workforce development providers, institutions of higher education, disability service entities, youth-service programs, and other stakeholders with an interest in the services provided by the core programs and any optional program included in Mississippi's Combined Plan, as well as the general public, including individuals with disabilities. State Workforce Investment Board activities also include coordinating economic and workforce data analysis activities with the Mississippi State Longitudinal Data System Governing Board to ensure that local economic developers have access to detailed information to formulate sector strategies

in local areas. Further, the State Workforce Investment Board created training modules to be used for continuing education of One-Stop Center staff.

## Local Workforce Development Boards

Mississippi is divided into four LWDAs. Local workforce development boards are board-administered, WIOA Strategic Partners responsible for regional and local development of workforce programs and the local implementation and oversight of One-Stop Centers. Local workforce development boards provide workforce-related education and training strategies for youth by contracting with local youth service providers.

The location of the Comprehensive One-Stop Centers and strategic partnership details have been determined by the local workforce development board in each LWDA based on targeted industries in the area and the needs of the workforce. This approach ensures that the services provided by the One-Stop Centers are aligned with data-driven sector strategies set by the State Workforce Investment Board. Comprehensive centers have been created in each of the four LWDAs. The local workforce development boards are responsible for memorandums of understanding (MOUs) with strategic partners. These MOUs describe the programs offered, detail the expectation of services for all involved partners, and address funding for support staff for each center. Appendix J contains the Office of the Governor's guidelines for the creation of Local Workforce Development Board WIOA plans. Each local board describes 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.

Local workforce development boards have the option to include additional Affiliate One-Stop Centers with any subset of Combined Plan Partners as long as they include at least two partners. Local workforce development boards also have the flexibility to include additional partners in Affiliate One-Stop Centers. While local workforce development boards ultimately decide the logistics of affiliate centers, the WIOA law specifically identifies the following approved federally funded partners: employment and training programs administered by the Social Security Administration, including Ticket to Work and the Self Sufficiency Program; employment and training programs carried out by the Small Business Administration; Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) programs; Client Assistance Program; and programs authorized under the National and Community Service Act of 1990.

Local workforce development boards are also responsible to ensure that local activities and local sector targets line up with state-level sector analysis. The Mississippi LifeTracks system will be modified to include frequently updated, web-accessible reports that feature dashboard numbers, pathway analysis, and supply and demand analysis to ensure that economic developers in Mississippi have a near real-time picture of the labor market. Sector analysis revealed laborshed zones that transcend LWDA boundaries and allow local workforce development boards to serve as intermediaries to connect local employers and training providers to meet labor market demands. Employers will communicate labor demand in real time by posting job orders in Mississippi Works Labor Exchange.

Performance Coordinators assist Local Workforce Development Boards in support of coordinated case management when participants receive services from more than one Combined Plan Partner and to monitor active cases to ensure that plans are drafted so as to maximize the allocation of resources to best serve participants and employers. This function will be carried out by persons or entities to be determined by local workforce areas.

## Mississippi's State Longitudinal Data System (LifeTracks)

Mississippi's State Longitudinal Data System (LifeTracks) was created to help meet data needs for reporting requirements and to answer critical policy questions relevant to education, workforce, and economic development. The Governing Board for the system consists of the executive directors of all data-contributing agencies in Mississippi, all of which are either Combined Plan Partner agencies or Strategic Partner agencies under WIOA. LifeTracks will play an integral role in combined WIOA reporting. Because all Combined Plan

Partners currently contribute data to the LifeTracks system, and because LifeTracks was created, in part, for the purpose of assisting state agencies with reporting and strategic planning, Mississippi will be able to meet its reporting requirements efficiently. Further, LifeTracks will play a continuing role in the Mississippi Works Smart Start Career Pathway Model by coordinating with the State Workforce Investment Board 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 laborsheds that often cross LWDA boundaries.

LifeTracks 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. The clearinghouse includes data from early childhood entities (e.g., Head Start); Mississippi Department of Education (MDE); all 15 community colleges and the Mississippi Community College Board; all eight public universities and the Institutions of Higher Learning (IHL); Mississippi Department of Employment Security (MDES); Mississippi Department of Human Services (MDHS); Mississippi Department of Rehabilitation Services (MDRS); Mississippi Department of Corrections (MDOC); Mississippi Development Authority (MDA); Mississippi State Department of Health (MSDH); and Mississippi Division of Medicaid (DOM). The clearinghouse includes data from 2000 to the present. Partners regularly transmit data through a secure transfer according to SLDS Governing Board rules and regulations and via memoranda of understanding (MOUs). The state data clearinghouse developed and manages Mississippi's online SLDS reporting system, LifeTracks ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)). All data are stored in a state-of-the-art data center built for managing large databases and hosting mission critical systems. The Mississippi SLDS also has access to one of the most powerful computing systems in the country for high-performance computations and complex modeling.

## Assessment of Programs and One-Stop Program Partners

### Core Programs Assessment

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

All Combined Plan Partners will provide data required for WIOA federal reporting to the WIOA Hub, and local workforce development boards and the State Workforce Investment Board may establish other metrics to be used internally for strategic planning. A common participation period occurs when an individual is co-enrolled in more than one WIOA core program. Under these conditions, the client'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. Mississippi's State Longitudinal Data System will assist all WIOA partners in calculating these indicators.

## One-Stop Program Assessment

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 State Workforce Investment Board. Data for assessment will initially be provided through a coordinated schedule of data transfers to the State Longitudinal Data System, LifeTracks. Once all coordinated technologies are operational and Combined Plan Partners begin submitting real-time data to the WIOA Hub, assessment of all partner programs will be able to occur in near real time.

## Previous Assessment Results

Previous 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 10 contains the results for fiscal year 2016-2017, and Table 11 contains results for fiscal year 2017-2018. 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 10: FY 2016-FY 2017 (July 1, 2016-June 30, 2017)*

	<b>Quarter 2 Employment</b>	<b>Quarter 4 Employment</b>	<b>Employer Retention</b>	<b>Quarter 2 Earning</b>	<b>Credential Attainment Rate</b>	<b>Skill Gain Rate</b>
	(%)	(%)	(%)	(\$)	(%)	(%)
UI	72.37	72.18	69.35	4,844	13.28	14.44
MDRS	53.07	53.64	70.41	4,077	7.76	8.42
ABE	48.05	50.30	48.14	2,392	18.79	5.12
TANF	52.94	61.76	48.89	2,484	13.53	16.47
WIOA Adults	85.00	84.60	69.11	5,982	65.40	37.20
WIOA Dislocated Workers	74.70	76.50	71.83	5,734	60.00	40.40



WIOA Youth	78.60	84.70	64.07	2,600	40.00	48.10
Wagner-Peyser	66.70	64.80	48.23	3,951	---	---

Table 11: FY 2017-FY 2018 (July 1, 2017-June 30, 2018)

	Quarter 2 Employment	Quarter 4 Employment	Employer Retention	Quarter 2 Earning	Credential Attainment Rate	Skill Gain Rate
	(%)	(%)	(%)	(\$)	(%)	(%)
<b>UI</b>	73.15	72.33	68.43	4,942	9.79	11.49
<b>MDRS</b>	63.79	60.29	78.39	5,270	4.73	5.76
<b>ABE</b>	49.43	50.95	47.30	2,221	14.36	6.10
<b>TANF</b>	54.09	64.15	53.49	2,376	8.81	13.21
<b>WIOA Adults</b>	83.90	84.30	67.78	6,003	66.30	44.90
<b>WIOA Dislocated Workers</b>	77.30	76.70	70.65	5,659	66.30	41.80
<b>WIOA Youth</b>	79.30	79.80	49.82	2,839	76.50	56.70
<b>Wagner-Peyser</b>	68.50	65.80	64.02	4,130	---	---

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

These performance results emphasize the positive impact on employment that may be realized through partnership strategies that involve participants in any state workforce or supportive program with concurrent reemployment activities. This observation forms the foundation of the Mississippi Works Smart Start Career Pathway Model, a roadmap for ensuring that every form of assistance provided by partner agencies includes reemployment assistance to support reconnecting participants with the Mississippi labor market.

## Evaluation

All requests for evaluations, research studies, reports, or information shall be classified into one of two review types for processing: Standard Review or Expedited Review. Standard Review is required for all requests for traditional/basic research studies where a research question or set of research questions is posed that is not subject to predefined or statutorily mandated methodology or reporting requirements. Standard Review is appropriate for requests that require the development of a research design that examines relationships using scientific techniques such as regression analysis or multilevel modeling and where the research design is guided by a conceptual or theoretical framework drawing upon current scholarly research published in peer-reviewed journals and technical reports. All requests for reports or information falling within the Standard Review category are reviewed by all members of the Research Review and Standards Committee. Requests classified for Expedited Review will be reviewed by the Research Review and Standards Committee chair or her/his designee and one or more Research Review and Standards Committee members designated by the chair. These reviewers may authorize the request or refer the request to the full Research Review and Standards Committee for consideration. If the request is referred to the full Research Review and Standards Committee, Standard Review procedures will be followed.

## Distribution of Funds for Core Programs

### 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 State Workforce Investment Board. 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 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 GrantTrak financial tracking module. Appendix H provides a sample WIOA Allocation Communication.

## Title I

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

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 GrantTrak financial tracking module. Appendix H provides a sample WIOA Allocation Communication.

### 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 GrantTrak financial tracking module. Appendix H provides a sample WIOA Allocation Communication.

## Title II

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

The Mississippi Community College Board, Office of Adult Education (OAE) is the state's Eligible Agency for Adult Education. 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 adult education services through a competitive Request for Application (RFA) process. The RFA is the mechanism through which OAE will identify, assess, and award multi-year grants to eligible providers throughout the state.

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

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

WIOA defines the term "eligible individual" as an individual who:

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

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

The Office of Adult Education 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 Office of Adult Education awards funds to eligible providers for the delivery of adult education services. These services provide academic instruction below the postsecondary level that increase an individual's ability to:

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

In accordance with federal regulation, eligible providers may receive adult education funding for the delivery of any of the following adult education 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; or
- Integrated education and training.

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

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

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

## Vocational Rehabilitation Program

Vocational Rehabilitation General and Vocational Rehabilitation for the Blind operate under the same administrative structure within the Mississippi Department of Rehabilitation Services 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 client served in each program and with consideration of additional costs for facility accessibility and training cost requirements for blind individuals.

## Program Data

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

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 Mississippi LifeTracks, the state longitudinal data system, for retrospective analysis and with the Mississippi WIOA Hub that enables real-time partner data integration.

The Mississippi WIOA Hub software was completed in May of 2017. As of 2020, 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 Mississippi WIOA Hub through the use of web services, or 2) are in the process of replacement by systems that support such data exchanges.

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

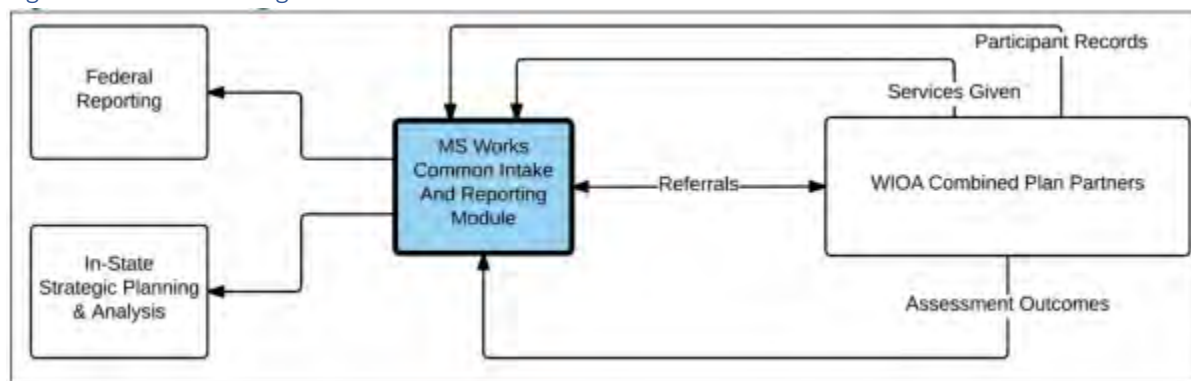
- **MDES** - The Mississippi Works Labor Exchange is the current workforce management software system used by the Mississippi Department of Employment Security (MDES) to administer, track, and report case management activities for Title I Adult, Dislocated Worker, and Youth services; Title III Wagner-Peyser services; Senior Community Service Employment Program services (SCSEP); Trade Adjustment Assistance (TAA) services; Jobs for Veterans State Grants Program services; and other workforce services. Mississippi Works is a mature, real-time, integrated web and mobile solution providing labor exchange services to job seekers and employers and allowing MDES One-Stop partner staff to perform case management activities. The system was developed in Mississippi through a partnership between MDES and the National Strategic Planning and Analysis Research Center (NSPARC) at Mississippi State University (MSU). Mississippi Works currently supports the calculation of common participation periods across what have become all WIOA Title I and Title III programs. Mississippi Works already supports web services as a way to integrate with external systems. In addition, MDES administers the state Unemployment Insurance system using ReemployMS, a modern web application that supports web services. 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** - The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation (OVR), and Office of Vocational Rehabilitation for the Blind (OVRB) administers vocational rehabilitation services using a commercial software package, AwareVR, created by Alliance Enterprises. This modern web application allows for complete program-specific case management of OVR/OVRB participants. AwareVR supports web services and connects in real time to the Mississippi WIOA Hub.
- **MCCB** - The Mississippi Community College Board 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, Adult Education programs. The system allows MCCB and its affiliate instructors to enroll students and track performance through pre- and post-tests

using a basic education-level assessment. In addition, the system allows MCCB to spot poorly attended classes before funds are spent inefficiently on instruction for few students. MCCB is currently developing the Mississippi Adult Education (MAE) computer system to replace LACES and is already able to send referrals to and receive referrals from the Mississippi WIOA Hub through MAE.

- **MDHS** - The Mississippi Department of Human Services 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 a newly created MDHS WIOA Hub Module allow for data exchanges with the Mississippi WIOA Hub.

Figure 16 illustrates how all WIOA Combined Plan Partners will interface with the Mississippi WIOA 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 16: Data Exchanged Between Partners Common Module

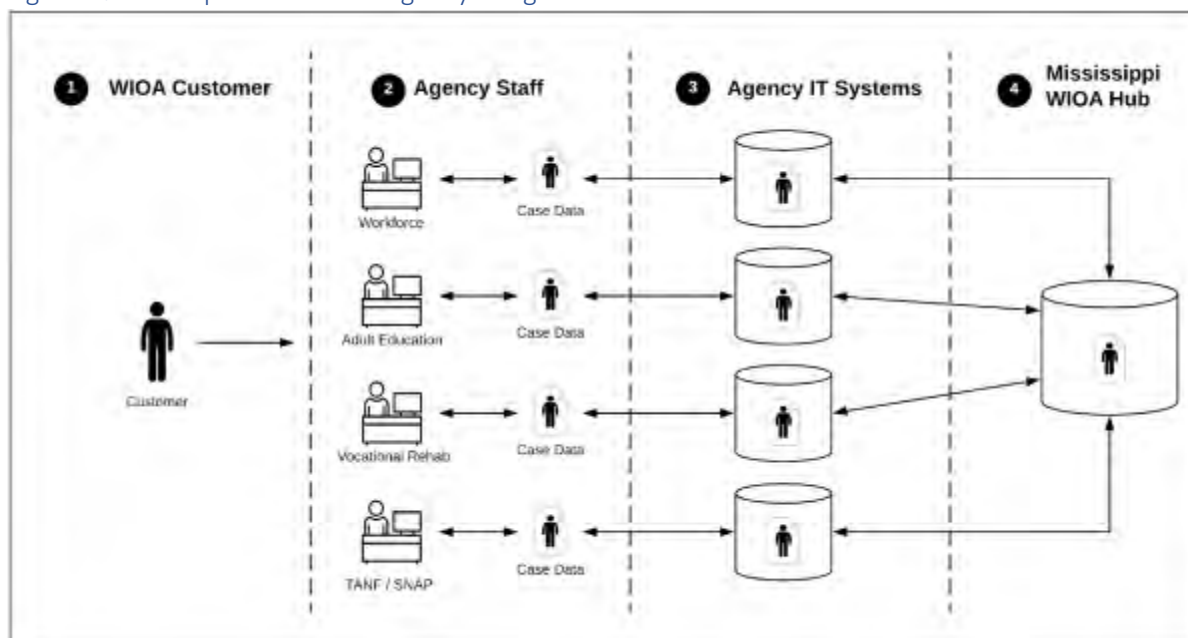


During the course of case management activities, each Combined Plan Partner will generate participant data such as participant records (basic information), information on services given to the participant, information on assessment outcomes, and any referrals to partner programs. These data items will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

In order to exchange program data, the Mississippi WIOA Hub provides a machine interface. Agency systems use the machine interface to ensure that data are reported properly and in real time while enabling their staff to continue to use familiar case management technology. Figure 17 illustrates that 1) a WIOA customer may access WIOA services from any WIOA partner, 2) the partner's caseworkers access the WIOA Hub through their own internal agency systems, and 3) the partner systems communicate with each other through the WIOA Hub, and 4) the WIOA Hub itself is a headless, coordinating system.



Figure 17: Conceptual Model of Agency Integration



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

While all Mississippi Combined Plan Partners serve participants in ways that fit best with each partner's focus and in terms of each partner's programmatic rules, several data artifacts of case management are standardized to ensure that agencies are able to align their intake and service delivery processes efficiently to avoid duplication.

- Common Intake Profile and Identifier** - The Mississippi Works Common Intake Profile is the basic unit of identification for a participant who begins to receive services through any Mississippi Combined Plan Partner. Each profile will have a Mississippi Works ID number that will be generated to allow the correlation of participant profiles with future data exchanges of services, referrals, Individualized Success Plans, and other participant attributes. There is no wrong door in the Smart Start Career Pathway Model; a participant may begin at any partner and be referred at any point to other partners for training and supportive services needed to fulfill the participant’s career pathway into middle-skill employment.
- Diagnostic Checklist and Decision Tree** - Along with the common intake profile, each Combined Plan Partner will collect, during intake, answers to a diagnostic checklist composed of questions submitted by all Combined Plan Partners. Upon receiving the diagnostic checklist from the Combined Plan Partner system, the Common Intake and Reporting Module will compare the diagnostic checklist to a decision tree that will automatically generate electronic referrals on behalf of the participant to any relevant Combined Plan Partner. For instance, a positive answer to the diagnostic checklist question “Do you have trouble buying food for your family?” may generate a referral to the Mississippi Department of Human Services which administers SNAP and TANF.
- Agency-to-Agency Referrals** - Agency-to-agency referrals are electronic records created in the Mississippi WIOA Hub to connect a participant who receives services from one WIOA Combined Plan Partner to another partner. The benefit of a formalized referral process is that it enables follow-ups, assessments of partner cooperation, and greater accountability for participants who have work search requirements associated with Combined Plan Program enrollments. Referrals will have several attributes, including the referring partner, the recipient partner, the recommended partner service,

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

- **Common Individualized Success Plans** - Individualized plans exist under various names in each Combined Plan Partner's toolkit for case management. For instance, Mississippi Department of Rehabilitation Services, OVR, and OVRB clients complete an "Individualized Plan for Employment" with a staff member, and Mississippi Department of Employment Security participants in the Trade Adjustment Assistance program complete an "Individual Employment Plan." The Common Individualized Success Plan, under Mississippi's WIOA implementation, will be an electronic record stored in the Mississippi Works Common Intake and Reporting Module that captures information common to current plans, such as goals, skills and experience, barriers, barrier mitigation strategies, referrals to supportive services, and participant rights/responsibilities. In addition, the plan will allow cross-agency case notes. As a participant receives referrals, these elements will be attached to his or her Individualized Success Plan. Participants who have created accounts in the Mississippi Works Labor Exchange will be able to review and print their own Common Individualized Success Plan. The Mississippi WIOA Hub will allow agency staff to consult and modify relevant portions of any participant's Common Individualized Success Plan.
- **Common Service Catalog** - In order to ensure the most efficient alignment of services and avoid duplication in service delivery, the Mississippi WIOA Hub supports the maintenance of a catalog of partner services. This common catalog of services contains services offered by all Common Plan Partners as well as supportive services from Strategic Partners. Each service is categorized. For example, childcare services offered by the Mississippi Department of Human Services under TANF are categorized as a "Childcare Barrier Mitigation Service." Likewise, childcare services offered by a community college Strategic Partner are also be categorized as a "Childcare Barrier Mitigation Service." When agency staff attempt to create a referral that suggests a service already being offered to the participant, agency systems will be able to detect the potential service duplication and allow the agency staff or system to take the appropriate action. Agency collaboration in maintaining and updating the common catalog of services will ensure that complementary services will be categorized differently and duplicative services will be categorized identically.
- **Common Assessment Catalog** - In order to enable the computing of improvements in assessment outcomes such as literacy or numeracy scores or work-readiness, the Mississippi WIOA Hub supports the maintenance of a catalog of possible assessments. Each assessment is categorized and consists of one or more numerically expressed scores. For example, Adult Education service delivery makes use of an assessment of educational functional level. Assessment scores are expressed as grade-level equivalency in several categories (reading, math, applied math, and language). The catalog would categorize the assessment as literacy/numeracy measurements and specify that scores will be expressed by a collection of four scaled numerical scores. Agency collaboration in maintaining and updating the common catalog of assessments will ensure that reported outcomes from different agencies administering assessments at different points in the participant's pathway can be compared properly to assess measurable gains in areas such as literacy, numeracy, work-readiness, and other measurable participant attributes.
- **Common Credential Catalog** - In order to enable the tracking and reporting of credential attainment, the Mississippi WIOA Hub supports the maintenance of a catalog of possible credentials.

Credentials attained, such as industry-recognized certifications or academic certificates, are reported by education or training partners during a participant's pathway progress. Agency collaboration with education and training providers to maintain and update the Common Credential Catalog supports efforts to assess whether Combined Plan Partners are supporting the attainment of credentials. The Common Credential Catalog will also provide a valuable source of data that enables participants to explore credential options within the Mississippi Works Labor Exchange.

- **Work-Ready Report Card** - For participants on the Work-Ready Pathway, creation of a workforce profile in the Mississippi Works Labor Exchange will culminate with the automatic generation of a Work-Ready Report Card. Based on the participant's education, experience, driver's license class, location, and other profile information, the Work-Ready Report Card will help the participant clearly understand his or her skill level, experience level in the occupations appropriate for the skill level, likely career transitions based on the participant's previous experience, and labor market information (average salary, demand projections, and number of current job openings) for each occupation within the participant's skill level. The Work-Ready Report Card will also contain aspirational information about the preparation needed to be competitive for other occupations that may be in higher skill levels.

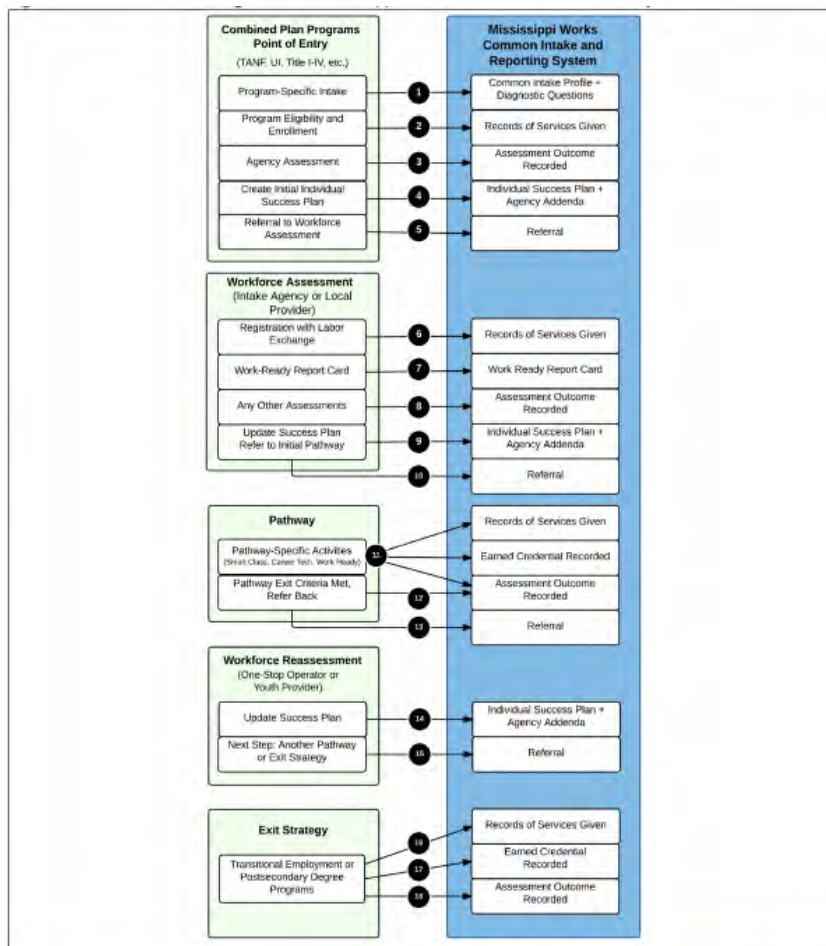
The Work-Ready Report Card will also be available to any participant with a completed profile in the Mississippi Works Labor Exchange, even those who registered in previous years, and it will be dynamic, taking into account current labor market information and any changes to a participant's profile.

Using a common profile, enabling agency-to-agency referrals, collaborating on a participant's Individualized Success Plan, operating via a common service catalog, and reporting assessment results via a common outcome catalog will enable a high degree of coordination and efficiency in WIOA case management. Figure 18 puts these elements together to demonstrate how data are collected and used at each point along a participant's engagement with the Mississippi Works Smart Start Career Pathway Model.

At nearly every step in the Mississippi Works Smart Start Career Pathway Model, data will be generated by Common Plan Partners and transmitted to the Mississippi WIOA Hub. The following material below describes each of the 18 data exchanges depicted in Figure 18. Numbers below correspond to the labels in Figure 18.

In addition to data generated during the participant's route through the Mississippi Works Smart Start Career Pathway Model, any transitional employment or final, unsubsidized employment will generate wage records captured by the Mississippi Department of Employment Services Unemployment Insurance system, *ReEmploy MS*. These data, wage records, will be correlated with data on WIOA service enrollments in the Mississippi WIOA Hub to calculate WIOA performance measures such as "Employed in the Second Quarter after Exit."

Figure 18: Data Created and Aligned in the Mississippi Works Smart Start Career Pathway Model



<b>Combined Plan Programs Point of Entry</b>	<p>When a participant first encounters a Combined Plan Partner to receive Title I Adult, Dislocated Worker, and Youth services, Title II Adult Education and Family Literacy Act (AEFLA) services, Title III Wagner-Peyser services, Title IV Vocational Rehabilitation (VR) services, Unemployment Insurance (UI) services, Senior Community Service Employment Program (SCSEP) services, Trade Adjustment Assistance (TAA) services, Jobs for Veterans State Grants Program services, or Temporary Assistance for Needy Families (TANF), he or she will pass through a program-specific intake procedure that will collect the minimal amount of information required to create an initial Common Intake Profile. In addition, the participant will answer a questionnaire composed of diagnostic questions submitted by each Combined Plan Partner. As the partner program's system transmits the intake profile and diagnostic question to the Mississippi WIOA Hub, the common system will either create a new Common Intake Profile or, if the participant has been registered previously, update the existing participant's Common Intake Profile with the newly collected information. The common system will respond to the Combined Plan Partner system with a Mississippi Works ID number that will enable future web service calls to transmit participant data by reference to a unique identifier. Based on answers provided to the diagnostic questions, the common system will automatically create electronic referrals to Combined Plan Partner services based on a decision tree. For example, if the participant signifies that he or she has recently lost a job, a referral may be made to MDES for Unemployment Services. When a Combined Plan Partner enrolls the participant in a service, the partner's case management system will transmit a service enrollment to the Mississippi WIOA Hub. This service enrollment will reference both the participant's Mississippi Works ID and the unique identifier of the service itself, as listed in the Common Service Catalog. Some Combined Plan Partners will perform workforce-readiness assessments. Any assessments will be transmitted to the Mississippi WIOA Hub as an Assessment Outcome. Assessment Outcomes are any measurable attribute, such as a test score, that WIOA partners wish to associate with a participant in order to gauge future improvements. In the case of a basic education level assessment, which is expressed as a grade level, the Mississippi WIOA Hub will allow all subsequent grade-level scores to be entered as outcomes to be assessed for improvements relevant to WIOA performance measures. Assessment Outcomes will reference the Mississippi Works ID of the participant and the Common Assessment Catalog ID of the assessment and will include the participant's earned score. Combined Plan Partners often create agency-specific individual plans, and at the time of initial enrollment, basic plan elements such as overall goal and barriers to employment will be used to populate an initial Individualized Success Plan with an attached agency-specific addendum. The plan will then be transmitted to the Mississippi WIOA Hub. Once a participant has received core services from a Combined Plan Partner and is ready to pursue a workforce pathway, the Combined Plan Partner will either create and transmit a referral to workforce assessment services or provide these workforce services itself. For instance, MDHS (TANF) customers will be referred for workforce assessment services, and the referral will appear on staff dashboards in Mississippi Works Labor Exchange software in use at all One-Stop Centers and Youth Providers.</p>
<b>Workforce Assessment</b>	<p>As a first step in workforce assessment, the participant will register with the Mississippi Works Labor Exchange. This step will transmit a service record to the Mississippi WIOA Hub and change the status of the workforce assessment referral to “resolved.”</p> <p>Registration in the Mississippi Works Labor Exchange will lead automatically to the generation of a Work-Ready Report Card. The Work-Ready Report Card will be a living data object, automatically adapting to labor market information and accessible to</p>

	<p>partner agencies through the Mississippi WIOA Hub via a web service call.</p> <p>Depending upon LWDA policies, some providers may perform an initial assessment of the participant using an assessment instrument included in the Common Assessment Catalog. Assessment Outcomes will be transmitted to the Mississippi WIOA Hub via a web service call.</p> <p>Working together with a One-Stop Center or Youth Provider staff member, or a staff member from any intake agency, the participant will further refine his or her Individualized Success Plan to reflect an initial pathway destination (either the Smart Start Pathway Class, Career Tech, or Work Ready Pathway). The revised Individualized Success Plan will be transmitted to the Mississippi WIOA Hub.</p> <p>A referral will be generated to the Combined Plan Partner responsible for the initial pathway destination. The referral will be transmitted to the Mississippi WIOA Hub and will be visible on staff dashboards in the relevant Combined Plan Partner's case management system.</p>
<b>Pathway</b>	<p>The participant will begin pathway-specific activities under the oversight of a Combined Plan Partner. During pathway activities, a number of data elements may be generated and transmitted to the Mississippi WIOA Hub, including service enrollments, earned credentials, or assessment outcomes.</p> <p>Once the participant has completed pathway activities and has met the pathway's exit criteria, any assessment scores generated during exit assessment will be transmitted to the Mississippi WIOA Hub.</p> <p>Exiting participants will be referred back to the workforce assessment partner (One-Stop Center or Youth Provider) that initially referred the participant to the pathway. This referral will be recorded in the Mississippi WIOA Hub and will appear on staff dashboards in the Mississippi Works Labor Exchange software in use at all One-Stop Centers and Youth Providers.</p>
<b>Workforce Reassessment</b>	<p>After a pathway is completed, the participant will be assessed again by a One-Stop Center or Youth Provider partner to update the participant's Individualized Success Plan and determine next steps. The revised Individualized Success Plan will be transmitted to the Mississippi WIOA Hub.</p> <p>Reassessment will either determine that the participant needs to enter another pathway and begin the Pathway-&gt;Reassessment loop again or that the participant is ready to enter an exit strategy that will connect the work-ready participant to unsubsidized employment. Following the exit path, a referral to an exit strategy will be created and transmitted to the Mississippi WIOA Hub. Depending upon which exit strategy is chosen, staff for the relevant Combined Plan Partner will be notified of the referral.</p>
<b>Exit Strategy</b>	<p>During the participant's exit strategy, any service enrollments into Common Service Catalog services will be transmitted to the Mississippi WIOA Hub.</p> <p>Some exit strategies involve two- or four-year credential attainment or the attainment of other recognized credentials from the Common Credential Catalog. Earned credential records will be transmitted to the Mississippi WIOA Hub.</p> <p>Some exit strategies will involve further assessments. Assessment outcome records will</p>



	be transmitted to the Mississippi WIOA Hub. Some credentials such as the Career Readiness Certificate (CRC) are awarded based on assessments. In the case of the CRC, both assessment and credential records will be created and transmitted to the Mississippi WIOA Hub.
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**Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals**

The State Workforce Investment Board (SWIB) will ensure the alignment of technology and data systems through collaboration with three state entities: the Mississippi Department of Employment Security (MDES), the State Longitudinal Data System (LifeTracks) Governing Board, and the National Strategic Planning and Analysis Research Center (NSPARC) at Mississippi State, the state data clearinghouse.

MDES will continue to develop the Mississippi WIOA Hub according to SWIB priorities, and SWIB 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 State Longitudinal Data System Governing Board, consisting of representatives from all state data-contributing agencies, 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 Mississippi WIOA Hub and in the integration activities necessary to make Combined Plan Partner systems interoperable with the common system.

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

Based on Memoranda of Understanding (MOU), WIOA partners will continue to work with the State Longitudinal Data System and the State Data Clearinghouse to develop and produce the reports required under WIOA. These MOUs allow WIOA partners to submit their administrative records into the Mississippi State Data Clearinghouse, where the wage records and program participation data can be securely aligned by the clearinghouse’s data science professionals. After wage records and participation data are aligned, additional education and demographic information is integrated from Mississippi’s State Longitudinal Data System. This process creates a comprehensive dataset containing the participant, employment, education, and demographic data that are necessary to complete the reports that are required under WIOA section 116(d)(2). This data is then shared out with WIOA partners, who use it to calculate performance measures and produce reports that are aligned with the PIRL format. Furthermore, the data science professionals at Mississippi’s 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 Mississippi Department of Employment Security 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, GrantTrak generates ETA 9130 reports from the initiation to the close-out of the funds for DOL reporting. GrantTrak 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.

## Assessment of Participants' Post-Program Success

In addition to making use of WIOA performance measures to assess the post-program success of WIOA participants, the State Workforce Investment Board will determine additional, specific longitudinal measures of socioeconomic mobility. Through the State Longitudinal Data System (LifeTracks), 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 more effectively compare actual outcomes with desired outcomes. Results for relevant measures will be available, in the aggregate, to all Mississippians via the LifeTracks online reporting website (LifeTracks.ms.gov) and will be used by the State Workforce Investment Board 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.

## Use of Unemployment Insurance (UI) Wage Record Data

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

## Privacy Safeguards

The state of Mississippi has made large efforts to ensure privacy protection. In order to protect the privacy of Mississippians, all partners that will 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 will ensure 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 Statewide Longitudinal Data System Rules and Regulations (see Appendix B) as provided for in Miss. Code Ann. §37-154-1 and §37-154-3.

Each partner will ensure 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.

### Priority of Service for Veterans

To ensure veterans receive consideration for all opportunities for which they qualify, the Mississippi Department of Employment Security 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:

- Referral of qualified veterans to new job openings, especially Federal Contractor job orders, prior to all non-veteran job referral activity.

- Veteran placement at the top of WIOA waiting lists (ITAs and OJT) for limited training funds.

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

DVOPs are integrated into the WIN Job Center service delivery system at the local job center level. Eligible veterans and eligible persons with significant barriers to employment are identified by intake forms or by electronic registration and referred to or assigned to DVOPs after other One-Stop Center staff complete initial service intake. DVOPs will be 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.

## Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities

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

1. Providing reasonable accommodations for individuals with disabilities;
2. Making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination against persons with disabilities;
3. Administering programs in the most integrated setting appropriate;
4. Communicating with persons with disabilities as effectively as with others;
5. Providing appropriate auxiliary aids and services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity; and
6. Providing for the physical accessibility of the one-stop center to individuals with disabilities.
7. All one-stop centers must comply with applicable physical and programmatic accessibility requirements, as set forth in 29 CFR part 38 and the implementing regulations of WIOA sec. 188.

## Addressing the Accessibility of the One-Stop Delivery System for Individuals with Limited English Language Proficiency

The Mississippi Department of Employment Security 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.

## Coordination with Combined State Plan Programs

### Overview of Steps Taken to Align Agencies

#### Planning Workgroups

For the 2020 WIOA Combined State Plan revision, the State Workforce Investment Board convened a series of five interagency meetings, beginning in Fall of 2019, to bring together all WIOA strategic and core partners along with representatives of all local workforce areas. Partners reviewed progress towards implementation of the original 2014 and 2018 WIOA plan revisions and noted successes and challenges. The group consensus was in favor of continuing Mississippi’s Smart Start Career Pathway strategy. 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.

This section contains details on the original planning process as background to stakeholder engagement in the 2020 plan revision process.

Mississippi’s original WIOA planning process began in July 2014 with the establishment of a SWIB task force to conduct a study on workforce development needs in Mississippi. A poll of SWIB members during the February 2015 SWIB meeting recommended using the findings of the task force study as a common framework in the development of the workforce plan as prescribed by WIOA. To kick off the development of the workforce plan, the governor met with education and workforce stakeholders to encourage their participation in the process. A planning document was developed that clearly outlined how each party would be involved. Working groups were established to seek input for the development of the strategic and operational aspects of the workforce plan. Open meetings provided ample opportunity for the public to contribute to the process. A focus group was conducted to gather input from the business community. A website was created to provide regular updates on the process and to provide an additional avenue for the public to participate.

Throughout the process, LWDA’s were represented in each workgroup and provided comments on the initial draft of the Combined Plan. In addition, local workforce development boards were tasked with updating and seeking input from chief elected officials in their respective areas on the development 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:

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

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

1. The Planning and Communication Workgroup managed the planning process of Mississippi’s Combined Plan. The primary responsibility was to ensure that the other workgroups remained on task and on time with meeting deadlines. Communication facilitation was another responsibility of this workgroup, as it was tasked with effectively communicating with the other entities throughout the planning process. This group communicated with other workgroups as well as with stakeholders to ensure that the public voice was heard on the overarching vision for the state’s revitalized workforce development system in order to create a vibrant economic climate for Mississippi.
2. The primary task of the Aligned and Integrated Technology Workgroup was to understand the WIOA requirements, leverage resources, and integrate Mississippi Works ([mississippiworks.org](http://mississippiworks.org)) as the foundation of the WIOA technology requirements. In order to meet the demands of today and the goals of tomorrow, technology must be used to bring Mississippians together to create a renewed and stronger workforce. This workgroup developed strategies to align the various agency systems to meet the WIOA unified technology requirement and universal profile incorporated into Mississippi’s Combined Plan. Six core programs are already under the Mississippi Works technology umbrella, a comprehensive system used by job seekers to apply for work, identify their barriers to employment, and follow through with an integrated case management system. Mississippi Works is working with technology vendors to ensure every Combined Plan Partner is compliant with the new law.
3. The Sector Strategies Workgroup was tasked with using data and analysis of the current and projected job market and economic conditions to develop strategies focused on linking job seekers to gainful employment. By identifying regional and local employment deficits, this group created strategies and approaches for training, development, and education programs that teach job seekers the skills necessary to address the needs of Mississippi’s employers. This workgroup met to confirm that the appropriate economic data and analyses were easily accessible for informed decision-making pertaining to the development and implementation of Mississippi’s Combined Plan. Analyzing workforce, employment, and unemployment data, labor market trends, and the educational and skills level of Mississippi’s



workforce allowed this workgroup to develop sector-based workforce strategies. The group also discussed regional sector strategies, with an emphasis on how these strategies connected to the state's overall plan. To make the best use of state resources, the workgroup concurred that the state should focus on targeted sectors backed by solid data analysis to make the biggest impact. In addition, data analysis will provide a clear-cut picture of which sectors are the best return on investment. This workgroup also established how all state and regional sector strategies would link to the career pathways element of the operational component of Mississippi's Combined Plan to ensure that Mississippians are prepared to fill the state's available jobs. If additional funding is invested in specific sector strategies, then the workforce ecosystem should promote opportunities in these sectors, which would result in a strategy that is mutually beneficial to employers and job seekers. Advancing Mississippi's workforce participants so they can have gainful employment and become self-sufficient is the highest measure of success. The performance measures mandated in the WIOA provide Mississippi with an opportunity to improve its focus and align workforce training resources more effectively across all programs.

The workforce groups organized around the Operational Planning Element worked collaboratively to implement the strategies conceived by the workgroups in the strategic planning element. Each Operational Planning Workgroup was charged with specific roles and responsibilities to help focus their efforts on implementation of the goals and strategies developed by the Strategic Planning Workgroups. The Operational Planning Workgroups include the One-Stop Operations Workgroup, Career Pathways and Assessment Workgroup, Performance and Accountability Workgroup, and Employer Engagement Workgroup. Each of these workgroups first met in June 2015 to discuss specific focus areas and strategize about methods to achieve the Governor's vision of a workforce ecosystem.

4. The goal of the One-Stop Operations Workgroup was to design a comprehensive workforce development system that encourages cross-program alignment of services in a seamless, coordinated, service-delivery model that accommodates all job seeker and employer customers. The workgroup developed a One-Stop System that provides access to all program services through a network of physical locations and a virtual environment. This system will allow individuals to have access to all appropriate programs at any point of entry into the system. In order to ensure the efficiency of the One-Stop system, the One-Stop Operations Workgroup implemented a clearinghouse where all programs communicate and are fully integrated.

The One-Stop Operations Workgroup met to discuss ideas for cross-program alignment of all services in a seamless model that best accommodates job seekers and employers. Various tiers of One-Stop Centers were developed. Sector Training Plus Comprehensive One-Stop Centers will provide access to all Combined Plan Partner services and to in-house career and technical education. Comprehensive One-Stop Centers will provide access to all of the Combined Plan Partner services in one place to assist the customer and provide referrals for career and technical education. A minimum of one Comprehensive One-Stop Center will be located in each of Mississippi's four LWDA's. In order to provide Mississippi job seekers with the education, training, and skills to meet the demands of Mississippi employers, a network of Affiliate One-Stop Centers will offer basic services and refer the customer to a Sector Training Plus or Comprehensive One-Stop Center if the affiliate center is unable to meet the customer's needs. Access points located throughout each LWDA would provide virtual access to job seekers. This workgroup also noted that in order for the Sector Training Plus, Comprehensive, and Affiliate One-Stop Centers to be successful, there is a critical need for a staff of skilled counselors who are cross-trained on all of the programs and services to best meet the needs of the job seeker. Another objective of the One-Stop Operations Workgroup was to develop a strategy to find job seekers who are not currently in the system, identify the services they need, and ultimately move the needle to increase Mississippi's workforce participation rate.

The Career Pathways and Assessment Workgroup was responsible for the design and implementation of career-readiness plans that allow Mississippians to gain the necessary training or education to move directly into careers that are in demand in the 21st century and in their respective LWDA's. This process

includes individualized education and training plans with multiple entry and exit points that ultimately track the job seeker's progress through the workforce ecosystem. The workgroup discussed strategies that included cross-program, non-duplicative assessments of education, skills, and assets. The workgroup also agreed on a need for a common assessment instrument for entry into the Mississippi Works Smart Start Career Pathway Model, the statewide integrated pathway model. The state-approved measure will be a recognized credential for the state of Mississippi and will assess a job seeker's trainability. To support this effort, there is also an individualized plan in place for every job seeker in the workforce pipeline.

The Mississippi Works Smart Start Career Pathway Model will guide job seekers through aligned resources and support to help them find a job and increase Mississippi's workforce participation rate. The overarching goal of the state's integrated workforce pathway model is creating opportunities for Mississippians to receive higher skills and higher wages as they progress through the workforce pipeline.

5. The Performance and Accountability Workgroup was tasked with developing a reporting system that will support the performance evaluation process. WIOA increases accountability and places stronger emphasis on results through the establishment of common employment outcome measures across all WIOA programs included in Mississippi's Combined Plan. The workgroup reviewed the six performance indicators mandated by WIOA and discussed how each measurement impacts each core program.

Currently, each program has its own definition of a "participation period" within the workforce system. Under WIOA, a common measurement is required across programs with well-defined entry and exit points. Another performance indicator that core programs must determine is median earnings of participants. Although job seekers can choose their own path, the workforce system will need to counsel job seekers on obtaining higher-level skills to meet the overarching goal of closing the middle-skill gap. Mississippi will be measured on its performance in educating and training workers under WIOA to meet the needs of employers seeking middle-skill workers.

The law also requires Mississippi to measure incremental steps or benchmarks that job seekers must take to obtain a recognized postsecondary credential or a secondary school diploma (or its recognized equivalent). Therefore, the workforce system must not only enroll low-skill job seekers into a training program but also ensure that the training program is successful and show evidence of putting people on a path to obtain higher credentials that result in higher wages.

The final performance indicator will be determined by the Department of Labor (DOL), which will establish parameters for employer participation. Mississippi will develop a plan with the understanding that the plan will be modified once DOL issues guidelines.

The workgroup determined that all of the performance indicators will be communicated through the technology developed by the Mississippi Department of Employment Security, which is already in place. A conceptual policy plan and timeline were developed to outline how all of the systems will share data, create reports, etc. Additional components to develop for this shared system will include a dashboard that allows workforce partners to view the status of performance indicators calculated in near real time and a notification system to ensure continuous progress.

6. The Employer Engagement Workgroup was tasked with designing a systematic approach to grow employer engagement and offer solutions on how to manage it. WIOA emphasizes engaging employers across the workforce system to align training with needed skills and match employers with qualified workers. There are 55,000 employers across Mississippi, but the current system is only engaged with 25 percent. The workgroup is committed to increasing employer involvement for Mississippi's workforce system of the future and developing strategies to increase employer engagement.

One strategy is to assign each employer a project manager since most companies prefer one point of contact. To avoid duplication and to streamline the process, the committee created a checklist of what information is needed from employers so that everything is addressed at one time. The group decided to contact employers less but in a more valuable way. Understanding the needs of the employer, referring them to the appropriate workforce partner, and ultimately following through on requests bring considerable value and will increase credibility and participation. When employers experience the positive benefits of the workforce system, they will be more inclined to participate. In addition, employers who help the system should be given priority of service.

Another strategy that will add value for both employers and workforce partners is tracking the engagement progress through technology similar to Mississippi Works. This technology will be designed to streamline the efforts of workforce partners making cold calls and referrals by allowing workforce partners to view data in a secure and centralized system to see who is involved with employer engagement. This strategy will allow Mississippi to have a better understanding of the needs of employers, which in turn directly impacts how the state trains and directs job seekers.

To be continuously effective, workforce partners recognize the need for ongoing professional development and training for themselves. The workgroup strategized that workforce partners should meet on a regular basis and provide cross-training of programs so all of the core agencies will have common knowledge of the services and programs that are offered. This strategy will enhance the referral process and keep the lines of communication open and the sharing of ideas ongoing. This workgroup will identify a curriculum and/or certificate program as well as a coordinator to start this process.

A final strategy from this workgroup identified internships as a win-win for both the employer and job seeker. Mississippi's Institutions of Higher Learning (IHL) and community colleges are working with MDES to match job seekers who are looking for internships. There is an effort to give job seekers both work experience and experience related to their field of study. An internship allows job seekers an opportunity to demonstrate their ability and connect with potential employers.

## Input from Mississippi Businesses

On July 8, 2015, Mississippi conducted a focus group with business representatives to obtain additional input on the plan. The purpose of this focus group was to gauge the interest of businesses in public partnership and determine the needs of Mississippi businesses. Involving the business community enabled the planning workgroups to incorporate a business sector perspective into the planning and implementation of Mississippi's Combined Plan and create momentum for increasing business and industry involvement in the workforce ecosystem. Participants were invited by the State Workforce Investment Board Executive Director. Feedback from attendees was first captured by an online survey, and the results were immediately shared with the focus group. This initial input provided a baseline discussion on the effectiveness of the current workforce system in meeting industry needs and the identification of barriers experienced by employers in locating skilled employees. Strategies to ensure that Mississippi has a successful and thriving business climate were also discussed.

## Communication Plan

Communication was critical to the planning process and to successfully fulfilling the requirements of WIOA. To facilitate communication throughout the entire planning process, a plan was developed to maintain a systematic method of communication across all parties and to ensure a consistent flow of information across all involved parties. The Office of the Governor provided overall guidance and leadership in the implementation of WIOA. The chairman of the SWIB Task Force served as the point of contact between the Governor's Office and the SWIB. Communications between the general public, Internal Workgroup, Subject Matter Experts, the Strategic

Planning and Operational Planning Workgroups, and the SWIB Task Force was coordinated through the SWIB via the executive director of the SWIB. The Management Team, as part of the Internal Workgroup, coordinated all activities and maintained communication with the SWIB. The remaining teams of the Internal Workgroup, specifically the Compliance Team and Public Relations Team, maintained communications with each other to ensure a smooth and consistent flow of information and that the writing of Mississippi's Combined Plan remained on schedule. Subject Matter Experts interacted with the teams of the Internal Workgroup. Any information submitted by the Strategic Planning or Operational Planning Workgroups was shared with the SWIB and all members of the other workgroups.

## State Workforce Investment Board (SWIB) Website

To ensure transparency and compliance with WIOA, the SWIB website ([swib.ms.gov](http://swib.ms.gov)) added a section titled Mississippi Works: WIOA. The purpose of this website was to keep Mississippians informed about the state's strategic plan to create an integrated workforce development system and a process to meet the requirements of WIOA. The Mississippi WIOA Planning Document and the SWIB Workforce Development Needs Study were posted to the website. Information and membership for the Strategic Planning Workgroups and the Operational Planning Workgroups were also available on the website. Dates, times, and locations of upcoming WIOA planning meetings were listed on the website. Beginning on June 15, 2015, a weekly newsletter was posted to the website. These newsletters summarized the progress being made on the development of Mississippi's Combined Plan. These items remained on the website until the plan review and comment period ended on September 28, 2015. The 2020 plan was posted to the SWIB website for a two-week public comment period beginning on February 10, 2020.

## Open Meetings

All planning workgroup meetings were open to the public. Three public forums were held at different stages in the development of Mississippi's Combined Plan in order to invite comments on the plan from the general public. Notice of these public meetings was announced in *The Clarion Ledger* and posted on the websites of the SWIB and involved state agencies (e.g., Mississippi Department of Rehabilitative Services). The initial public forum allowed all concerned individuals the opportunity to voice their comments and concerns regarding the development of the state's plan. The information collected from the initial public forum was collated and provided to the WIOA plan writing team. The second public forum focused on plan implementation. The comments and suggestions from the second public forum were also provided to the WIOA plan writing team. The final public forum was held on September 18, 2015, to reveal the final plan and allow for final comments. Any comments submitted at the final public forum were collated and placed on the SWIB website for public viewing.

## Overview of Process to Designate Local Workforce Development Areas

In accordance with the requirements of section 106 of the Workforce Innovation and Opportunity Act (WIOA) and Mississippi's Local Workforce Development Area Designation Policy (Appendix C), Governor Phil Bryant received and approved requests for initial designation from the four local workforce development boards: Delta, Mississippi Partnership, Southcentral Mississippi Works, and Twin Districts. Prior to submitting the initial designation requests to Governor Bryant, the boards posted the requests on their websites for a public comment period. These areas met the three criteria for initial designation: (1) they were designated as local areas for the purposes of the Workforce Investment Act of 1998 prior to the two-year period preceding the date of enactment of WIOA; (2) they have performed successfully; and (3) they have sustained fiscal integrity.

Subsequent designation of local workforce development areas took place according to Mississippi's Local Workforce Development Area Designation Policy and in compliance with all relevant sections of WIOA.

## Common Assurances (For All Core Programs)

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes



# Program Specific Requirements for Core Programs

## Title I-B

### a. General Requirements

#### Identify the regions and the local workforce development areas designated in the State

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

- Administering Mississippi's WIOA system. This activity happens at MDES and is capped at 5% of the total WIOA allocation. Included costs are accounting, staffing, policy and procedure issuance, monitoring and audit, planning, grant management and liaison with USDOL and the local areas.
- Operating the State's management information systems. The largest expense within the state's Governor's reserve has been the MIS system. Data elements are collected from every participant, each

data element is validated and entered into the MIS system and reports are delivered to USDOL and the four local workforce development areas.

- Incentive grants and technical assistance for local areas.
- Eligible Training Provider information (ETPL). WIOA requires that states maintain and disseminate a list of every approved training program, including detailed performance information such as student completion and employment rates. Customers of all the WIN Job Centers use this list and the performance information to select their training program. Youth programs are also tracked statewide.

ETPL is a statewide, comprehensive, real-time system for the agency's WIOA training programs. Mississippi has automated the processes for eligible training providers' registration, application of training courses and subsequent eligibility. The system also includes the automation of the Individual Training Account (ITA) obligations, the ITA payment system (expenditures), and provides the local workforce development areas and one-stop operators the ability to track obligations, expenditures, and accruals in real time. Mississippi's ETPL system interfaces with the Mississippi Department of Finance and Administration's statewide accounting system for daily invoice payment and reconciliation.

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

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

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

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

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

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

The State developed an employee survey form to determine the specific assistance needed by the affected workers. The form collects information on the employee's education and skill levels, work history, employment assistance needs, and training interests. The survey is completed by the employee as part of the on-site session, collected, and reviewed by the Rapid Response team. The team identifies the worker's specific needs and

coordinates with the WIN Job Center and community college to facilitate the delivery of services from the appropriate partner agencies.

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

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

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

Because MDES serves as the lead agency for Rapid Response in the state, it is uniquely positioned to provide mandated services in the case of natural disasters. As outlined in the MDES Continuity of Operations Plan, the Rapid Response staff are part of the agency's disaster response team. Staff assists in the identification of businesses adversely affected and workers who lost jobs as a result of the disaster. This information is important for the development of requests for National Dislocated Worker Grant funds. Rapid Response staff also assist in disseminating information on emergency unemployment insurance and reemployment services available. The agency disaster response team works with FEMA and other appropriate state and federal agencies to develop strategies for addressing natural disasters to ensure rapid access to the broad range of assistance.

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

The Mississippi Department of Employment Security administers the Trade Adjustment Assistance (TAA) Act.

Providing early intervention to worker groups on whose behalf a TAA petition has been filed:

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

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

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

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

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

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

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

##### **Registered Apprenticeship**

An increasing number of jobs opportunities and low unemployment rates means there are not enough people to fill middle skill jobs in Mississippi. Apprenticeship is one way we are using to fill the middle skill gap. The Mississippi Registered Apprenticeship Program is changing lives, providing more sustainable wages, and promoting a better quality of life for many Mississippians. Apprenticeship in Mississippi is gaining new ground as the state received new funding from the statewide Apprenticeship State Expansion Grant (ASE) and new guidance provided by DOL regarding Non-Registered Apprenticeships.

Since 2016, Mississippi has received a total of four Apprenticeship grants and created new partnerships under the leadership of the Mississippi Apprenticeship Program (MAP). MAP partners include the Governor's Office, the MS Departments of Employment Security (MDES), Human Services (MDHS), Rehabilitation Services (MDRS), Education (MDE), the Mississippi Community College Board (MCCB), and the Mississippi Development Authority (MDA). This collaboration has improved communication and accountability for MAP's expansion goals.

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

##### **Training Provider Eligibility Procedure**

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

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

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

The State of Mississippi is currently modifying its ETP Policy to clarify several issues, including specific guidance for RAPs. The process of registering through the LWDBs will continue to be encouraged but not required because this causes minimal burden on the RAP and connects the RAP with the LWDBs for assistance. Mississippi is revising the ETP policy to include requirements in TEGL 08-19. The policy will be revised by June 30, 2020, with an effective date of July 1, 2020, and will be issued via a WIOA Communication to the Local Workforce Development Areas and posted on the ETPL page of the MDES website.

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

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

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

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

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

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

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

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

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

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

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

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

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

### *c. Youth Program Requirements*

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

**Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.[11]**

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

The State met with the local workforce development area directors to discuss the RFP process for youth providers. In this meeting, requirements were outlined to include performance indicators. The State then provided two draft RFPs to the directors to be used in developing the areas' RFPs. The State reviewed the RFPs prepared by the local workforce development boards and the rating tools. The rating tools were designed to ensure awareness and capacity to meet WIOA performance indicators.

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

The State is implementing a WIOA Common Intake and Reporting System that will capture common participant information for the four core programs. The system will align resources and generate automatic referrals among the core programs.

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 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 work supports that lead to high-demand jobs in targeted sectors.

**Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element. [12]**

**[12] Sec. 102(b)(2)(D)(i)(I)**

Services to eligible youth are delivered through a network of youth providers. The local workforce areas competitively procure independent contractors to deliver youth services.

The State and LWDA's require these contractors to ensure that these services include all 14 program elements outlined in WIOA Section 129(c)(2). The State's participant tracking system, MS Works, has been modified to capture all 14 program elements.

Innovative approaches used by youth providers include the Gateway youth programs, Out-of-School Youth Work Experience, and Career Connections.

The Gateway Youth Program provides one-to-one counseling that helps to develop a personalized individual service strategy that leads to short term and long-term employment. Career Connections offers four types of training designed to equip youth with the education and skills to take advantage of new and increasing job opportunities in high-growth labor markets.

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

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

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

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

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

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

- Provide academically rigorous preparation for work and/or post-secondary education;
- Assist with the transition to work and/or post-secondary education;
- Address the youth’s barriers to work and/or education.
- Some examples include:
  - Alternative high schools;
  - Juvenile boot camps;
  - Wilderness treatment.

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

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

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

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

Mississippi is not a single area state.

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

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

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

The State of Mississippi is seeking a waiver of the requirements at WIOA Section 129 (a)(4)(A) and 20 CFR 681.410, which requires not less than 75 percent of funds allotted to states under Section 127(b)(1)(C), reserved under section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for OSY.

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

3. A waiver of the requirement to expend 75 percent of Statewide activities funding on the OSY population. Mississippi is requesting that this percentage be lowered to 50 percent.

## **Background**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Describes the processes used to:**

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

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

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

See answer at section (D) below

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

See answer at section (D) below

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

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

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

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

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

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

The Mississippi Partnership was the first workforce area in the state to begin implementing the new 50/50 strategy. While there is no strong statewide data to support the shift to the increased percentage for ISY, the Mississippi Partnership provides strong evidence that Mississippi will benefit from this waiver.

The Mississippi Partnership's in-school expenditures have increased tremendously over the last three program years. PY 18 expenditures were approximately 10% in-school vs. 90% out-of-school. PY 19 expenditures to date is approximately 35% in-school vs. 65% out-of-school.

*Table 12: In-School and Out-of-School Expenditures, PY 17-PY 19*

	<b>In-School Expenditures</b>	<b>Out-of-School Expenditures</b>
<b>PY 17</b>	\$58,325.68	\$1,650,604.10
<b>PY 18</b>	\$194,955.04	\$1,619,816.10
<b>PY 19</b>	\$479,518.77	\$858,194.28

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

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

For instance, Twin Districts LWDA will continue to serve OSY in the same capacity; all five OSY providers will continue to serve OSY. An increase of ISY will not decrease our OSY numbers. Adding more ISY will be an enhancement to the total number of youth served in the TDWDA.

The Mississippi Partnership currently has out-of-school youth programs that serves 19 out of 27 counties in our workforce area and is serving over 370 out-of-school youth in PY19. The Mississippi Partnership will continue to provide out-of-school youth services and prepare out-of-school youth for the workforce and continued education.

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

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



at-risk students are exposed to work ready skills and career pathways, the more likely the youth will continue in the school system increasing their graduation rate and future employability.

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

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

**Goal:** Increase the number of work-ready and post-secondary ready students in each local area and build a pipeline of students with work-ready skills identified by employers and necessary to meet employer needs. The goal is to increase the number of students eligible for college dual enrollment and industry recognized credentials and to build a strong partnership with local business and industry.

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

In PY18, the Mississippi Partnership served 134 in-school youth. In PY19, they have served 257 in-school youth and had plans to serve approximately 100 more in-school youth this program year before the COVID-19 pandemic situation. The increase from PY18 to PY19 is a direct result of having the waiver to spend up to 50% of youth funds on in-school youth. They have also been able to build stronger partnerships with local business and industry as a direct result of being able to serve the in-school youth. The Mississippi Partnership is working to link the in-school youth program with industry recognized apprenticeships at local community colleges so there will be a seamless transition for in-school youth who choose to continue their education in career tech fields within LWDA target sectors.

**New Waiver Request**

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

N/A

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

N/A

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

N/A

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

N/A

- a. connecting education and training strategies;

N/A

- b. supporting work-based learning;

N/A

- c. improving job and career results, and

N/A

- d. other guidance issued by the Department.

N/A

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

N/A

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

N/A

Provide notice to any local board affected by the waiver;

N/A

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

N/A

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

N/A

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

N/A

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

#### Title I-B Assurances

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

<b>The State Plan must include</b>	<b>Include</b>
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	No
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

## Wagner-Peyser Act Programs (Employment Services)

### A. Employment Service Staff

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

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

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

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

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

All Wagner-Peyser staff are cross trained to identify Unemployment Insurance eligibility issues and participate in training along with WIOA staff. Wagner-Peyser staff members utilize an issue detection worksheet that is submitted to Unemployment Insurance management when potential issues are detected. Wagner-Peyser management works closely with Unemployment Insurance management to provide continuous training to staff on updated policy information.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**E. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need. An assessment need describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.**

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

Due to the low number of migrant and seasonal farm workers in Mississippi, it is considered a non-significant state relative to the Migrant and Seasonal Farm Worker (MSFW) program. The estimated number of MSFWs during the peak season in the state is 2,500. This is based on data supplied by the WIOA Title 1 section 167 National Farmworker Jobs Program (NFJP) grantee, other MSFW organizations, employer organizations, and federal and/or state agency data sources such as the U.S. Department of Agriculture and the Employment and Training Administration (ETA).

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



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

**2. An assessment of the agricultural activity in the State means: 1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.**

Due to the low number of migrant and seasonal farm workers in Mississippi, it is considered a non-significant state relative to the Migrant and Seasonal Farm Worker (MSFW) program. The estimated number of MSFWs during the peak season in the state is 2,500. 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 30 to 39 counties where the majority of crops are grown. The number of seasonal farmworkers remains constant during these months with more migrant workers coming in during the harvest season (fall).

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

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

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

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

#### 4. Outreach Activities

Narrative not saved yet.

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

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

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

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

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

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

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

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

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

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

### **1) Providing the Full Range of Employment and Training Services to the Agricultural Community, Both Farmworkers and Agricultural Employers, Through the One-stop Delivery System. This Includes:**

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

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

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

MDES is able to reach out to agricultural employers for job development, assistance with job orders, and to ensure that the agricultural employers are able to secure a reliable labor force. MDES staff market the services

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

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

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

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

As a MSFW non-significant state, Mississippi strives to ensure that employment and training services required under WIOA Title I are provided to MSFWs at the WIN Job Center as well through the MDES website. As previously mentioned, services provided to MSFWs in the WIN Job Center include information on unemployment insurance, assessment, counseling, job referrals, job development contacts, training, support services and job placement assistance. Appropriate assessments for each MSFW that registers at the WIN Job Center are conducted, to determine the specific employment and training needs of that worker. The MDES self-service system for employment and unemployment opportunities streamlines the process of getting immediate service that can be delivered anywhere, anytime. Posters and other printed material are posted at farms to provide contact information for the MSFW department. Such information is also provided to local partnering agencies that often come into contact with MSFW many times per year.

## **6. Other Requirements**

### **A. Collaboration**

MDES and MDC work in collaboration where an estimated 300 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 agency 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 2017 AOP.

1. The AOP must include a statement confirming NEJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have

been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The Mississippi AOP for Program Year 2017 was reviewed by the 167 NFJP grantee, and at the discretion of the NFJP other interested groups affiliated with the NFJP were given an opportunity to comment on the state AOP.

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

### C. Data Assessment

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

### D. Assessment of Progress

MDES submits an AOP in accordance with Department of Labor directives each year. MDES completed an AOP for Program Year 2017 in accordance with DOL guidance. PY 2018 data is the most recent data,

Previous year's history based on Program Year (PY) 2018 data:

- Approximately 1062 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 684 interstate clearance orders received.
- There were 684 interstate clearance orders initiated.

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

- Approximately 455 agricultural job orders and openings to be received.
- Most job orders filled will be a combination of H2A and MSFW applicants totaling 100%.
- Approximately 1% of the job orders are expected to be filled by MSFWs.
- Project 647 interstate clearance orders to be received and initiated.

### State Monitor Advocate

The State Monitor Advocate works for MDES; and was afforded the opportunity to review and comment on the Program Year 2017 AOP.

### Wagner-Peyser Assurances

<b>The State Plan must include</b>	<b>Include</b>
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (see 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

### Wagner-Peyser Program Performance Indicators

<b>Performance Indicators</b>	<b>PY 2020 Expected Level</b>	<b>PY 2020 Negotiated Level</b>	<b>PY 2021 Expected Level</b>	<b>PY 2021 Negotiated Level</b>
Employment (Second Quarter After Exit)	65.0	65.0	66.0	66.0
Employment (Fourth Quarter After Exit)	65.0	65.0	65.0	66.0
Median Earnings (Second Quarter After Exit)	3,950	4,000	4,000	4,050
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 <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>



## Adult Education and Family Literacy Act Programs

### A. Aligning of Content Standards

Mississippi adopted the National Governor's Association, Council of Chief State School Officers' Common Core State Standards at all educational levels (K-12), referred to as the Mississippi College and Career Readiness Standards. In July of 2013, the Mississippi Community College Board (MCCB), Office of Adult Education (OAE) adopted the College and Career Readiness Standards (CCRS) for Adult Education released by the Office of Career, Technical and Adult Education (OCTAE) which fully align to the Mississippi K-12 standards. The intent of the adoption of these standards is to improve the quality of instruction in adult education classrooms and formally align standards with current instructional practices.

A statewide CCRS Implementation Team consisting of adult education instructors, local program directors and state staff participated in CCRS Standards-in-Action Training led by LINC'S Trainers on how to implement standards in Mississippi. To ensure the sustainability of standards based instruction throughout the state, OAE has established a train-the-trainer model. Cohorts of instructors who successfully complete and provide applicable evidence of standards-based instruction will be used to train the next cohort of instructors. It is the goal of OAE to create a system of CCRS content specialists/master teachers in Language Arts, Math, Reading, and English as a Second Language to provide regional training, technical assistance, and guidance to instructors in their region, thus ensuring statewide rigorous standards-based instruction in all programs.

In the summer of 2019, all adult education instructors were trained on the foundational units of the standards where they became familiar with the standards for both math and English Language Arts (ELA). Instructors also received training in instructional strategies to implement the standards into their classrooms.

The CCRS Implementation Team has been chosen to participate in a Standards in Action 2.0 pilot, beginning January 2020. Mississippi will have an ELA and a Math team participating in the pilot. The training will be led by Susan Pimentel, author of the College and Career Readiness Standards <https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf>, and will provide guidance on how to align curriculum with the standards, how to recognize when existing curricula should be replaced, and give our state access to nationally recognized standards experts. The team will then provide advanced training to adult education instructors throughout the state.

In order to address the need for educational equity, access and rigor for adult English Language Learners (ELLs), the OAE adopted the English Language Proficiency (ELP) Standards for Adult Education released in October 2016 by the U.S. Department of Education. In August of 2019, all ELL instructors were trained on the ELP Standards. Instructors also received training in instructional strategies to implement the standards into their classrooms. The ELP Standards for Adult Education are essential to ensuring adult ELLs receive the focused and effective instruction they need to access our state's academic content standards. Mississippi's English language acquisition programs will be designed to support ELLs in becoming skilled in reading, writing, and comprehension of English and help ELLs obtain a Mississippi High School Equivalency Diploma and support them as they move toward further education, training, or employment.

### Adult Education and Literacy Activities (Section 203 of WIOA)

The Mississippi Community College Board (MCCB), Office of Adult Education (OAE) is the eligible agency in the State with the responsibility of administering the Workforce Innovation and Opportunity Act of 2014 – Title II Adult Education and Family Literacy Act (AEFLA). The OAE is responsible for administering funds to eligible providers and providing program and performance oversight to grantees.

The purpose of adult education in Mississippi is to enable local adult education programs to develop, implement, and improve adult education and literacy services throughout the state to further the vision and goals as outlined in this State Plan. To support the vision and goals of the State Plan, the OAE established the following goals:

### **1. Improve Outcomes by Scaling Effective Models and Strategies across the State**

The OAE will continue building, expanding and scaling comprehensive career pathways systems and creating conditions across every adult education program to achieve expansion of evidence-based models.

### **2. Increase Postsecondary Transitions and Credential Attainment**

The OAE will provide support and training to local programs to ensure students are transitioning to postsecondary education or training and earning in-demand credentials that lead to self-sustaining employment. The OAE will promote integration of adult education with occupational education and training, as well as development of career pathways systems and authorize the use of funds for integrated education and training and workforce preparation activities.

### **3. Strengthen College and Career Readiness for Adult Learners**

The OAE will provide training and support to local programs to prepare adult learners for success in postsecondary education and the workforce. In addition, all adult education programs will provide the Smart Start Course utilizing the framework developed by the U.S. Department of Education: Employability Skills Framework [U.S. Department of Education: Employability Skills Framework](#).

### **4. Develop Multi-Level Career Pathways Options**

Enable the system to design multiple entry points into postsecondary education for various functioning levels of adult education learners that are aligned to clearly identified student readiness levels and credentials, certifications, and/or degrees that lead to employment in high-growth, family-supporting jobs.

Local programs measure educational levels and progress using standardized assessment tools and must adhere to the assessment policy guidelines disseminated to programs annually. All funded providers are required to record gains using the Mississippi data management online reporting system. State and local providers promote continuous improvement on the performance accountability measures and ensure optimal return on the investment of Federal funds.

The OAE provides funding to eligible local entities for the provision of adult education services through a competitive Request for Application (RFA) process. In 2017, the OAE published a competitive Request for Application (RFA) soliciting statewide eligible providers to apply for funding to provide Title II Adult Education and Literacy Services as aligned with the MS Combined State Plan. Twenty-one providers were approved to provide adult education and literacy services through 2020.

In 2020, a new, multi-year competitive RFA will be released. The RFA is the mechanism through which the OAE identifies, assesses and awards multi-year grants to eligible providers throughout the state. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. To ensure programs are of high quality, all eligible providers submitting an RFA are required to provide performance data to support the request for funding. Eligible providers may include a (an):

- 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; and
- partnership between an employer and an entity described above.

The OAE is committed to conducting a competitive process that ensures direct and equitable access to all eligible providers competing for Title II grant funds. Information regarding the application and process will be made available to all potential applicants via a public website and through press releases. An adequate amount of time to complete the application will be allowed, based on best practices as determined by the OAE's procurement department. Submittal of applications will be done in a manner that allows equitable access to all individuals, including those with disabilities. Furthermore, the RFA process will include provisions that ensure organizations not previously funded are given a fair and equitable opportunity to address the requirements of the application.

The RFA process includes a procedure to ensure the applicable Local Workforce Development Board(s) (LWDB(s)) reviews the application and provides comments and/or recommendations regarding the application's alignment to the strategies and goals of the local plan under Section 108 of WIOA.

The thirteen considerations in WIOA, Title II, Sec. 231 (e) will be used as the basis to determine funding decisions. Applicants will be evaluated using a scoring rubric that includes:

- the thirteen considerations;
- alignment to the LWDB(s) strategies and goals;
- description of strategies and activities that promote concurrent enrollment with Title I services and core partner responsibilities;
- data collection;
- demonstrated effectiveness;
- program performance; and
- the ability to provide services that meet the needs of the target population.

Each applicant requesting funds will be 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 (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 will determine whether these or other barriers may prevent participation in the program or activities and the steps to be taken to overcome identified barriers must be included in the application.

All funds received by local providers are to be used to:

1. 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. Individuals eligible for adult education services include those who:

- are at least 16 years of age;
- are not enrolled or required to be enrolled in secondary school under State law; and
- are basic skills deficient;
- do not have a secondary school diploma or its recognized equivalent and have not achieved an equivalent level of education; or
- are English language learners.

2. Provide the following services and activities:

- **Adult Basic Education (ABE):** A program of academic instruction and education services below the secondary level that increase an individual’s ability to read, write, and speak in English and perform mathematics necessary to attain a secondary school diploma or its recognized equivalent, transition to postsecondary education or training, and obtain employment.
- **Adult Secondary Education (ASE):** — A program of instruction designed to help eligible individuals who are English language learners (ELLs) to achieve perform mathematics necessary to attain a secondary school diploma or its recognized equivalent, transition to postsecondary education or training, and obtain employment.
- **English Language Acquisition (ELA):** A program of instruction designed to help eligible individuals who are English language learners (ELLs) to achieve competence in reading, writing, speaking, and comprehension of the English language, and that leads to attainment of a secondary school diploma or its recognized equivalent and transition to postsecondary education and training or employment.
- **Integrated Education and Training (IET):** A service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation and workforce training for a specific occupation or occupational cluster for the purposes of educational and career advancement. IET must include three components:
  - adult education and literacy activities,
  - workforce preparation activities, and
  - workforce training for a specific occupation or occupational cluster.
- **Integrated English Literacy and Civics Education (IELCE):** A program of instruction funded under WIOA, Section 243, which includes education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. It includes instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training. In addition, the program must be provided in combination with IET.

- **Correctional Education Program:** A program of ABE, ASE, or ELL instruction for adult criminal offenders in correctional institutions.
- **Workforce Preparation:** Instruction, activities, programs, or services designed to help an individual acquire a combination of academic, critical thinking, digital literacy, and self- management skills, including competencies in utilizing resources and information, working with others, understanding systems, and obtaining skills necessary for successful transition into (and completion of) postsecondary education and training or employment. Mississippi has developed a 45-hour Smart Start Pathway Course that addresses workforce preparation. Programs are required to provide the Smart Start Pathway Course as part of their core services.
- **Workforce Training:** Training for a specific occupation or occupational cluster for the purpose of educational and career advancement. Workforce training may include:
  - (1) occupational skill training;
  - (2) on-the-job training;
  - (3) incumbent worker training;
  - (4) programs that combine workplace training with related instruction;
  - (5) training programs operated by the private sector;
  - (6) skill upgrading and retraining;
  - (7) entrepreneurial training;
  - (8) transitional jobs;
  - (9) job readiness training provided in combination with services (i) through (viii);
  - (10) adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in any of clauses (i) through (vii); and
  - (11) customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

3) Implement evidence and research based strategies that accelerate learning and promote readiness for postsecondary education and employment:

- **Standards-Based Instruction:** The OAE is committed to a standards-based education system. There are many requirements and assurances in place that require adult education providers to use the College and Career Ready Standards for instruction and to align all curricular resources used for instruction to the Standards. Professional development and ongoing technical assistance for local administrators and instructors will be delivered to support the implementation of standards-based instruction and the integration of bridge programs, workforce preparation activities and career pathway pilots into all adult education and literacy activities.
- **Technology Integration and Distance Learning:** The use of technology to assist adult learners in attaining the skills needed to successfully participate in the 21st century world and to accelerate and extend student learning outside the classroom has been a priority of the OAE for several years. All

funded providers are required to integrate digital literacy skills training into classroom instruction and implement hybrid learning models that strategically blend face-to-face instruction with distance learning activities through the use of a high quality online curriculum to all adult learners.

- **Career Pathways:** The OAE will assist in the development of robust career pathways that include multiple aligned programs with funding from a variety of sources and driven by industry needs as defined through sector strategies and partnerships. Entry points on these pathways must extend to adult learners with barriers such as disabilities, low basic skills, lack of a secondary diploma and lack of English language skills
- **Postsecondary Bridge Programs:** The OAE will develop a program of study model with strategies specifically designed to assist adult learners, including those at the lowest academic skill levels, to successfully transition to postsecondary education and training.
- **Alignment of Services and Concurrent Enrollment:** The OAE will continue to work towards a customer-centered and seamless approach to providing an array of services through strategic and deep collaboration with core partners and other entities in the workforce system. The implementation of programmatic and operational strategies, such as common intake, orientation and assessment and data sharing among all partners will ensure adult learners have coordinated access to needed systems and services.
- **American Job Center Partnership (WIN Job Centers):** Through the development of formal collaborative agreements with local job centers, including co-location when appropriate, adult education providers ensure students as jobseekers have access to information and services that lead to positive employment outcomes.

### Corrections Education and other Education of Institutionalized Individuals

The Mississippi Department of Corrections (MDOC) has been an excellent partner with Mississippi's adult education and literacy programs. One of MDOC's major objectives is to provide educational and career and technical training to incarcerated youth and adults, to ensure a smooth transition for returning citizens and a reduction in the state's recidivism rate. The OAE will continue to work collaboratively with the MDOC in aligning their curriculum and student performance standards, data accountability system and teacher training with the state administered adult education and literacy services.

The OAE will award Section 225 grant funds for corrections education and education of institutionalized individuals using the same Request for Application (RFA) process and timeline described for Section 231 funds. The OAE will award multi-year grants to eligible providers through a competitive RFA. The review of applications will include evaluation based on the 13 considerations outlined in Title II of WIOA. All applications will be evaluated using the same rubric and scoring criteria. Special consideration will be given to eligible applicants indicating priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

The OAE will ensure no more than 20 percent of funds allocated to local providers with grant contracts under Section 231 will be used to carry out Section 225. As part of the grant contract, funded providers will be required to ensure WIOA funds are used to provide educational services to individuals in a correctional or other institutional facility as described in Section 225. Priority must be given to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

Programs will provide adult education instruction at all levels of basic academic skills, for students who meet the eligibility requirements for enrollment. The use of funds will include all allowable activities detailed in Section 225(b)(1-8). Particular emphasis will be in developing programs that integrate the basic skills instruction with life



skills, digital literacy and employability skills (Smart Start Pathway Course) to help participants acquire the necessary abilities to become and remain self-sufficient after leaving prison. Transition focused activities include pre-apprenticeship efforts as well as integrated education and training activities in partnership with apprenticeship efforts. Corrections will continue to be a partner in the career pathway efforts to ensure instructional activities are aligned with regional needs at each correctional location.

### **Integrated English Literacy and Civics Education Program**

The State will use Integrated English Literacy and Civics Education (IELCE) funds in combination with integrated education and training activities to address how to prepare adults, including professionals with degrees and credentials in their native countries, who are English language learners, and place such adults in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and integrate with the local workforce development system and its functions to carry out the activities of the program.

Eligible applicants will be required to describe how they propose to integrate English language acquisition activities and civics education concurrently and contextually. Providers funded to deliver services to adults who are English language learners will address the requirements of fully implementing Integrated English Literacy and Civics Education (IELCE) as described below:

Integration of civics engagement skills into career pathways and workforce preparation activities targeted to English language learners, including professionals with degrees and credentials in their native countries;

Integration of educational technology and hybrid learning models into civics educational activities, including the use of technology and social media to increase learner opportunities for responsible civic engagement;

Training and technical assistance on research and evidence-based instructional strategies that promote deeper learning, including the incorporation of experiential civic learning opportunities;

Collaborative agreements and formal partnerships with local area workforce system entities, including American (WIN) Job Centers, libraries, postsecondary institutions and employers; and

Dissemination and replication of evidence-based resources and promising practices.

The OAE will award Section 243 grant funds for Integrated English Literacy and Civics Education (IELCE) programs using the same Request for Application (RFA) process and timeline described for Section 231 and 225 funds. The OAE will award multi-year grants to eligible providers through a competitive RFA. The grants will be awarded on a cycle that is a minimum of three years and all providers will be subject to the same funding cycle. The review of applications will include evaluation based on the 13 considerations outlined in Title II of WIOA. All applications will be evaluated using the same rubric and scoring criteria. Applicants will provide narrative details to demonstrate how they will meet the criteria. As part of the competitive RFA process described above and in Section (b) Local Activities, applicants applying for funds to serve English language learners will also address the requirements of implementing Integrated English Literacy and Civics Education (IELCE) as part of the English Language Acquisition for Adults (ELAA) program. The distribution of both ELAA and IELCE funds across the state will be based on demographic data and needs analysis pertaining specifically to the geographic distribution of eligible individuals with language barriers in each workforce area.

Eligible providers must demonstrate in their application for funds the manner in which the program would be delivered in combination with integrated education and training activities, directly or through collaboration with partners identified in the law or other community-based organizations.

Grantees will deliver the activities under WIOA including the integration of literacy and English language instruction with occupational skill training, including promoting linkages with employers. Further, grantees must

prepare English language learners for unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency, and how they will integrate the program with the local workforce development system to carry out the activities of the program.

Programs applying for IELCE funds under Section 243 will be required to provide IELCE instruction that includes integrated education and training activities. Applicants will be 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 not be limited to, immigration trends, demographics of the English language learners in the area where the program will be provided and employment and labor market statistics 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 231 (e) of WIOA.

Special Note: Programs who provide civics education only in conjunction with English literacy instruction must do so under Section 231.

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

The primary goal of the OAE's use of state leadership funds is to support a system of professional development and technical assistance to ensure a high-quality adult education system that aligns with the goals of the state and local workforce development plans to meet the needs of workers and employers in the state. The system emphasizes program improvement based on data and high-quality research-based technical assistance and professional development opportunities that promote such program improvement.

The OAE will use funds made available under Section 222(a)(2) for the following adult education and literacy activities to develop or enhance the adult education system of the state. Not more than 12.5 percent of the grant funds made available will be used to carry out state leadership activities under Section 223.

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

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

The OAE has aligned adult education and literacy activities with other core programs and one-stop partners as outlined in the State plan. The OAE will assist programs in the coordination and delivery of key services within the one-stop delivery system. These services may include instruction, assessment, support and referral services. The OAE will develop and provide relevant training to assist locals in the development of partnerships within the one stop system.

To assist in aligning services across core programs, Mississippi has provided multiple opportunities for statewide cross-training. In 2019 state level core partners hosted the Governor's Workforce Summit which provided training for state, regional and local staff. This training provided an opportunity to enhance professional growth and development and included topics such as: common intake procedures, common referral processes and specific programmatic information for each core partner. In addition, the development of sector partnerships and career pathway development will continue to be a priority with a focus on aligning services as a participant

transitions from adult education through integrated education and training to further their education and employment opportunities.

Mississippi has four Local Workforce Development Boards (LWDB(s)) and all funded programs are required to develop written agreements to ensure service alignment. Eligible providers align services with local plans to promote concurrent enrollment with Title I programs and activities in order to meet the state adjusted levels of performance and collect data to report on performance indicators. In addition, all providers describe how they will fulfill one-stop responsibilities in their region. As members of LWDBs, local providers will participate in ongoing plan development and implementation of WIOA.

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

The OAE is responsible for designing, implementing and operating statewide professional development activities for all AEFLA funded programs. The OAE utilizes state leadership funds to plan, coordinate and continue implementation of the College and Career Readiness Standards (CCRS) for all eligible providers in the state. The CCRS Team will provide support for the implementation of standards-based instruction both in English language arts and mathematics. State leadership funds will be used to hold conferences and institutes to ensure ongoing professional development in standards-based instruction and other OAE priority areas.

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

Reading is a complex process and many adult learners in Mississippi fall below the 6<sup>th</sup> grade reading level on the TABE assessment. In order to support reading instruction, the OAE developed written guidelines to assist local programs with resources and guidance for classroom instruction.

In order to address the reading skills of students, instructors participate in ongoing professional development to address evidence-based reading practices for teaching the four components that are proven to increase the reading achievement of adult education students. EBRI practices for primary focus differ according to the grade level equivalent (GLE) of students. Mississippi has developed written guidelines for implementing the essential components of reading across the curriculum.

The STudent Achievement in Reading (STAR) program supports local programs with evidence-based reading instruction (EBRI) professional development for instructors of intermediate-level adult learners. Instructors use evidence-based reading instruction (EBRI) to help learners improve their skills in each of the four essential components of reading— alphabetic, vocabulary, fluency, and comprehension—by using EBRI to explain new concepts and strategies, and by providing feedback when learners practice. Mississippi employs two nationally certified trainers who provide ongoing support and resources for local programs. New directors, instructors and mentor/coaches participated in STAR hybrid training in 2019. Training will continue to be offered as needed.

In addition to STAR training, local programs have access to software programs to support the essential components of reading such as Achieve 3000 and Reading Horizons. Reading Horizons is more than just a reading curriculum—it’s an entire ideology about reading instruction that changes the way instructors teach reading. The Reading Horizons Elevate® Comprehensive Teacher’s Kit includes all of the materials needed to

prepare and deliver research-based direct instruction lessons to struggling readers and English Language Learners. The teacher manuals give teachers a complete guide for confidently implementing Reading Horizons strategies in the classroom. The Reading Horizons program incorporates direct instruction as well as individualized instruction via the software provided. Achieve 3000 is a software program that focuses on Lexile levels using benchmark assessments. The program includes differentiated text with embedded assessments using a variety of content to increase students Lexile measures.

The OAE, in partnership with the Literacy Information and Communication System (LINCS), provides Adult Numeracy Instruction (ANI) for funded AEFLA programs. This training focuses on key instructional practices: connections among mathematical ideas; communication of mathematical thinking; mathematical proficiency; and introduction of algebraic and geometric thinking along with basic skills. The training is designed to determine what to teach in adult numeracy instruction, how to teach it and how to teach teachers to teach it. Mississippi has multiple trainers who assist in providing ANI Institutes to local program directors and instructors. In addition, advanced mathematics training is provided to local programs utilizing national instructors from Technical Education Research Centers (TERC) to provide Adults Reaching Algebra Readiness (AR<sup>2</sup>). AR<sup>2</sup> provides instructional strategies for higher level math through research-based methods to increase knowledge and skills of instructors.

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

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

The purpose of professional development (PD) is to raise the level of expertise of Mississippi's adult educators through continuing learning opportunities. All program directors, instructors and staff participate in mandatory professional development throughout each program year. Professional development hours are tracked in the adult education management system and reviewed during desk-top monitoring of programs on a quarterly basis.

The professional development initiative builds a systemic approach incorporating all aspects of adult education. Professional development will focus on the following:

- **Instructor, program director, staff standards** - define what teachers, directors, and support staff need to know and be able to do in order to provide quality programs;
- **Content standards** - define the skills and knowledge that adult learners need to know and be able to do in their roles as workers, parents, and citizens;
- **Program standards** - define the characteristics that exemplary local programs should demonstrate;
- **Professional development standards** - define the essential elements of meaningful professional growth activities;
- **Performance standards** - define expectations for program outcomes;

- **Data quality standards** - ensure reliable and valid data are available to make informed decisions and guide program management.

Ongoing technical assistance is provided to local programs to enhance program effectiveness, increase the ability of providers to meet established program, instructor and performance standards and fulfill obligations associated with being a one-stop partner. Specific areas of focus include: Increasing the capacity of instructors and programs to provide quality instruction in the areas of reading, writing, speaking, mathematics, English language acquisition and distance education via implementation of professional development activities and associated technical assistance such as:

- Annual Adult Education Conference;
- Annual New Teacher Academy;
- Annual ELL Training Institute;
- Assessment training for TABE 11/12 and TABE CLAS-E;
- Components of Integrated Education & Training to include team teaching and development of a single set of learning objectives;
- Using data for program improvement; and
- Integrating technology and instruction in the classroom and online training through customized modules.

The OAE uses a variety of methods to ensure information about proven or promising practices and models is disseminated to local programs, practitioners and participants. These will include activities such as:

- Local program site visits;
- An electronic OAE newsletter with information about training opportunities, high-quality resources and promising practices for instruction and programming;
- Sessions at state, regional and local training to showcase promising practices and models;
- Webinars showcasing promising practices and models; and
- Dissemination of standards and annually updated program guidelines.

The OAE works collaboratively with other core programs and partner agencies to provide comprehensive and wraparound services to program participants. Adult Education provides resources and services through One-Stop Centers (including intake/orientation for Adult Education services, and transition resources), referral processes, and other joint mechanisms developed through agency partnerships. Adult Education is responsible for the development and implementation of the Smart Start Pathway Class which will include assessment and instruction in basic skills, necessary skills and career exploration. Adult Education programs participate in local job fairs and employer engagement activities in collaboration with local workforce development boards and one-stop partners to provide access to employment, education, and training services. In addition, the OAE works with the State Workforce Investment Board (SWIB), the Local Workforce Development Boards and the one-stop system to determine appropriate training needed across partner organizations. The OAE hosts a variety of

regional planning summits/forums/workshops for all partners to enhance and align partnerships in the delivery of services.

The OAE provides annual training related to the use of technology to improve classroom effectiveness and program outcomes. Training may focus on NRS processes and the effective use of the statewide data system in order to maintain accurate student data. The OAE may also provide technical assistance to prepare instructors and program administrators to identify and utilize technology to enhance classroom experiences. State staff provides *Wednesday Webinars* on a monthly basis to provide training to instructors and directors.

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

Fiscal and programmatic evaluations are conducted throughout the year to determine compliance with federal and state requirements. During the course of the fiscal year, programs will be monitored in the following ways:

- **Data Reviews** - OAE conducts frequent and ongoing data reviews using the designated statewide OAE data management system. Areas of review include overall performance and outcomes, assessment data, attendance and compliance.
- **Monitoring Visits** - OAE has established a systematic monitoring schedule for all programs. During site-visits, compliance team members meet with program directors and/or staff, observe classroom instruction, tour facilities and meet with stakeholders (optional). Areas of concern are addressed with the program director either through informal feedback or in some cases, a formal plan.
- **On-Site Program Reviews** -Programs identified for review will be evaluated on the quality of instruction, adherence to policies and procedures and the overall quality of program administration. A formal written report will be provided and each program will be asked to respond to areas that need improvement.
- **Bi-annual Performance Report Card** -OAE provides a bi-annual performance report card to local programs throughout the fiscal year. The report includes year-to-date performance for each of the WIOA performance outcomes. Local programs are asked to develop a Performance Improvement Plan (PIP) to address areas in need of improvement.

One hundred percent of AEFLA funded programs will be monitored annually through the use of desktop monitoring. The OAE monitoring program is risk-based; however, all recipients will receive an on-site monitoring visit at least once every three years.

Programs are identified for on-site monitoring through a comprehensive risk analysis based on the following factors:

1. Desktop monitoring;
2. Need to verify data quality and program expenditures;
3. Consistent low performance on NRS indicators in several categories;
4. Prospective noncompliance with grant requirements identified through review of programmatic and fiscal reports or ongoing communications with the program;



5. Unresolved audit findings;
6. Ongoing lack of progress in resolving required actions from a prior monitoring visit;
7. Significant staff turnover in the program; and
8. Recent or newly establish programs.

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

The OAE provides activities such as:

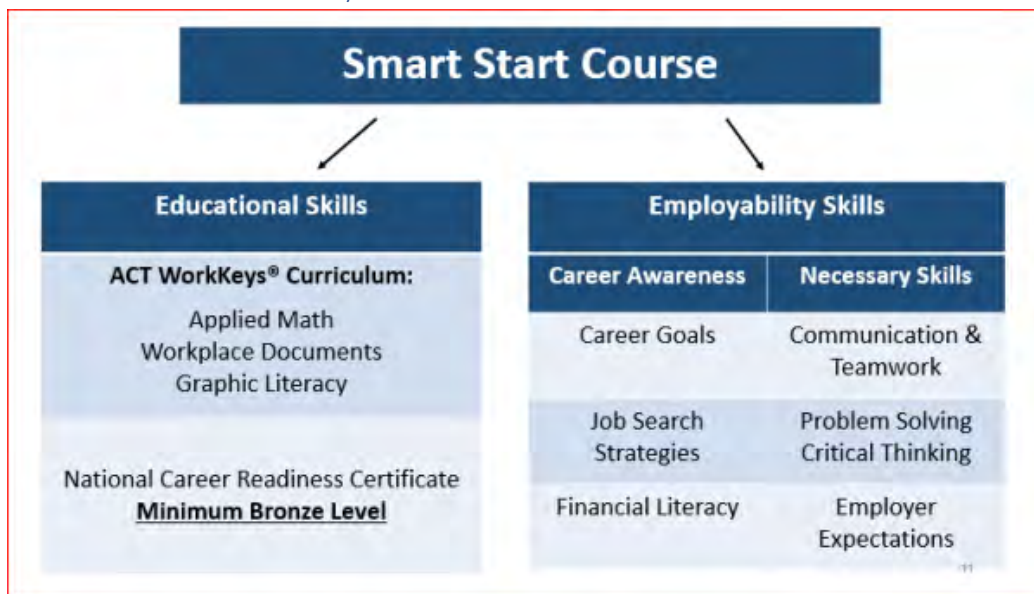
- the operation of professional development programs;
- the provision of technology assistance, including staff training;
- program improvement and support;
- alignment studies with standards and competencies, especially curricula incorporating 21st century skills, workplace readiness activities and phonemic awareness;
- coordination with other agencies to increase enrollment and successful completion in adult education programs; and
- linkages with post-secondary institutions.

Online professional development courses make it possible for Mississippi's adult educators to receive information without disrupting local programs' services for adults. Improved consistency of instruction and reduced travel costs for trainers and participants are also important considerations for implementing distance learning. Online courses can be accessed at the convenience of the educator, thereby enabling new instructors to begin learning about their roles and responsibilities immediately. The OAE developed an online course with multiple modules called *Back 2 Basics* for local program use to provide consistent training on guidelines throughout the state. The interactive course is designed to ensure directors, instructors and staff are knowledgeable on the policies and guidelines for the state. The course has embedded assessments and local examples to ensure transfer of information is occurring. The following interactive modules have been developed:

1. Program Overview: AEFLA and WIOA
2. Mississippi Assessment Policy
3. Intake and Orientation
4. Cumulative Folder Checklist
5. National Reporting System and Data Collection
6. Instructional Practices
7. Retention
8. Transition Services

The OAE has primary responsibility for implementation of the Mississippi Works Smart Start Career Pathway Model through the Smart Start Pathway Course. To meet the requirements of the State plan, the OAE developed a 45-hour Smart Start Pathway Course required for all adult education students. This course helps prepare participants for middle-skill level employment. Participants will develop job skills needed for their careers, learn and practice good work habits and effective communication necessary for successful employment. Participants have the opportunity to earn a Smart Start Credential which includes a National Career Readiness Certificate (NCRC). The NCRC demonstrates to employers the participant has the skills needed to be successful in a job. Participants will complete the WorkKeys tests for Applied Math, Graphic Literacy and Workplace Documents. Participants will also learn new skills for future careers and increase their ability for middle-skill level jobs which results in higher pay. Smart Start Pathway Courses can be taken face-to-face, online, or hybrid.

Figure 19. Smart Start Course Pathways



Participants who meet the minimum requirements of the Smart Start Pathway Course receive a Smart Start Credential and can earn 3 hours of college credit at a local community college. Students enrolled in Integrated Education and Training (IET) pathways are required to take the Smart Start Course as it meets the workforce preparation component for an IET.

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

### Assessing Quality

Fiscal and programmatic evaluations are conducted throughout the year to determine compliance with federal and state requirements. During the course of the fiscal year, programs will be monitored in the following ways:

- **Data Reviews** - OAE conducts frequent and ongoing data reviews using the designated statewide OAE data management system. Areas of review include overall performance and outcomes, assessment data, attendance and compliance.
- **Monitoring Visits** - OAE has established a systematic monitoring schedule for all programs. During site-visits, compliance team members meet with program directors and/or staff, observe classroom

instruction, tour facilities and meet with stakeholders (optional). Areas of concern are addressed with the program director either through informal feedback or in some cases, a formal plan.

- **On-Site Program Reviews** - Programs identified for review will be evaluated on the quality of instruction, adherence to policies and procedures and the overall quality of program administration. A formal written report will be provided and each program will be asked to respond to areas that need improvement.
- **Bi-annual Performance Report Card** - OAE provides a bi-annual performance report card to local programs throughout the fiscal year. The report includes year-to-date performance for each of the WIOA performance outcomes. Local programs are asked to develop a Performance Improvement Plan (PIP) to address areas in need of improvement.

One hundred percent of AEFLA funded programs will be monitored annually through the use of desktop monitoring. The OAE monitoring program is risk-based; however, all recipients will receive an on-site monitoring visit at least once every three years.

Programs are identified for on-site monitoring through a comprehensive risk analysis based on the following factors:

- Desktop monitoring;
- Need to verify data quality and program expenditures;
- Consistent low performance on NRS indicators in several categories;
- Prospective noncompliance with grant requirements identified through review of programmatic and fiscal reports or ongoing communications with the program;
- Unresolved audit findings;
- Ongoing lack of progress in resolving required actions from a prior monitoring visit;
- Significant staff turnover in the program; and
- Recent or newly establish programs.

Local eligible providers are responsible to meet all programmatic goals and outcomes required in their approved Request for Application (RFA). Performance outcomes for each provider will meet or exceed the levels of performance for each of the established National Reporting System benchmarks. The OAE will assess the quality of providers of adult education and literacy activities through data reviews, monitoring visits and performance reports. If a program fails to meet performance indicators or other programmatic requirements, specific actions will be taken to improve the quality of the program. The OAE uses two plans to take action to improve the quality of the adult education and literacy activities.

1. **Corrective Action Plan (CAP)** - A CAP will be implemented with programs out of compliance with state and/or federal policies. The OAE will provide technical assistance throughout the corrective process, and by the end of a designated timeframe, programs should be able to correct the identified issues and end their respective CAP.
2. **Performance Improvement Plan (PIP)** – Local programs who fail to meet or exceed negotiated performance targets are subject to a program improvement plan with clearly defined goals and actions.

A PIP will be required for programs which are identified as low-performing when compared to the state performance on federal or state benchmarks. The PIP will include specific action steps, such as student retention, post-testing and assessment, data analysis, training and professional development which will be designed to improve program performance.

As a part of both plans, the OAE will provide ongoing technical assistance, professional development and other support until the required steps of the plans are completed. The type of technical assistance, professional development and other support will be based upon the specific area(s) of deficiency or need at an individual program.

### Evaluating Professional Development

In order to promote continuous improvement of professional development activities and the impact on student learning outcomes, OAE conducts ongoing and systematic needs assessment and evaluation processes to not only provide information about the impact of professional development, but to provide data for refining and adjusting professional development activities.

- Participant evaluations/surveys are collected for all professional development activities. These evaluations reflect the response of participants to the objectives, material, presentation and the trainer providers.
- Evaluations/surveys are aggregated and evaluated to determine quality of training and adjustments are made according to the results. These results are analyzed for areas in need of improvement and changes are made accordingly.

To support local programs and instructors, a cadre of Program Mentors/Lead Instructors provide ongoing classroom observation, feedback and support to ensure that the objectives of professional development are being effectively implemented in the classroom. Data from the adult education management system are utilized to evaluate and determine if the professional development activities impact student learning outcomes.

### Adult Education and Family Literacy Act Program Assurances

<b>The State Plan must include</b>	<b>Include</b>
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	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

<b>The State Plan must include</b>	<b>Include</b>
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

#### Adult Education and Family Literacy Act Program Certifications

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

#### *Authorizing or Certifying Representative*

<b>APPLICANT'S ORGANIZATION</b>	<b>Enter information in this column</b>
Applicant's Organization	Mississippi Community College Board

<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	<b>Enter information in this column</b>
First Name	Andrea
Last Name	Mayfield
Title	Executive Director
Email	amayfield@mccb.edu

## Section 427 of the General Education Provisions Act (GEPA)

The Mississippi Community College Board, in its capacity as the coordinating Board of the Mississippi Community and Junior Colleges, strongly urges each of the colleges to comply fully with federal and state nondiscrimination laws and executive orders which constitute the legal mandate for equal employment opportunity. The Board also strongly urges each community and junior college to ensure no one shall be excluded from participating in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity of the college on the grounds of race, sex, age, color, creed, national origin, religion, disability or any other protected group. The Board itself further adheres to the principle of equal educational and employment opportunity as mandated by each of these statutes.

The Office of Adult Education (OAE) will ensure to the fullest extent possible equitable access to, participation in and appropriate educational opportunities for all federally funded local adult education programs to include faculty, staff and students with special needs. Activities, programs and services will be accessible to all teachers, students and other program beneficiaries with special needs allowing them to participate fully in the projects. The OAE does not discriminate on the basis of age, color, religion, creed, disability, marital status, veteran status, socio-economic status, national origin, race, gender or sexual orientation in its education and research programs or its services and activities. It provides reasonable and appropriate accommodations to meet the learning and evaluation needs of a diverse group of students, faculty, community members and other participants.

All funded AEFLA programs are required to submit a GEPA plan as part of the application process for the WIOA Competition. The OAE will monitor each local program on the plan submitted as part of the application.

### *Adult Education and Literacy Program Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2020 Expected Level</b>	<b>PY 2020 Negotiated Level</b>	<b>PY 2021 Expected Level</b>	<b>PY 2021 Negotiated Level</b>
Employment (Second Quarter After Exit)	46.0	44.5	47.0	46.3
Employment (Fourth Quarter After Exit)	46.0	44.5	47.0	46.3
Median Earnings (Second Quarter After Exit)	3,100	\$ 2,964	\$3,100	\$ 3,100
Credential Attainment Rate	30.0	30.0	30.0	30.5
Measurable Skill Gains	51.0	49.3	52.0	50.2
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>



*Adult Program Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2020 Expected Level</b>	<b>PY 2020 Negotiated Level</b>	<b>PY 2021 Expected Level</b>	<b>PY 2021 Negotiated Level</b>
Employment (Second Quarter After Exit)	81.0	81.0	82.0	82.0
Employment (Fourth Quarter After Exit)	75.0	78.0	77.0	78.0
Median Earnings (Second Quarter After Exit)	5,600.0	5,400.0	5,800.0	5,600.0
Credential Attainment Rate	52.0	54.0	54.0	55.0
Measurable Skill Gains	Baseline	50.0	Baseline	51.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*Dislocated Worker Program Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2020 Expected Level</b>	<b>PY 2020 Negotiated Level</b>	<b>PY 2021 Expected Level</b>	<b>PY 2021 Negotiated Level</b>
Employment (Second Quarter After Exit)	74.0	74.0	75.0	75.0
Employment (Fourth Quarter After Exit)	65.0	67.0	67.0	67.5
Median Earnings (Second Quarter After Exit)	5,100.0	5,300.0	5,200.0	5,400.0
Credential Attainment Rate	50.0	52.0	52.0	53.0
Measurable Skill Gains	Baseline	45.5	Baseline	46.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*Youth Program Performance Indicators*

<b>Performance Indicators</b>	<b>PY 2020 Expected Level</b>	<b>PY 2020 Negotiated Level</b>	<b>PY 2021 Expected Level</b>	<b>PY 2021 Negotiated Level</b>
Employment (Second Quarter After Exit)	74.0	74.0	75.0	76.0

<b>Performance Indicators</b>	<b>PY 2020 Expected Level</b>	<b>PY 2020 Negotiated Level</b>	<b>PY 2021 Expected Level</b>	<b>PY 2021 Negotiated Level</b>
Employment (Fourth Quarter After Exit)	71.0	72.0	72.0	73.0
Median Earnings (Second Quarter After Exit)	Baseline	2,650.0	Baseline	2,700.0
Credential Attainment Rate	71.0	71.0	72.0	72.0
Measurable Skill Gains	Baseline	48.0	Baseline	48.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## Vocational Rehabilitation

### A. Input of State Rehabilitation Center

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

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

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

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

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

### SRC Questionnaires

1. Do you have any comments or recommendations for input into the Mississippi Department of Rehabilitation Services' Office of Vocational Rehabilitation or Vocational Rehabilitation for the Blind (OVR/OVRB) service delivery system?

**SRC Comments:**

- Please make sure you use person first language. Also, please call back or make contact back with client or client applicant in a timely manner.
- No
- Keep up the great work!
- To educate clients on ABLE Act.
- None
- I think it would be helpful for these reports to be first in the meeting. By the time were listening to them, everyone needed a break. Or build a break into the meeting. The Annual Report was very nicely done. That was clearly a huge job-well done!
- Great Report.
- Recommendations: Counselors provide information on application process/services provided to individuals. Some potential clients may slip through the cracks due to lack of communication between the clients and provider. Some clients are frustrated when follow-up calls/services takes a long time, or non-existent. Another recommendation is to provide counselors with additional training on new code changes or rule changes. This may include the type of services clients are eligible for that includes job training. Hire additional staff to assist with the number of clients that counselors are assigned (host a job fair).
- The numbers served are impressive. The open case satisfaction survey from certain districts did not indicate as high of satisfaction while services were being provided.
- None.
- No. Keep up the great work.
- The number of individuals served by VR and VRB that was presented during this quarter's SRC was impressive. Likewise, the performance data regarding timeliness of eligibility determinations and IPE development was equally impressive. Magnificent job. Employment outcome data presented quarterly would be helpful to understand the end impact to individuals' lives after services.
- No comments.
- None.

**DSU Response:**

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 satisfactions surveys will continue to be provided as a means of providing the DSU with feedback regarding the quality of client services.

2. Having heard this quarter's report on the results of consumer satisfaction surveys, do you have any comments or recommendations for input into the service delivery process?

**SRC Comments:**

- From what I heard from the report the survey results sounded like MDRS was doing a great job.
- No
- Keep up the good work.
- The ratings are excellent. Keep up the great work.
- No comments.
- Keep up the great work.
- I believe MSU does a very nice job calling for the input information
- I wish the consumer satisfaction measures of open and closed cases could be congruent in both questions asked and scale used so that the two could be compared. The reports indicate overall satisfaction. The staff described use of the data to provide feedback to staff that leads to continual improvement.
- Develop a process that can be easily followed by internal administrators and staff and 3rd party entities. Provide customer service training for all staff members and administrators.
- Individuals whose cases are closed continue to have high satisfaction this quarter. That fact speaks a lot for the outcomes of services for peoples' lives. I struggle making a comparison due to the two different scales used for open and closed cases. I would like to see the same 1 to 5 scale used for both. Should the questionnaire consist of the same questions for both measures with possible some sub questions if more information is needed for open cases? The system described for the open cases and the address of concerns in a timely manner with staff seems to be an effective tool to keep staff informed of areas that both lead to any dissatisfaction with customers; as well as areas in which customers are highly satisfied. Good feedback for staff.

**DSU Response:**

The DSU will continue to implement ways and strategies to improve customer service and address those areas of weaknesses that are identified in the consumer satisfaction survey. 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.

3. Do you have any comments or recommendations for input in terms of potential service providers or discussions on the performance of service providers currently being used by OVR/OVRB?

**SRC Comments:**

- Please have MDRS do a yearly review because some of the providers don't work in a timely manner or what until they have enough work in an area before proceeding with work.
- No

- None.
- I am very pleased with what is going on.
- The closed case satisfaction questionnaire ask.
- The closed case satisfaction questionnaire ask specifically about the services providers and indicates high satisfaction from consumers this quarter.
- No comment
- The Pre-ETS service provides were reviewed with the SRC members. This listing seemed comprehensive, statewide, and given students with a disabilities a variety for choices of service.
- Add a detailed list of acronyms on the agency website.
- In person sight visits from state and federal agencies.

**DSU Response:**

The DSU will work on ways to improve our knowledge of the performance of service providers. This will help in providing more quality informed choices to our clients regarding providers of services as they make choices.

We will continue to determine ways to obtain more statewide providers for Pre-Employment Transition Services to help ensure we are able to serve students statewide that need Pre-Employment Transition Services.

**Presentation of Information on Policy**

4. Do you have any comments or recommendations concerning the:

A. Transition Potentially Eligible Program?

**SRC Comments:**

- Not at this time
- No
- Not at this time
- No comments at this point. Service delivery systems appears to be working fine.
- The numbers of outcomes are impressive.

B. Pre-ETS Transitions Services update?

**SRC Comments:**

- Good.

- Good to see that this is growing.
- The discussion regarding providers of Pre-ETS and the plan to publicize which providers provide which services and in which geographic area will be beneficial to staff, customers, and the public. The policy itself that was presented looks well written for staff use. The referencing of law and regulation helps one to understand why procedures are developed in the way that they are developed. Well done!
- No comments
- Excellent.

**DSU Response (A and B):**

The DSU will work to continue to improve the quality and quantity of Pre-Employment Transition Services provided to potentially eligible and eligible students with disabilities.

**C. Alcohol and Drug (A&D) Policy?**

**SRC Comments:**

- Good.
- Thank you so much for approval of the denial letter that residential treatment programs need for DMH Fee services.
- The reasons for a denial for a referral for secondary treatment were explained via a form letter that is available for a staff member to send to a referral source. I would suggest having a check box for use by staff that a consent to disclose information is valid and on file for the entity to be in receipt of the letter.
- No comments
- None.

**DSU Response:**

The DSU updated this procedure in order to provide programs with a means to provide additional funding for clients needing secondary treatment. We will update our Consent to Disclose Information for the clients to sign.

**D. Policy Procedures for Order of Selection?**

**SRC Comments:**

- Great! MDRS serves all.
- Nothing at this time.
- I hope you do not have to implement the order of Selection. The policy seems to be in line with the law. How will you notify the public if you implement Order of Selections?
- No comments or recommendations.
- More information and explanation.



- Informative.

**DSU Response:**

The DSU implemented the changes to the Order of Selection based on federal mandates. The new changes will also allow VR to decide to serve clients who require specific equipment or services should the Order of Selection be implemented. At this time, all Priority Categories remain open.

E. Policy Procedures for Financial Needs Analysis?

**SRC Comments:**

- It's great to know about computers not needing financial needs analysis because it is AT for the person's disability.
- No comments at this point.
- I believe that financial needs analyses do not fit within Vocational Rehabilitation. I believe the spirit of VR is to support job seekers with disabilities to achieve the highest employment outcomes possible. However, many employees with disabilities due to the nature of a disability being progressive or very significant may, in fact, need services more than once to maintain or progress in employment. Financial needs analyses can be an incentive for job seekers and later employees with disabilities to limit their income and earnings as not to earn themselves out of support services that they need. I do believe that all other comparable benefits should be utilized prior to VR funds being utilized. I like that some services are excluded from a financial needs analysis.
- No comments.
- None.

**DSU Response:**

Changing the policy for financial participation will benefit the clients we serve, especially when we have funds available to serve all clients. We do not want to create a hardship for clients that are in need of these services. Computers are more often a requirement for accommodations and accessibility. It is our goal to help ensure that the clients we serve are able to increase their skill gain and earn credentials. Often times, clients may have been eligible for services; however, based on the financial need, VR could not participate in the costs. Previous policy guidelines were developed that indicate that the FAFSA is the primary federal determination regarding a client's ability to pay and the amount of financial assistance they will receive.

F. Blind Enterprise Program Vendor Spotlight

**SRC Comments:**

- This was very good.
- Enjoyed hearing about the success.
- Great process. Recognition of vendors and the services they provide is always needed.
- This a most excellent employment opportunity. I enjoyed hearing from an active and successful BEP Vendor.

- More information from client with complete vision lost.
- All recognitions regarding vendors and the clients they serve should always be front and center during meetings. Good job.
- Informative.

### **DSU Response:**

The DSU values the employment of all Mississippians who are Blind or Visually Impaired. The DSU will endeavor to continue to bring awareness to Blind vendors and commissaries throughout the great state of Mississippi.

The DSU will also implement the quarterly Blind vendor spotlight to display the working abilities, skills and strengths of the Blind and Visually Impaired entrepreneurs of Mississippi. The DSU will continue to support the Business Enterprise Program (BEP) to meet 21<sup>st</sup> century sales guidelines and newly renovated facilities throughout the state.

### **Results of 2019 Consumer Satisfaction Survey**

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

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

The ratings for the various services consumers received are presented below using the average (means) score given to each item by all respondents interviewed. If an item did not apply to a particular respondent or if the consumer did not know or refused to rate an item he/she is not included in calculating the average score for that item. The seven items rated are in the table below (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 poor and 5 being excellent. Thus, a high score indicates that the service was good and a low score that it was poor.

#### *Service Ratings by Consumer*

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

	<b># of Consumers</b>	<b>Average Rating Mean</b>
<b>Q1 The help the OVR staff provided at the time you applied for VR services</b>	1,007	4.75
<b>Q2 The help from the OVR staff during the planning of your services</b>	1,006	4.73
<b>Q3 The help from the OVR staff when you were receiving your VR Services</b>	1,000	4.76
<b>Q4 The help you received from other agencies or service providers</b>	138	4.58

<b>Q7 Your employment outcome</b>	820	4.56
<b>Q8 Employment benefits provided by your new employer</b>	409	4.02
<b>Q9 Overall, how do you rate the services you received?</b>	1,003	4.75

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.

The DSU will work on ways to improve our knowledge of the performance of service providers. This will help in providing more quality informed choices to our clients regarding providers of services as they make choices.

We will continue to determine ways to obtain more statewide providers for Pre-Employment Transition Services to help ensure we are able to serve students statewide that need Pre-Employment Transition Services.

The DSU will work to continue to improve the quality and quantity of Pre-Employment Transition Services provided to potentially eligible and eligible students with disabilities.

We will update our Consent to Disclose Information for the clients to sign.

The DSU implemented the changes to the Order of Selection based on federal mandates. The new changes will also allow VR to decide to serve clients who require specific equipment or services should the Order of Selection be implemented. At this time, all Priority Categories remain open.

Changing the policy for financial participation will benefit the clients we serve, especially when we have funds available to serve all clients. We do not want to create a hardship for clients that are in need of these services. Computers are more often a requirement for accommodations and accessibility. It is our goal to help ensure that the clients we serve are able to increase their skill gain and earn credentials. Often times, clients may have been eligible for services; however, based on the financial need, VR could not participate in the costs. Previous policy guidelines were developed that indicate that the FAFSA is the primary federal determination regarding a client's ability to pay and the amount of financial assistance they will receive.

The DSU values the employment of all Mississippians who are Blind or Visually Impaired. The DSU will endeavor to continue to bring awareness to Blind vendors and commissaries throughout the great state of Mississippi.

The DSU will also implement the quarterly Blind vendor spotlight to display the working abilities, skills and strengths of the Blind and Visually Impaired entrepreneurs of Mississippi. The DSU will continue to support the Business Enterprise Program (BEP) to meet 21<sup>st</sup> century sales guidelines and newly renovated facilities throughout the state.

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. In June 2020, VR and VRB Counselors completed RSA-911 Training. This training is a recorded training that was designed so that Counselors could go back and listen to the training as often as they need to. In addition, this recorded training through Microsoft TEAMS, helped provide consistent information throughout the state. Staff was also provided with an RSA 911 Coding Manual. As we work with more Transition aged students, we continue to see caseloads increase. Initially, the Counselors caseloads were restructured so that more counselors would serve students with disabilities. However, as we move further from the first year of implementation of the new law and regulations in WIOA, we continue to see an increase in caseload size. Recommendations for new Counselors' positions have been made and the need for CRPs that will be able to provide to Pre-ETS to potentially eligible.

When the results of the Consumer Satisfaction Survey are received, this report is provided to the District Managers. When caseloads are identified that show significant weaknesses, managers work with the staff to determine why the issues have occurred and develop strategies to improve the performance of that particular Counselor. Also, follow-up is made to the client to correct the issues.

We will implement training for staff in this area to help address concerns and to help improve the overall quality of services. On-going training in areas identified as a result of the consumer satisfaction survey and overall case reviews assist us in addressing policy and procedure issues and selecting subject areas for on-going staff development. The DSU will also examine ways to improve the survey and accept the recommendation/suggestions regarding the rating scale, etc.

#### **The Results of 2019 Consumer Satisfaction Survey for (Closed Cases) is as follows:**

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

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

The ratings for the various services consumers received are presented below using the average (means) score given to each item by all respondents interviewed. If an item did not apply to a particular respondent or if the consumer did not know or refused to rate an item he/she is not included in calculating the average score for that item. The seven items rated are in the table below (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 poor and 5 being excellent. Thus, a high score indicates that the service was good and a low score that it was poor.

#### *Service Ratings by Consumer*

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

	<b># of Consumers</b>	<b>Average Rating Mean</b>
Q1 The help the OVR staff provided at the time you applied for VR services	1,007	4.75

	<b># of Consumers</b>	<b>Average Rating Mean</b>
Q2 The help from the OVR staff during the planning of your services	1,006	4.73
Q3 The help from the OVR staff when you were receiving your VR Services	1,000	4.76
Q4 The help you received from other agencies or service providers	138	4.58
Q7 Your employment outcome	820	4.56
Q8 Employment benefits provided by your new employer	409	4.02
Q9 Overall, how do you rate the services you received?	1,003	4.75

The DSU will work on ways to improve our knowledge of the performance of service providers. This will help in providing more quality informed choices to our clients regarding providers of services as they make choices. In PY 2019, a Pre-ETS Service provider consumer satisfaction survey was provided to Counselors to rate the satisfaction with the new Pre-ETS Providers. This survey was very helpful in determining the quality of services of the Pre-ETS providers and ways to provide feedback to the provider's regarding their service delivery. We will continue to implement this survey and plan to conduct more vendor/service provider survey at least every two years.

The DSU will work to continue to improve the quality and quantity of Pre-Employment Transition Services provided to potentially eligible and eligible students with disabilities. A Pre-ETS Resource Guide Document was developed and provided for staff so that they would know the services each provider provides, the area of the state they serve and the fees and codes associated with the service. DSU will seek new providers of Pre-ETS to potentially eligible.

The DSU updated this procedure in order to provide programs with a means to provide additional funding for clients needing secondary treatment. We will update our Consent to Disclose Information for the clients to sign. At the request of the SRC, a new letter was also developed to assist Treatment facilities know when the applicant did not apply for VR Services.

Changing the policy for financial participation will benefit the clients we serve, especially when we have funds available to serve all clients. We do not want to create a hardship for clients that are in need of these services. Computers are more often a requirement for accommodations and accessibility. It is our goal to help ensure that the clients we serve are able to increase their skill gain and earn credentials. Often times, clients may have been eligible for services; however, based on the financial need, VR could not participate in the costs. Previous policy guidelines were developed that indicate that the FAFSA is the primary federal determination regarding a client's ability to pay and the amount of financial assistance they will receive. In September 2019, changes were made to the Financial Need Analysis as a result of the recommendations by the SRC and issues that had been expressed by clients and staff. Computers and equipment needed for accommodations (Assistive Technology) was removed from a financial need analysis. Because of the availability of funds, the cost of training, such as college tuition and fees, was not removed from financial participation, however, a baseline amount for all clients despite income was increased. This change will help those clients that were determined eligible, however, based on the calculation of financial participation of the client, VR could not participate in the cost of the service. This change was approved by the SRC.

### **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*

### **A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;**

The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind is requesting will continue to develop targeted third-party services and program agreements with local agencies in Fiscal Years 2020-2023.

These agreements are written and carried out in compliance with 34 CFR 361.28. MDRS, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind requires each agreement describe the services to be provided, will contain written assurances signed by the local education agency that local agencies funds are provided with non-federal funds.

MDRS has on record that no federal funds are used by the LEAs to provide their share of the services.

### **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.

### **Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.**

All agreements approved under this waiver will comply with all requirements of the VR Services portion of the Combined State plan, including the state's Order of Selection for Services requirements and this assurance will be written in all agreements.

As new agreements are added, the current state plan will be updated to add the new agreements that have been entered into.

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**

MDRS, Office of Vocational Rehabilitation (VR) request a waiver of statewideness for its Interagency Cooperative Agreements with local educational agencies.



MDRS sponsors a jointly funded contract employee with the local education agency which implements the position of a VR Transition Contract Employee in the school. These agreements between MDRS - VR and the local educational agency are 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 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, VR/VRB Counselors and/or the LEAs are providing the Pre-Employment Transition Services to these students with disabilities.

MDRS may enter into new agreements with additional school districts during Federal Fiscal Year 2020.

**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 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 32 school districts currently have Interagency Agreements with MDRS for the jointly funded VR Transition Contract Employee: Alcorn County School District, Bay St. Louis-Waveland School District, Booneville School District, Carroll County School District, Clinton Public School District, Coahoma County School District, Columbia School District, Hattiesburg Public School District, Jackson County School District, Jackson Public School District, Jones County School District, Kemper County School District, Kosciusko School District, Lamar County School District, Lauderdale County School District, Laurel School District, Long Beach School District, Madison County School District, New Summit School, North Tippah School District, Ocean Springs School District, Oxford School District, Petal School District, Prentiss County School District, Quitman County School District, Rankin County School District, Senatobia Municipal School District, South Tippah School District, Tishomingo County 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 is currently piloting a cooperative Pre-Employment Transition Services (Pre-ETS): Peer Mentoring Program at Mississippi State University (MSU) and the University of Southern Mississippi (USM) through their disability support services offices. At this time, the Peer Mentoring Program is only available to VR/VRB eligible students at MSU, USM and Hinds Community College. Other postsecondary students across the state are eligible to receive support services through their VR/VRB Counselor and/or through their college disability support offices.

VR may enter into new agreements with additional colleges and universities during Federal Fiscal Year 2020-2023.

- Using federal allocated Pre-ETS funds, MDRS reimburses MSU, USM, 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 statewideness 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 made by the school district with 100% non-federal monies and are certified by the district when MDRS is invoiced for reimbursement by the school district.
- This position is provided under an Interagency Agreement which provides for 50% funding from each agency for the Project SEARCH Transition Contract Specialist position.
- MDRS reimburses the school for one-half the cost of salary, fringe benefits, travel, staff development and other possible items that are necessary to achieve the goals of this agreement.
- MDRS covers the cost of the licensing agreement for the current Project SEARCH sites.
- The services provided are for VR eligible students with significant disabilities that are seeking Competitive Integrated Employment.

The following school districts currently have Interagency Agreements with MDRS for Project SEARCH. New Summit School, Rankin County School District, Petal School District, Jones County School District, Tupelo School District. The following sites will be added in 2020: Brookhaven School District, Neshoba Central School District, Philadelphia School District and Ocean Springs School District.

#### *A. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System*

##### **Federal, State, and local agencies and programs;**

The Mississippi Department of Rehabilitation Services (MDRS), Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind, has cooperative relationships with an extensive number of public and private agencies and programs, including local school districts, community mental health centers, community colleges, universities, human services agencies, and other agencies.

The Office of Vocational Rehabilitation has always strived to maximize and improve the level of services afforded to individuals with the most significant disabilities. The OVR 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 VR to expand and improve services to individuals with significant disabilities in our State will be enhanced and ongoing. These 'methods' entail several administrative and programmatic activities intended to facilitate and/or maintain expansion of services for individuals with significant disabilities.

##### **Cooperative Agreements:**

MDRS and OVR 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 relies on many Cooperative Agreements, memorandums of agreements and contracts with various agencies, organizations and groups.

##### **The entities that OVR is actively involved with include, but is not limited to:**

- Department of Mental Health, Bureau of Mental Health - OVR is currently implementing a statewide provision of services for individuals with severe mental illness. 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.

The purpose of this program is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. This program will result in increased integrated employment opportunities for these individuals.

A comprehensive program evaluation will be completed with mental health sites participating this year, including site visits to the mental health centers as well as discussions with VR Counselors about how the program is working, what is working well and improvements that might help the program.

Throughout the districts, VR offices work with the community mental health centers serving the area. VR Counselors and District Managers will provide orientation and training sessions for mental health center staff and their clients.

Where the community mental health centers have established vocational and Supported Employment programs, OVR often collaborates with these centers to meet the needs of our mutual clients;

- **Mississippi Department of Education** - for the coordination of transition services and local school districts to carry out transition and youth career services plus implement a Transition Contract Employee in participating local school districts;
- **Hinds Community College Disability Support Services and VR Memorandum of Understanding** - provides for both interpreting services in the classroom and the provision of Pre-Employment Transition Services to eligible students. This enables students to participate in their chosen academic coursework as well as preparing them for the world of work upon graduation. Through this partnership, students are equipped with the necessary skills to achieve identified employment goals within their chosen career path;
- **Division of Medicaid** - to provide seamless, non-duplicated services to individuals who are eligible for both Medicaid and VR services and for maximum utilization of resources between the two agencies;
- **Department of Mental Health (DMH) Planning and Advisory Council** - as federally mandated for advice and support. DMH to cover the costs for therapeutic medical services offered at secondary alcohol and drug treatment centers that have been approved by DMH;
- **Department of Mental Health - Bureau of Intellectual and Developmental Disabilities** - to continue enhancing, expanding, and developing methods to support eligible persons with intellectual and developmental disabilities who express a desire for Competitive Integrated Employment; establish a state-level work group to address system, policy and funding issues that impede the continuous provision of employment services by MDRS and DMH; engage MDRS staff and DMH providers and stakeholders at the local level in collaboration and cooperation in the accomplishment of the vision and desired outcomes; identify and disseminate best practices including training and funding strategies; and, provide individuals with intellectual and developmental disabilities with quality employment services that lead to Competitive Integrated Employment in a non-duplicated and seamless manner;
- **Department of Human Services (DHS)-Division of Family and Children Services** - to assess foster care participants who are diagnosed as having physical and/or mental disabilities; **DHS-Division of Field Operations** to assist TANF recipients who are diagnosed with physical and/or mental disabilities;
- **Mississippi Band of Choctaw Indians** - for interagency referrals for vocational rehabilitation services, including transition planning to Choctaw Indians;
- **U. S. Department of Veterans Affairs** - to improve work opportunities for veterans with disabilities and coordinate a referral and service delivery process;
- **Warren-Yazoo Mental Health Service Program of Assertive Community Treatment (PACT)** - to facilitate the most effective and efficient process to assist PACT recipients gain access to vocational rehabilitation services;
- **Department of Transportation** - to coordinate transportation and related program resources and services at the state level wherever possible and promote maximum feasible coordination at the local level;
- **Mississippi State University, T.K. Martin Center** - to provide for evaluations pertaining to assistive technology, primarily related to seating, positioning and mobility; adaptive driving, including bioptic driving; vehicle modifications; and augmentative and alternative communication;

- **Mississippi State University, Student Support Services, and the University of Southern Mississippi / Institute for Disability Studies** operate the **Peer Mentoring Program** - to provide self-advocacy training as part of Pre-Employment Transition Services for post-secondary students with disabilities, and to assist with the transition of these students into post-secondary education in order to achieve degrees in higher education that allow for successful careers;
- **Department of Education, Office of Special Education** - continues the memorandum of agreement to support the seamless transition of students from school to adult life, facilitating the development and completion of their Individualized Education Program. The agreement addresses the Individuals with Disabilities Education Act and the Rehabilitation Act. It includes information about the purpose, authority and scope, foundations of the partnership, roles and responsibilities, confidentiality, student documentation, student eligibility, VR/VRB staff attendance at IEP meetings, coordination of resources, resolution of differences, data reporting, 504 students and termination and changes.

#### 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 operates an Assistive Technology Program to assure the adequate and appropriate utilization of rehabilitation engineering assistance is provided to individuals with disabilities. OVR 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.

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

MDRS 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 representative to present to VR Counselors at their District meetings.

#### Non-educational agencies serving out-of-school youth; and

MDRS, VR/VRB, 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. MDRS will provide accommodations necessary to obtain this credential such as interpreters and tutors that will instruct in the student's natural language. These students, who have struggled with standardized tests due to English being a second language, will have an avenue that will facilitate their educational credential attainment opening further educational opportunities.

Some additional non-educational agencies serving out of school youth in which VR has memorandums of understanding as follows:

- **Department of Mental Health, Bureau of Mental Health** - In 2018, a formalized agreement between the Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and the Mississippi Department of Mental Health, Bureau of Mental Health which serves out of school youth. In PY 2020, an MOU was amended to also service individuals with severe mental illness, including out of school youth. The purpose of this program is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. This program will result in increased integrated employment opportunities for these individuals.
- **Division of Medicaid** - to provide seamless, non-duplicated services to individuals who are eligible for both Medicaid and VR services and for maximum utilization of resources between the two agencies; that serves out of school youth.
- **Department of Mental Health - Bureau of Intellectual and Developmental Disabilities** - to continue enhancing, expanding, and developing methods to support eligible persons with intellectual and developmental disabilities who express a desire for Competitive Integrated Employment. There are specific services under this waiver program that serves out of school youth.
- **Department of Human Services (DHS)-Division of Family and Children Services** - to assess foster care participants who are diagnosed as having physical and/or mental disabilities;
- **Mississippi Band of Choctaw Indians** - for interagency referrals for vocational rehabilitation services, including transition planning to Choctaw Indians;
- **Warren-Yazoo Mental Health Service Program of Assertive Community Treatment (PACT)** - to facilitate the most effective and efficient process to assist PACT recipients gain access to vocational rehabilitation services.

#### State use contracting programs.

Mississippi has no state use contracting programs.

#### *A. Coordination with Education Officials*

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students

To comply with the partnership of WIOA (Workforce Innovation Opportunity Act), MDRS, VR/VRB staff collaborates with the Mississippi Department of Education and has updated the Memorandum of Agreement. This agreement explains how VR/VRB 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 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.

### **Policies and procedure to facilitate the transition of students from school to receipt of VR services**

One of the Mississippi Department of Rehabilitation Services 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-VR/VRB 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 MDRS-VR/VRB 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 the 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 45 and 50 VR Counselors throughout the state who work in preparing students with disabilities for entry into the world of work.

The goal is to help the students with disabilities achieve a seamless transition from high school into the world of work, community, vocational or post-secondary education, and/or other planned outcomes. OVR administers the VR Transition and Youth Career Services Program as specified in Title I of the Rehabilitation Act of 1973, as amended.

District level VR offices and local education districts work together in maintaining local agreements between each VR district office and the local school districts as to *how to* execute the transition services.

There are nearly 143 of these agreements with various school districts resulting in services to about 440 schools. These agreements are shared with other state agencies, family members, and consumer groups to ensure the seamless transition of services for students. The agreements do not include any specified financial agreement other than the implied cost for serving students with disabilities.

Restructuring of the VR Transition and Youth Career Services Program has resulted in additional VR Counselors being assigned to designated high schools, who we refer to as Transition Counselors. These Counselors provide leadership, work with the students, parents, and school personnel.

We also have designated VR Program staff that consist of a Statewide Coordinator for Transition Services. Because of the continued growth in the Transition and Youth Career Services Program, we are anticipating adding additional Transition Coordinators.

VR Counselors are assigned to all public secondary schools, including Mississippi School for the Deaf and Blind.

The counselor and the District Manager establish linkages within each school with the following individuals:

1. Special Education Coordinator;
2. Principal;
3. Guidance Counselor for junior and seniors;
4. School health personnel; and
5. Other school-based staff determined appropriate by the counselor and the District Manager.

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;
2. Work with the school district to appropriately identify students who may benefit from VR services;
3. Participation in school-based transition activities, including conferences and meetings;
4. Participating in information and formal presentations to parent groups;
5. Providing consultation to local education staff regarding challenging or complex situations before or after referral;
6. 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;
7. Attending local educational transition fairs and community job fairs to promote employment;
8. Participating on Transition teams;
9. Participating in local meetings that provide services to students;
10. Determine eligibility for VR services;
11. 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;
12. 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, VR/VRB 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. VR/VRB Counselors and Rehabilitation Counselors for the Deaf will continue to be assigned to designated school districts as identified by the Transition Survey that is coordinated by the Transition Coordinator and local school districts;
3. The VR Transition Counselor will work with the school district each year prior to the beginning of school to provide outreach and information training to the school he/she is assigned;
4. Continue to update Resource Guide and technical information for staff and contract providers to help deliver and coordinate VR services during the transition process
5. VR policy indicates that the IPE will be completed before the student exits high school. This will help ensure that the student on an education/employment track upon exiting high school.
6. Each year, information is obtained from the Department of Education to provide update Special Education staff contact information.

Prior to making services available, the VR Counselor utilizes school documentation, health records, and other pertinent information as deemed appropriate for determining a student with a disability potentially eligible for Pre-Employment Transition Services and/or for determination of eligibility for the VR Transition Program.

The VR Counselor may then collaborate with the student, family members, school district personnel and others to provide Pre-Employment Transition Services (Pre-ETS). MDRS has set aside 15% of its Reserve in order to make the Pre-ETS available to all eligible and potentially eligible students with a disability. Pre-Employment Transition Services encompass five required activities that must be made available for students between the ages of 14 to 21 years old. Pre-ETS include the following: job exploration counseling; work-based learning experiences; counseling on enrollment in comprehensive transition or postsecondary educational programs; workplace readiness training; and instruction in self-advocacy. Pre-ETS should be planned on an eligible student's Individualized Plan for Employment (IPE) through informed choice if they were not previously provided by VR prior to the student applying for VR transition services, or if it is determined that additional Pre-ETS are needed.

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 Vocational Rehabilitation for the Blind, has recently sent Request for Proposals for third party providers to provide Pre-ETS activities in accordance with the Workforce Innovation & Opportunity Act (WIOA). At this time, two proposals have been awarded contracts and additional Request for Proposals are being sought.

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 VR/VRB 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 2018 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 also assures that, with respect to students, the needs identified in the state has developed and will implement new strategies to address the needs identified in the FFY 2018 Comprehensive Statewide Assessment.

### **Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;**

Mississippi has both a state level agreement, Memorandum of Agreement for Transition Planning for Secondary Students with Disabilities between the Mississippi Department of Rehabilitation Services (MDRS) and the Mississippi Department of Education (MDE) and a local level Agreement of Cooperation with each of our education agencies.

The scope of services between MDRS and MDE are described in (d) 2, between MDRS 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 MDRS/OVR and OVRB;
- Responsibilities of Local Education Agency;
- Referral Process;
- Joint Development of IEPs and IPEs; and
- Coordination necessary and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by WIOA, with regard to students with disabilities who are seeking subminimum wage employment.

This Memorandum of Agreement for Transition Planning for Secondary Students with Disabilities is made and entered into by and between the Mississippi Department of Rehabilitation Services, hereafter referred to as 'MDRS', for and on behalf of its Offices of Vocational Rehabilitation and Vocational Rehabilitation for the Blind, hereafter referred to as 'OVR/OVRB', and the Mississippi Department of Education, for and on behalf of its Office of Special Education, hereafter referred to as 'MDE OSE'.

Both the Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act of 1973 (the Rehabilitation Act), as amended by The Workforce Innovation and Opportunity Act (WIOA), require State

Educational Agencies (SEA) and Vocational Rehabilitation (VR) agencies to plan and coordinate transition services, as well as Pre-Employment Transition Services for students with disabilities through a formal Interagency Agreement (Section 612(a)(12) of the IDEA and Section 101(a)(11)(D) of the Rehabilitation Act)

A formal Interagency Agreement is mandated under the Individuals with Disabilities Education Act (IDEA) 34 CFR 300.154, and section 101(a) (11) (D) of the Rehabilitation Act and its implementing regulations at 34 CFR 361.22 (b). Additional references used in this document include Sections 113 and 511 of the Rehabilitation Act, and the Final Regulations: State Vocational Rehabilitation Services Program; State Supported Employment Services Program; Limitations on Use of Subminimum Wage. This Agreement is designed to improve the cooperative and collaborative efforts between OVR/OVRB and MDE/OSE to coordinate the receipt of Pre-Employment Transition Services, Transition Services and other Vocational Rehabilitation (VR) Services to students with disabilities who are eligible for special education services under the Individuals with Disabilities Education Act (IDEA), students who have a 504 plan, and other students with disabilities who are eligible or potentially eligible for services through OVR/OVRB in order to facilitate their smooth transition from school to post-school employment-related activities and Competitive Integrated Employment.

It is also the intent of this agreement to serve as a mechanism for OVR/OVRB and MDE OSE to clearly specify the plans, policies and procedures for coordinating services to facilitate the transition of students with disabilities, including:

- Consultation and technical assistance in the planning for the transition of students with disabilities;
- Transition planning by OVR/OVRB and educational personnel that facilitates the development and implementation of a student's Individualized Education Plan (IEP);
- Roles and responsibilities, including financial and programmatic responsibilities of each agency;
- Procedures for outreach to and identification of students with disabilities;
- Assessment of students' potential need for transition services and Pre-Employment Transition Services;
- Coordination necessary and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by WIOA, with regard to students with disabilities who are seeking subminimum wage employment;
- Assurance that the MDE OSE will not enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage; and
- Additional considerations include grievance procedure to resolve disputes between OVR/OVRB and the MDE OSE, as appropriate, as well as procedures to resolve disputes between an individual with a disability and the entities specified above, and information about the Client Assistance Program.

The Cooperative Agreement between the Office of Vocational Rehabilitation and the Office of Vocational Rehabilitation for Blind and the Mississippi School for the Deaf and Blind was implemented to ensure that students who are Blind and Deaf receive effective seamless services as they make the transition from high school to post-high school education and/or training. This agreement includes Pre-Employment Transition services and other VR services. This agreement follows the same guidelines for all cooperative agreements with Mississippi Department of Education and the local education agency in terms coordination, consultation and technical assistance.

### **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 VR staff working with the school and transition age youth that it is their responsibility to work with students and the school in the school's efforts to develop and implement an IEP so that the student and VR will be able to develop and implement an IPE before the student exists high school. The school system is responsible for inviting the student, his or her parent 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.

### **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 works with the school to either share the cost or determine how the service will be paid. Staff are provided guidelines to help determine how and who will be responsible for the services. Some questions are asked to help guide the decision, such as:

1. Is the service required to help achieve the education goal? If yes, the school has the primary responsibility for payment.
2. Will the service help to achieve the IPE employment goal? If yes, VR has the primary responsibility for payment.
3. If the service is planned on the IEP and IPE, the school and VR are responsible for negotiating a cost sharing agreement. Conflicts between the school and VR are resolved utilizing the process outlined in the Memorandum of Understanding
4. If the student is over 18 and eligible for services through the Department of Mental Health, Bureau for Individuals with Intellectual Disabilities, the school, VR and Mental Health will be responsible for negotiating a cost sharing agreement.

VR 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.

### **Procedures for outreach to and identification of students with disabilities who need transition services.**

Outreach to students with disabilities should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals.

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.

The counselor will actively work in collaboration with their local school district to identify students with disabilities who can benefit from vocational rehabilitation services. Schools usually provide a list of names to the counselor during the first semester of the current school year. Schools may also provide the information to the counselor prior to the end of a school year or during the summer break, which helps with preparation for the upcoming school year. When referring a student to VR, it is recommended that the school district:

1. Understands VR's eligibility requirements and the purpose of VR services;
2. Makes referrals based on student needs;
3. Obtains consent for release of information from the parent, legal guardian or from the student (a student age 18 or older can independently sign the release form unless he/she has a designated legal guardian);
4. Provides documentation that describes the student's disability, needs, preferences, interests, and skills (e.g., interpersonal, work, academic, independent living) which are relevant to vocational rehabilitation and achieving employment. Preferred information includes descriptions of the student's current abilities, work-related capacities and limitations, functional limitations and service needs, if available.

A referral packet which includes a referral letter, the Referral Information Form (MDRS-VR-05), Transition and Youth Referral Form Addendum (MDRS-TY-01) and transition brochure will be sent to individuals the school identifies as someone who may benefit from VR services. Contact will then be made with these referrals and their parents to introduce the vocational rehabilitation program and determine their potential interest in services. When the counselor sends letters to the client, a copy will be sent to the parent/guardian.

Students who express interest in services by returning the appropriate referral paperwork will be scheduled for a meeting with the counselor at school during school hours. The parents of the students must be notified of the meeting and invited to attend. When requested by the parent, other arrangements can be made to begin the application process. During the meeting, the counselor will explain the vocational rehabilitation program and answer questions posed by the student and/or his/her parents/guardians.

The counselor is required to enter the referral information in AACE (the MDRS 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.

#### *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.**

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, VR/VRB 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 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 the some of the same information that providers submit that answer request for proposals. The provider is asked to provide valid W-9 information, evidence of incorporation with the MS Secretary of State, Scope of Services and the professional licensures, certification, credential, qualifications, resumes and job descriptions of key leadership positions. The vendor is also asked to provide information concerning their status as a supplier, grantee, and business structure.

The number of providers for Pre-Employment Transition Services in the state was very limited. To expand the delivery of Pre-Employment Transition Services, and obtain providers for Pre-Employment Transition Services, the Competitive Sealed Proposal process was used to request and obtain proposals from competing sources in response to advertised competitive specifications, through the issuance of a Request for Proposals (RFP), 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 RFP was posted on MDRS external website and in the legal notice 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.

For PY 2019, In order to determine consumer satisfaction with Pre-Employment Transition providers, VR developed a survey to quantify VR staff satisfaction and feedback. The consumer satisfaction survey was collected from VR staff first because this was the first time this type of satisfaction survey had been initiated for the providers of Pre-Employment Transition Services. This mechanism was used in 2020 to assist in determining staff feedback for providers of Pre-Employment Transition Services. Steps will be made in the next two years to develop a consumer satisfaction survey that consumers will be surveyed.

#### Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

MDRS 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 supports 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.

MDRS - VR 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 64 new Extended Service Support Plan Agreements from January 1, 2019 through December 31, 2019. These 64 new agreements are in addition to the agreements previously established and still ongoing.

Providers of long term supports are required to document twice monthly contact with each consumer successfully working in the community, and to maintain this documentation in case files for the duration of that consumer's job. This information is reported monthly to the VR Supported Employment Coordinator for tracking purposes.

WIOA increased the maximum amount of time for SE staff to provide time-limited Supported Employment services to 24 months. However, the rate of transitioning a client to extended services is dependent upon the needs of the individual, his/her family, the employer, the third party agency, and other involved individuals. Since SE staff members and the Extended Service provider will have been collaborating in the provision of SE services throughout an individual's Vocational Rehabilitation Program, such transitions are normally seamless and do not cause job disruptions.

Individuals with chronic mental illness who need special support services, but not job skills training services provided either at the work site or away from the work site in order to obtain employment, perform work skills and maintain employment are provided VR employment services. These services are coordinated with the DMH Case Manager to ensure the individual receives the support and is able to maintain employment.

In VR practice, when stabilization occurs, the client is ready to transition from VR-funded SE services to the appropriate source of ongoing support from the *Extended Service* provider.

Transition to *Extended Services* must take place no later than 24 months after the initial job placement. If there are exceptional circumstances that require ongoing support services to be provided longer than 24 months, the Counselor should justify this in a case note.

VR may provide extended service supports to youth who have a most significant disability and are eligible for SE services. Extended support services provided to youth with the most significant disabilities can continue for a period of time not to exceed four (4) years or until the youth reaches the age of 25 and no longer meets the definition of a youth with a disability (or whichever comes first). VR can begin providing extended support services once initial job stabilization is achieved.

The use of Job Trainers at the worksite is an integral part of SE services. This individual is responsible for learning the job prior to the client coming to work, then teach the job to the client. The trainer not only teaches the work skills needed at the job site but will help the client become adjusted to the new work environment. The job trainer will help the client develop relationships with coworkers and supervisory staff. If the client cannot meet the job standards, the trainer is there to ensure the employer that he work will be done to the business' quality and quantity levels. As the client becomes more independent at the worksite and is able to perform most of the job tasks with minimum intervention by the trainer, the trainer will fade assistance until the case can be closed and the extended service provider assumes the extended long-term support.

The following are possible resources for Extended Services the counselor coordinates with to provide Extended Services:

- Natural Supports: Support from supervisors and co-workers occurring in the workplace to assist employees with disabilities to perform their jobs, including supports 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 adult.

## **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.

## *Coordination with Employers*

### **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.

### **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 taking 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 trainings we provide, the services we offer, and individuals we represent to meet the needs of that business.

### **Services to Business**

OBDs 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 carries a caseload of “job-ready” clients who are willing and ready to return to work. When approaching businesses, the first step for the BD rep is exploration and fact-finding. The goal is to understand the business model and to understand the business’ human capital needs. Once we have a grasp on those topics, then the BD rep moves to try meet those needs of the business with the job-ready client that we are serving through VR. The BD reps primary function is relationship building, understanding their client’s needs, finding opportunities, and connecting our clients to those opportunities. Their performance is graded on their ability to connect their client’s to employment, internships, community-based opportunities, and other services that we provide.



Lastly, OBD has entered into relationships with businesses who want to hire individuals with disabilities on a mass scale. These companies understand the value of diversity and the value that our clients bring to their workforce and want to incorporate this deep within their corporate model. Our office will meet with the businesses and determine how to best achieve this for them. The assessment usually determines how many individuals they are looking for, the specific jobs and areas they need our individuals to work, training existing staff to prepare for individuals with disabilities to work there, and developing training to prepare our individuals for success when entering the workplace.

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

#### **Career Exploration Services**

OBD offers a number of services to help our individuals, student and adult, explore different career opportunities before committing to them. These services are geared to serve the client and business alike. These services include: internships, community-based experiences, job shadowing, on-the-job training, and business sponsored training programs.

Our internship program has recently been expanded from a summer program geared toward students to a year-round programs geared to serving both students and adults whenever the need should arise.

In 2018, VR had 45 adults and 17 students participate in the Summer Internship Program with approximately 58 different employers. In 2019, VR had 56 students participate.

The program is used by BD staff to allow the person 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 MDRS 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. MDRS can cover up to 320 hours to allow the person to train at no cost to the client or business.

Our community-based training program is used by BD staff to allow students and adults, who already have skill sets needed by a partner business, to go into the business, work, and prove themselves and their abilities to the business. The program is used on a shorter term basis to help the client to see if this is an opportunity they'd like to pursue or to allow the business to become sure that this client is a good fit for them. MDRS usually covers between 40 and 80 hours of the cost to the business.

Job Shadowing is a new service to the BD portfolio of services. We saw the need for individuals to go into a business to see how they operate. 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 our 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 the overarching management, the cost, job placement, and the counseling to the program. The students rotate through three 10 week internship rotations during their regular school year. The goal of the program is to gain valuable specific

career skillsets, learn what it means to work, and work through employment hurdles all while still in school. Many of our sites have aimed to hire the students that they work with. While this is nice it is not required and much of the training and career development is geared toward being able to be used elsewhere in the community upon exit.

### *MDRS Community Rehabilitation Program Services to Business*

#### Office of Vocational Rehabilitation

#### **AbilityWorks, Inc.**

AbilityWorks, Inc., a network of Community Rehabilitation Programs (CRP), provides vocational assessment, job training, and actual work experience for individuals with disabilities. This is possible through a wide array of contract and subcontract services provided to local business and industry. It is a division of MDRS with 15 AbilityWorks locations throughout the state. AbilityWork's mission to clients is *"to improve the quality of life, employment opportunities, and integration of people with disabilities into the community"*. The mission to business and industry through the subcontracting program is to provide fast turnaround times, high-quality workmanship, competitive rates, credit rates, credit terms and speedy delivery. Some of the services and products AbilityWorks offers include collating and sorting, packaging and handling, assembly work, product reworking, product reclamation, grounds maintenance, housekeeping and quality reviews.

AbilityWorks enables the VR program staff and employers to work together to identify career exploration opportunities and Competitive Integrated Employment opportunities for clients. Both activities are conducted mainly through Community Based Services connecting the client's abilities with employer opportunities.

AW considers career exploration as a comprehensive process that systematically utilizes work, either real or simulated, as the focal point for evaluation and vocational exploration, the purpose of which is to assist an individual with vocational development.

When a client has an interest in a career but AW cannot provide the client with similar tasks or experiences related to that career, then the AW staff establishes a work-based learning opportunity in the community for the client.

The client gains exposure and experience in the type of career in which he/she is interested, thereby either helping the client realize the career is not the correct choice or reaffirming the client's interest in the career.

The work-based learning experience may additionally help the client and the VR Counselor understand what additional training is required as well as the skills and/or abilities that must be acquired to be successful in the selected career.

Through its AbilityWorks program, MDRS-VR partnered with Sephora to provide training for individuals with disabilities in a warehouse distribution setting. This program began at Sephora's Olive Branch location August 2017.

In regards to the customer service they received, respondents reported the AbilityWorks and Addie McBryde staff treated them with respect, kindness, patience and professionalism over 65% of the time, with proficient knowledge being exhibited at only 55%. It was further noted that punctuality and explaining the situation or process was displayed 50% of the time.

According to survey results, 90.63% of the respondents that attended a CRP received services from AbilityWorks, Inc. The most common and frequent reported services received from AbilityWorks were Work-Adjustment training, Vocational Assessment services, and Community-Based services.

### **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.

According to survey results, 9.38% received services from the Addie McBryde Center. The most common services received from the Addie McBryde Center were Rehabilitation Technology, followed by Orientation and Mobility, Independent Living and Braille Services.

### *Interagency Cooperation*

#### **The State Medicaid plan under title XIX of the Social Security Act;**

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 are 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.

### The State agency responsible for providing services for individuals with developmental disabilities; and

**Mississippi's ID/DD Waiver** provides individualized supports and services to assist individuals with intellectual and developmental disabilities live successfully at home and in the community and are an alternative to care in institutional settings. The ID/DD Waiver includes an array of services aimed at assisting people to live as independently as possible in their home and community. Services include: Supported Employment, Home and Community Supports, Supervised Residential Habilitation, Day Services-Adult, In-Home Nursing Respite, Community Respite, ICF/MR Respite, Prevocational Services, Specialized Medical Supplies, Behavior Support/Intervention Services, and Speech, Occupational and Physical Therapy.

When the IDD Waiver case manager and the individual has determined that competitive integrated employment is an option for the individual with appropriate services, referrals are made to Vocational Rehabilitation.

A formal referral process has been developed and coordinated with the IDD Waiver. The individual's information is submitted to the VR SE Program Coordinator with existing information to assist in expediting the eligibility process.

Upon receipt of referral and agreed upon referral information, the referral is assigned to an SE Counselor who initiates the application for VR Services.

The formal Memorandum of Understanding outlines the services each agency is responsible for, as well, as how service cost sharing will be resolved.

### 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.

The purpose of this program is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery.

This program will result in increased integrated employment opportunities for these individuals. A comprehensive program evaluation will be completed with mental health sites participating this year, including site visits to the mental health centers as well as discussions with VR Counselors about how the program is working, what is working well and improvements that might help the program.

Throughout the districts, VR offices work with the community mental health centers serving the area. VR Counselors and District Managers will provide orientation and training sessions for mental health center staff and their clients.

Where the community mental health centers have established vocational and Supported Employment programs, OVR often collaborates with these centers to meet the needs of our mutual clients as referrals are made to VR for services for those who have been determined to need and want to obtain competitive integrated employment.

*Comprehensive System of Personal Development; Data Systems on Personnel and Personnel Development*

**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, 36 work 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 VR/VRB workforce by filling vacancies and adding positions where needed throughout the state. Currently, MDRS is experiencing vacancies in all of the personnel categories mentioned above, but is actively advertising vacancies to maintain the needed ratios.

The table below displays current VR and VRB personnel.

*Table 13: Current OVR and OVRB Personnel*

<b>Job Title</b>	<b>OVR Filled Positions</b>	<b>OVRB Filled Positions</b>
Counselor	117	21
Counselor Assistant	57	10
Interpreter	8	
Psychometrist	3	
Evaluator	20	
Work Adjustment Instructor	36	

<b>Job Title</b>	<b>OVR Filled Positions</b>	<b>OVRB Filled Positions</b>
Instructors at the Center for the Blind		9

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

Table 14: OVR and OVRB Vacancies and Staff Needs

<b>Job Title</b>	<b>OVR Vacancies</b>	<b>OVRB Vacancies</b>	<b>Current Total Staff Needs</b>
<b>Counselor</b>	13	3	154
<b>Counselor Assistant</b>	17	0	84
<b>Interpreter</b>	3		11
<b>Psychometrist</b>	3		6
<b>Evaluator</b>	7		27
<b>Work Adjustment Instructor</b>	4		40
<b>Instructors at the Center for the Blind</b>		2	11

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.

Table 15: Projected Staffing Need in Five Years

<b>Job Title</b>	<b>Projected Additional Staffing Needs over the Next 5 Years</b>	<b>Total Staff Needed in 5 Years</b>
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<b>Counselor</b>	149	303
<b>Counselor Assistant</b>	68	152
<b>Interpreter</b>	0	11
<b>Psychometrist</b>	3	9
<b>Evaluator</b>	12	39
<b>Work Adjustment Instructor</b>	0	40
<b>Instructors at the Center for the Blind</b>	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.

#### **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 determine 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.

Table 16: Program Data for Institutions of Higher Education

<b>Institutions</b>	<b>Students Enrolled</b>	<b>Employees sponsored by agency and/or RSA</b>	<b>Graduates sponsored by agency and/or RSA</b>	<b>Graduates from the previous year</b>
Jackson State University	39	29	5	7
Mississippi State University	9	2	7	4

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.

Table 16: Program Data for Institutions of Higher Education

<b>Institutions</b>	<b>Students Enrolled</b>	<b>Employees sponsored by agency and/or RSA</b>	<b>Graduates sponsored by agency and/or RSA</b>	<b>Graduates from the previous year</b>
Jackson State University	39	29	5	7
Mississippi State University	9	2	7	4

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 determine 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

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Jackson State University	39	29	5	7
Mississippi State University	9	2	7	4

### **Plan for Recruitment, Preparation and Retention of Qualified Personnel**

The VR Services Portion of the Combined State Plan continues to address the need to recruit and retain qualified staff, including those staff with minority backgrounds and individuals with disabilities.

OHRD encourages managers seeking to hire new counselors to hire only those individuals who meet the requirements of Comprehensive System of Personnel Development (CSPD). If a manager determines that there is not a qualified rehabilitation professional available to fill a vacancy, the vacancy may be filled by an individual with lesser qualifications as long as the individual meets the national standards for a Vocational Rehabilitation Counselor.

VR maintains close relationships with universities including minority institutions such as historically black colleges and universities, and disability specific organizations. VR employees collaborate with universities in securing grant funding; invite university employees to help with training and education activities; and provide practicum and internship slots for students. VR acknowledges that it is not able to easily recruit an adequate number of qualified rehabilitation counselors to replace those retiring and departing for other reasons. VR is currently engaged in the activities indicated below to address recruitment preparation and retention of counselors.

MDRS staff works closely with the graduate programs in Rehabilitation Counseling at both Mississippi State University and Jackson State University by establishing placement opportunities for intern and practicum students, and actively participating in university career development activities, including participation in Career Days and Job Fairs. Representatives from MDRS meet with the graduate students from each program annually to explain career opportunities and the state employment application process.

VR staff is requested by the university to serve on each program's Advisory Council. VR also designates a Program Coordinator to serve on each program's Advisory Council. Working with Jackson State University provides significant opportunities for recruitment of minorities, and MDRS works closely with university support services on both campuses to recruit graduates with disabilities.

### **OVR/OVRB Student Practicum/Internship Programs**

MDRS has an ongoing working relationship with the Institutions of Higher Learning to provide practicum and internship training to college students. Practicum and Internship trainings are coordinated through the OVR/OVRB district or regional manager and the designated OVR program coordinator. A list of all practicum and internship students will be provided to the MDRS Office of Human Resources (HRD) by the OVR Program Coordinator.

In 2019, VR and VRB had 26 interns who were receiving their master's 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 student.
8. Upon a contingent internship offer, a background report will be conducted for all potential interns. Intern Students must comply with the agency's policies pertaining to these issues outlined in Section 8.7 Background Reports on New Employees, of the MDRS Policy and Procedures Manual.
9. Once approval has been given, the department advisor and student will be informed of the start date by the program coordinator.
10. The student will be required to complete the MDRS Confidentiality Certification Statement form and the Computer Rules and Policy Agreement on the first day they report for training. This form will be returned to the program coordinator and a copy of the MDRS Confidentiality document will be given to the student.
11. Upon completion of the practicum/internship training, the MDRS student supervisor will complete the Exit Evaluation for Practicum and Intern Student form. The form shall be submitted to the designated program coordinator. The program coordinator will forward the Exit Evaluation form to the HRD training department.

Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

There is not a state approved or recognized certification, licensure or registration of Vocational Rehabilitation Counselors. VR in conjunction with the State Rehabilitation Council establish the Certified Rehabilitation Counselor (CRC) educational eligibility requirement as its highest standard. Efforts are made to recruit those who meet the CRC educational eligibility status.

However, if MDRS is unsuccessful in finding enough applicants who meet the highest standards, MDRS will accept and consider qualified those who meet the minimum initial standard for providing Counseling and Guidance services, with an understanding of the needs of individuals with disabilities and a 21st century understanding of the evolving labor market and the attainment of:

- A bachelor's degree from an accredited university and one year of experience counseling individuals with disabilities, with an understanding of the needs of individuals with disabilities and a 21st century understanding of the evolving labor market. Alternative majors may be considered such as vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, economics, or another field that reasonably prepares individuals to work with consumers and employers, or attainment of:
- A master's degree or doctoral degree in a field of student such as vocational rehabilitation counseling, law, social work, psychology, disability studies, business administration, human resources, special education, management, public administration, or another field that reasonably provides competence in the employment sector, in a disability field, or in both business-related and rehabilitation-related fields and from an accredited university in a Social, Behavioral or Rehabilitative Science may substitute for the year of required experience.

Policies and activities to ensure that all professional and paraprofessional personnel receive appropriate and adequate training in terms of a system of staff development as follows:

MDRS is committed to assuring that its personnel are qualified to provide the highest quality of service to its constituents. This commitment is demonstrated through a comprehensive training program which begins with orientation and continues throughout the career of the individual employee. A systematic program of skills-based training provides all programmatic and support personnel with the abilities and tools necessary to deliver quality services. Training activities range from providing staff with information about correct and/or better methods of carrying out assigned jobs to providing staff with new and challenging ideas pertinent to the programs in MDRS.

The Division of Training within the Office of Human Resource Development serves as a centralized unit to plan, implement, and coordinate training activities for all VR and VRB staff.

Educational Assistance - MDRS, within the limits of available funds, is authorized, pursuant to Section 37-101-293 of the Mississippi Code of 1972 Annotated, to grant educational assistance to its employees. Educational assistance may consist of any combination of paid educational leave (full-time or part-time) at a maximum salary to be established by the Mississippi State Personnel Board and/or reimbursement for tuition, books, and related fees for undergraduate or graduate level courses. The purpose of the educational assistance program is to encourage employees to develop job-related skills and to develop employees for higher level professional and management positions. Priorities for awarding educational assistance will be based on the established need within MDRS for staff with the educational credentials being sought and the availability of individuals with those credentials in the relevant applicant pool.

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.

VR/VRB 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 and four Orientation and Mobility Specialists throughout the state that work with VRB clients. Three 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.

**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 programs to 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 who did 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 not currently 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 maintains a 21st century knowledge for working with individuals with disabilities, the Core Curriculum series will be provided annually for all Vocational Rehabilitation Counselors and Vocational Evaluators. This training program provides a structured introduction to the Mississippi Vocational Rehabilitation Program presented at the State Office and/or via webinar in two to three day training sessions conducted over the course of a year.

Core Curriculum includes modules on the history and law affecting rehabilitation; program policies; medical and psychological aspects of disability; Accessible Automated Case Environment (the Agency's computerized case management system); counseling theories; job development and job placement; assistive technology; vocational assessment and various commercial evaluation systems utilized by the Agency's CRPs (for Vocational Evaluators); and training on disability-specific issues such as autism, blindness, deafness, etc.

### **Annual Ongoing Staff Development Training Sessions**

Although there has been an emphasis on assisting counselors meet the CSPD standards and developing the technical, managerial and leadership skills of supervisors and managers, VR provides ongoing staff development training to employees at every level.

Ongoing staff development training can include a variety of topics but, generally, include the following:

- Disability-Specific Topics
- Case Management
- Eligibility
- Individualized Plan for Employment (IPE) Development
- Various Types of Caseloads including Supported Employment and Transition
- Issues Regarding Work with Minority Populations, including Cultural Diversity

- WIOA Pre-Employment Transition Services - Customized Integrated Employment
- Other Areas Identified during Case Reviews conducted by MDRS Program Evaluation Staff

### **Additional Training Based on Need**

VR offers individual training allocations for staff members. This allocation can be used for job related professional development activities such as attending conferences, purchasing books, CDs, DVDs or other materials, taking on-line short courses or any other approved professional development activity. Supervisory approval is required for these professional development activities to ensure that employees participate in activities consistent with their individual needs and job responsibilities and requirements. Our HR Department provides consultation and technical assistance to VR employees as needed. Training sessions are held at the district level and in formal statewide training as needed.

In order to address the increasing percentage of retirement eligible employees and the need for knowledgeable managers and supervisors, the MDRS Executive Team established a formal leadership development program. This program, known as Leadership, Education, and Development for Rehabilitation Services (LEADRS), addresses the future loss of institutional memory and the transfer of accumulated wisdom through its development of employee management skills and technical competencies. LEADRS' mission is, *"To educate, develop, and empower current and future leaders of MDRS to sustain and enhance the Department's holistic approach in meeting the needs of Mississippians with disabilities"*.

MDRS also promotes capacity building and leadership development through supervisory staff's participation in a Basic Supervisory Course and the Certified Public Manager Program available through the Mississippi State Personnel Board, and In-service Supervisor Training available through MDRS. In addition, staff members have participated in the National Executive Leadership Program at the University of Oklahoma; the National Rehabilitation Leadership Institute at San Diego State University; the Community Rehabilitation Program Leadership Development Program and the Institute for New Supervisors through Georgia State University; the John C. Stennis State Executive Development Institute at Mississippi State University; and, the South Central Public Health Leadership Institute at the Tulane School of Public Health and Tropical Medicine. The staff development plan is based upon the assessed needs of the staff.

The Performance Development System (PDS) was developed by the Mississippi State Personnel Board in November 2010 to replace the previous Performance Appraisal System and is applicable to all state service employees to evaluate employee performance.

Also incorporated into the employee evaluation process is the employee's Individual Development Plan (IDP), which serves as an employee training needs assessment. IDPs are developed by the employee and evaluated by the supervisor to assure that the employee receives work-related training and training in other areas that the employee and supervisor agree will benefit the employee's performance.

The system of employee performance evaluation does not impede the accomplishment of specific mandates contained in Title I of the Rehabilitation Act. The system facilitates accomplishment by means of including in performance standards the responsibilities of MDRS and its employees under the Rehabilitation Act.

Information from case reviews conducted by the MDRS Program Evaluation Unit is analyzed to evaluate the knowledge and skill of employees as they relate to the policy of serving individuals with the most severe disabilities. Results of such evaluations are included in the development of objectives for the annual VR training plan. Information from annual client surveys is also used in determining training objectives and is incorporated into the VR training plan.

## 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 staff usage.

## Personnel to Address Individual Communication Needs

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 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 or Deaf-Blind. Materials are available in Braille and other accessible formats, as requested by consumers.

MDRS 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.

## Coordination of Personnel Development Under the Individuals with Disabilities Education Act

Mississippi VR and VRB program has an established partnership with the Mississippi Department of Education/Office of Special Education including an executed Interagency Agreement (IA). A new IA has been developed to comply with required content elements of WIOA.

VR and VRB have operationalized the transition and youth services program and has continued to work on improving the quality of those services. To support this, additional staff will be hired to help coordinate, plan and provide services to students with disabilities, coordinate and plan with local education agencies, and to work with district staff.

### Statewide Assessment

Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

With the most significant disabilities, including their need for supported employment services;

Based on information from the 2018 U.S. Census Bureau/ACS, the following types of disabilities in the state:

Table 17: Most Significant Disabilities in Mississippi

Disability Types	Number of Individuals with Disability	% Type of Disability
<b>Ambulatory</b>	266,996	39.2%
<b>Cognitive</b>	183,211	26.98%
<b>Hearing</b>	116,298	17.13%
<b>Vision</b>	112,508	16.57%
TOTAL OF INDIVIDUALS with Disability	<b>679,013</b>	

Based on AACE - VR Case Management System (October 1, 2018 through September 30, 2019), the following types of disabilities served:

Table 18: Types of Disabilities Served by VR Case Management in Mississippi

DISABILITY IMPAIRMENT	VR CLIENTS	VRB CLIENTS	TOTAL (VR/VRB)
<b>Other Physical Impairments Not Listed Elsewhere</b>	2,742	10	2,752
<b>Communicative Impairments (Expressive/Receptive)</b>	2,405		2,405
<b>Other Mental Impairments</b>	2,238	1	2,239
<b>Cognitive Impairments</b>	1,982		1,982

<b>Psychosocial Impairments</b>	726	2	728
<b>Other Orthopedic Impairments</b>	659	2	661
<b>Mobility Orthopedic / Neurological Impairments</b>	655		655
<b>Disability Not Reported (Closed From App)</b>	313		313
<b>Deafness, Communication Visual</b>	220		220
<b>General Physical Debilitation</b>	181	1	182
<b>Manipulation Orthopedic/Neurological Impairments</b>	154		154
<b>Combination Of Orthopedic/Neurological Impairments</b>	152		152
<b>Other Hearing Impairments</b>	129	1	130
<b>Hearing Loss, Communication Auditory</b>	95	1	96
<b>Respiratory Impairments</b>	67		67
<b>Other Visual Impairments</b>	45	1,480	1525
<b>Deafness Comm. Auditory</b>	35		35
<b>Dexterity Orthopedic / Neurological Impairments</b>	28		28
<b>Hearing Loss, Communication Visual</b>	23		23
<b>Legally Blind (Excluding Totally Blind)</b>	5	131	136
<b>Blindness</b>	3	71	74
<b>Deaf-Blindness</b>	1	2	3
<b>Applications</b>		41	41
Total	<b>12,858</b>	<b>1,743</b>	<b>14,601</b>

The Mississippi Department of Rehabilitation, Offices of Vocational Rehabilitation, Office of Vocational Rehabilitation for the Blind and the Mississippi State Rehabilitation Council completed the *2018 Comprehensive Needs Assessment*. The assessment is mandated to be performed every three years. 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.

In addition, data was captured and utilized from the 2018 U.S. Census Bureau/ACS reporting and the AACE Case Management System.

Furthermore, realizing it is crucial for counselors to understand what clients believe to be most helpful and what they perceive to be the greatest obstacles in regards to gaining and retaining employment, the agency developed survey questions and implemented a statewide survey to capture this data.



The results of the 2018 *Comprehensive Needs Assessment* provided the following results: Of those who responded to the survey, 25% indicated they received SE services, 94.87% of those identified as SE participants stated they were receiving all the services they required, 97.44% of the respondents professed the SE staff showed respect, kindness, patience, professionalism and proficient knowledge of the SE program during service delivery.

For adults with most significant disabilities age 25 and older, according to the 2018 Comprehensive Statewide Needs Assessment of the Rehabilitation Needs of Individuals with Disabilities Survey results indicated that 83.33% of the respondents identified themselves as an individual with a disability with the remaining percentage identifying as a family member of a person with a disability or as “other”.

Based on the results of this assessment and information generated from our AACE Case Management system, it is projected that number of individuals with significant disabilities and the number of individuals that need supported employment services will increase in FY 2020 – 2023.

### Who are minorities;

Based on the AACE VR Case Management System 10/1/18 through 9/30/19 results are as follows:

*Table 19: Minorities with Disabilities Who Are Unserved or Underserved by VR*

ETHNICITY/RACE *	VR Clients Served	VR %	VRB Clients Served	VRB %
<b>White</b>	6,966	54.2%	788	45.2%
<b>Black or African American</b>	5,517	42.9%	892	51.2%
<b>Multi-Racial</b>	290	2.3%	43	2.5%
<b>Asian</b>	36	0.3%	8	0.5%
<b>American Indian or Alaskan Native</b>	18	0.1%	2	0.1%
<b>Not Completed</b>	15	0.1%	6	0.3%
<b>Does not wish to self-identify</b>	10	0.1%	1	0.1%
<b>Native Hawaiian or Pacific Islander</b>	6	0.0%	3	0.2%
<b>TOTAL</b>	<b>12,858</b>		<b>1,743</b>	

*\*Data Based on AACE VR Case Management System-10/1/18 through 9/30/19. Note: may have more than one ethnicity.*

### 2018 Comprehensive Statewide Needs Assessment

Based on the *FFY 2018 Comprehensive Statewide Needs Assessment Survey*, for Adult Services (age 25 and older) in regards to race and ethnicity, the results are as follows: 50.4% African-American, 5.38% American Indian, and 3.23% Hispanic.

Based on the AACE VR Case Management System 10/1/18 through 9/30/19, the results reflect that: 5,517 individuals were Black or African American, 36 Asian, 290 Multi-Racial, and 6,966 individuals were White.

Individuals Served by the VR Program: White 6,966 (54.2%), 5,517 Black or African American (42.9%); 290 Multi-Racial (2.3%); 36 Asian (0.3%); 18 American Indian or Alaskan Native (0.1%); Native Hawaiian or 6 Pacific Islander (0.0%).

Individuals Served by the VRB Program: 892 (51.2%) Black; 788 (45%) White; 43 Multi-Racial (2.5%); Asian 8 (0.5%); American Indian or Alaskan Native 2 (0.1%); Native Hawaiian or Pacific Islander 3 (0.2%).

Because of 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;
- Assist individuals in accessing training and training opportunities to compete in today's labor market;
- On-the-Job Training;
- Job Search/Placement Services;
- Vocational Assessment/Evaluation;
- Transportation;
- Training: College/Vocational;
- 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.
- Develop resources and tools to be able to communicate with individuals who are 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; and
- VR and VRB collaborate with minority businesses and service providers that are located in the community in order to develop relationships that lead to employment.
- The Interagency Agreement between MDRS and the Mississippi Band of Choctaw Indians is maintained. Both agencies 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.

#### Who have been unserved or underserved by the VR program;

Access to and services provided by VR/VRB for individuals who are unserved or underserved.

Specific service needs identified for FFY 2020 – 2023 include:

- Increased the outreach activities to assist in creating awareness of available services to meet their needs of individuals in the African American, Asian, Hispanic and Latino communities;
- Transition aged - Youth need to have work experience to put on job applications and to assist in learning soft skills;
- Students as they enter post high school need peer mentors to encourage them (a mentor they can relate to and feel comfortable with);

- Outreach to 504 students and those with physical disabilities;
- Although data indicates that individuals with Mental Illness, Deaf, Intellectual Disabilities and Visual Impairments apply for VR/VRB Services, data supports that individuals with these impairments are less likely to obtain competitive integrated employment and earn living wages;
- A better understanding of available VR services;
- Increase collaboration with the Choctaw Indian Vocational Rehabilitation entity to target services that are not provided by Choctaw VR to assist in increasing employment in the community; and
- VR Counseling and Guidance to assist Career Exploration to obtain access to services that will provide support in employment with competitive wages.
- Continue outreach activities, Career Counseling, and Information Services to combine the needs of students with intellectual and developmental disabilities and those that might have been previously referred from schools to subminimum wage facilities /segregated facilities, rather than VR for career and employment services.
- Transition Students – Increase 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 that 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 work 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.
- MDRS 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.
- MDRS 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. MDRS will also continue to provide outreach to other minority populations to ensure they have information regarding the VR program.

#### Benefits Planning and Counseling

In 2018, (October 1, 2018 through September 30, 2019), the agency served 12,858 VR clients and 1,743 VRB clients. The federal requirement for service rate of all individuals with disabilities is 0.80. Based Standard and Indicator 2.1, Ratio of Minority Service Rate to Non-Minority Service Rate is 0.800. 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.

## 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.

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.

## Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

### Youth and Students with Disabilities

According to the 2017 American Community Survey, 36,422 or 7.6% youth in the state have a disability and 442,700 or 92.4%, youth in the state do not have a disability.

According to the 2017 *American Community Survey*, the *Distribution of Disabled Youth in Mississippi by Disability Type* are: any disability 36,422/100.0; cognitive difficulty only 12,595 or 34.6; ambulatory difficulty only 856 or 2.4%; independent living difficulty only 2,114 or 5.8%; self-care difficulty only 759 or 2.1%; vision difficulty only 5,284 or 14.5%; hearing difficulty only 1,575 or 4.3%; and two or more disabilities 13,239 or 36.3%.

Information on the disabilities experienced by survey respondents: Over one quarter of respondents, (26.5%) reported having a disability of a type not otherwise specified by the survey. After that, the most commonly referenced forms of disability were mental health impairments (23.0%); intellectual impairments (21.4%); neurological impairments (19.4%); communication impairments (9.7%); and visual impairments (9.2%).

According to the 2017 American Community Survey, the characteristics of Mississippi Youth and Students by Disability Status:

Table 20: Characteristics of Mississippi Youth and Students by Disability Status

Characteristic	Disabled		Non-Disabled	
	N	%	N	%
Average Age	19.1	---	18.9	---
Gender				
<b>Male</b>	22,865	62.8	225,926	51.0
<b>Female</b>	13,557	37.2	216,774	49.0
Race				
<b>White</b>	16,665	45.8	230,365	52.0
<b>Black</b>	17,868	49.1	192,331	43.4
<b>American Indian/Alaskan Native</b>	278	0.8	1,475	0.3
<b>Asian/Pacific Islander</b>	594	1.6	4,299	1.0
<b>From Multiple Races</b>	950	2.6	6,223	1.4
<b>Other</b>	67	0.2	8,007	1.8
Hispanic Status				
<b>Hispanic</b>	1,907	5.2	19,392	4.4
<b>Not Hispanic</b>	34,515	94.8	423,308	95.6
Educational-Workforce Status (Age 16-24)				
<b>Enrolled in school</b>	11,953	39.5	227,113	62.3
<b>Not enrolled in school, employed</b>	4,979	16.5	86,125	23.6
<b>Not enrolled in school, unemployed</b>	1,821	6.0	14,932	4.1
<b>Not enrolled in school, not in labor force</b>	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
- 0.76% - Asian
- 76.52% - Black or African American
- 18.94% - White
- 3.03% - Multiple Races
- 1.52% - Other

### Education Level

- 60.61% of respondents were in the 11<sup>th</sup>-12<sup>th</sup> grade. The table below provides a breakdown of the educational level of all respondents.

Based on the 2018 Comprehensive Statewide Assessment Survey, the current level of education responses is:

*Table 21: Current Level of Education Attained by Students and Youth with Disabilities*

Current Level of Education:	%
<b>7-8<sup>th</sup> Grade</b>	1.52%
<b>9<sup>th</sup>-10<sup>th</sup> Grade</b>	5.30%
<b>11<sup>th</sup>-12<sup>th</sup> Grade</b>	60.61%
<b>College or Training Prog.</b>	22.73%
<b>Not in School</b>	12.88%

Respondents were asked to select a category that best described their disability. Results were as follows (*based on the 2018 Comprehensive Survey Results*):

### Transition Responses - Disability Selected - 132 Respondents



- Intellectual Impairments - 39%
- Mental Health Impairments - 15%
- Deafness - 12%
- Neurological Impairments - 11%
- Other Physical Impairments - 9%
- Hearing Loss - 8%
- Communication Impairments - 6%
- Mobility Impairments - 6%
- Visual Impairments - 5%
- Deaf/Blind - 4%
- Respiratory Impairments - 2%
- Blindness - 2%
- Legal Blindness - 2%
- Orthopedic Impairments - 2%

### **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.

Pre-ETS services are made available by the counselor 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:

#### **\*Based on 2018 Comprehensive Assessment Survey:**

Table 22: Pre-ETS Services Provided to Eligible Students with Disabilities

PRE-ETS Services	Received Pre-ETS	Never Received Pre-ETS	Interested in Receiving Pre-ETS	Not Interested in Receiving Pre-ETS
<b>Job Exploration Counseling</b>	53.79%	46.21%	70.45%	29.55%
<b>Work-Based Learning Experiences</b>	54.55%	46.97%	70.45%	29.55%
<b>Workplace Readiness Training</b>	48.48%	51.52%	62.88%	37.12%
<b>Instruction in Self-Advocacy</b>	60.61%	39.39%	65.15%	34.85%
<b>Counseling on Post-Secondary Educational Opportunities</b>	53.79%	46.97%	68.64%	31.36%

Based on the *Comprehensive Needs Assessment* for Disabled Youth in Mississippi, 54.5% of respondents were enrolled in a school or college at the time of the survey. At the time of the survey, 10% were in Grades 7-11, 25.5% were in Grade 12, 7.3% were enrolled in a vocational or certification program, 33.6% were enrolled in a community college, and 23.6% were enrolled in a four-year university. By far the most common level of education, accounting for 59.3% of all respondents, was to have a high school diploma but no additional education. Relatively sizable shares of respondents also completed the 12<sup>th</sup> grade without earning a diploma (17.6%) and gained some college experience but no college degree (8.8%).

### **Employment Plans for Students (based on the 2018 Comprehensive Assessment):**

In order to determine the services that students in the state of Mississippi will need upon graduation from secondary and/or post-secondary education programs, their post-graduation plans were assessed. 33.33% of students indicated they would be employed full time upon graduation. 34.09% did not know their future employment plans and less than 8% reported that this question was not applicable to them.

### **Identify the need to establish, develop, or improve community rehabilitation programs within the State; and**

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.

The Mississippi Department of Rehabilitation Services, through the Office of Vocational Rehabilitation, operates 15 transitional rehabilitation community facilities referred to as AbilityWorks. In 2017, AbilityWorks restructured its services to be able to provide Pre-Employment Transition Services such as work-based learning opportunities and career/vocational exploration services.

These facilities provide a variety of services including Vocational Evaluation, Work Adjustment Training, and 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

Community Rehabilitation Programs (CRP) in Mississippi provide an array of services to students and youth that will assist them in achieving Competitive Integrated Employment. Clients who attend AbilityWorks can receive vocational assessment, job training, work experience or other services based upon their individualized needs. Addie McBryde also provides services 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.

AbilityWorks, Inc., a network of Community Rehabilitation Programs (CRP), provides vocational assessment, job training, and actual work experience for individuals with disabilities. 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.

The Addie McBryde Rehabilitation Center is a comprehensive personal adjustment center for adults who are Blind, Visually Impaired or Deaf-Blind. Through a program of training offered to both residential and day clients, individuals participate in class learning skills which enable the client to successfully live and work independently. Established in 1972, the center is located on the campus of the University of Mississippi Medical Center in Jackson, Mississippi. The facility has a dormitory capacity for 28 clients, a gymnasium, a client library and classrooms equipped with specialized technology for the Blind and Visually Impaired. Certified Instructors individualize training to meet a client's needs during the class day from 8:00 AM to 3:00 PM. Clients participate in additional activities in the 'Achieving Milestones' class focusing on adjustment to vision loss, confidence building, resume writing, interviewing and utilizing resources in the community.

According to survey results, 90.63% of the respondents that attended a CRP received services from AbilityWorks, Inc. while 9.38% received services from the Addie McBryde Center. The most common and frequent reported services received from AbilityWorks were Work Adjustment training, Vocational Assessment services, and Community-Based services. The most common services received from the Addie McBryde Center were Rehabilitation Technology, followed by Orientation and Mobility, Independent Living and braille services.

In regards to the customer service they received, respondents reported the AbilityWorks and Addie McBryde staff treated them with respect, kindness, patience and professionalism over 65% of the time, with proficient knowledge being exhibited at only 55%. It was further noted that punctuality and explaining the situation or process was displayed 50% of the time.

### 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:

- Job Search/Placement Services - 45.45%
- Vocational Rehabilitation Counseling and Guidance - 40.91%
- Transportation - 33.33%
- Job Coaching - 26.52%
- No Other Services Required - 22.73%

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 facilitates this need by opening a VR case. This

service provision will help strengthen VR's efforts to reach more students and strengthen the opportunity for successful employment outcomes.

In accordance with the Rehabilitation Act of 1973, as amended, the inclusion of transition services is not intended to shift the responsibility from school districts to Vocational Rehabilitation (VR) but enforces the need for coordinated efforts between education and workforce programs such as VR.

MDRS, through OVR/OVRB, is the state agency that delivers transition services to secondary school students with disabilities. These counselors work with students, families, and educators during the transition process to inform them of available VR services, including Pre-Employment Transition Services (Pre-ETS), and identify students who might benefit from or need VR services and career services designed to assist in obtaining a post school employment outcome.

While local school districts are responsible for providing education and transition services to students with disabilities who are still in the secondary school system, under WIOA, VR is the state unit that is mandated to make available Pre-ETS begin at age fourteen (14) for all eligible and potentially eligible students with disabilities with parental consent.

District Managers and Counselors are responsible for developing cooperative working relationships with the local education agency staff in the districts and other agencies working with youth. Letters were sent by the State Transition Program Coordinator to the Special Education Directors and 504 Coordinators for each school district to discuss VR services for students with IEPs and 504 plans. The counselor is to follow-up with their Special Education Directors and 504 Coordinators at least annually to discuss the provision of outreach services for students with disabilities and to determine the need for potential referrals.

Counselors are assigned to all public secondary schools. The counselor and the District Manager establish linkages within each school with the following individuals:

- Special Education Coordinator;
- 504 Coordinator;
- Transition Coordinator
- Principal
- Guidance Counselors for grades 8<sup>th</sup> through 12<sup>th</sup>;
- School health personnel; and
- Other school-based staff 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 are 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.

#### *A. Annual Estimates*

##### **The number of individuals in the State who are eligible for services**

In review of the data obtained from the Mississippi Disability Data Table from the 2018 U.S. Census Bureau/American Community Survey (ACS), there are approximately 480,783 Mississippians age 18-64 that have a disability, which is 16.5% of the overall population.

#### **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.

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. In comparing FFY 2019 to FFY 2020, VR/VRB had a 17.97 percent increase in the total number served and an 11.5 percent increase in total costs. These percentages of increase were used to estimate the number of eligible individuals who will receive services in FFY 2020 – FFY 2023.

*Table 23: Estimated Number of Eligible Clients who Will Receive Services*

FFY	Number of Clients who will receive services
<b>2020</b>	13,855



<b>2021</b>	16,345
<b>2022</b>	19,282
<b>2023</b>	22,747

#### The Supported Employment Program; and

In 2018, Mississippi VR provided Supported Employment services to 424 individuals at an average cost of \$2,762.09. In 2019, 510 individuals received SE services with an average cost of \$3,343.83. Based on the 6% increase in the number of individuals that received SE services, MDRS estimates that in 2020, approximately 644 individuals will receive SE services.

#### Each priority category, if under an order of selection.

Mississippi VR/VRB anticipate sufficient resources to provide the full range of VR services to all eligible individuals without implementing the Order of Selection.

*Table 24: Priority Category, if Under Order of Selection*

<b>FFY</b>	<b>PC 1 Served</b>	<b>PC1 Cost</b>
<b>2020</b>	4,038	\$22,082,838
<b>2021</b>	4,159	\$22,745,324
<b>2022</b>	4,283	\$23,427,683
<b>FFY</b>	<b>PC 2 Served</b>	<b>PC 2 Cost</b>
<b>2020</b>	3,957	\$23,036,050
<b>2021</b>	4,076	\$23,727,131
<b>2022</b>	4,198	\$24,438,945
<b>FFY</b>	<b>PC 3 Served</b>	<b>PC 3 Cost</b>
<b>2020</b>	4,102	\$16,339,360
<b>2021</b>	4,226	\$16,829,540
<b>2022</b>	4,352	\$17,334,427
<b>FFY</b>	<b>Total Served</b>	<b>Total Cost</b>

<b>2020</b>	12,097	\$61,458,248
<b>2021</b>	12,460	\$63,301,996
<b>2022</b>	12,834	\$65,201,055

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.

The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

The estimated cost to serve the estimated number of eligible individuals in each Priority Category are as follows: Projections are based on the number of individuals served in each Priority Category and the average cost of the clients served in each Priority Category.

Based on the current trend analysis if the VR Program continues to see the growth in the numbers served and costs of services, we will have to close a priority category. At this time all priority categories are open.

### **Title I Funds**

For FFY 2019 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 2020.

### **Social Security Reimbursements**

During FFY 2019, VR collected \$1,917,794.73 in Social Security Reimbursements. MDRS expects that this reimbursement will remain around the same amounts for FY 2020 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 2019 and 2020, VR did not request additional federal funds and does not anticipate requesting additional federal funds through the reallotment process for FY 2020-2023.

### **Pre-Employment Transition Services**

MDRS set aside \$6,702,139 which is the 15% earmarked for Pre-Employment Transition Services.

#### *A. State Goals and Priorities*

**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.

**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, VR/VRB 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.

VR/VRB will continue to target individuals with disabilities who are already working to retain or progress in employment; previous VR/VRB consumers who may have lost employment to become reemployed; college students nearing completion of their academic programs; and,

- high school transition age youth with disabilities
- individual with blindness and visual impairments
- individuals with deafness and hearing impairments
- youth and adults with most significant disabilities

**Goal I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

**Strategies (Plan of Action):**

- Develop a job placement culture by providing ongoing training in the job development and placement process.
- Develop and implement on-campus work experience training for students who reside in rural communities when community-based work experience is not available.
- Refer those consumers receiving SSI/SSDI cash benefits who are interested in earnings that will eliminate their reliance on SSA cash benefits for work incentives Benefits Analysis and Counseling.
- Coordinate and conduct the Annual Governor's Job Fair for individuals with disabilities.
- Summer Internship Program for high school students with disabilities including those who have blindness and visual impairments, deafness and hard of hearing.

**GOAL II: Improve the VR Service Delivery System to Individuals with disabilities.**

**Strategies (Plan of Action):**

- Designate staff in MDRS districts to be responsible for conducting outreach and orientation sessions on a regular basis.
- Provide input to assure appropriate inclusion of vocational rehabilitation activities in, public service announcements, and agency website and publications.
- Update and distribute vocational rehabilitation brochures to appropriate referral sources.
- Designate and train specific staff members in each district to handle referrals and provide information to the public.
- Assure that all geographic areas of the state are covered with appropriate service delivery staff.
- Develop and implement a consumer satisfaction survey to be completed while the consumer's case is open with VR.
- Develop a consumer satisfaction survey to be completed by the consumer regarding services received from vendors/providers of VR services.

**Goal III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.**

**Strategies (Plan of Action):**

- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are** in special education.
- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are not** in special education.
- Co-develop a formal Interagency Cooperative Agreement with officials from the Department of Education, local school districts and local high schools.
- Plan and coordinate with the Mississippi Department of Education-Special Education Director and Director 504 Services of to plan and conduct at least annual training and semi-annual work groups for the purpose of cross-training in understanding the services offered by Vocational Rehabilitation.
- Develop and implement the use of an OVR Transition Manual designed to assist staff in the delivery of transition services. This manual will be used as a technical assistance tool for transition planning purposes.
- Annually identify 504 Coordinators and special education staff for each school.
- Co-develop and implement self-identification tool identifying youth with disabilities who could possibly benefit from transition services.
- Establish relationships with parent training and information groups, advocacy groups and other service providers to encourage referral and parental participation in the development and provision of transition services.
- Establish comprehensive guidelines and indicators for assessing the individual transition needs of students.
- Work with other core partners in the workforce system to provide employment related services to prevent duplicative services.
- Contract with additional Community Rehabilitation Programs to provide Pre-Employment Transition Services.

**Goal IV: Implement identified improvements to increase statewide consistency and quality of consumer services.**

**Strategies (Plan of Action):**

- Use results of the annual case review to determine where additional guidance and training are required.

- Utilize the new counselor training process for mentoring, training, and leadership development for all VR Counselors.
- Utilize and continue to develop consistent training process for key VR staff that deliver direct client services.
- Conduct annual statewide case record reviews of case service practices to determine consistency and adherence with federal/state requirements. Use case review results to identify and implement improvements in quality and consistency of services.
- Survey OVR staff on practices and provide refresher training to assure consistent and quality service delivery.
- Deliver high quality training and support to provide staff with the knowledge and skills needed to perform effectively.
- Recognize and appreciate staff throughout the division for their contributions to VR's success.
- Continue to update and deliver advanced best practices training to field staff statewide to provide ongoing skill development in key service delivery operations and practices, including a strong focus on customer service, cultural sensitivity, and better addressing each consumer's impediments to employment.
- Increase collaboration within the workforce system to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs.
- Play stronger roles on state and local Workforce Boards to assure that VR consumers and other individuals with disabilities are better served by the One-Stop system.
- Increase collaboration with community colleges to improve coordination of VR services with community college programs and Adult Basic Education programs.
- Implement written agreements with providers for individuals with intellectual and development disabilities to affirm their roles and responsibilities for serving VR consumers, including their capacity for providing long-term employment supports to individuals after the VR case is rehabilitated.

### **Goals Specific to the Service Delivery for Individuals who require Supported Employment Services:**

#### **GOAL 1: Strategies**

- Continue the referral process between MDRS and DMH to identify 'youth with the *most significant disabilities*' who will require SE services;
- Continue the referral process between the VR Transition/Youth Counselor and the VR Supported Employment (SE) Counselor for students with disabilities, ages 14-21, who have been determined to need long-term ongoing support services;
- Ensure equitable distribution of the funds;



- Provide technical assistance to district staff about the appropriate use of the funds;
- Monitor to ensure that the funds are being correctly utilized;
- Obtain service providers for Customized Employment;
- Train all VR Counselors, including those who work with General VR consumers, in Supported Employment
- Increase the number of individuals closed rehabilitated with a Supported Employment Outcome

#### **The most recent comprehensive statewide assessment, including any updates;**

The FFY 2020 – 2023 goals and priorities are based on the 2019 Comprehensive Statewide Needs Assessment, and the 2019 Transition Needs Assessment.

The listed goals and strategies were discussed with some goals being recommended by and developed in collaboration with the SRC.

The goals and strategies were discussed with, some goals recommended by and developed in collaboration with the SRC.

#### **The State's performance under the performance accountability measures of section 116 of WIOA; and**

Over the last year, VR and VRB had met and in some areas exceeded its performance goals based on the performance data provided by RSA, Data Dashboard.

Our Counselor's performance development system has changed as a result of the new Common Performance Measures and the 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.

#### **Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.**

No additional recommendations or reports were received from the SRC.

## Order of Selection

**Whether the designated State unit will implement and order of selection. If so, describe:**

**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, musculoskeletal 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 - VR/VRB Policy on Order of Selection**

At any time that MDRS resources do not permit all eligible consumers to be served, an Order of Selection for services shall be implemented.

In 2015, the Order of Selection process was updated and approved by the State Rehabilitation Council (SRC) and approved as part of the updated 2018 State Plan.

First Priority will be given to consumers with the *most significant disabilities*. The OOS allows for individuals with *most significant disabilities* to receive services before all other individuals with disabilities. Second Priority shall be given to consumers with significant disabilities. Third Priority will be given to other eligible consumers. The Order of Selection was implemented in May 2001. Since July 13, 2009, all Priority Categories have been open.

In 2015, VR updated its Order of Selection which was approved by the State Rehabilitation Council.

**Priority Category 1:** An individual has a *Most Significant Disability* if a mental or physical impairment exists that seriously limits three (3) or more functional capacity areas in terms of an employment outcome and whose vocational rehabilitation will require multiple VR services over an extended period of time.

**Priority Category 2:** An individual has a *Significant Disability* if a mental or physical impairment exists that seriously limits one (1) or two (2) functional capacity areas in terms of an employment outcome and whose vocational rehabilitation will require multiple VR services over an extended period of time.

**Priority Category 3:** An individual has a *Non-Significant Disability* if a mental or physical impairment exists that seriously limits one (1) functional capacity area in terms of an employment outcome and whose vocational rehabilitation will not require multiple VR services over an extended period of time.

MDRS, in consultation with the SRC, will close the Priority Categories designated to be *closed*. Any individual currently under an approved IPE at the time his/her Priority Category is closed will continue to receive with his/her IPE, including the provision of Pre-Employment Transition Services and Post-Employment Services.

Individuals placed in delayed status will be notified of their Priority Category, process for reclassification, their right to appeal, and the availability of the Client Assistance Program (CAP).

If an OOS is implemented, MDRS will provide the following information:

- Show the order to be followed in selecting eligible individuals to be provided VR services
- Provide justification for the order
- Identify the services and outcome goals
- Identify the time within which these goals may be achieved for individuals in each Priority Category within the order

When an OOS is in effect, individuals meeting eligibility requirements but are in a *closed* Priority Category have access to information and referral services. VR will provide all eligible individuals with disabilities who do not meet the OOS criteria with information about, and referral to, other Federal or State programs (including to Workforce Investment Network Job Centers for training and placement) that can assist them with obtaining or retaining employment.

MDRS will elect to provide services, regardless of any established Order of Selection, to eligible individuals who require specific services or equipment to maintain employment.

### 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*.

### The service and outcome goals

Since 2009, MDRS – VR/VRB has been able to keep all Priority Categories open and not maintain a waiting list.

During FFY 2019, VR/VRB all Priority Categories have remained open. MDRS has also had sufficient funds to service all individuals with apply for services. For FFY 2020-2023, MDRS anticipates that all priority categories will remain open and there will be no wait list.

**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.

**How individuals with the most significant disabilities are selected for services before all other individuals with disabilities**

At any time that MDRS resources do not permit all eligible consumers to be served, an Order of Selection for services shall be implemented. When an OOS is in effect, MDRS continues to accept applications and make determinations of eligibility while notifying all eligible individuals of the Priority Category they are assigned.

When an individual is assigned to a category that is *closed*, the individual will be moved to *delayed* status and placed on a waiting list to be served in the chronological order in which he/she applied. Individuals having an active Individualized Plan for Employment (IPE) prior to the implementation of the OOS will continue to receive services uninterrupted.

In 2015, the following Order of Selection was updated and approved:

**Priority 1. Most Significant Disability:** Individual With a *Most Significant Disability*: An individual —

- who has a severe physical or mental impairment that seriously limits three (3) or more functional capacities in the areas of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one (1) or more physical or mental disability(ies) resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, intellectual disability, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), spinal cord conditions (including paraplegia and quadriplegia), sickle cell anemia, specific learning disability, end-stage renal disease or other disability or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitations.

**Priority 2. Significant Disability:** Individual With a *Significant Disability*: An individual -

- who has a severe physical or mental impairment that seriously limits one (1) or two (2) functional capacities in the areas of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;

- whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one (1) or more physical or mental disability(ies) resulting (See List under *Most Significant Disability*)

**Priority 3. Non-Significant Disability:** Individual with a *Non-Significant Disability*: An individual -

- who has a physical or mental impairment that seriously limits one (1) or more functional capacity(ies) in the area of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation is *not* expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one (1) or more physical disability(ies) or combination of disabilities (See list under *Most Significant Disability*)

Individuals having an active plan prior to the implementation of the Order of Selection will continue to receive services uninterrupted.

**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 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, VR/VRB will make the adjustment. No consumer will be moved to a lower Priority Category.

Goals and Plans for Distribution of Title VI Funds

**Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services**

For PY 2020 – 2023, MDRS will continue to invest all Title VI allocations to fund the purchase of job training services, especially job trainers. MDRS expects to continue supplementing Title VI funds as supplemental funds are available and, if possible, continue the level of Title I monies committed to the SE Program. MDRS occasionally supplements Title VI funds with Social Security Reimbursement funds as there is a need for additional funds for program expenditures. MDRS plans to continue this process if Title I funds are not available.

When the Title VI-B funds are awarded, they are distributed to the SE Counselors to fund job coach services for SE clients.

Additionally, MDRS will continue its efforts to increase the funds available for use by the SE program by development and submission of proposals for grants that may become available.

MDRS will also explore ways to utilize available funds more efficiently by entering into Cooperative Agreements with other entities who may participate in the cost of providing services to SE clients.

VR goals and priorities regarding the distribution of Title VI-Part B funds are to:

- Allocate 50 percent of the federal Supported Employment allotment for eligible youth with the most significant disabilities.
- Because based on current case data and referral information, it is anticipated that more individuals will require SE services to obtain and maintain competitive integrated employment, SE Funds will also be used by VR Counselors to purchase SE services from community rehabilitation programs with Cooperative Agreements with the agency as providers become available in the state
- In PY 2020 – 2023, VR staff will continue to collaborate with community partners to add additional providers for SE Services. VR (Title I) Funds will be used to purchase traditional VR employment services and SE Services from Shelby Residential and Vocational Services (SVRS), which is the only third party provider in the state.

#### **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 supports 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.

#### **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 including it 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.

## State's Strategies

### The methods to be used to expand and improve services to individuals with disabilities

The following methods will be used to expand and improve the services to individuals with disabilities.

- Designate staff in each MDRS district to be responsible for conducting Vocational Rehabilitation outreach and orientation sessions on a regular basis.
- Continue to work with local education agencies to identify and provide Pre-Employment Transition Services and Transition Services to students with disabilities.
- Expand Project SEARCH sites to be used as a tool to provide Pre-Employment Transition Services to students with disabilities.
- Utilize relationships with workforce partners at the state and local levels to have more options and resources available for job placement and training.
- Share specific agency expertise to facilitate interagency knowledge to improve services to all participants with disabilities served by any agency within the workforce system.
- Annually evaluate physical location of VR staff to assure that all geographic areas of the state are covered with appropriate service delivery staff.
- Continue to administer a consumer satisfactory survey while the consumer's case is open with VR.
- Develop a consumer satisfaction survey with the consumer regarding services received from vendors/providers of VR services.
- Use case review results to identify and implement improvements and quality consistency of service.
- Increase collaboration within the state's workforce system to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs.

### How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis

VR Counselors evaluate the need for Assistive Technology (AT) services throughout the rehabilitation process. At initial interview, consumers are routinely provided information on accommodations and information in their mode of communication. At *eligibility determination*, the need for AT is assessed and when determined needed, provided as part of the individuals' Individualized Plan for Employment. At employment, the need for additional AT is assessed.

Through the MDRS Assistive Technology (AT) Program, nine Rehabilitation Technologists and two Rehabilitation Engineers are strategically located throughout the state to provide consultation on AT referrals as well as perform initial evaluations and assessments; procure and set up AT equipment; provide follow-up evaluations; design and fabricate original items; and provide specifications and final inspections for AT services.

**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 Needs Assessment* and other data received from the VR Case Management System, individuals with mental illness, cognitive disabilities and Autism Spectrum Disorders are the primary emerging population that are reported as underserved and who staff has requested the most assistance in understanding the disability in terms of employment. VR will seek to provide more training and resources to assist staff in serving this population.

MDRS contracted with RL Brown Group Inc. to translate documents used in routine casework from English into Spanish. MDRS is currently in the process of having all necessary documents and brochures that are made available to the public translated into Spanish. These documents are being uploaded into the case management system and brochures are being made available for those constituents and stakeholders whose natural language is Spanish. District Outreach teams will provide outreach activities in their local communities in efforts to obtain referrals for individuals from diverse populations.

MDRS will continue to monitor the ACS survey data for the most recent race and ethnicity statistics per county to be aware of areas where the information should be disseminated.

MDRS will also continue to provide outreach to other minority populations to ensure they have information regarding the VR program.

**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, and 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.

In 2019, VR and VRB served 4,285 students with disabilities. In 2019, 1,900 were potentially eligible students with disabilities. 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.

#### **If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State**

MDRS, VR/VRB will continue to request proposals 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.

## 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. 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.

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- 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.

### **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 take 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-VR/VRB will continue to work with workforce partners to provide for 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 website for individuals with disabilities including website accessibility. Assistive Technology staff provide expertise to Workforce Partners on building accessibility issues, etc.

MDRS will continue to participate in staff training with the four local workforce development areas that include Mississippi Partnership, Delta, Twin Districts, and South Central Mississippi Works.

Designated staff are assigned to each of the workforce area boards and attend quarterly meetings. This information is shared and communicated with VR staff and assist the local areas and the District offices to work together in providing employment services for common clients.

As part of the Intensive Technical Assistance with the Workforce Innovation Network Technical Assistance Center (WINTAC), we have received assistance and training on service integration, which is referred to as Integration Continuum. The initial meeting was held in August 24, 2017 at the Madison State office, Madison, Mississippi. Representatives from each of WIOA Core Partner agencies were in attendance: Department of Human Services – Temporary Assistance for Needy Families, State Workforce Investment Board, Adult Basic Education, Mississippi Department of Employment Security,

To further assist in moving VR services more toward integration as we have defined it, on-site state meetings were held in March 2019 with the Delta Workforce Area(Greenville), Three Rivers Workforce (Belden) and VR and VRB staff in District 3 and VR and VRB Staff in District 2. In collaboration with the Workforce areas and VR/VRB programs, we recognize the importance of service integration as part of the Combined State Plan and ultimately, to provide the highest level of service to individuals with disabilities that are served by all workforce program. Aligning systems assist in providing quality customer service and quality competitive employment outcomes. WINTAC continued to work with both areas to update and provide guidance for the integration plans that were developed as a result of the March 2019 meetings. A second on-site meeting was being scheduled for April 2020; however, this was postponed due to COVID-19.

## Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The following strategies will be required to achieve the goals and priorities as listed in (l) State Goals and Priorities and (n) Goals and Plans for Distribution of title I Funds:

### **Goal I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

#### **Strategies (Plan of Action):**

- Develop a job placement culture by providing ongoing training in the job development and placement process.
- Develop and implement on-campus work experience training for students who reside in rural communities when community-based work experience is not available.
- Refer those consumers receiving SSI/SSDI cash benefits who are interested in earnings that will eliminate their reliance on SSA cash benefits for work incentives Benefits Analysis and Counseling.
- Coordinate and conduct the Annual Governor's Job Fair for individuals with disabilities.
- Summer Internship Program for high school students with disabilities including those who have blindness and visual impairments, deafness and hard of hearing.

### **GOAL II: Improve the VR Service Delivery System to Individuals with disabilities.**

#### **Strategies (Plan of Action):**

- Designate staff in MDRS districts to be responsible for conducting outreach and orientation sessions on a regular basis.
- Provide input to assure appropriate inclusion of vocational rehabilitation activities in, public service announcements, and agency website and publications.
- Update and distribute vocational rehabilitation brochures to appropriate referral sources.
- Designate and train specific staff members in each district to handle referrals and provide information to the public.
- Assure that all geographic areas of the state are covered with appropriate service delivery staff.
- Develop and implement a consumer satisfaction survey to be completed while the consumer's case is open with VR.
- Develop a consumer satisfaction survey to be completed by the consumer regarding services received from vendors/providers of VR services.

### **Goal III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.**



**Strategies (Plan of Action):**

- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are** in special education.
- Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are not** in special education.
- Co-develop a formal Interagency Cooperative Agreement with officials from the Department of Education, local school districts and local high schools.
- Plan and coordinate with the Mississippi Department of Education-Special Education Director and Director 504 Services of to plan and conduct at least annual training and semi-annual work groups for the purpose of cross-training in understanding the services offered by Vocational Rehabilitation.
- Develop and implement the use of an OVR Transition Manual designed to assist staff in the delivery of transition services. This manual will be used as a technical assistance tool for transition planning purposes.
- Annually identify 504 Coordinators and special education staff for each school.
- Co-develop and implement self-identification tool identifying youth with disabilities who could possibly benefit from transition services.
- Establish relationships with parent training and information groups, advocacy groups and other service providers to encourage referral and parental participation in the development and provision of transition services.
- Establish comprehensive guidelines and indicators for assessing the individual transition needs of students.
- Work with other core partners in the workforce system to provide employment related services to prevent duplicative services.
- Contract with additional Community Rehabilitation Programs to provide Pre-Employment Transition Services.

**Goal IV: Implement identified improvements to increase statewide consistency and quality of consumer services.****Strategies (Plan of Action):**

- Use results of the annual case review to determine where additional guidance and training are required.
- Utilize the new counselor training process for mentoring, training, and leadership development for all VR Counselors.

- Utilize and continue to develop consistent training process for key VR staff that deliver direct client services.
- Conduct annual statewide case record reviews of case service practices to determine consistency and adherence with federal/state requirements. Use case review results to identify and implement improvements in quality and consistency of services.
- Survey OVR staff on practices and provide refresher training to assure consistent and quality service delivery.
- Deliver high quality training and support to provide staff with the knowledge and skills needed to perform effectively.
- Recognize and appreciate staff throughout the division for their contributions to VR's success.
- Continue to update and deliver advanced best practices training to field staff statewide to provide ongoing skill development in key service delivery operations and practices, including a strong focus on customer service, cultural sensitivity, and better addressing each consumer's impediments to employment.
- Increase collaboration within the workforce system to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs.
- Play stronger roles on state and local Workforce Boards to assure that VR consumers and other individuals with disabilities are better served by the One-Stop system.
- Increase collaboration with community colleges to improve coordination of VR services with community college programs and Adult Basic Education programs.
- Implement written agreements with providers for individuals with intellectual and development disabilities to affirm their roles and responsibilities for serving VR consumers, including their capacity for providing long-term employment supports to individuals after the VR case is rehabilitated.

### 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 VR/VRB 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 application and being job ready.

VR/VRB Counselors will ensure that at the application process Counselors are providing VR Counseling and Guidance regarding the overall purpose of VR Services which is competitive integrated employment. The Office of Business Development Representatives will continue working to bring to the table labor market information so that Counselors will be aware of career opportunities and sector strategies in the state.

Paid Internship opportunities and paid work based learning opportunities will continue to be developed with employers in the community so that consumers can receive training in the competitive labor market. This

training will also assist with career exploration, the selection of employment goals and ultimately clients obtaining skills so that they will qualify for competitive integrated employment opportunities.

MDRS engages in numerous programs and activities designed to inform and make available VR and Supported Employment services to individuals with disabilities including individuals with Significant Disabilities. MDRS will continue outreach activities and provide information to community partners, community program, high schools and colleges and universities.

Continuing to implement the strategies and goals to serve more students with disabilities, such as engaging key partners, participating in training opportunities and outreach meetings to ensure that school staff understand the importance of VR Services for students prior to them exiting high school will increase the success of those students that exit school and transition to post high-school training programs and employment.

MDRS will continue to support the work of the Statewide Rehabilitation Council. The SRCs input has been very important in impacting change in the delivery of VR Services as well as the implementation of the Consumer Satisfaction Survey and other policy changes.

### **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 VR/VRB 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.

Evaluation and Reports of Progress: VR and Supported Employment Goals

### **Identify the strategies that contributed to the achievement of the goals**

#### **Goal I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

##### **Report of Progress:**

- 28.2% increase in VR consumers that obtained and employment outcome from 2018 to 2019.

- 50% increase in VRB consumers that obtained an employment outcome from 2018 to 2019.
- 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.
- 267 clients received Job Prep and Job Ready Services. VR Career Counselors continue to assist clients become 'Job Ready'.
- The 7<sup>th</sup> Annual Summer Internship for Students with Blindness was completed in 2019.
- 626 clients received Benefits Counseling from our Community Work Incentive Partners in 2019.
- 10,346 individual contacts to business in the state of Mississippi were made by Business Development staff in 2018.
- 11,245 individual contacts to business in the state of Mississippi was made in 2019.
- 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.
- Seventy students with disabilities participated in the Student Summer Internship Program (SIP) in 2019.
- Eleven students with disabilities participated 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).
- 104 individuals with disabilities have been placed into employment at Sephora Distribution facility in Olive Branch, MS as of October 2019, Sephora has committed to hiring another 50-75 more individuals through 2020. In July of 2019, Sephora had an attrition rate of 2-3% compared to 20-30% of the able-bodied population. Employees with disabilities had less than 1% absenteeism in the program. This partnership started in October 2017.

## **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.
- 415 individuals signed and developed a Career Pathway IPE in 2019. 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.
- VR staff work in partnership with other agencies such as the Department of Mental Health, Bureau of Intellectual and Developmental Disabilities.
- Autism Spectrum Disorders - Two new providers entered into contracts to provide evaluation and assessment services to individuals with Autism and other significant disabilities.
- In 2018, 311 individuals with autism were provided VR Services. In 2019, the number of individuals with autism increased to 449.
- The 3<sup>rd</sup> Annual VR Deaf Pre-ETS Summer Program was held by the Deaf Services Program at Eagle Ridge in July 2019.
- In July 2019, the 4<sup>th</sup> Annual Pre-Employment Transition Camp for Students with Deafness was held.
- VR developed the Outreach and Orientation Program to be utilized by district staff to conduct outreach with other organizations and service providers. Continuing in 2018 and 2019, progress on this has been slow due to other major responsibilities.
- 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 was updated in 2017.
- In 2019, all Memorandum of Agreements with local education agencies were updated.
- OVR/OVRB launched the first Peer Mentoring Pilot Program at the University of Southern Mississippi and Mississippi State University. The guidance and support of the WINTAC Pre-ETS team played a vital role with the implementation of these projects in Mississippi. Given the support of WINTAC and the Pre-ETS team, Mississippi is proud to be one of the first states in the nation to implement a Peer Mentoring project.
- 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.

**Goal III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.**

**Report of Progress:**

- The 3<sup>rd</sup> Annual VR Deaf Pre-ETS Summer Program was held by the Deaf Services Program at Eagle Ridge in July 2019. In July 2019, the 4<sup>th</sup> Annual Pre-Employment Transition Camp for Students with Deafness was held.
- 14 Students with Blindness participated in the OVRB 6<sup>th</sup> Summer Internship Program.
- VR served 3,609 students with disabilities and VRB served 676 students with disabilities for a total of 4,285. This is an increase of 486 students from 2018.
- 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.
- Pre-Employment Transition Services were provided through OVR's partnership with the Mississippi State University - T.K. Martin Center through on-campus internships.
- 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.
- Pre-Employment Transition Services were provided through VRB's partnership with the National Federation of the Blind through two Transition conferences.
- Pre-Employment Transition Services were provided through OVR's partnership with Life of MS through two different one-day transition conferences across the state.
- Pre-Employment Transition Services were provided through OVR's partnership with Vocational & Rehabilitation Consultants, LLC through one three-day conference.
- 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.

#### **Goal IV: Implement identified improvements to increase statewide consistency and quality of consumer services.**

##### **Report of Progress:**

- Consumer Satisfaction Survey was implemented in 2018 for open VR/VRB cases by the Program Evaluation Unit.

##### **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 all of 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:

- Staff turnover



- 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.

### 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 SE program for 2018

#### **Goal I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.**

##### **Report of Progress:**

- 106 referrals were received from the IDD Waiver Program
- 84 referrals for individuals with serious mental illness were received from the Department of Mental Health.
- 29 Number of referrals received from 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:

- 58 Job Coaches were trained and hired to provide job training services.
- 262 Individuals placed in employment
- # 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.
- Four(4) 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

When school year begins, the Transition Counselor should contact each school district and schedule a meeting with the Special Education teachers to discuss possible referrals. If the school reports having any students identified with hearing and/or vision loss, the RCD and/or VRB Counselor should be invited to attend the meeting as well. The Counselors will work together to actively elicit referrals on all students with disabilities age 14-21, regardless of their classroom assignment. They will meet with potential referrals and review the school's supporting documentation. It can be assumed, students who have been identified by the school as requiring

additional supports 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 assist with monitoring the SE services provided to Adults and Students/Youth.

Goal III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.

### **Report of Progress:**

Training was provided to all Transition Counselors and SE Counselors on procedures for making referrals and changes due to new federal regulations. Discovery Training was provided by Shelby Residential and Vocational Services (SRVS);

New provider, Shelby Residential and Vocational Services (SRVS), entered into a contract to provide Customized Employment Services to individuals with the *most significant disabilities*. Discovery is available through the IDD Waiver Program that certify providers for SE services.

### **Describe the factors that impeded the achievement of the goals and priorities**

VR/VRB 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 Caseload size continue to increase which causes a delay in service and sometimes the quality of service provision is impacted;
- The number of referrals received from Transition counselors increased, therefore, increasing the workload for these counselors;
- SE Counselors understanding cooperative agreements with other programs and the services other programs provided such as the IDD Waiver
- The lack of enough trained and reliable job coaches(trainers)
- New Vocational Training Instructors with limited training and skills and;
- The current tracking system for SE placements is not sufficient
- SE Counselors ability to put in practice training resource

### **The VR program's performance on the performance accountability indicators under section 116 of WIOA**

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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.

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- MDRS continues to submit multiple quarters of RSA 911 data and the Annual Performance Report (RSA 9169).

## 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

### **Transition Contract Employee**

Funds will be used to expand pre-employment and transition services to students with disabilities. The Transition Contract Employment will help expand services and assist VR/VRB provide access to these needed services. Based on information from the Mississippi Department of Education, there are over 21,000 students in the state with disabilities.

### **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 already started initial conversation and collaboration.

### **Quality, Scope, and Extent of Supported Employment Services**

**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 supports to maintain an individual in Supported Employment) for up to four (4) years. MDRS will invest all Title VI allocations to fund the purchase of job training services and other allowable vocational rehabilitation services as needed by clients served in the SE Program. Additionally, the Coordinator for the SE Program and the Coordinator for Transition and Youth Career Services will work together to ensure new policies are in place and the appropriate amount of funding is utilized for youth with the most significant disabilities.

Eligible individuals are those who are determined to be *most significantly* disabled, which means they meet the following criteria:

- individual has a most 'significant disability' - \*individual's physical or mental impairments seriously limit three (3) or more functional capacities in terms of an employment outcome. Individual will require vocational rehabilitation services in order to prepare for, secure, retain, or regain employment.

MDRS employs a unique strategy for delivery of SE services. The SE Program's structure and service delivery mechanism are integrated into that of the general agency service delivery system. The services are authorized, coordinated and, in most instances, delivered by staff of the state unit. Counselors who specialize in SE perform the functions of case management, job development, and supervision of overall SE service delivery in their respective districts. They are assisted by Vocational Training Instructors (VTIs) who perform a variety of functions including assessment, job development and placement, job training, job coach supervision, and facilitation of natural supports. Job Coaches are employed on an "as needed" basis. Counselors are assigned to serve SE eligible individuals in each of the ten districts to ensure statewide coverage. The SE staff includes 11 Counselors, 12 VTIs, and a pool of available Job Coaches who are assigned to work with a Supported Employment (SE) client *as needed*. Additionally, this staff works with the statewide Community Rehabilitation Program, AbilityWorks, Inc., a division of MDRS.

MDRS, Office of Vocational Rehabilitation, contends that its responsibility regarding SE is the same as its responsibility for the general program. The SE Programs for both VR and VRB have been combined into one program serving all eligible individuals. VR Counselors, assigned to SE caseloads, have the same duties and responsibilities as those in the VR and VRB programs. However, the caseloads of the VR Counselors assigned to SE caseloads consists of only those clients who meet Title VI eligibility criteria. Therefore, in addition to general agency policy and procedures, VR Counselors must be knowledgeable about Title VI regulations and the unique requirements for SE eligibility.

SE personnel are trained in general VR case management techniques and VR federal regulations, and are held to the same procedures and standards of performance as all other VR Counselors.

MDRS, Office of Vocational Rehabilitation, designates a statewide Supported Employment (SE) Program Coordinator whose duties include the following:

- monitor issues developing in the field of SE;
- monitor staff performance and make recommendations and assist in implementing procedures to improve performance;
- serve as a resource person to staff;
- serve as an advisor to administrative staff in implementing programmatic policies in accordance with federal dictates;
- develop effective programmatic procedures;

- recommend training of SE staff;
- provide training for SE staff; and
- other typical functions of a coordinating and liaison nature.

MDRS, Office of Vocational Rehabilitation, maintains formal agreements with the Mississippi Department of Education and the Department of Mental Health as well as other public and private entities, which identify areas of collaboration to ensure a comprehensive program of services to SE eligible individuals. Staff members collaborate intensively with local mental health centers, school districts, businesses and industries, the DD Council, parents, advocacy groups and other relevant third party providers and resources.

The service approach for SE eligible clients emulates the nationally accepted ‘best practices’ models of SE service delivery which include individual job placement, enclaves, and temporary employment placement (TEP) for individuals with chronic mental illness. Central to each of these approaches is an emphasis on Person-Centered Planning and facilitation of natural supports. Individualized job development is conducted by SE staff based on job matching assessment information and client’s informed choice. SE clients are assisted with employment planning and placement by VTIs and job skills training is provided at the job site either by Job Coaches or through natural supports.

### 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.

## Vocational Rehabilitation Assurances

<b>The State Plan must include</b>	<b>Include</b>
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	Yes



<b>The State Plan must include</b>	<b>Include</b>
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	No
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act	

<b>The State Plan must include</b>	<b>Include</b>
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes

<b>The State Plan must include</b>	<b>Include</b>
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

## Vocational Rehabilitation Certifications

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

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

Mississippi Department of Rehabilitation Services-Office of Vocational Rehabilitation

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17] , the Rehabilitation Act, and all applicable regulations[18] , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Enter the name of the designated State agency

Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

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

Enter the name of authorized representative below:

Chris Howard

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

Enter the title of authorized representative below:

Executive Director

*Certification Signature*

<b>Signatory Information</b>	Chris Howard
<b>Name of Signatory</b>	Chris Howard
<b>Title of Signatory</b>	Executive Director, MS Department of Rehabilitation Services
<b>Date Signed</b>	2/28/2020

### Vocational Rehabilitation Program 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 <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

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

### Temporary Assistance for Needy Families (TANF)

A. Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act)

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 supportive services (childcare, work stipend, and work-related expense payments) focused on enabling families to achieve and maintain self-sufficiency. In Mississippi, TANF monthly benefits and supportive service payments provided to individuals participating in allowable work activities or transitional programs are provided

to the family by means of a Mississippi Debit MasterCard® card account. TANF supportive service payments issued to providers are paid by check, direct deposit, or by vouchers redeemable for services.

Mississippi will continue to provide financial assistance to needy families determined eligible under the established policies and the Standard of Need and maximum payment level for that size family. Needy Families are identified according to ongoing income, resources, and deprivation criteria. The monthly TANF grant described in Mississippi Code 1972 Annotated at 43-17-5(1), is \$110 for the first person, \$36 for the second person and \$24 for additional persons, except as restricted by the Family Benefit 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:
  - Divorce
  - Desertion or non-support of legal parent
  - Illegitimacy
  - Hospitalization for more than a temporary period
  - Imprisonment
  - Court sentence to perform unpaid public work or service while living at home
  - Removal of the child from the home by court order
  - Legal adoption by a single parent
4. Unemployment of the principal wage earner (PWE)

## **TANF UP Program**

Mississippi operates a separate state program to serve needy two-parent families. State funds are used for cash assistance payments (TANF grant and transportation stipends). This program will not count toward the state's MOE requirements. Although two able-bodied parents are in the home, a dependent child is considered deprived of parental care or support when the natural or adoptive parent is unemployed. Two-parent families are only eligible if the parent is designated as the "principal wage earner."

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

- Works less than 100 hours per month,
- Has not refused a bona fide offer of employment or training, without good cause, within
- Is not on strike.

All other eligibility requirements for the two-parent family are the same as the TANF (Basic) case.

To encourage the formation and maintenance of two-parent families:

When the TANF recipient marries, the new spouse's income and resources will be disregarded for six months. This will allow the single parent who marries an employed person the opportunity to continue receiving TANF cash assistance and work preparation activities without immediately losing benefits because of the spouse's income. (One-time disregard for the first marriage of the PI on or after October 1, 1999)

Recent work history requirements will be waived for two-parent families when both parents are under 21 years of age to allow these young families to qualify for the TANF Unemployed Parent program.

## **Deny TANF Assistance**

1. 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:
  - Families without a minor child residing with the parent or adult caretaker relative;
  - 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);
  - Families not assigning certain support rights to the State;
  - Families who fail to cooperate in establishing paternity or obtaining child support;
  - Teenage parents without a high school diploma or a high school equivalency (HSE) diploma, who are not employed and do not attend school or an equivalent training program;
  - Minor parents not living in an adult-supervised setting;
  - Minor children who are absent from the home for a significant period (30 days or more). NOTE: A relative who fails to report the absence of a child within five days will be disqualified;



- Fleeing felons and parole violators; and
  - Ineligible aliens
2. Mississippi will also deny TANF assistance to families if the adult(s), age 18 or older, included in the assistance unit fails to engage in TANF applicant job search activities, fails to comply with the Employability Development Plan signed by the individual, fails to cooperate with the TWP, fails to participate satisfactorily in the assigned work activity, or after receiving TANF assistance for twenty-four (24) months, whichever is earlier.
  3. Mississippi will deny TANF assistance to families if the adult(s), age 18 or older, included in the assistance unit fails to submit to a written substance abuse screening questionnaire.
  4. Mississippi shall deny TANF assistance to a convicted fleeing felon.
  5. Mississippi will also deny assistance for ten years to an individual convicted in Federal or State court of having made a fraudulent statement or representation, with respect to the individual's place of residence in order to receive TANF assistance simultaneously from two or more states.
  6. Recipients of SSI are excluded from the TANF assistance Unit.
  7. In accordance with agency policy, adults and minor children who fail to comply with enumeration requirements will be excluded from the TANF assistance unit.

Mississippi will coordinate services, where available, with public and private entities (i.e., Mississippi Departments of Rehabilitation Services, Employment Security and Mental Health, and the Mississippi Community College Board, etc.) to allow TANF families with barriers (i.e., little or no work experience, domestic violence, limited English proficiency, learning disabilities, mental, physical disabilities and/or substance abuse) an opportunity to gain access to services and resources needed to obtain the highest level of self-sufficiency within the constraints of the TANF time-limits. Special screening and referral procedures will be used to identify and refer the individual for the appropriate service. Mississippi will deny benefits to individuals who fail to comply with the activities provided by these entities.

Mississippi will not deny assistance to a minor parent with a child under the age of 12 weeks for failure to attend school but will permit the minor parent to voluntarily participate in educational activities as medically appropriate.

Mississippi will deny benefits to all adult TANF applicants who do not meet an exemption from work requirements and fail to comply with TANF Work Registration requirements or vocational rehabilitation activities during the 30-day TANF application processing period.

Mississippi will deny benefits to all adult TANF applicants age 18 and older who fail to submit to a written drug screening questionnaire. State law provides for an individual sanction of TANF until compliance for an adult recipient age 18 or older who fails, without good cause, to submit to a required drug test or declines to enter into required treatment for a substance abuse disorder or fails to meet the requirements of his/her treatment plan, including refusal to take or testing positive to a required drug test.

Mississippi will not issue assistance payments to a family that includes an adult head-of-household, minor head-of-household, minor parent head-of-household, spouse of such head-of-household or a non-recipient parent who has received TANF funding for 60 months (whether consecutive or not), except as allowed by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 in regard to the 20% exemption.

## **60-Month Extension**

Hardships will be assessed starting at forty (40) months and continued eligibility determined at the end of the individual's five (5) year time limit. The following individuals, as approved, may continue to receive benefits beyond the five-year time limit so long as the State does not exceed the 20% exemption criteria:

- Adults who are determined to be temporarily or permanently incapacitated and the household income does not exceed the TANF Basic 100% Requirement.
- Parents who are required to provide full-time care for an ill or incapacitated child or adult in the home and the household income does not exceed the TANF Basic 100% Requirement.

A family will **not** be considered for a 60-month time limit extension when the only child remaining in the TANF case is a family cap child and is ineligible for monthly TANF benefits.

### **School Attendance Requirement**

Mississippi requires regular school attendance and regular immunizations for all dependent children served under TANF. This is in accordance with regulation described in Mississippi Code of 1972 Annotated at 43-17-5 (5). A 25% monthly benefit reduction is imposed for failure to comply without good cause.

### **Family Cap**

Mississippi will impose a family benefit cap to prevent increases in assistance for new children coming into the family after the initial ten months of benefits, with certain exceptions.

### **Earned Income Disregards**

Mississippi will provide a one-time total earned income disregard opportunity for six months to TANF adults who find a job working at least 35 hours per week, at or above the federal minimum wage either: within 30 days after authorization for new TANF approvals on or after July 1, 1997; or within 30 days after the initial start date of the job readiness/job search work activity. The six-month total disregard of earnings will be available only once for new TANF approvals and ongoing cases beginning July 1, 1997, and thereafter.

A three-month total earned income disregard will be available when the TANF case is subject to closure because of increased earnings and the individual is employed at least 25 hours per week at or above the federal minimum wage. The three-month disregard cannot be claimed in combination with the six-month disregard. The three-month disregard can be claimed again after a 12-month consecutive break in assistance.

### **Non-Discrimination**

The MDHS does not discriminate against any individual or group because of race, sex, religion, national origin, color, marital status, handicap, or political beliefs. Mississippi will follow the nondiscrimination provisions in Title IV, Section 408, for any program or activity receiving funds under Public Law 104 - 193, provision in State Law and Title IV of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act.

**B. Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)**

The goal of the program is to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage. The work program emphasizes unsubsidized jobs with supportive services following employment and/or transitional services following termination of the TANF grant because of increased earnings or loss of earned income disregards. The family also receives supportive services while engaged in other allowable activities.

Mississippi will require work eligible individuals (adults or minor heads of household or a non-recipient parents) receiving assistance under the Program to engage in allowable work activities once the State determines parents or caretakers are work eligible. Work eligible individuals may not receive assistance under the program for more than 24 months (whether or not consecutive), unless they are engaged in allowable work program activities.

Upon referral to the work program, the client will be assessed within 30 days to identify and prioritize the individual's strengths and needs and translate these into realistic goals which will lead to employment and self-sufficiency. A uniform assessment should be utilized among all participants as a guide to conduct in-depth, interactive interview assessments to evaluate job skills, levels of work readiness and intermediate goals needed in order for individuals to reach their long-term career goals. An Employability Development Plan (EDP) is the client's plan of action for achieving these goals. The EDP describes the responsibilities of the client as well as entities performing case management. The plan also describes the supportive services available to the client, lists the assigned work activity, and reinforces the consequences for failure to participate.

MDHS may contract, using Federal TANF funds, with public, private or private non-profit entities to provide TANF Work Program services as needed statewide. Services may include but may not be limited to Case Management which is the process designed to coordinate work activities and supportive services for TANF Work Program participants. This involves monitoring the participants attendance and progress and amending the Employability Development Plan, component assignment, and supportive services, as necessary, to keep the participant on a path to achieving self-sufficiency. When appropriate, reasonable accommodations and language assistance may be provided to recipients to endure meaningful access and effective communication. All contractual services used will be competitively procured for non-state agencies. The subgrant will contain performance measures which will assure 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:

#### **1. Job Search and Job Readiness**

Job readiness and job search activities are considered one activity by Federal law. These activities are defined as the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities for those who are otherwise employable. Such treatment or therapy must be determined to be necessary and certified by a qualified medical, substance abuse or mental health professional. A qualified professional is defined as any individual who is licensed or certified.

Structured job search and job readiness assistance activities are supervised daily by the case manager, instructor or other responsible person.

The maximum number of hours that can be included in the State's participation rate calculation for each participant in any 12-month period is limited to:

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

- 180 hours for a single custodial parent whose youngest child is age six or older.

A maximum of four consecutive weeks may be counted and reported as participation. After four consecutive weeks are reported, there must be at least a one-week break (seven consecutive days) before additional participation can be included in the participation rate calculation process.

## 2. **Unsubsidized Employment**

Unsubsidized employment is full or part-time employment in the public or private sector for which the state does not furnish aid or support to the employer for wages paid to the TANF recipient. Types may include:

- Regular and/or contractual employment in the public or private sector for which a person receives unsubsidized wages on an hourly, weekly, or monthly basis.
- Self-employment is work for which a person earns income directly from one's own business, trade or profession rather than a specified salary or wages from an employer. Income may be verified by a 1099/W2 form, check stubs or written statements from customers.

## 3. **Subsidized Employment**

Subsidized employment is defined as employment in the private or public sector for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a TANF recipient. Subsidized employment includes the following employment models:

- Work supplementation where TANF funds that would otherwise be paid as assistance are paid to the employer;
- A third-party contractor, like a temporary staffing agency, serves as employer of record and is paid a fee to cover salary, expenses and success in placing employees;
- Work study programs which involve paid employment provided by an educational institution if the student's earnings are subsidized by the educational institution; and
- Supported work for individuals with disabilities in an integrated setting, e.g., Vocational Rehabilitation Ability Works. Workers with disabilities may receive individualized services such as, but not limited to, transportation, family support or additional supervision.

Employers participating in a subsidy program must submit monthly documentation to verify participant attendance data. Agency staff will monitor and review employer reports to determine whether sufficient documentation exists to substantiate reported time and to warrant a subsidy payment. This auditing process will ensure the agency only pays for and reports actual and allowable hours of participation.

### **Work Study**

Work study is also defined as subsidized employment. Work study is an approved employment plan at an accredited college, frequently granted in addition to other student

financial aid. Various public funding sources may be utilized to pay earnings for hours worked. Earnings may be paid directly to the student or applied toward the student's tuition fees.

### **Temporary Employment with the U.S. Census**

Certain temporary employment with the U.S. Census is defined as subsidized employment. This specifically refers to temporary census workers who are hired part-time during a census campaign. The employment is not expected to last longer than three months and the income received is totally disregarded in establishing TANF eligibility and the TANF benefit amount. Employment will be verified, by the case manager, via employer wage verification forms or check stubs. Countable work hours must be based on employer reports (wage forms) or check stubs and will be projected forward up to three months.

## **4. Work Experience**

Alternative Work Experience Program (AWEP) placements are only made with private non-profit or for-profit entities for no cash payment. These activities are intended to improve soft skills and build employability skills by offering training and experience for a better understanding of the work world so the individual may move more quickly into full-time employment. Individuals participating in these programs are subject to the Fair Labor Standards Act (FLSA) requirements and cannot be required to participate for more hours than the total benefits divided by the federal minimum wage (FMW). The maximum number of hours in any month that a participant may be required to participate in AWEP is based upon the family's combined value of TANF assistance (monthly grant and work stipend) and SNAP benefits divided by the federal minimum wage. The TANF benefit amount, net out child support, will be determined during the TANF application process and at each TANF redetermination appointment for all TANF cases that are subject to TANF Work Program requirements. TANF recipients assigned to this activity cannot displace regular workers. Based on certain criteria private, for-profit entities may be used for AWEP placements. For example, a certain type of placement may be necessary for the participant to gain skills needed to successfully accomplish his/her career goals. Such entities must be approved in writing by the Director of the Division of Workforce Development and Program Management or designee.

## **5. 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 in 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.

## **6. Vocational Educational Training**

Vocational education is defined as an organized educational program which offers a sequence of courses directly related to the preparation of individuals for employment in current or emerging occupations that do not require an advanced degree. Such programs shall include competency-based applied learning which contributes in an individual's academic knowledge, higher-order reasoning, problem-solving skills, work attitudes, general employability skills, and the occupational-specific knowledge and skills that prepare participants for a specific trade, occupation, or vocation. Vocational education programs must be provided by education or training organizations, such as vocational-technical schools, community colleges, post-secondary institutions, proprietary schools, nonprofit organizations, and secondary schools that offer vocational education. Vocational educational training cannot be included in the work participation rate for more than 12 months for any individual. No more than 30% of the individuals counting toward the participation rate in a month may meet the work requirement by participating in vocational educational training. A teen parent head-of household attending secondary school or in an educational activity directly related to employment will be included in the 30%.

## **7. 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.

## **8. Secondary School Attendance**

Satisfactory attendance at secondary school or in a course of study leading to an HSE diploma is an allowable "non-core" activity for individuals age twenty and older who do not have a high school diploma or HSE diploma. Participation in this activity is not restricted to individuals for whom obtaining an HSE diploma is a prerequisite for employment. Minor parents, under age twenty, who have not completed secondary school or received an HSE diploma will be encouraged to pursue a high school diploma or HSE diploma. Educational activities for individuals under the age of twenty are considered "core" activities and are countable in the participation rate calculation. Educational



activities for individuals age twenty and older are considered “non-core” activities and participation will only count in the work participation rate after the individual participates for an average of twenty (20) hours per week in a “core” activity.

## 9. **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 fully and adequately perform the job. 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.

### *Job Skills Training Directly Related to Employment*

Job skills training directly related to employment is training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. Job skills training can include customized training to meet the needs of a specific employer or training that prepares an individual for employment, including literacy and language instruction, if necessary, to enable the participant to perform a specific job or engage in a specific job training program.

If available, funds shall be used by the Mississippi Community College Board (MCCB) for the assessment, enrollment, certification, follow-up and performance standards as they relate to career-related training of TANF Work Program (TWP) participants. Training may be established based on employer needs in a particular area of the State. Training may also be established on an individual basis based on the individual’s career goal(s)/objective(s) and training needs in conjunction with employer needs.

As described in 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 participant's 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:

#### **1. 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.

#### **2. Responsible Parenthood Initiative**

To encourage the formation and maintenance of two-parent families and prevent and reduce out-of-wedlock pregnancies, MDHS may provide comprehensive services that support and educate parents on the importance of responsible parenthood. The program goals are to:

- increase public awareness concerning the impact of a parent's absence,
- assist parents in becoming "Team Parents" and to share the legal, financial and emotional responsibilities of parenthood with the custodial parent of their child(ren)
- improve the self-image of parents and their families,
- increase parents' parental involvement in their child(ren)'s education,
- improve academic performance and graduation rate and reduce the dropout rate of their children,
- decrease the teenage pregnancy rate,
- decrease juvenile crime,
- promote two-parent families and both parents' role in the family, and
- recruit parents and expectant parents to volunteer as mentors to other parents.

Financial eligibility determination is not required for the program.

### 3. **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 accommodations are provided to employees with disabilities. Individuals with language barriers shall be referred to an English as a Second Language (ESL) activity prior to job placement. Case management will also work with potential employers to ensure reasonable accommodations 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.

### 4. **TANF Prevention/Intervention Program**

To develop projects in community-based settings to prevent and reduce at-risk behaviors among youth and their families to prevent, or break the cycle of welfare dependence, MDHS may provide services/activities to:

- reduce and prevent out-of-wedlock pregnancies,
- prevent/reduce substance abuse (use of alcohol, drugs and tobacco products), and
- prevent/reduce other behaviors that prevent the attainment of a high school diploma or HSE diploma.

Financial eligibility determination is not required for the program.

### 5. **Afterschool or Summer Recess Program**

To reduce out-of-wedlock pregnancy through intensive supervision or afterschool/summer program for non-adjudicated and age appropriate youth during non-school hours when youth are unsupervised and vulnerable. By engaging in activities that create a positive future, youth are enabled to consider how the choices they make today affect their tomorrow. Program activities include but are not limited to:

- academic tutoring
- literacy
- remediation
- financial literacy
- science, technology, engineering, arts, or math (STEAM)
- career exploration
- life and soft skills
- leadership and personal development
- work-based learning
- teenage pregnancy prevention
- drug, alcohol, and violence prevention

Additional goals include but are not limited to:

- reducing criminal activity
- reducing drug and alcohol abuse
- reducing violence
- promotion positive family outcomes
- increase in school attendance
- to improve self-esteem, motivation and performance of youth

Financial eligibility determination is not required for the program.

## 6. **Crisis Intervention Program**

To provide assistance, using Federal TANF funds, to low-income families in resolving barriers to self-sufficiency. The program may use TANF funds to:

- Meet a TANF family's ongoing basic needs (i.e. food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses.)
- Provide assistance to families experiencing an emergent need (i.e. utility payments) That cannot be met with their own income and resources. This program is designed to deal with a specific situation or an episode of need and is not intended to meet recurrent or ongoing needs. These services will not extend four (4) months.

Families are not required to be TANF eligible but must be below 185 percent of the Federal Poverty Level.

7. The Mississippi Department of Human Services may implement a TANF Up-Front Diversion Program to provide assistance, using Federal TANF funds, to families with Emergency circumstances. As an alternative to TANF cash assistance, a family with an emergency circumstance may be eligible for a one-time short-term cash assistance payment.

To receive the diversion program assistance:

- Family unit must include an adult and dependent child(ren) under 18 years of age.
- Family members must have lived in the designated disaster areas at the time disaster occurred.
- Family members must currently live together in Mississippi.
- Family members must not be current recipients of regular TANF, including Transitional Transportation or Transitional Child care.
- Family's primary individual must sign an agreement restricting any member of their household from receiving TANF for a period of three (3) months.

Households will be required to pass the gross income limits standard (200% of Federal Poverty Level). The maximum amount of resources the family may retain to be eligible is \$3000. In addition to the above, the adult(s) in the family must:

- be employed an average of 25 or more hours per week at or above the federal minimum wage;
- have documentation of the promise of a job starting within 14 days from the application date, working an average of 25 or more hours per week at or above federal minimum wage; or

- be currently participating in a short-term, work-related training program.

A payment of up to \$1,000 will be issued directly to the family (parent/caretaker relative and child) to assist in resolving any short-term financial issues related to basic needs (i.e., childcare, transportation, rent and relocation expenses).

8. TANF funds may be used to provide family preservation services to families, with dependent children, earning at or below 350 percent of the Federal Poverty Level. Social workers and homemakers provide supportive services to promote the safety and well-being of children and their families, promote stability and permanency, and preserve family unity. The goal of the program is to provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.
9. TANF funds may be used for temporary care (not to exceed 45 days) of children in foster care. The placements are through emergency shelter facilities and normally do not exceed 45 days. TANF funds will not be used to duplicate Federal foster care payments. Families eligible for this program are not required to be TANF eligible but must be below 350 percent of the Federal Poverty Level. The goal of the program is to provide assistance to needy families so that children may be cared for in their own homes or in homes of relatives.
10. In efforts to provide a continuum of service and prevent gaps of opportunity for youth and adults ages 16-59 and to reduce the overall incidence of poverty, TANF funds may be used for workforce, training and education to provide assistance to needy families and to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage.

Program activities include but are not limited to:

- adult basic education
- high school equivalency
- work based learning
- internships
- apprenticeships
- industry recognized credentials
- life and soft skills

Families that are eligible for this program must be at or below 350% of the federal poverty guidelines.

**C. Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance**

Mississippi will ensure that work eligible individuals (adult heads of household, needy caretaker relatives and non-recipient parents) receiving assistance under the Program will engage in work activities in accordance with regulation described in Section 407, Title IV of the Social Security Act. Mississippi will comply with the mandatory work requirements and strive to meet the 50% participation rate required under current TANF regulations. Participation rate requirements may be adjusted based on reduction in the caseload.

Work requirements and activities are defined in the Combined State Plan, TANF section (b) above. This document will be open for public review and comment according to the Administrative Procedures Act. The work requirements and activities are tracked through the MDHS eligibility and case management systems interface throughout the period of assistance to ensure compliance is met, appropriate penalties imposed, and time limits not exceeded.

## Exemptions

TANF mandates participation in approved work activities for all adult recipients who do not meet specific exemption criteria. All adults who are not specifically exempt will be referred for work activities. When appropriate, reasonable accommodations and language assistance will be provided to recipients to ensure meaningful access and effective communication. An adult included in the TANF grant assistance unit may be exempt from the mandatory work requirements for one of the following reasons:

- Incapacitated and not eligible for vocational rehabilitation services
- Temporary illness or injury
- Pregnancy in third trimester if there is a verified complication with the pregnancy
- Caretaker of a child under 12 months old (up to 12 months)
- Caretaker of an ill or incapacitated person
- Age (over 60 and under 18)
- Domestic violence victim (up to 12 months)
- Caretaker in two-parent family of a child who is mentally retarded or physically handicapped

The State may exempt a TANF recipient from work requirements while receiving treatment for substance abuse as long as the recipient is in compliance with the treatment plan. If certain criteria are met, the recipient's treatment plan may be defined and countable under the TWP job readiness activity.

## Sanctions

MDHS Policy provides for a full benefit sanction of TANF and comparable SNAP sanctions until compliance for families in which the non-exempt individual refuses, without good cause, to participate. If any adult in a household refuses, without good cause, to participate in work as required under TANF, the following full benefit sanction will apply. When appropriate, reasonable accommodations and language assistance will be provided to recipients to ensure meaningful access and effective communication to assist them in the conciliation process. If necessary and appropriate, the need for disability and language related accommodations are bases for good cause.

*Table 25: Violations and Corresponding Penalties for Adults Receiving TANF Who Refuse to Participate in Work as Required by TANF*

<b>Violation</b>	<b>Penalty</b>
1 <sup>st</sup> Violation	3 Months Minimum or Until Compliance

<b>Violation</b>	<b>Penalty</b>
2 <sup>nd</sup> Violation	Permanent Disqualification

NOTE: For a two-parent family, the parent who was meeting work requirements, but lost TANF benefits due to the other parent's non-cooperation, may open his/her own case with the dependent children after six months.

Beginning October 1, 2001, State funds were used for cash assistance payments (TANF grant and transportation stipends) for two-parent families. The State does not claim these expenditures against the Maintenance of Effort requirement. Two-parent family cases are not included in the state's federal work participation rate calculation; however, federal work requirements apply to two-parent families.

The State will not reduce or terminate assistance to a single custodial parent caring for a child under age six (6) for refusing to engage in work, if the parent demonstrates an inability to obtain appropriate, quality childcare. The parent's demonstrated inability must be for one of the following reasons:

1. Appropriate child care is unavailable and/or unaffordable. Appropriate child care 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.
  - Appropriate child care must be within a reasonable distance (within a 20-mile radius) of the parent/caretaker relative's home or worksite.
  - Appropriate child care must be affordable. Affordable formal childcare is childcare that is equal to or less than the established rates for the type of care according to the Division of Early Childhood Care and Development (DECCD)
2. Informal child care by a relative or under other arrangements is unavailable or unsuitable. Unavailable or unsuitable child care shall be defined as a situation involving child abuse, neglect or an unsafe environment. If the parent/caretaker relative refuses to take the child to a particular day care center, he/she must inform the case manager of the reason for the refusal. The case manager must investigate to verify and substantiate the parent's claim of unsuitable childcare. Complaints involving child abuse, neglect or an unsafe environment will be reported to the MS State Health Department, Division of Child Care Facilities Licensure. The case manager must contact the DECCD representative to discuss the problem and determine what other childcare services are available in the area. The case manager will determine good cause for non-participation based on the investigation and information gathered. Parental complaints regarding a breakdown in receiving child care services or against a DECCD representative must be submitted in writing to the Director, Division of Early Childhood Care and Development, Mississippi Department of Human Services, Post Office Box 352, Jackson, MS 39205. The parent/caretaker relative may also contact the DECCD Resource and Referral telephone line (1-800-877-7882).

**D. Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)**

Mississippi will take reasonable and necessary steps to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal government. MDHS restricts disclosure of recipient information pursuant to federal regulations and to laws

regarding use of electronically exchanged data with a Confidential Information Agreement. MDHS also provides staff training upon entry and annually thereafter with an Awareness/Security Training form. These documents set forth policy and penalties for safeguarding information in accordance with requirements for the exchange of information received from the Social Security Administration and Internal Revenue Service.

**E. Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)**

MDHS will utilize partnerships with community-based organizations and agencies to impact the whole family by taking a multi-generational approach. This approach seeks to provide the basic needs of the family and the skills that will enable the family to become self-sufficient and ensure future well-being. The Sexual Risk Avoidance Education (SRAE) Program will promote sexual risk avoidance education as defined by Section 510 of the Social Security Act (42 U.S.C. 710) for youth 10-19 years of age and their families. The SRAE Program, known as The Healthy Teens for a Better Mississippi initiative, provides educational and innovative programs on healthy choices, youth development and sexual risk avoidance to aid in the continued reduction in teen pregnancies and out-of-wedlock births. Through this initiative CHAT (Choosing Healthy Alternatives for Teens) was created to engage teens in conversation surrounding teen pregnancy, making healthy choices, sexual risk avoidance and participating in peer leadership. These programs allow teens and parents alike to engage in a variety of activities/programs designed to address the challenges many teens face each day.

**F. Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)**

1. 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
2. A person of any age has sexual intercourse with a child who:
  - (i) Is under the age of fourteen (14) years/
  - (ii) Is twenty-four (24) or more months younger than the person; and
  - (iii) Is not the person's spouse.

MDHS will provide county offices with material, both printed and digital, about statutory rape for display where partner agencies, local schools, law enforcement, relevant counseling service agencies and the general public, including men who may have committed the crime, may view.

MDHS will use social media platforms to educate the general public on the problem statutory rape.

In addition, if funding is available, MDHS will continue to award TANF funding on a competitive basis to subgrantees that incorporate education and training about statutory rape within their teen pregnancy prevention programs or parenthood initiatives to include educators, law enforcement, relevant counseling services and other vital service providers to include programs expanded to include men.

MDHS staff is required to report suspected abuse or neglect to the appropriate entity.



**G. Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)**

Mississippi delivers TANF benefits via the Mississippi Debit MasterCard Program ePayment/EPPICard. Mississippi also delivers other benefits via the EPPICard including child support, adoption subsidy and foster board payments.

TANF assistance may be accessed worldwide at any commercial point-of-sale (POS) machine using the recipient's signature and PIN number. Cash may be accessed at any automated teller machine (ATM) that displays the MasterCard logo or teller-assisted withdrawals in a bank or credit union location that displays the MasterCard logo. Recipients may also receive cash back with a purchase at their favorite merchant locations that accept MasterCard. TANF recipients experiencing a problem accessing their TANF benefits can contact their local county office or call customer services toll free. The State will work one-on-one with TANF recipients reporting inadequate access to their cash benefit.

Pursuant to regulations described in Section 4004 of Public Law 112-96, Mississippi's policies outline procedures to prevent access to TANF assistance through electronic fund transactions at casinos, liquor stores, and establishments providing adult-oriented entertainment. This section also explains how the state ensures that recipients have adequate access to their TANF assistance and can withdraw the TANF assistance with minimal fees or charges, including the opportunity to access the TANF assistance with no fee or charge and how information on fees are communicated to recipients.

Mississippi law follows the Federal Statutes to prohibit the use or acceptance of an electronic benefit transfer card at the following locations:

- Liquor or package stores that sell intoxicating liquor, either exclusively or primarily;
- Gambling establishments that offer, as its primary services, casino, gambling or gaming activities; and
- All retail establishments that provide adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

State law prohibits TANF benefits from being accessed from an Automated Teller Machine (ATM) or Point-of-Sale (POS) device physically located in:

- Liquor Stores
- Gambling Establishments
- Strip Clubs
- Jewelry Stores
- Tattoo and Body Piercing Parlors
- Tobacco Paraphernalia Stores
- Spas
- Nail Salons

- Lingerie Shops
- Massage Parlors
- Vapor Cigarette Stores
- Psychic or Fortune Telling Businesses
- Bail Bond Companies
- Dog or Horse Racing Facilities
- Movie Theaters
- Cruise Ships
- Theme Parks
- Video Arcade
- Pari-mutuel Facilities
- Sexually Oriented Businesses
- Businesses or Retail Establishments where Minors under 18 are not Permitted

State law also prohibits TANF benefits from being used to purchase the following items:

- Alcohol
- Cigarettes
- Liquor or Imitation Liquor
- Sexually Oriented Adult Materials
- Bail
- Gambling Activities
- Lottery tickets
- Tattoos
- Tobacco Products
- Concert Tickets
- Travel Services Provided by a Travel Agent
- Professional or Collegiate Sporting
- Money Transmission to Locations Agent Abroad
- Tickets for Other Entertainment Events Intended for the General Public

In order for Mississippi to prevent prohibited transactions and purchases as defined above, agency staff will discuss with TANF applicants/recipients the proper use of their TANF benefits at initial application and

redetermination. All county offices are required to display a poster with the TANF restrictions and penalties in a prominent location.

Methods for reporting fraud include the Fraud Tip Hotline toll free number 1-800-299- 6905 and the Fraud Tip Email [fraud@mdhs.ms.gov](mailto:fraud@mdhs.ms.gov). To expand the pathway of communication regarding programmatic fraud, fraud tips can now also be submitted to the Division of Investigations through the Fraud Tip PowerForm located on the MDHS website. This form can be accessed by clicking on the “Report Fraud” button located on the MDHS homepage, or by direct link at <https://www.mdhs.ms.gov/report-fraud/>

The assistance unit will be denied TANF benefits when the MS Debit MasterCard is used at prohibited locations or prohibited items are purchased as outlined below:

*Table 26: Violations and Corresponding Penalties for Use of TANF Benefits at Prohibited Locations*

<b>Violation</b>	<b>Penalty</b>
1 <sup>st</sup> Violation	3 Months
2 <sup>nd</sup> Violation	Permanent Disqualification

H. Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

The cardholder can use their EPPICard at vendor and bank locations worldwide wherever MasterCard is accepted. EPPICard transactions performed at some POS machine vendors are subject to surcharges by the financial institution or owner.

Form MDHS-EA-303A, Mississippi Debit MasterCard Program ePayment/EPPICard Customer Information Sheet, is provided to and discussed with the TANF recipient during the interview at application and redetermination. The MDHS-EA-303A also informs the recipient of merchant and bank locations where cash benefits may be redeemed. The card carrier mailed with the EPPICard also provides this information, as well as, EPPICard account access, card use and customer service information. Recipients may also access this information via the internet at <https://www.eppicard.com/>.

#### *Fees:*

Purchase - No fee

- Cash-back or Bank Teller Window - No fee
- In-Network ATM Cash Withdrawal - \$1.75 after 3 withdrawals (each withdrawal, each calendar month)
- Out-of-Network ATM Cash Withdrawal - \$1.75
- In-Network ATM Balance Inquiry - \$0.75 after 3 inquiries (each inquiry, each calendar month)
- Out-of-Network ATM Balance Inquiry - \$0.75

- Card Replacement - \$5.00
- Expedited Card Delivery - \$16.00
- In-Network ATM Denial for Insufficient Funds - \$0.50 after 3 denials (each denial, each calendar month)
- Out-of-Network ATM Denial for Insufficient Funds - \$0.50
- Monthly Account Access by Calling Customer Service - \$0.50 after 5 calls (each call, each calendar month)

#### *ATM Surcharges:*

A surcharge is an additional fee that may be charged for using a card at an ATM, or for withdrawing cash only at some point-of-sale machines in retail stores. The surcharge is charged by the owner of the equipment or financial institution supporting the ATM.

Banks and other retailers may have varying surcharges. Recipients may avoid the surcharge by accessing benefits at any Hancock, Trustmark or Regions Bank ATM.

TANF recipients are informed of benefit prohibitions by use of posters displayed in all MDHS county offices. In addition to the MDHS-EA-303A noted above, benefit use prohibitions are provided to all TANF households via the MDHS-EA-300, TANF Rights and Responsibilities, and the MDHS-EA-312, Personal Responsibility Contract. Benefit use prohibitions are also included in the TANF Approval Notice, the MDHS website, the EPPICard website, and through the recipient's online account "My MDHS Account". In addition, County and Regional Directors randomly observe TANF client interviews to ensure that eligibility workers are complying with requirements to explain benefit use and restrictions with TANF households.

#### **I. Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)**

Mississippi will not treat families moving into the State differently than other families under the TANF program. To treat families differently would create an unfair advantage to person moving into the State with higher benefits.

#### **J. Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)**

Mississippi will provide assistance to individuals who are not citizens of the United States only in accordance with the provisions outlined in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Mississippi Code of 1972 Annotated 43-17-5 and subsequent amendments to the Social Security Act.

The following qualified aliens are eligible:

- For five years after obtaining the designated alien status:
  - An alien admitted as a refugee defined under Section 207 of the Immigration and Nationality Act (INA);
  - An alien who is granted asylum defined under Section 208 of the INA;

- An alien whose deportation is being withheld defined under Section 243 of the INA, or whose removal is being withheld under Section 241 of the INA; or
- An alien lawfully admitted for permanent residence, if the alien entered the U.S. within the last five (5) years as a refugee, an asylee, or deportation was withheld.
- For an unlimited period, the following qualified aliens lawfully admitted for permanent residence:
  - Aliens who are veterans of the U.S. Armed Forces (honorably discharged for reasons other than alienage); active duty personnel of the U.S. Armed Forces (other than active duty for training), and their spouses and unmarried dependent children; and
  - Aliens who are lawfully admitted for permanent residence and have worked for 40 qualifying quarters of coverage or can be credited with such quarters, not including quarters beginning January 1, 1997 in which the alien received any Federal means-tested public benefit.

NOTE: Unlimited Period does not mean there are no time limits applicable to the TANF case; only that the qualified alien may receive benefits, if otherwise eligible, under the same time limit maximums as all other TANF assistance cases.

Mississippi may provide assistance to victims of severe forms of trafficking to the same extent as aliens.

**K. Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)**

Mississippi has established objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including the opportunity for recipients who have been adversely affected to be heard in a State administrative or appeal process. The State will administer the due process notification of adverse action with an opportunity for a fair hearing handled independently of the county office eligibility and/or benefit level decision to resolve any recipient benefit decreases, terminations, or related issues. Basic assistance program eligibility criteria and benefit levels are the same statewide.

**Criteria or Basis for a Hearing**

An applicant or recipient has a right to appeal decisions regarding eligibility for assistance including the following issues:

1. Decisions regarding eligibility and/or amount of TANF benefits
2. Conditions of payment or repayment
3. Denial of opportunity to make application or reapplication of benefits
4. Undue delay in determining eligibility for TANF and in making TANF benefits available
5. Suspension or discontinuance of TANF benefits in whole or in part

6. Assignment or participation issues in the TANF Work Program, including work exemptions, supportive services, good cause, etc.
7. Decisions regarding cooperation with the Division of Child Support Enforcement and good cause claims
8. Application of penalties which results in rejection of application, case closure, or reduction of benefits

NOTE: Some issues that are established by law are not subject to the fair hearing process, such as the maximum TANF benefit level.

### Requesting a Hearing

TANF applicants or recipients have the choice of either an agency conference or a state hearing to appeal any decision made on their cases. Individual may bypass the agency conference and request a state hearing, or if they choose to request an agency conference and are dissatisfied with the result, a state hearing may then be requested. The individual must make the request for a hearing in writing and sign the request. The claimant may be represented by any one designated; however, the designation must be made in writing.

The request for a hearing may be made by:

1. Checking in the space provided on any of the notification forms
2. Writing a letter indicating a request for a hearing
3. Completing form MDHS-EA-305, Request for a Hearing

The individual may make the request orally, but this must be followed by a formal written request. The worker will assist the individual by explaining how to request a hearing, sending the form MDHS-EA-305 (Request for a Hearing) to the individual who does not wish to write a letter and lacks a notification form, or helping to fill out a request form when the individual comes to the office of the Department of Human Services and requests a hearing. The request for a hearing may be sent to the county office or to the Administrative Hearings Unit. The worker may give the individual an addressed envelope when the individual prefers to mail the request himself.

### State Hearing Request After Local Hearing

When the individual has had a local hearing and is not satisfied with the outcome, he must request a state hearing within 90 days, following the expiration of the advance notice of case change or closure.

NOTE: To prevent the action or to request continued benefits, the hearing request must be made within 10 days from the date of the change/closure notice. If the 10th day falls on a weekend or holiday, the individual must always be given until the first working day following the weekend or holiday.

**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)— (1-2)**

1. Providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or
2. In other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

If TANF funding is available, Mississippi will assist TANF Work Program participants to train for, seek, and maintain employment:

- providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or
- in other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel.

Mississippi's four local Workforce Development Areas have identified Healthcare in their Sector Strategy Plans to help align the state's resources with needs of business and industry, career goals of workers and the economic goals of the state. The Mississippi Department of Human Services (MDHS), Division of Workforce Development (DWD) will partner with the Mississippi Community College Board (MCCB) and/or community colleges, Mississippi Department of Employment Security (MDES) and/or other entities to provide short-term training (e.g., Certified Nurses Assistance (CNA) training for placement in a nursing home, etc.) for TANF Work Program (TWP) participants who seek employment in the eldercare workforce. Training may be established on an individual basis based on the individual's career goal(s)/objective(s) and training needs in conjunction with employer needs.

**M. Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)**

The State shall maintain a Segregated State program for the following state-funded programs. These programs shall count towards the State's MOE:

- State funded scholarship programs for needy families with dependent children that began after 1995. [Mississippi Code of 1972 Sections 37-106-29, 37-106-31, and 37-157-1 amended by Senate Bill 2231(1997) and House Bill 1273(1998)]

Eligible population: A needy family is defined as a family with a dependent child(ren) and an average annual income at or below 350 percent of the Federal Poverty Level. The eligible child is defined as anyone who has not yet attained their 24th birthday, continuously enrolled in a program of post-secondary education [Attorney General's Opinion (September 6, 2002)]. The eligible child is not a veteran, not a graduate or professional student, not married, not an orphan or ward of the court, and does not have legal dependents. The eligible child is living in the home; however, he/she may be absent from the home for periods while attending the post-secondary program.



The cost of a scholarship provided to the head of household and/or his/her spouse in an income eligible family shall also count toward the State's MOE requirement.

- State funded programs to increase the likelihood of school success of preschool and school age children in needy families. Eligible population: Preschool and school age children from families with an income at or below 185 percent of the Federal Poverty Level. Mississippi established new programs to assist needy families with educational opportunities. The Mississippi Department of Education developed state funded programs for 3 and 4 year olds whose families are at or below 200 percent of the federal poverty level. However, the Reading and Intervention Program was established for school age children who have scored low on state tests and this program does not have a financial eligibility criteria. Pamphlets, brochures, and posters are provided to local MDHS offices ensuring the public is aware of all available services funded by the Mississippi Department of Education. The TANF goals of these programs/activities are to:
  1. Provide assistance to needy families so that the children may be cared for in their homes or in the homes of relatives;
  2. End the dependence of needy parents on government benefits by promoting job preparation and work. These programs provide safe and stable environments which help children succeed and allow their parents to work;
  3. Prevent and reduce the incidence of out-of-wedlock pregnancies; and
  4. 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:
  1. State funded programs to assist TANF Work Program participants with out-of-pocket expenditures for work-related items and/or services required by the employer in order to accept or maintain employment;
  2. State funded expenditures to provide basic assistance and transportation assistance as applicable;
  3. Mandatory State funded expenditures for early care and education for children whose parent(s) are employed or required to participate in TANF Work Program activities;
  4. State funded administrative expenditures for frontline caseworkers and state level staff which includes salaries, office supplies, and commodities as defined in MDHS's subgrantee manual; and
  5. State funded expenditures to maintain and enhance the eligibility and case management systems required to support the TANF Work Program.
  6. State funded expenditures to include the cost related to providing case management services.

## TANF Certifications

<b>The State Plan must include</b>	<b>Include</b>
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes
6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	Yes

## Jobs for Veterans State Grants

### **a. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;**

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 five-year, 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:

1. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

Mississippi Department of Employment Security (MDES) will assign and utilize DVOP Specialists and other agency employees trained in case management to metropolitan WIN Job Centers throughout the state where the needs of individualized career services are greatest. Services will be provided in person and remotely as needed. JVSG staff will travel to other WIN Job Centers to serve veterans as needed. DVOP Specialists will conduct relationship building, outreach and recruitment activities with other service providers in the local area to enroll eligible veterans in the JVSG program. With the approval of this plan, JVSG will operate on a four-year plan.

MDES will assign and utilize LVER staff and other agency employees to promote the advantages of hiring veterans to employers, employer associations, and business groups. LVER staff will advocate for all veterans served by the WIN Job Center with business, industry, and other community-based organizations. LVER staff will be assigned to a multi-county area and will be housed in WIN Job Centers throughout the area.

MDES will fill grant-funded vacancies expeditiously despite State budget problems, hiring freezes, and furloughs. MDES plans to identify projected losses and retirements early when possible. Applicants will be given the following order of priority: qualified service-connected disabled veterans, qualified eligible veterans, and qualified eligible persons.

To ensure vacancies are filled timely, veteran (non-JVSG) staff in the agency may be considered for assignment to the program if no eligible veteran is available to fill the position.

### **b. The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;**

In accordance with Veterans' Program Letter 03-14, including changes 1 and 2, or most recent policies, Disabled Veterans' Outreach Program (DVOP) Specialists provide individualized career services to veterans experiencing significant barriers (SBE) to employment, with an emphasis on assisting veterans who are economically or educationally disadvantaged.

The WIN Job Center staff identify eligible veterans or eligible persons at the point of entry using the intake (attestation) form and complete initial assessments. Those identified (self-attest) as having SBE will be referred to the DVOP Specialists or, in instances where a DVOP Specialist is not available or has reached the predetermined caseload, another WIN Job Center staff will provide services, including individualized career services. To better serve this target group, DVOP Specialists will continue to be oriented in all WIN Job Center programs, i.e., WIOA qualifications.

The Disabled Veterans' Outreach Program (DVOP) Specialist works directly with veterans and eligible persons who have significant barriers to employment. The services provided by a DVOP Specialist are referred to as individualized career services. These services include, but are not limited to:

- Comprehensive and specialized assessments.
- Career planning.
- Individual Employment Plans (IEPs).
- Individual counseling.

The DVOP Specialists conduct the following outreach activities to locate and assist eligible veterans and eligible persons:

- Veterans Rehabilitation & Employment Centers.
- Vet Centers, VA Medical Centers and Outpatient Clinics.
- Homeless Veterans Reintegration Program (HVRP) Projects and Homeless Shelters.
- Community-based and Civic Organizations.
- Veterans' Service Organizations.
- Mississippi Department of Rehabilitation Offices.
- Workforce Partners and Service Providers.
- Veterans Affairs Coordinators at colleges.
- Faith-Based Organizations.
- Reserve and National Guard units.
- Military Base Family Service/Support Centers.
- Military Treatment Facilities and Warrior Transition Units.
- Other venues and locations where veterans congregate.

In the event that a DVOP Specialist does not have a full caseload of eligible veterans and eligible persons, the DVOP Specialist may perform additional activities, in the order specified below:

- Review all open case files of current participants who have significant barriers to employment and perform 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. 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.

### **c. 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.

#### **d. The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;**

##### **Performance Incentive Awards**

MDES intends to use up to one percent of the annual JVSG allocation for Performance Incentive Awards. In accordance with Veterans' Program Letter 04-19, MDES has established a performance incentive awards program to recognize individuals for quality employment outreach, placement services to veterans, promotion of Hire Veterans Medallion Program, promotion of entry into federal employment, outstanding case management, and efforts to assist hard-to-place populations. Individuals must provide a cognizable service that exceeds their ordinary job duties and demonstrates extraordinary and commendable efforts on behalf of eligible veterans and eligible persons. It includes outstanding outreach and placement efforts on behalf of veterans, or extraordinary community relations efforts to increase the awareness of veterans' issues.

The incentive awards program was established to (a) encourage the improvement and modernization of employment, training, and placement services for veterans and (b) recognize eligible employees and WIN Job Centers for excellence in the provision of such services, or for having made demonstrable improvements in the provision of services to veterans.

MDES expects an increase in services to veterans by our partners, innovative approaches to servicing veterans, expanded program integration, an increase in performance outcomes and increased advocacy within the employer community. MDES also expects that staff will:

- Improve the employment status of veterans who have significant barriers to employment.
- Improve policies and procedures related to veterans' services.
- Improve the promotion of services to veterans by rewarding innovative outreach strategies, supportive services, case management and job development.
- Improve procedures that will increase collaboration and improve performance outcomes.

The incentive program will bring attention to veterans as a group with special employment needs and will reinforce the special federal regulations that support priority of services to veterans.

Eligible recipients of incentive awards are DVOP specialists, LVER staff, and any other individual who provides employment, training, and placement services to veterans under the WIOA, including labor exchanges funded by the Wagner-Peyser Act or staff of the WIN Job Centers. WIN Job Centers may receive the incentive award as an entire office. Awards to WIN Job Centers will be reserved for instances where most, if not all, employees in an office contribute to improving employment or training services offered and provided to veterans. The incentive award will be inclusive of the full spectrum of Department of Labor employment and training-related programs and non-Federal partners.

The selection criteria for award recipients will be based on performance standards and activities accomplished during the fiscal year for which the award is given. Consideration for employees and offices that demonstrate outstanding outreach on behalf of veterans who have barriers to employment, especially homeless, incarcerated, disabled, and recently separated veterans. Attitude, motivation, program improvement, positive feedback, and other indicators of outstanding performance will be given consideration in addition to numerical data.

Awards are administered by the Director of the Office of Job Connections and the Employment Manager of Workforce Services, with input from local management. The incentive program award will be one percent of the initial grant allocation. Disbursement of incentive award funds will be in non-cash award items representing the total amount of designated funding. Awards options include membership dues, personal services, and travel expenses for conferences, award ceremonies, training, and other items.

The costs of these individual trips or alternative awards, will not exceed \$3,000.00. All trips and other awards provided will not exceed 1% of the incentive award amount of \$16,875.00 or subsequent incentive award amount totals.

Each award winner (3-4 per year, depending on the budget) will be provided official travel to include flight, mileage, hotel and government per-diem. Award travel expenses for conferences may include, but not limited to, the National Association of State Workforce Agencies National Veterans Conference. The monetary amount of each award will be adjusted accordingly to stay within the allocated budget.

Selection of recipients and presentation of incentives will be made by the end of the fourth quarter of each year. Incentive award funds will be obligated by September 30th of each year and liquidated by December 31<sup>st</sup> of the same year. An Incentive Award Report will be submitted with the quarterly report due mid-November.



e. The populations of eligible veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

### **Targeting Services to Veterans with Significant Barriers to Employments (SBE)**

In accordance with 38 U.S.C. 4103A, Veterans' Program Letter 03-14, including changes 1 and 2, or most recent policies, the DVOP Specialists will provide individualized career services to eligible veterans and eligible persons who have significant barriers to employment (SBE) through the case management approach. An eligible veteran or eligible person is determined to have SBE if he or she attests to belonging to at least one of the six criteria below:

- A special disabled or disabled veteran, who is entitled to VA compensation or released from active duty because of a service-connected disability.
- Homeless.
- A recently-separated service member who at any point in the previous 12 months has been unemployed for 27 or more nonconsecutive weeks.
- Offender.
- Lacking a high school diploma or equivalent certificate.
- Low-income, as defined by WIOA.

In accordance with , DVOP Specialist will target services to other special populations of veterans who have SBE in accordance with VPL 03-19 or most recent policies:

- Veterans age 18-24.
- Vietnam-era veterans.
- Eligible transitioning service members.
- Receiving treatment at a military treatment facility or warrior transition unit.
- Spouse, or other family caregiver or a caregiver of an eligible veteran.
- Most recent populations as designated by the Secretary of Labor.

At the local level, WIN Job Centers' management will utilize the manager's report on services to veterans, the DVOP Specialist's outreach and recruitment activity report, and the DVOP Specialist's case management log to monitor and assess the productivity and quality of services provided to veterans.

At the state level, the State Veterans Coordinator (lead LVER) will continue to conduct WIN Job Center assistance visits to ensure guidelines set forth in Veterans' Program Letters, State Plan, Special Grant Provisions for Jobs for Veterans Grants, 38 U.S.C. Chapters 41 and 42, and other applicable compliance requirements are followed. Performance reports will be analyzed quarterly.

**f. How the State implements and monitors the administration of priority of service to covered persons;**

**Priority of Service**

To ensure veterans receive consideration for all opportunities for which they qualify, MDES ensures covered persons are aware of their entitlement to priority of service. Also, the full array of employment, training, and placement services available through the WIN Job Centers service points and that all applicable eligibility requirements for these programs are understood and applied.

MDES will also utilize the following as means of providing priority of service:

- Referral of qualified veterans to new job openings, especially Federal Contractor job orders, prior to all non-veteran job referral activity.
- Veterans placed at the top of WIOA waiting lists (Individual Training Accounts and On-the-Job Training) for limited training funds.

MDES management will monitor priority of service by reviewing quarterly performance reports, manager's report on services to veterans, and MS Works reports. MDES management will monitor priority of service in covered programs at two levels. At the local level, WIN Job Centers will continue to use established protocol of identifying targeted groups. At the state level, management will continue to analyze quarterly performance reports, manager's report on services to veterans, and MS Works reports.

WIN Job Center services are made available and provided to eligible veterans, transitioning service members, VA Vocational Rehabilitation & Employment program veterans, and veterans who have significant barriers to employment through outreach activities performed by DVOP Specialists. MDES will continue to encourage non-DOL program partners to focus on providing priority of service to targeted groups for special consideration.

**g. How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff:**

**g. 1. Job and job training individualized career services,**

DVOP Specialists provide and measure:

(1) **Individualized career services** - DVOP Specialists identify the appropriate career services needed by individual veterans, by using the case management process. They assess the job or job training needs of the veterans referred to them that have been identified by WIN Job Center staff as having significant barriers to employment. If training is needed, DVOP Specialists refer veterans to the appropriate WIN Job Center staff.

**g. 2. Employment placement services, and**

(2) Employment placement services - DVOP Specialists refer veterans to jobs based on job orders within the MS Works system. If no job orders are available for the skill-set desired by the veterans, the DVOP Specialist works with the LVER staff and WIN Job Center staff to locate employers in the community.

**g. 3. Job-driven training and subsequent placement service program for eligible veterans and eligible persons;**

(3) **Job-driven training** - DVOP Specialists refer those veterans with significant barriers to employment to the appropriate program within the WIN Job Center for job-driven training and placement services.

DVOP Specialist job services, career services, and placement services are measured through the MS Works system and manual tools, i.e., manager's report on services to veterans, DVOP Specialist's outreach and recruitment activity report, and the DVOP Specialist's case management log.

**h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and**

Hire date and training information is provided in the "Addendum for Mandatory Training Requirements" form is included below:

<b>Employee Name</b>	<b>Program</b>	<b>"Date Assigned"</b>	<b>Completed all Required Training</b>
Anderson, Chasity	SVC	1-Mar-19	Yes
Amos, Stanford	DVOP	16-Jan-19	Yes
Bradley, Latricia	LVER	3-Apr-17	Yes
Brown, Calvin	LVER	17-Jul-17	Yes
Cannon, Gloria	LVER	1-Jan-03	Yes
Davis, Demetria	DVOP	1-Jun-18	Yes
Fair, William	DVOP	17-Apr-17	Yes
Fett, Edward	DVOP	4-Sep-18	Yes
Forrest, Riley	DVOP	16-Dec-19	No
Holifield, Jerry	DVOP	16-Jan-19	Yes
Ivory, Thessaol	DVOP	1-Aug-19	No
Mann, David	LVER	19-Feb-02	Yes
Mays, Bianca	DVOP	18-Aug-14	Yes
Olson, John	DVOP	7-Nov-11	Yes
Petro, Marvin	DVOP	3-Apr-17	Yes
Robinson, Lawrence	DVOP	16-Jun-14	Yes
Smith, Johnny	LVER	1-Nov-01	Yes

**i. Such additional information as the Secretary may require.**

At the time of plan submission, no additional information was requested by the Secretary.

## **Unemployment Insurance (UI)**

### ***A. Contents of a Complete UI SQSP Package***

#### **a.1. Transmittal Letter**

Mississippi's complete SCSP package is provided in Appendix I7. The requisite transmittal letter for the SQSP is presented in Appendix I7A.

#### **a.2. Budget Worksheets/Forms**

Worksheet UI-1 is provided in Appendix I7B. Worksheet SF 424 is provided in Appendix I7F. Worksheet SF 424A is provided in Appendix I7G.

#### **a.3. The State Plan Narrative**

The State's SQSP Narrative is provided in Appendix I7C.

#### **a.4. Corrective Action Plans (CAPs)**

The State's SQSP CAPS and Quarterly Report are provided in Appendix I7D. The State's SQSP Assurances are provided in Appendix I7E.

#### **a.5. UI Program Integrity Action Plan (UI IAP)**

The State's UI IAP is provided in Appendix I7J.

#### **a.6. Organizational Chart**

The organizational chart indicating the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery, including details on each organizational unit is presented in Appendix I7H.

#### **a.7. SQSP Signature Page**

The SQSP Signature Page is provided in Appendix I7I.

*B. Requirements for States electing to include UI in the Combined State Plan*

**1. Submit an SQSP in the following manner depending on their timing in the SQSP cycle:**

**b. 1. A.** If a State is in the first year of their 2-year cycle, the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

The SQSP for FY 2020 was submitted to the U.S. Department of Labor/ETA on August 21, 2019.

**b. 1. B.** If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

N/A

**b. 2.** Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year

The required off-year components will be submitted as a modification to the Combined State Plan by October 31 each year.

## Senior Community Service Employment Program (SCSEP)

### A. Economic Projections and Impact

**a. 1.** Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d)) (May alternatively be discussed in the economic analysis section of strategic plan.)

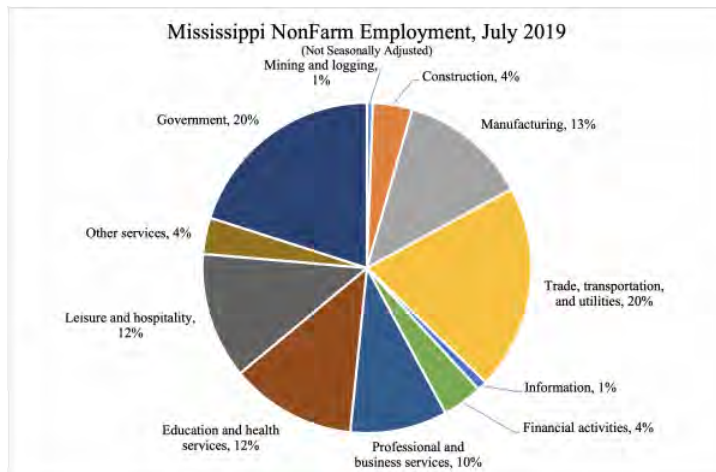
Mississippi is a predominantly rural state with only three metropolitan areas and a population of 2,988,762. From 2010 to 2018, Mississippi's overall population grew by 46,771. The following population groups experienced the greatest percentage growth in the previous decade: Asian, 14.67 percent; Native Hawaiian or Pacific Islander, 11.16 percent; and two or more races, 36.5 percent. This demographic change has led to a more diverse Mississippi. The state also has a larger potential workforce in 2018 than it did in 2010, as Mississippi's population over 18 years old grew by 83,838 to a total potential workforce of 2,268,454.

The population over 55 grew by 130,067 to a potential older workforce of 829,364. According to data from the Bureau of Labor Statistics, Mississippi's unemployment rate has dropped from 10.4 percent in 2010 to a historic low of 4.8 percent in 2018, before rising slightly to 5.5 percent by November 2019. As of November 2019, unemployment rates by county currently range from 4 to 16.1 percent. Mississippi private-sector employers have

added 40,200 jobs (an increase of 3.59 percent) since July 2015. The largest job gains have been in leisure and hospitality (12,300 jobs), trade, transportation and utilities (9,900 jobs), and education and health services (9,200 jobs). These three sectors provide employment options for seniors.

The Healthcare sector is projected to continue growing rapidly in Mississippi. Healthcare is an industry of necessity. As Mississippi population ages, the need for quality, accessible medical care will increase. Nationally, healthcare jobs growth rose 21.36 percent between 2010 and 2019. This growth requires more Direct Service Workers in both patient care and ancillary healthcare jobs from housekeeping to medical records. This is an employment area that the Mississippi SCSEP will target for unsubsidized employment.

Figure 20: Mississippi Nonfarm Employment, July 2019



Source: MDES, 2020

As the chart above indicates, Mississippi's economy is dominated by six sectors. The largest sector as of June 2019 was Trade, Transportation, and Utilities; followed by Government; and Manufacturing.

The data below compare Mississippi's employment by industry sector as of July 2015, to employment as of June 2019. Leisure and Hospitality and Professional and Business Services show robust growth and are areas that have significant employment potential for senior workers.

Table 27: Employment By Industry

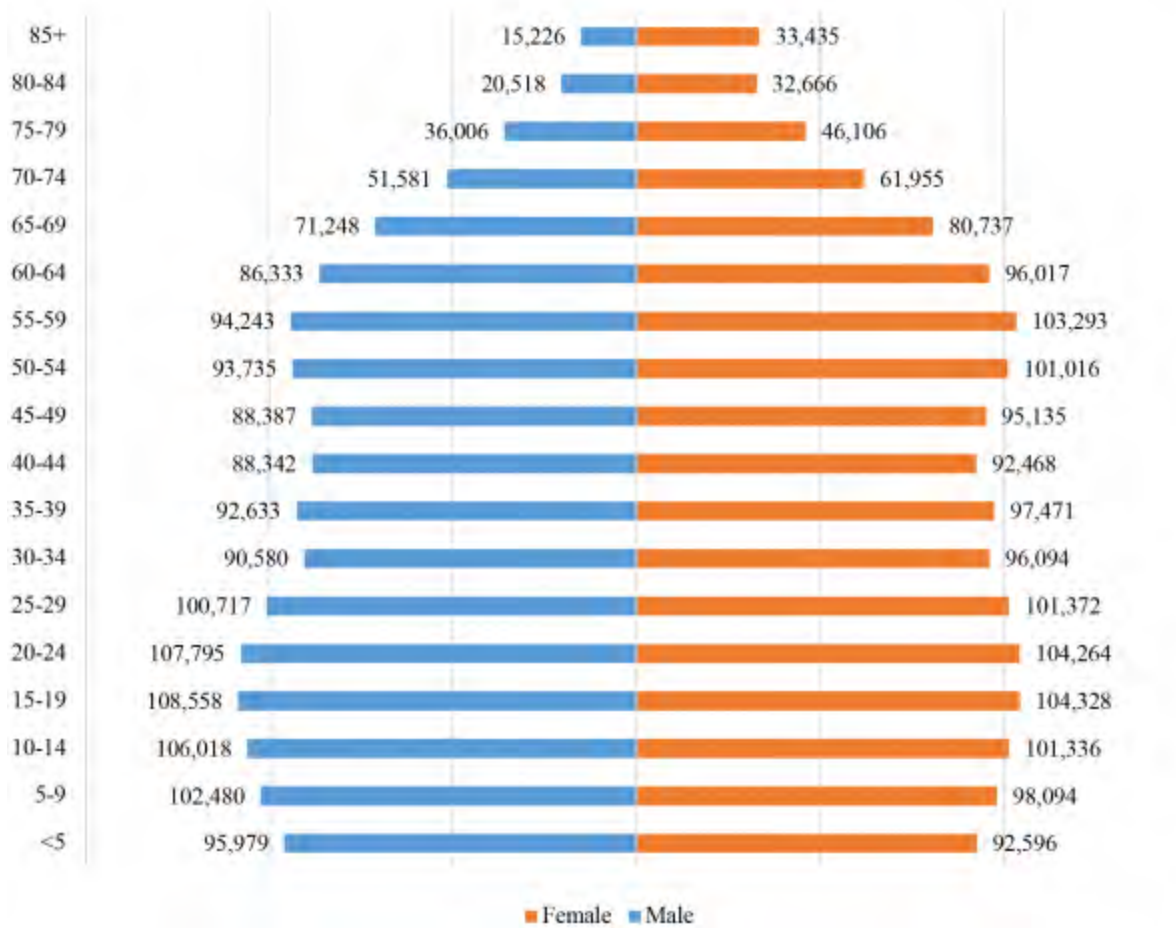
Industry Sector	July 2015	June 2019	Number Change	Percent Change
<b>Trade, transportation, and utilities</b>	223,400	233,300	9,900	4.43%
<b>Government</b>	234,200	233,200	(1,000)	-0.43%
<b>Manufacturing</b>	141,900	146,700	4,800	3.38%
<b>Education and health services</b>	134,400	143,600	9,200	6.85%
<b>Leisure and hospitality</b>	131,200	143,500	12,300	9.38%

<b>Professional and business services</b>	104,000	110,800	6,800	6.54%
<b>Financial activities</b>	43,800	45,800	2,000	4.57%
<b>Construction</b>	47,100	44,800	(2,300)	-4.88%
<b>Other services</b>	40,100	41,300	1,200	2.99%
<b>Information</b>	12,700	11,200	(1,500)	-11.81%
<b>Mining and logging</b>	7,900	6,700	(1,200)	-15.19%
<b>Total nonfarm</b>	1,120,700	1,160,900	40,200	3.59%

Source: MDES, 2020

The charts below indicate that Mississippi is losing certain population groups while the population of those over 55 years of age is growing. The total population over 55 from the 2018 American Community Survey was 829,364 and will increase to 1,011,768 by 2030.

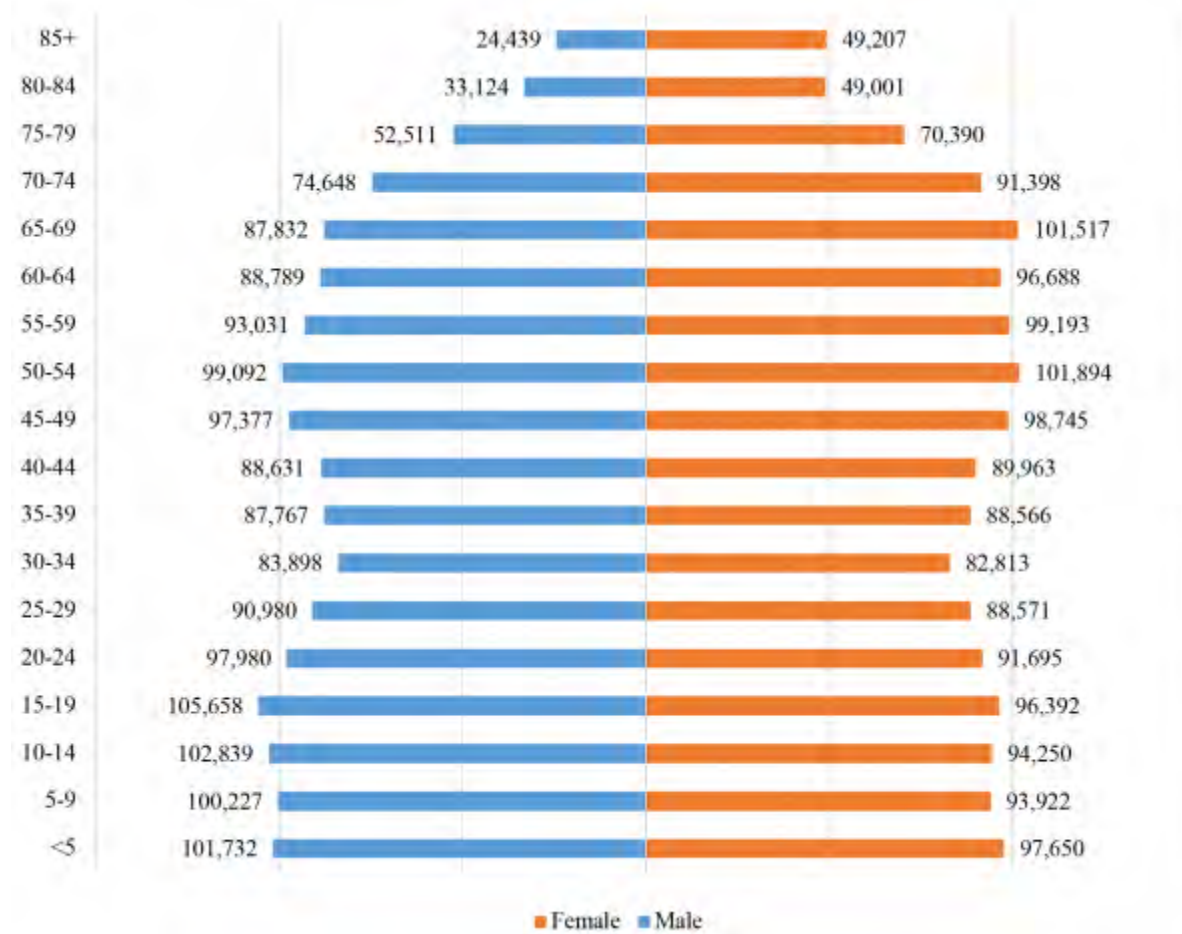
Figure 21: Population by Age and Sex, 2018



Source: Census Bureau, 2020



Figure 22: Projected Population by Age and Sex, 2030



Source: Centers for Disease Control, 2020

Individuals with Disabilities make up the following percentages in Mississippi:

Table 28: Disability Status of The Civilian Noninstitutionalized Population

	Total	Total With a Disability	Percentage With a Disability
Civilian Noninstitutionalized Population (CNP)	2,922,647	476,720	16.30%
Under 18 years old	717,902	33,163	4.62%
18 to 64 years old	1,768,479	260,090	14.71%
65 years old and over	436,266	183,467	42.05%

Source: Census Bureau, 2020

Data from the 2018 5-Year American Community Survey also indicate that:

- Among Mississippians age 55 and older, 13.25 percent are veterans
- 52.27 percent of the overall population of Mississippi live in non-metropolitan counties;
- 1.62 percent of Mississippians speak English less than “very well”;
- Of the total population in Mississippi of 2,988,762:
  - White number: 1,751,193 or 58.59 percent
  - Black or African American number: 1,125,834 or 37.67 percent
  - American Indian and Alaska Native number: 13,689 or 0.46 percent
  - Asian number: 28,313 or 0.95 percent
  - Native Hawaiian or Pacific Islander number: 707 or 0.02 percent,
  - Some other race number: 28,833 or 0.96
  - Two or more races number: 40,193 or 1.34 percent.

Educational attainment statistics from the 2018 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*

	<b>Total</b>	<b>Percentage of Population over 25</b>
Population 25 years and over	1,967,314	-
Less than 12th grade, no diploma	316,345	16.08%
High school graduate (includes equivalency)	596,564	30.32%
Some college or Associate degree	625,228	31.78%
Bachelor's degree	266,274	13.53%
Graduate or professional degree	162,903	8.28%
Percent high school graduate or higher	1,650,969	83.92%
Percent bachelor's degree or higher	429,177	21.82%

**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))**

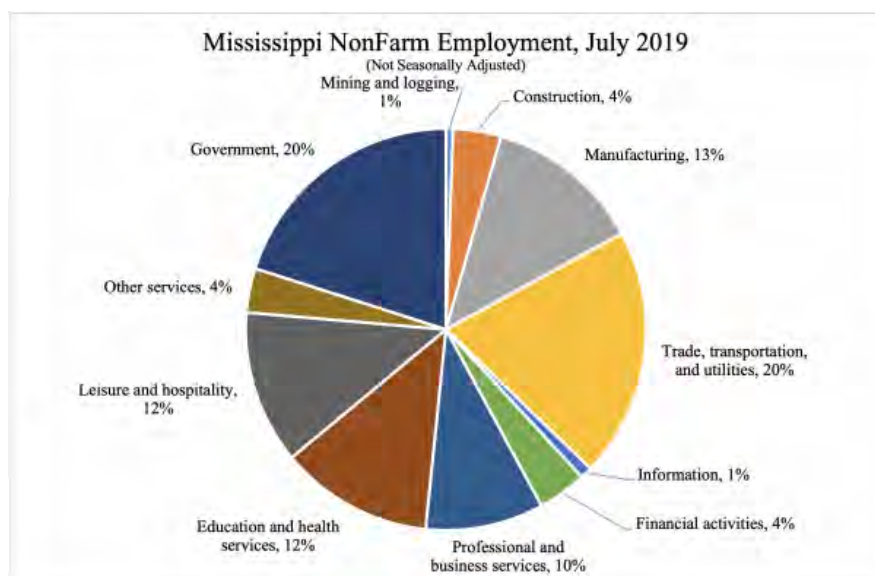
Mississippi is a predominantly rural state with only three metropolitan areas and a population of 2,988,762. From 2010 to 2018, Mississippi’s overall population grew by 46,771. The following population groups experienced the greatest percentage growth in the previous decade: Asian, 14.67 percent; Native Hawaiian or

Pacific Islander, 11.16 percent; and two or more races, 36.5 percent. This demographic change has led to a more diverse Mississippi. The state also has a larger potential workforce in 2018 than it did in 2010, as Mississippi's population over 18 years old grew by 83,838 to a total potential workforce of 2,268,454.

The population over 55 grew by 130,067 to a potential older workforce of 829,364. According to data from the Bureau of Labor Statistics, Mississippi's unemployment rate has dropped from 10.4 percent in 2010 to a historic low of 4.8 percent in 2018, before rising slightly to 5.5 percent by November 2019. As of November 2019, unemployment rates by county currently range from 4 to 16.1 percent. Mississippi private-sector employers have added 40,200 jobs (an increase of 3.59 percent) since July 2015. The largest job gains have been in leisure and hospitality (12,300 jobs), trade, transportation and utilities (9,900 jobs), and education and health services (9,200 jobs). These three sectors provide employment options for seniors.

The Healthcare sector is projected to continue growing rapidly in Mississippi. Healthcare is an industry of necessity. As Mississippi population ages, the need for quality, accessible medical care will increase. Nationally, healthcare jobs growth rose 21.36 percent between 2010 and 2019. This growth requires more Direct Service Workers in both patient care and ancillary healthcare jobs from housekeeping to medical records. This is an employment area that the Mississippi SCSEP will target for unsubsidized employment.

Figure 23: Mississippi Nonfarm Employment, July 2019



Source: MDES, 2020

As the chart above indicates, Mississippi's economy is dominated by six sectors. The largest sector as of June 2019 was Trade, Transportation, and Utilities; followed by Government; and Manufacturing.

The data below compare Mississippi's employment by industry sector as of July 2015, to employment as of June 2019. Leisure and Hospitality and Professional and Business Services show robust growth and are areas that have significant employment potential for senior workers.

Table 30: Employment By Industry

Industry Sector	July 2015	June 2019	Number Change	Percent Change
<b>Trade, transportation, and utilities</b>	223,400	233,300	9,900	4.43%
<b>Government</b>	234,200	233,200	(1,000)	-0.43%
<b>Manufacturing</b>	141,900	146,700	4,800	3.38%
<b>Education and health services</b>	134,400	143,600	9,200	6.85%
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<b>Professional and business services</b>	104,000	110,800	6,800	6.54%
<b>Financial activities</b>	43,800	45,800	2,000	4.57%
<b>Construction</b>	47,100	44,800	(2,300)	-4.88%
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<b>Information</b>	12,700	11,200	(1,500)	-11.81%
<b>Mining and logging</b>	7,900	6,700	(1,200)	-15.19%
<b>Total nonfarm</b>	1,120,700	1,160,900	40,200	3.59%

Source: MDES, 2020

The charts below indicate that Mississippi is losing certain population groups while the population of those over 55 years of age is growing. The total population over 55 from the 2018 American Community Survey was 829,364 and will increase to 1,011,768 by 2030.

Figure 24: Population by Age and Sex, 2018

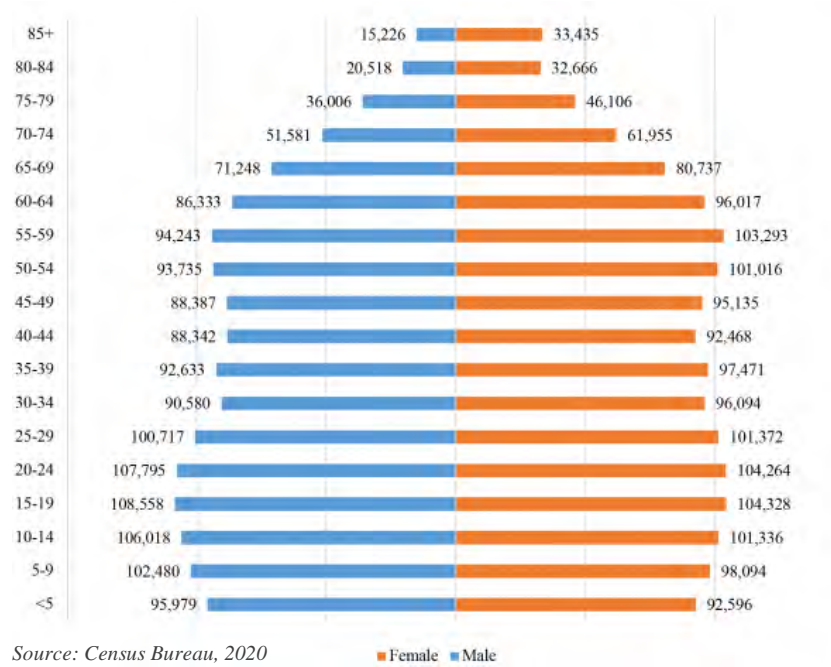
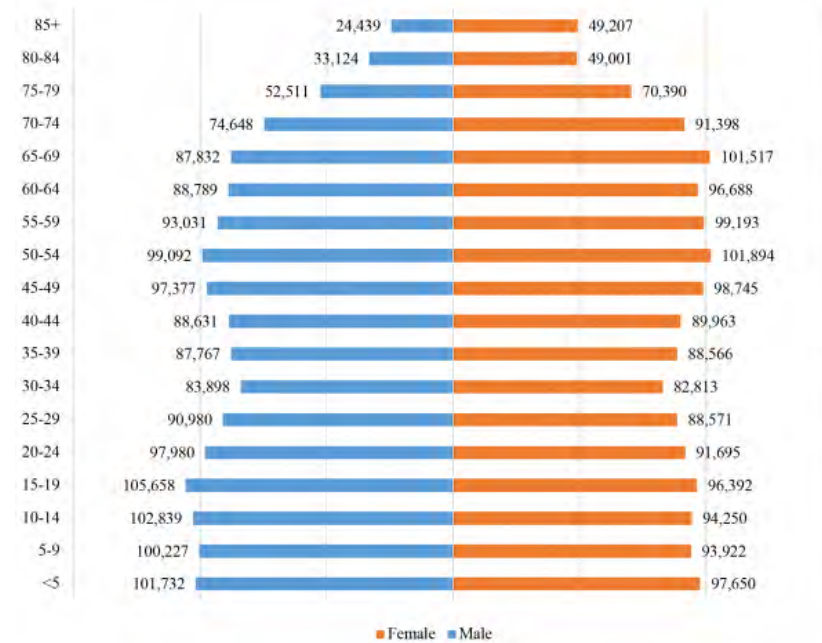


Figure 25: Projected Population by Age and Sex, 2030



Individuals with Disabilities make up the following percentages in Mississippi:

Table 31: Disability Status of The Civilian Noninstitutionalized Population

	Total	Total With a Disability	Percentage With a Disability
<b>Civilian Noninstitutionalized Population (CNP)</b>	2,922,647	476,720	16.30%
<b>Under 18 years old</b>	717,902	33,163	4.62%
<b>18 to 64 years old</b>	1,768,479	260,090	14.71%
<b>65 years old and over</b>	436,266	183,467	42.05%

Source: Census Bureau, 2020

Data from the 2018 5-Year American Community Survey also indicate that:

- Among Mississippians age 55 and older, 13.25 percent are veterans
- 52.27 percent of the overall population of Mississippi live in non-metropolitan counties;
- 1.62 percent of Mississippians speak English less than “very well”;
- Of the total population in Mississippi of 2,988,762:
  - White number: 1,751,193 or 58.59 percent
  - Black or African American number: 1,125,834 or 37.67 percent
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  - Two or more races number: 40,193 or 1.34 percent.

Educational attainment statistics from the 2018 census are only available for the total population over 25, not specifically for those over 55, but show the following:

Table 32: Educational Attainment Statistics

	Total	Percentage of Population over 25
<b>Population 25 years and over</b>	1,967,314	-
<b>Less than 12th grade, no diploma</b>	316,345	16.08%
<b>High school graduate (includes equivalency)</b>	596,564	30.32%
<b>Some college or associate degree</b>	625,228	31.78%

<b>Bachelor's degree</b>	266,274	13.53%
<b>Graduate or professional degree</b>	162,903	8.28%
<b>Percent high school graduate or higher</b>	1,650,969	83.92%
<b>Percent bachelor's degree or higher</b>	429,177	21.82%

**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))**

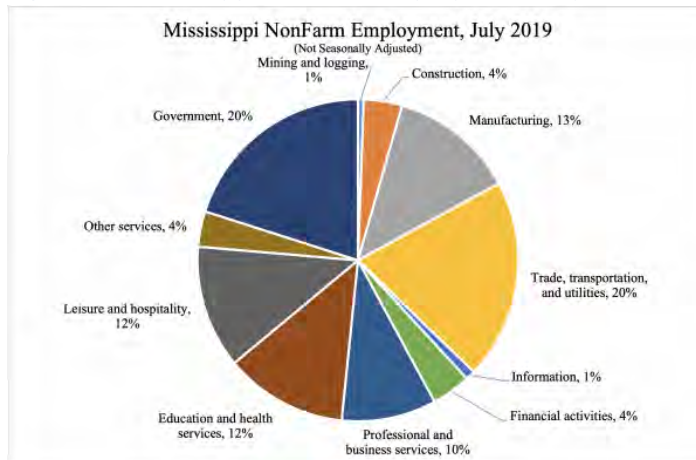
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Figure 26: Mississippi Nonfarm Employment, July 2019



Source: MDES, 2020

As the chart above indicates, Mississippi's economy is dominated by six sectors. The largest sector as of June 2019 was Trade, Transportation, and Utilities; followed by Government; and Manufacturing.

The data below compare Mississippi's employment by industry sector as of July 2015, to employment as of June 2019. Leisure and Hospitality and Professional and Business Services show robust growth and are areas that have significant employment potential for senior workers.

Table 33: Employment By Industry

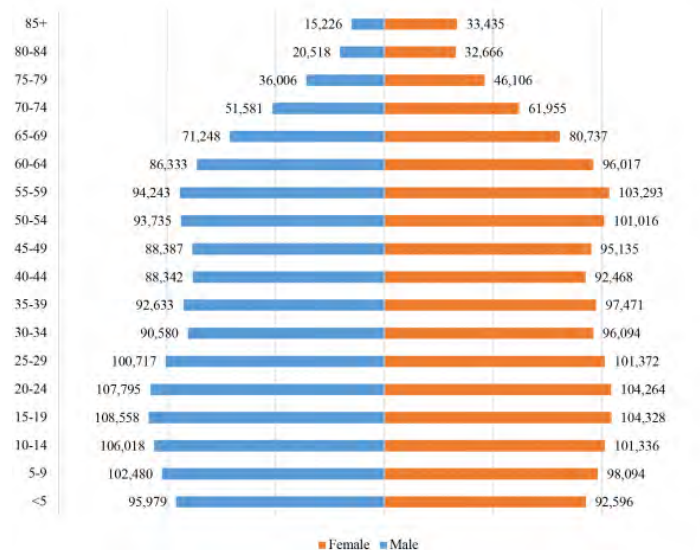
Industry Sector	July 2015	June 2019	Number Change	Percent Change
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<b>Mining and logging</b>	7,900	6,700	(1,200)	-15.19%

<b>Total nonfarm</b>	1,120,700	1,160,900	40,200	3.59%
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Source: MDES, 2020

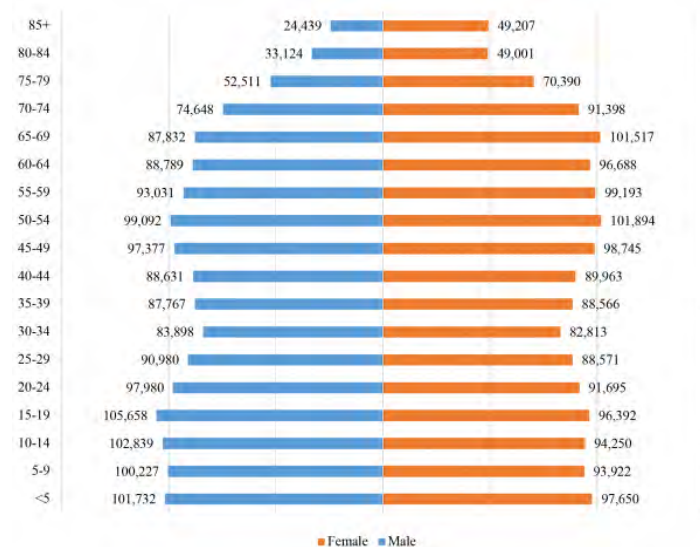
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Figure 27: Population by Age and Sex, 2018



Source: Census Bureau, 2020

Figure 28: Projected Population by Age and Sex, 2030



Source: Centers for Disease Control, 2020

Individuals with Disabilities make up the following percentages in Mississippi:

Table 34: Disability Status of The Civilian Noninstitutionalized Population

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<b>65 years old and over</b>	436,266	183,467	42.05%

Source: Census Bureau, 2020

Data from the 2018 5-Year American Community Survey also indicate that:

- Among Mississippians age 55 and older, 13.25 percent are veterans
- 52.27 percent of the overall population of Mississippi live in non-metropolitan counties;
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Educational attainment statistics from the 2018 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

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<b>High school graduate (includes equivalency)</b>	596,564	30.32%
<b>Some college or Associate degree</b>	625,228	31.78%
<b>Bachelor's degree</b>	266,274	13.53%

<b>Graduate or professional degree</b>	162,903	8.28%
<b>Percent high school graduate or higher</b>	1,650,969	83.92%
<b>Percent bachelor's degree or higher</b>	429,177	21.82%

Source: Census Bureau, 2020

## *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))**

In July 1, 2012, the Mississippi Department of Employment Security (MDES) was designated as the SCSEP State Grantee. Since MDES is the state agency that operates the state workforce system, coordination of SCSEP with other workforce programs in the state should increase greatly.

### **Coordination with State's Title I Workforce Innovation and Opportunity Act (WIOA) Activities.**

MDES is the agency that oversees WIOA in Mississippi. MDES staff members are liaisons to the Local Workforce Development Areas and track the use of WIOA funding. WIOA in Mississippi and the LWDA's are important partners to SCSEP. The SCSEP Managers rely on MDES and the LWDA's for labor market information, training, and job search assistance.

SCSEP participants register with the WIN Job Centers (American Job Centers) to research the available jobs in their area and jobs of interest to them. Participant training plans are based on the employment opportunities for which they are interested. Employment specific training is usually coordinated through the WIOA course offerings.

Coordination with Title I WIOA is further enhanced through the WIN Job Centers' option to participate as host agencies. Placing participants in the WIN Job Centers serves many purposes such as:

- having a senior on site provides a more comfortable setting, thereby attracting other seniors;
- provides an opportunity for the older worker to network with potential businesses and locate unsubsidized employment;
- provides an opportunity for the older work to recruit eligible individuals into the SCSEP program; and,
- provides an opportunity to research jobs regularly.

### **B. Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))**

The U.S. Department of Labor provides funds to operate SCSEP to States and other national sponsor organizations. Governor Bryant 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 local Area Agency on Aging transportation services. The state and National Grantees target transportation providers with a goal of benefiting SCSEP participants interested in training – with the transportation providers acting in a host agency capacity.

- **Nutrition.**

The Nutrition Program serves a dual purpose; it provides a well-balanced meal for SCSEP participants and it provides host agencies that train participants at their congregate meal sites. Training at the Nutrition Program congregate meal sites offers skills training in food handling and preparation, management skills, and recreation development. SCSEP Managers' goals are to continue partnering with the Nutrition Program congregate meal sites as host agency sites.

- **Aging and Disability Resource Center.**

The state and National Grantees plan to partner with the Aging and Disability Resource Center (ADRC), an online database of resources. The Aging and Disability Resource Center Program (ADRC), a collaborative effort of AoA and the Centers for Medicare & Medicaid Services (CMS), is designed to streamline access to long-term care. The ADRC program provides states with an opportunity to effectively integrate the full range of long-term supports and services into a single, coordinated system. The ADRC provides a single entry-point for resources that can assist SCSEP participants to meet their personal and family needs. Additionally, the ADRC will identify eligible participants for SCSEP.

- **Adult Day Care.**

The Adult Day Care program is beneficial for the SCSEP participants that are also caregivers. The Adult Day Care program allows participants to continue training at host agencies with the reassurance their family member is taken care of. The state and National Grantees also benefit from the Adult Day Care Program in a host agency capacity. Certified Nursing Assistants (CNA) are needed in Adult Day Care centers; CNA Training is an opportunity for participants interested in furthering their careers or entering the medical field.

- **Family Caregiver Support Program.**

The Family Caregiver Support Program provides information about services, assistance in gaining access to services, counseling, respite care, and supplemental services to complement the care provided by the caregivers. The program can support the needs of SCSEP participants that are caregivers needing to be training for unsubsidized employment.

**C. Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith-based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))**

## **National Sponsors**

Mississippi has three (3) national sponsor organizations operating SCSEP. The following is a list of the national sponsors and the contact person for each of those agencies.

National Caucus and Council on Black Aged, Inc.

Chester A. Johnson, Program Manager

Post Office Box 545

Cleveland, MS 38732

(662) 846-6992

Email: [cjohnson@myncba.com](mailto:cjohnson@myncba.com)

Senior Service America, Inc.

Chris Garland, National SCSEP Director

8403 Colesville Road, Suite 1200

Silver Spring, MD 20910

(301) 578-8932

[cgarland@ssai.org](mailto:cgarland@ssai.org)

[www.seniorserviceamerica.org](http://www.seniorserviceamerica.org)

Institute for Indian Development, Inc.

John Silver, Program Director

991 Grand Caillou Road

Houma, Louisiana 70363-5705

(985) 851-5408

(985) 346-3682

[jsilver@itcla.com](mailto:jsilver@itcla.com)

## **Service Organizations and Community Based Organizations**

The state's subgrantees, the PDDs, through the AAAs, utilize the services of or directly contract with the service organizations that serve the aging population, such as elder abuse prevention services, legal services, and transportation services. Many of these services are provided by community-based organizations. Due to these relationships, AAA and PDD staff members remain in constant contact with the service provider staff from which participant and host agency referrals are made. SCSEP managers, through the AAAs, work with homemakers, transportation, nutrition providers, and community action organizations. Service providers and

community action agencies are invited to the public hearings held annually to discuss aging programs, including SCSEP.

#### Collaboration with Other Public and Private Entities and Programs that Provide Services to Older Americans

##### **Community Based Organizations.**

The state subgrants SCSEP to the 10 PDDs in the state; the PDDs/AAAs have a direct contractual relationship with community-based organizations as service providers. Local community action agencies work closely with the state grantee to collaborate on SCSEP.

##### **Transportation Programs.**

Transportation providers are generally non-profit organizations that partner with AAAs. The rural nature of the state is compounded by the lack of an entity with mandated responsibility for providing transportation assistance to citizens in need. To combat transportation problems:

- the Mississippi Department of Transportation is actively involved in leading the United We Ride campaign in the state;
- the Planning and Development Districts either sponsor or closely partner with the Regional Transportation Councils.

#### **b. 1. D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))**

##### **Labor Market Effects on Employment Opportunities and Host Agencies.**

Employment opportunities for SCSEP participants vary greatly based on the jobs available in the local labor market. Data on the local jobs, such as type, availability, and potential growth should determine the types of host agencies and the how many are needed to support SCSEP participant training. Also, each SCSEP participant's Individual Employment Plan is developed based on the skills needed for the available jobs in the region and should guide the training he or she receives. The labor market data needed to drive these decisions comes from the MDES Labor Market Information unit and is provided in partnership with the LWDBs through board meetings, conferences, the Workforce Innovation and Opportunity Act State Plan, and local WIN Job Centers.

##### **Collaboration with Other Labor Market and Job Training Initiatives.**

MDES is the State Grantee for SCSEP and developed the 5-Year SCSEP State Plan. MDES is also the designated state workforce agency, and as such, provided Governor Phil Bryant's WIOA Combined State Plan to the US Department of Labor for WIOA, Wagner-Peyser, and other DOL-funded workforce programs. The combined plan is centered on an effective and efficient state workforce development system that meets the demands of Mississippi's businesses and job seekers by creating a Work-Ready Mississippi. This system will integrate state and local resources to create a seamless system to serve the business community and the individuals who use the system. The SCSEP plan will coordinate with, support, and benefit from the WIOA Combined State Plan and the Governor's workforce initiatives.

As a demonstration of his commitment to transform the system, Governor Bryant directed a commission of workforce and education partner agencies to develop a statewide plan that establishes a more coordinated and accountable workforce development system with greater emphasis on training, increasing job skills, and certifications. Governor Bryant also created a statewide economic development plan, "Mississippi Works," that



is aligned with the redesigned workforce development system. This will be an industry-focused, demand-driven workforce development system.

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 which expands the healthcare industry. This law advocates centralizing health care and encouraging healthcare-related businesses to create high-paying jobs and to locate within qualified Health Care Zones. Businesses that create jobs in the research, development, manufacturing or processing of pharmaceuticals, biologics, biotechnology, medical supplies and medical equipment, diagnostic imaging and other shared services would be eligible for incentives.

As Mississippi's population ages, the need for quality, accessible medical care will increase. This increase in need for medical care will require an increase in the number of healthcare jobs, as evidenced by the national growth in this sector of twenty-one percent between 2001 and 2010. Mississippi jobs in healthcare pay 40 percent more than the statewide average. This is an area in which older Mississippians can be placed in unsubsidized employment after SCSEP job training.

At the heart of Mississippi's economy are our existing businesses and industries. Developing a workforce for the growth and sustainability of Mississippi businesses large and small - from tourism on the Mississippi Blues Trail to the high tech and advanced manufacturing of military drones - must remain a priority. The vision is simple: to help our state attract, keep, and grow businesses that create good jobs.

Mississippi understands that our economic growth is dependent on a comprehensive statewide workforce system that integrates education, industry, employment and economic development into a unified enterprise with a shared vision and common goal. This system is employer-focused and demand-driven. The growth of high wage employment is dependent upon Mississippi having a trained workforce, a continued supply of skilled Mississippians who are ready, willing, and able to fill jobs, regardless of their age.

Mississippi has identified five keys to meet the shortage a high-quality workforce:

- A high-quality education for all citizens is a key tenet of competitiveness that makes Mississippi an attractive place to create, locate and grow a business;
- High wage jobs must be filled by highly skilled workers possessing the appropriate skills to do the job and further business growth. Unfilled job positions are wasted opportunities in the short- and long-term causing employers to look outside Mississippi for talent;
- An information system that supports data-driven planning and decision making for state and local workforce stakeholders;
- An increase in post-secondary credentials and certifications that help jobseekers access the high-skill, high-growth jobs of the future; and
- A pipeline for workforce development must be advanced through strategic partnerships with a common vision among K-12, community colleges, universities, state agencies and other stakeholders devoted to workforce training and retraining.

Each of these five keys is as critical in helping seniors fill a part of the shortage in skilled workforce as they are

for other workers.

### **Leveraging Resources from Key Partners to Support SCSEP.**

PDDs work with community colleges to provide training to SCSEP participants at a reduced cost; many provide tuition waivers for SCSEP participants. Community colleges are an integral component of the WIOA programs offered through the WIN Job Centers. SCSEP participants are encouraged to dual enroll in WIOA with the WIN Job Centers for job search assistance and training classes.

### **E. Actions to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)**

#### **Infrastructure Funding Agreements.**

Each PDD is required in their subgrant with the state to negotiate with a local WIN Job Center (WJC) to ensure SCSEP's required partner presence in the center. Each PDD entered into a Memorandum of Understanding (MOU) with the WJC and negotiated payment for space used and provided a copy of the MOU and the basis for the cost to MDES. Funds in the amount of that cost basis are included in the PY19 SCSEP allocations for estimated cost for the space, and the PDDs include these costs in their budget narratives submitted to MDES.

#### **Collaboration with State Vocational Rehabilitation.**

The Mississippi Department of Rehabilitation Services, like SCSEP, is a required partner in the WIOA programs. SCSEP and Vocational Rehabilitation will collaborate with the WIN Job Centers for employment assistance for older individuals with disabilities.

#### **Collaboration with Adult Education and Literacy Providers.**

SCSEP participants complete an initial assessment upon entrance into the program to determine their employment plan. For participants that are interested in completing their High School Equivalency Diploma (HSE), SCSEP partners with the Adult Education program administered by the Mississippi Community College Board. The Adult Education program is designed to offer opportunities to enhance the skills and abilities of individuals preparing for the workforce. SCSEP participants are encouraged to prepare themselves in the areas of math, reading, writing, communication, and computer skills to become employment ready. The Adult Education program provides assistance in developing these skills based on the individual's skill level and learning capacity.

The Adult Education program is available statewide through community colleges, public schools, and other resources. SCSEP participants can test at any of the available high school equivalency sites across the state.

#### **Collaboration with Education and Training Providers.**

The SCSEP program collaborates with the WIN System to offer SCSEP participants access to training using Individual Training Accounts (ITAs) through the state's Eligible Training Provider System. Available courses include, but are not limited to:

- Accounting;
- Administrative Services;
- Animal Husbandry;
- Auto Mechanics;
- Banking and Finance;

- Building Maintenance;
- Clerical;
- Computer;
- Data Word Processing;
- Forestry;
- Health Services;
- Industrial;
- Landscaping;
- Manicuring;
- Medical Coding;
- Pharmacy Tech;
- Retail Sales;
- Teacher Assistant; and,
- Welding.

#### **F. Efforts to work with local economic development offices in rural locations.**

##### **Local Governments.**

PDDs are also directly linked to the economic development of the region and receive funds from local cities, counties and local governments. PDDs have direct relationships with cities, counties and local governments; many are host agencies for SCSEP participants. The following are government agencies that SCSEP works with on an ongoing basis:

- Board of Supervisors;
- Cities;
- Towns;
- Libraries;
- Local Chambers of Commerce; and,
- State Chamber of Commerce.

SCSEP staff from all grantees and subgrantees will continue to foster these relationships to increase their participation as host agencies. These entities may potentially hire participants into unsubsidized employment.

##### **Business Organizations.**

State subgrantees and their SCSEP managers work with business organizations such as the Mississippi Manufacturers Association and local chambers of commerce to develop job opportunities. They collaborate with Medicaid and regional transportation and economic assistance providers to access services to SCSEP participants in need. They also solicit advice and recommendations from support service organizations through public hearings and joint conferences.

### **Mississippi Chambers of Commerce.**

The mission of a Chamber of Commerce is to provide leadership in economic development activities, support existing businesses, attract new businesses, and promote civic, cultural, and recreational activities that improve the quality of life for businesses and residents. There are about one hundred (100) Chambers of Commerce in Mississippi.

### **Strategy for Collaborating with Chambers of Commerce.**

SCSEP Managers will contact the chambers to educate them on the benefits of hiring older workers. The mission of the chambers supports the goals of SCSEP; working together will strengthen the case for targeting older workers when meeting new and existing businesses. Additionally, the chambers will be avenues that SCSEP Managers can use to identify industry appropriate training opportunities for SCSEP participants interested in the local labor market opportunities.

### **Strategy for Seeking Advice and Recommendations.**

The state and national grantees will meet with the Chambers of Commerce at Workforce Development Board meetings, conferences, and individually to seek their advice and recommendation on improving SCSEP. The chambers can provide important information on the local economy and ensure that SCSEP Managers meet with and partner with existing and new businesses interested in hiring and/or training older workers. Partnering with chambers as host agencies and providing a SCSEP participant to train onsite brings recognition to SCSEP while providing valuable training to participants. Chambers of Commerce that are host agency sites provide skills training in clerical, phone skills, record keeping, etc.

### **Economic Development Agencies.**

Economic development is a focus on the state level as well as at the local community level. SCSEP grantees and subgrantees in the state will target economic development agencies for partnership opportunities.

### **Strategy for Collaborating with Economic Development Agencies.**

The state and national grantees will work with economic development agencies at the state and local level to network and educate on employment training opportunities for older workers that new and existing businesses can utilize to hire skilled older workers. Collaboration with the economic development agencies through the Mississippi Economic Development Council allows SCSEP a single point of entry to providing education on older workers to the more than 3,100 manufacturing entities that drive the state's economy. The Mississippi Economic Development Council organizes two conferences a year. SCSEP Managers will attend the conferences to network with businesses.

### **Strategy for Seeking Advice and Recommendations.**

The state and national grantees will network with the economic development agencies and attend their meetings and conferences. SCSEP Managers will present the benefits of hiring older workers at Local Workforce Development Board meetings and conferences, such as the Governor's Conference on Workforce Development, to increase the entered employment rate for SCSEP participants. The state and national grantees will glean information from the economic development agencies on ways to improve participant's individual employment plans to ensure that participants are receiving the training needed to be job ready in the industries that support our economy.

### **Labor Organizations.**

Labor unions for business organizations in Mississippi can assist SCSEP Managers by providing information for the design of individual employment plans for participants, as they best know the skills needed for worker safety and career advancement.

**b. 2. The State's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the State strategies section of strategic plan.)**

### **Strategy for Collaborating with Major Employers.**

The state and national grantees will target the major employers with an educational campaign to raise awareness of the benefits of hiring older workers. The goals are to increase the rate of entered employment of exited SCSEP participants and increase the number of higher paying jobs (with benefits) for SCSEP participants.

- **Strategy for Seeking Advice and Recommendations**

Seeking advice and recommendations from local businesses is beneficial to SCSEP. Businesses can provide information on the skills needed for employment to assist in the development of the SCSEP participant's individual employment plan. Another possibility is to increase the number of On-the-Job Training contracts that SCSEP managers can enter into with businesses to ensure that SCSEP participants received the training needed for hiring by the business. SCSEP managers will attend job fairs and will require all participants to attend as part of their training.

- **Engaging and Developing Partnerships with Businesses.**

The state and national grantee SCSEP managers will coordinate with the LWDBs to show businesses the benefits of hiring older workers. Older workers in general have low turnover rates, are flexible and open to change, are interested in learning new skills, have low absentee rates, have experience and knowledge, and are willing to work. Therefore, hiring older workers is a solution to the shortage of workers in the state.

SCSEP managers will work with the LWDBs to develop partnerships with businesses by utilizing recruitment efforts such as sending brochures and fact sheets on the older workers, sending letters to businesses outlining the benefits of older workers and following up with a presentation to the Human Resources Director and/or President, and where applicable recruit them to become a host agency. Developing partnerships with businesses creates the opportunity to share success stories from other businesses that hire older workers.

To increase partnerships with businesses, SCSEP managers are encouraged to:

- increase contacts with local businesses;
- promote On-the-Job Training contracts with businesses;
- make presentations to businesses; and,
- assist local businesses with training needs.

### **Retention Activities for Participants in Unsubsidized Employment.**

Once a SCSEP participant is trained and placed in unsubsidized employment, the SCSEP manager continues to follow the participant for one year to ensure he/she has the support needed to remain employed. SCSEP participants in unsubsidized employment may need additional training and support to keep up with the

demands of the changing workforce. Support will be provided in the form of tracking, counseling, and job development.

SCSEP managers will work with the LWDA's to educate businesses on how to retain older workers. Once businesses see the value older workers bring to their businesses, they will be looking for ideas to retain their older workers. SCSEP assists in restructuring jobs that help employees to maintain or advance their careers. Managers can educate businesses on the following strategies for creating a positive environment for older workers:

- **Flextime:** employees can begin and end their workday at varying times;
- **Job Sharing:** use two employees for one job position;
- **Part-time Position:** older workers may be looking for 20-30 hours a week;
- **Consulting:** older workers may prefer to work in a consultant role;
- **Compressed Work Week:** work longer hours, but fewer days; and,
- **Telecommuting:** working from home.

**b. 3. The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))**

The State subgrants to the Planning and Development Districts since their AAAs are the primary provider of other services to the aging community and have established contacts and rapport in the community. The PDDs should collaborate with the WIN Job Centers and other workforce system partners to provide outreach services to minority populations.

MDES provides the required Equitable Distribution (ED) report and Minority Report to USDOL annually. MDES will continue to use both the ED and the Minority Report to guide the PDDs as they provide SCSEP services and to advise the national grantees that operate the program in the state.

**b. 4. A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)**

**Process Implemented to Identify Community Service Needs.**

MDES will work with the national grantees and the 10 PDDs to collect information on the participants, services, and skills needs of the businesses in the area that each serves. Identifying gaps between the participants, the skill requirements, and the services provided will guide decisions on targeted recruitment, training, host agency assignments, and recruitment of businesses willing to hire seniors into unsubsidized training.

The industry makeup of the state varies by region. The Delta region of the state is predominately agricultural with a secondary gaming and tourism emphasis; the northeastern region is industrial; the west-central region is mixed with agriculture, manufacturing, and professional, with a recent growth in oil production; and the southern region is agricultural, gaming and tourism, and industrial. Due to the variety of industries in the state, SCSEP managers will continue to work with the local WIN Job Centers and other stakeholders to identify local community service needs and obtain recommendations on how SCSEP participants can bridge those gaps. Individual Employment Plans will be tailored to meet the needs of the participants and the community service assignments.

### **Timeline for Identifying and Recruiting Host Agencies to Meet Community Service Needs.**

State and national grantees, with the assistance of the LWDAs, will identify non-profits and government organizations as potential host agencies for a resource list. The resource list will guide the SCSEP managers in their attempts to recruit host agencies to train SCSEP participants. The USDOL data collection system will assist SCSEP managers to track the types of host agencies using the host agency management reports. The state and national grantees will increase the number of host agencies every program year to meet the needs of participants.

### **b. 5. The State's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))**

Since the Mississippi Department of Employment Security (MDES) was designated as the State Grantee as of July 1, 2012, coordination with other workforce programs in the state has greatly increased. The division of MDES that has direct oversight of the SCSEP also provides direct fiscal and programmatic support for WIOA to the state's four Local Workforce Development Areas.

#### **Improving SCSEP Services.**

#### **Long-Term Strategy to Improve SCSEP Services.**

The State has implemented a WIOA Common Intake and Reporting System, known as the Hub", that captures common participant information for the four core programs. The system aligns resources and generates automatic referrals among the core programs and partner programs such as SCSEP.

Using a no wrong door policy, all participants will develop an individualized success plan that coordinates the optimum blend of services and funding to achieve their goals for success. This success plan also indicates which of the pathways in the 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 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 Senior Service America, Inc., operating a total of 125 slots. SMPDD will use the Smart Start Pathways Model throughout its service area. SSAI 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 the 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 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 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 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

**Meeting, trainings, and conference calls.**

Meetings among the state, national grantees, and subgrantees will be held on a regular basis, either in person or using electronic means such as conference calls and webinars. As issues warrant, MDES will meet with subgrantees on an individual basis by phone or during site visits, monitoring visits, or data validation visits. Topics may include:

- Data entry review prior to close date for reports
- Quarterly reports
- Reports reviewed
- Reports discussed by SCSEP Managers.

*C. Location and Population Served, including Equitable Distribution*

**1. A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))**

**Current and Projected Employment Opportunities in the State.**

There has been a shift in the last two decades in the nation as a whole from an industrial to a service and knowledge-based economy. According to the U.S. Bureau of Labor Statistics, Mississippi has followed the national industrial trend with 36 percent of the workforce employed in service-oriented jobs. In the service

industry, the largest sub- sectors include healthcare and social assistance followed by administrative and support services.

The economic priorities for Mississippi over the next four years and guidance from the SWIB will guide the strategic and operational workforce planning for state agencies. The priorities include providing an attractive economic climate for current and emerging industries that foster economic opportunity, job creation, capital investment and infrastructure development by developing a well-trained, educated, and productive workforce.

The initial emphasis will be placed on the three sectors in the Combined State Plan; Advanced Manufacturing, Healthcare and Energy, which were the focus of important pieces of legislation passed in the 2012 legislative session. Of equal importance is the retention and expansion of existing industries such as transportation and logistics, agribusiness, tourism; and defense and homeland security.

### **Employment Projections for High Growth Industries and Occupations.**

The state relies on labor market information disseminated by the MDES Labor Market Information division to ensure that SCSEP meets the local labor market demands. Labor market information shows that all industry sectors are in need of skilled workers, especially those that require the application of technology and knowledge such as automotive and health care professionals.

The SCSEP managers must emphasize the need to obtain skills through training at host agencies in order to generate quality job placements in high growth industries. Mississippi projects that over 1.2 million jobs are expected to be available in the next ten years. Increasing SCSEP job placements in the high growth areas will move Mississippi ahead.

### **Industries and Occupations with Employment Opportunities for SCSEP participants.**

Participants are encouraged to design their employment plan around the following industries most in need of skilled workers:

- service sector;
- healthcare;
- retail;
- food service;
- social assistance; and,
- education.

### **Employment Histories and Skills Possessed by Eligible Individuals in the State.**

Generally, SCSEP participants in Mississippi have very limited skills and work history; many are displaced homemakers or widows with limited work experience. Therefore, the state and national grantees must ensure that the SCSEP participant's Individual Employment Plan includes the skills training needed to locate unsubsidized employment upon exiting the program. Training may be attained at the host agency, the WIN Job Centers, community colleges, and at participant educational meetings.

Mississippi ranks last in educational attainment in the adult population, particularly older females. In the state, 21 percent of SCSEP participants have no high school degree, 35 percent have a high school degree or equivalent, and only 13 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 2018 Final

	IID	NCBA	SSA	MS	All Mississippi SCSEP	
<b>Total</b>	54	227	332	134	844	100%
Educational Attainment						
<b>8th grade &amp; under</b>	3	5	5	4	28	3.32%
<b>9th grade - 11th grade</b>	12	39	35	7	147	17.42%
<b>High School diploma or equivalent</b>	36	85	117	57	294	34.83%
<b>1 - 3 years college</b>	2	71	109	42	197	23.34%
<b>Post-secondary Certificate</b>	0	1	3	1	23	2.73%
<b>Associate degree</b>	0	6	24	8	46	5.45%
<b>Bachelor's degree or equivalent</b>	1	18	24	12	76	9.00%
<b>Some graduate school</b>	0	0	9	0	5	0.59%
<b>Master's degree</b>	0	2	6	3	25	2.96%
<b>Doctoral degree</b>	0	0	0	0	3	0.36%
Age						
<b>55-64</b>	40	144	189	78	534	63.27%
<b>65+</b>	14	83	143	56	310	36.73%
Wages & Hours						
<b>Median Placement Wages</b>	\$10.00	\$8.00	\$9.25	\$8.00		
<b>Average Hours per Week</b>	40	24.7	27.4	25.6		

Source: SCSEP Quarterly Progress Report, ETA 5140, PY18 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.**

As of July 1, 2017, Experience Works, Inc. is no longer a grantee in Mississippi. The state also has a new set-aside grantee, the Institute for Indian Development. The US Department of Labor has redistributed positions among Senior Service America, Inc., National Caucus on Black Aged, the Institute for Indian Development, and the Department of Employment Security in order to more equitably serve the eligible population as indicated by the 2010 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 May 17, 2019. The state grantee will monitor distribution and service of the slots to ensure that all grantees are working to implement the action plans stated in the reports. We will also continue to monitor distribution of slots relative to demographic changes and will address any potential issues as they arise through communication with DOL.

**B. Equitably serves rural and urban areas.**

See answer above at c.4.A.

**C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)**

See answer above at c.4.A.

**c. 5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))**

See answer above at c.4.A.

*6. The relative distribution of eligible individuals who:*

**A. Reside in urban and rural areas within the State**

The State of Mississippi is a predominately rural state, with 50.72 percent of Mississippians living in rural counties, according to the 2010 census. Access to transportation and limited numbers of host agencies in the most rural counties will continue to be a challenge that all SCSEP grantees must work together to overcome.

**Inadequate Resources.**

The state and national grantees strive to serve both rural and urban areas of Mississippi equitably. In order to accomplish this, state and National Grantees must work together to overcome inadequate resources (limited employment prospects, few host agencies, lack of transportation, etc.).

**Employment.**

The rural nature of the state combined with an agrarian-based economy makes it difficult to provide adequate unsubsidized placement opportunities. The number of jobs available is few and because public and mass transportation are not available, access to many of the existing jobs or employment opportunities can be problematic. In some instances, the cost of transportation and other job maintenance factors exceed the benefits of employment.

### **Host Agencies.**

The rural nature of the state also creates a shortage of host agencies. The state and national grantees operating in the state know the challenge of developing enough host agencies to rotate participants appropriately according to their individual employment plan. SCSEP managers will continue to partner with the LWDBs to assist in developing new business opportunities and to partner with new and existing non-profit organizations located in the state.

### **Transportation.**

Access to transportation continues to be a problem in areas outside of the metropolitan area of Jackson. To alleviate transportation concerns, the state grantees may reimburse participants for transportation costs only when travel is necessary for training, physical exams or enrollee meetings. If there is no public transportation available, and there are no other options, and if the participant could not otherwise participate in the program, transportation to and from host agency assignment may be reimbursed until another option is identified.

The state grantee will attempt to collaborate with other local agencies and resources to provide participant transportation at no cost or reduced cost whenever possible.

Additionally, flexible scheduling is encouraged to help participants reduce travel costs by training more hours on fewer days, providing the same community service assignment hours.

### **Timeline.**

To address inadequate resources in rural areas, the grantees will target individual geographic areas and systematically contact community representatives in an attempt to develop host agencies or employers and in partnership with these organizations determine if a plan to accomplish program requirements can be developed. The PDDs and the national grantees will be challenged to identify and develop two targeted areas each program year. This strategy will result in approximately one-fourth of the 76 rural counties achieving successful targeted development each program year.

#### *C. Specific Populations Groups.*

The state and national grantees offer various recruitment and selection techniques in order to address Older Americans Act Section 518(b) as detailed below:

OAA Section 518(b) defines priority individuals as those who qualify based on one or more of the following criteria:

- Are aged 65 years or older;
- Have a disability;
- Have limited English proficiency or low literacy skills;
- Reside in a rural area;
- Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act, 38 U.S.C. sec. 4215(a)(1);
- Have low employment prospects;

- Have failed to find employment after utilizing services provided under Title 1 of WIOA; or,
- Are homeless or at risk of homelessness.

Other populations identified in the statute are defined in OAA Section 503(a)(4)(C)(i)-(iv) as:

- Eligible individuals with the “greatest economic need” (as defined in 20 CFR 641.140);
- Eligible individuals who are minority individuals; and,
- Eligible individuals who are individuals with “greatest social need” (as defined in 20 CFR 641.140). The LWDBs that oversee the workforce system in the state are key partners for both the state and national grantees in the state as they provide labor market information and economic data to assist grantees in developing new host agencies, educating employers on the benefits of hiring older workers, and providing job search assistance for SCSEP participants. The workforce system provides an additional avenue to recruit eligible individuals to participate in the SCSEP.

Additional recruitment activities include, but are not limited to, the following:

- attending job fairs;
- advertising in local newspapers and newsletters;
- referrals from exited participants, host agencies, faith-based organizations and local officials;
- running public service announcements;
- visiting local senior centers;
- partnering with organizations that serve aging and/or disabled adults;
- distributing brochures, flyers, posters and fact sheets throughout the state; and,
- partnering with the local WIN Job Centers.

#### **B. Have the greatest economic need**

See response included at c.6.A.

#### **C. Are minorities**

See response included at c.6.A.

#### **D. Are Limited English Proficient**

See response included at c.6.A.

#### **E. Have the greatest social need. (20 CFR 641.325(b))**

See response included at c.6.A.

#### **c. 7. A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))**

The state and national grantees are dedicated to the avoidance of disruptions in the service to SCSEP participants. Mississippi’s state and national SCSEP grantees will follow the recommendation of the USDOL that when there is over-enrollment, for any reason, there will be a gradual shift that encourages current



participants to move into unsubsidized employment to make positions available for eligible individuals in the areas that are underserved. Grantees understand that participants are not entitled to remain in a subsidized community service assignment indefinitely and will adhere to the time limits on a SCSEP community service assignment as detailed in the Older Americans Act.

SCSEP standards define the program requirements that state subgrantees must adhere to. Issued in March 2006, the standards address Designation of Service, slot movement, and time in training assignment

#### *d. SCSEP Operations*

**1. Administrative: describe the organizational structure of the project and how subprojects will be managed, including:**

**A. identification of the key staff, including the primary responsibilities and the amount of time assigned to the SCSEP grant;**

##### **A. Organizational Structure**

The Office of Grant management at MDES has day-to-day responsibilities for the administration and operation of the Workforce Innovation and Opportunity Act (WIOA) Title I and SCSEP in Mississippi. The SCSEP funds will be subgranted to 10 Planning and Development Districts. The AAAs, which are housed with the PDDs, currently operate the SCSEP and are experienced in all aspects of the program.

The Grants and Contracts Unit (GCU) is staffed with a manager and four staff. This unit of five staff serves as fiscal and programmatic liaisons to the four Local Workforce Development Areas, other WIOA subgrantees, and the 10 SCSEP subgrantees. As liaisons, they provide technical assistance on all financial, programmatic, and performance issues. A copy of the MDES Organizational Chart is included in Appendix I8E.

The manager and the grant managers will assign approximately twenty percent (20%) of their time to the grant. The fiscal oversight staff will each devote approximately ten percent (10%) of their time. The program oversight specialist will assign approximately eight percent (8%) of his time to this grant. MDES does not anticipate exceeding the Administrative Cost Limit of 13.5% for this grant. State-level administration is budgeted at 5% and Project Operator administration at 8.5% of the total grant, for a total administration cost of 13.5%.

**B. Include an organization chart depicting any subgrantees or local affiliates implementing the grant. Include a table with authorized positions for each subgrantee or affiliate, if applicable;**

Subgrantees/Area Agencies on Aging (AAAs) at the PDDs have administered the Senior Community Service Employment Program (SCSEP) since its inception in Mississippi. The AAAs are assigned chief responsibility for planning, coordinating, developing, and pooling resources to assure the availability and provision of a comprehensive range of services at the substate level to enhance project administration and overall accountability. The names and locations of the nine AAAs and one PDD, the counties they serve, and the number of authorized positions for which they are responsible, are shown in the 2019 County Slots by PDD Chart. The attached Mississippi AAA Map & Contacts document includes the locations of the 10 subgrantees (Appendix I8B).

##### **C. describe training that will be provided to local staff;**

Meetings among the state, national grantees, and subgrantees will be held on a regular basis, either in person or using electronic means such as conference calls and webinars. As issues warrant, MDES will meet with subgrantees on an individual basis by phone or during site visits, monitoring visits, or data validation visits. Topics may include:

- Data entry review prior to close date for reports
- Quarterly reports
- Reports reviewed
- Reports discussed by SCSEP managers

**D. describe how projects will be monitored for program and financial compliance, including audit plans; and**

MDES complies with the monitoring requirements of the Uniform Administrative Requirements for Federal Grants at 2 CFR 200.327 – 332 and the audit requirements at 2 CFR 200.500 – 520. MDES monitors its subrecipients annually and requires audits from those who meet the \$750,000 threshold for annual federal expenses. We also follow our agency’s WIOA Programmatic and Fiscal Monitoring policy - Policy #8, Revision 3, and require the PDDs to monitor their host agencies and subcontractors. (Appendix IIC).

**E. describe how the State will manage its providers and how it will transfer participants if new providers are selected to serve in the State.**

The state manages our providers by monthly review of expenditures and quarterly review of SCSEP Reports as well as through monitoring, technical assistance, and training. The state currently does not plan to identify new providers to serve the state since the AAAs are the primary provider of other services to the aging community and have established contacts and rapport in the community. If the need arises to defund or replace a local provider, the state will do so in consultation with our Federal Project Officer and other USDOL SCSEP staff.

**2. Recruitment: describe how grantee will recruit and select of participants will be achieved. The eligibility of participants is described under 20 CFR 641.500 and 641.525.**

Recruitment and selection of participants is performed by the Area Agency on Aging staff at the PDDs or by their subcontractors. MDES monitors the local projects’ ability to meet their staffing needs and avoid vacancies by monthly review of the expense reports, and quarterly through the SPARQ performance reports. MDES also reviews eligibility determination in its annual monitoring of the PDDs/AAAs.

**3. Income Eligibility: describe how participant income will be recertified each year, including where eligibility records will be maintained.**

The PDDs/AAAs are required to recertify each participant annually to verify income eligibility. This process is verified by the State through annual monitoring and data validation.

Eligibility records are kept in the participant records at the PDD offices.

**4. Orientation: describe the orientation procedures for:**

*A. Participants*

Before a participant begins the community service assignment, the host agency must provide an assignment related orientation including but not limited to the host agency background and purpose, the community service(s) it provides, agency personnel policies and procedures related to work hours, time and attendance, and work performance expectations.

A Safety Procedures Consultation must also be included in the orientation if it has not already been done with the participant, including: the location(s) and use of fire extinguishers and alarms; the posted designated route(s) of escape in event of a fire; the participant's role, if any, in an emergency; and a review of all other disaster action plans for the agency.

The participant signs a Certification of Orientation stating that they have completed orientation with the host agency. This document is retained in the participant file.

### *B. Host Agencies*

Host agencies are provided orientation by the PDD and sign an acknowledgement of Orientation. The most recent modification to the Host Agency Handbook includes a host agency acknowledgement in which the host agency supervisor states that he has received, read, understood, and agreed to follow the program requirements stated in the SCSEP host agency handbook.

This agreement reinforces the supervisor's understanding of the SCSEP as a training program as well as the supervisor's responsibility to cooperate with all job development efforts made on the participant's behalf.

#### **1. Duration Limits: describe any policy for maximum duration of enrollment or maximum time in community service and provide a copy of the current Duration Limit policy.**

MDES has chosen to adhere to the program-required Duration Limit of 48 months as provided in 20 CFR 641.570 (a) and not to allow waiver of the limit as allowed in 641.570 (b). The Mississippi Individual Durational Limit Policy is attached as Appendix I8E.

#### **2. Assessments: describe the procedures for assessing job aptitudes, job readiness, and job preferences of participants and their potential to transition into unsubsidized employment. Also describe how the assessment will be used to develop the participant's Individual Employment Plan (IEP).**

### **Mississippi Works and Skill Gap Analysis.**

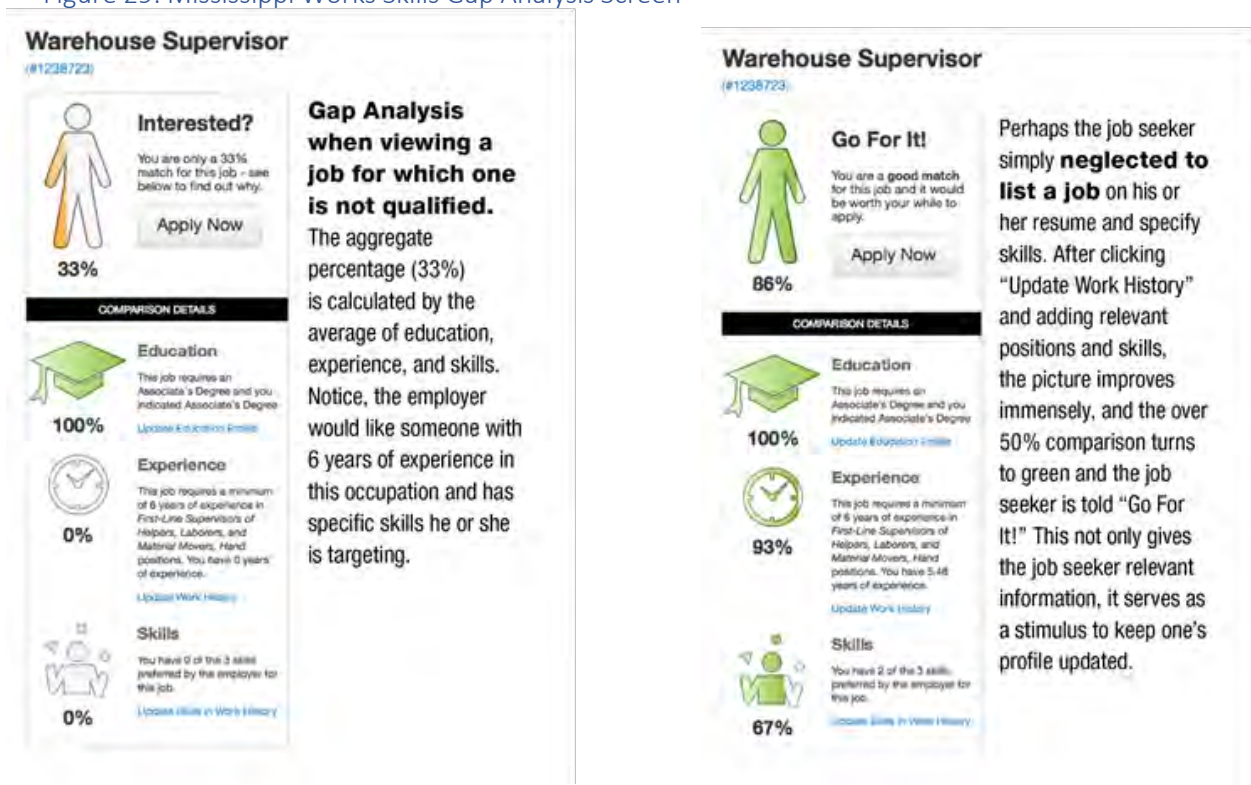
Mississippi Works is a smartphone app and web-based job resource provided by MDES where employers and job seekers connect. The connection is driven by the ability of job seekers to match experience and qualifications to employer needs. Mississippi Works can be a valuable tool for seniors and SCSEP staff to identify participant skill gaps and training needs.

Labor market studies show that the largest share of future employment opportunities will be middle-skill jobs. Middle-skill jobs account for 59 percent of Mississippi's labor market but only 50 percent of the state's workers are trained to a middle skill level, thus creating a gap. In program year 2013, Mississippi Works added a gap analysis tool to help workers make informed decisions on career choices and training needs. The Mississippi Works is easy to use. The user simply creates a profile and begins the job search; this launches the gap analysis tool.

After clicking on a recommended job, a question arises for the job seeker: "How do I measure up?" The user needs some means of figuring out how his or her credentials measure up to the job's requirements. Here is where real-time gap analysis comes into play. If the job originated in Mississippi Works, the system can ask employers explicitly what skills, what level of education, and what kinds of experience are required for the candidate to have the best chance to be hired. The system then compares the job seeker's credentials against the credentials required by the employer. In the case of jobs that might be taken from an external labor exchange or other sources, Mississippi Works has a statistical library of career requirements enabling it to give best estimates to the job seeker based on a survey of job seekers in the particular career area.

The following is an example of the Mississippi Works Skill Gap Analysis screen showing a participant with a skill gap and after the participant has closed that gap with training or by additional information to their profile.

Figure 29: Mississippi Works Skills Gap Analysis Screen



Mississippi Works and its skill gap analysis abilities can provide SCSEP participants and counselors with a powerful tool that can guide the participants' individual training decisions and improve their IEPs. MDES will inform our subgrantees and the national grantees about this new system and the provide training for it, as needed.

**7. Community Service Assignments:** describe how the participant will be assigned to community service including:

- the types of community service activity that will be emphasized and how they were chosen; methods used to match participants with community service training;
- the extent to which participants will be placed in the administration of the project itself;
- the types of host agencies used and the procedures and criteria for selecting the assignments;
- the average number of hours in a participant's training week;
- the fringe benefits offered (if any); and
- procedures for ensuring adequate supervision.

**Training Positions Available at Host Agencies.**

- Telephone Operator
- Janitorial

- Administrative Assistant
- Landscaping
- Homemaker
- Food Preparation
- Maintenance
- Outreach/Referral
- Recreation/Senior Center
- Nutrition Program
- Education, Training, and Library
- Healthcare
- Retail and Sales
- Transportation

**Skill Training Offerings.**

- Computer Training
- Heavy Equipment Training
- Custodial
- Clerical
- Telephone skills
- Adult Basic Education
- Record Keeping

**Training Linkages Negotiated with the One-Stop.**

- Resume writing classes
- Interviewing Skills
- Word Processing Instruction
- Typing Classes
- Conflict Resolution
- Job Search Assistance
- Labor Market Information

**Ensuring Community Services Assignments Provide Skill Training that Meets the Needs of Participants and Employers: A Collaborative Effort.**

The state and national grantees will follow the SCSEP regulations that require participants be assessed to determine the most suitable employment and community service assignment. They will also require that case managers conduct reassessments every six months to develop and amend IEPs and to ensure that the training the participants receive at the host agency provides the skills training necessary to secure unsubsidized employment in the fields that support the local economy. Additionally, the state will host a collaborative meeting with the national grantees, LWIBs, and host agencies to ensure that community service assignments are truly providing skill training that meets the needs of both participants and employers.

The USDOL Subgrantee Performance Assessments and Reporting Quarterly (SPARQ) data collection system generates management reports that allow grantees to track performance. The SPARQ reporting system generates reports on the types of host agencies that allow SCSEP managers to track the types of host agencies used to provide training to participants to ensure that the training participants receive meets the needs of the participant and the employers. The USDOL has proposed significant changes to the SPARQ system in the upcoming year.

## **8. Training: describe the training that will be provided during community service assignments and any other types of training provided, including linkages with local one-stop centers, and Registered Apprenticeship.**

### **Classroom Training.**

Older workers are willing and sometimes eager to update their skills. However, structured training can cause anxiety and fear of failure in older workers. To reduce anxiety, SCSEP managers provide participants with studying tips, shorter hours of training, and assurance that the training is hands-on. Training will be coordinated with WIN Job Centers, local community colleges, SCSEP education meetings and libraries.

### **Other Training Opportunities.**

SCSEP participants will also be prepared for unsubsidized employment through training that is in addition to their community service assignments. SCSEP Managers assist participants to identify other training opportunities based on their Individual Employment Plans. Other training opportunities may include:

- lectures;
- seminars;
- classroom instruction;
- individual instruction;
- private sector on-the-job experiences; and,
- work experience.

### **Strategies for Improving Training Opportunities.**

Stressing the need for participant training to all levels of the SCSEP service delivery system – grantees, sub-grantees, host agencies, and participants – will keep this vitally important aspect of the program at the forefront of SCSEP in Mississippi. To this end, we will work with our partners to provide information on free, reduced price, and partner-funded training resources that can be utilized by our service providers, host agencies, and our participants to further the skills and abilities of our participants. Utilizing Mississippi Works and its skill gap analysis tool can help simplify this process.



Mississippi's network of WIN Job Centers is the centerpiece of the Mississippi workforce system. These centers provide easy access to employment services such as education and training for workers, human resource assistance for businesses and information for economic developers. MDES will provide information to the national grantees and to our sub-grantees regarding which WIN Job Centers offer onsite training classes. MDES will also coordinate the development of computer training classes geared specifically to the needs of our seniors, many of whom may be computer illiterate and fearful of learning new technologies.

MDES continues to encourage training to address literacy skills among participants when needed. For participants that are interested in completing their high school equivalency, SCSEP partners with the Adult Education program administered by the Mississippi Community College Board (MCCB). The Adult Education program is designed to offer opportunities to enhance the skills and abilities of individuals preparing for the workforce. A link to Adult Education information at the MCCB website will be provided on our website.

MDES has redesigned our agency website and added a section providing information on SCSEP in Mississippi for participants, our SCSEP partners, and the public. Included on the site is information on what SCSEP offers to the senior population, who qualifies for the program, and the benefits of being a host agency in the program. Future upgrades to the website would include information on the training options for our participants to inform our host agencies and partners about what classes and programs are offered, where and when the trainings are offered, and which entities are providing the classes.

#### **9. Supportive Services: describe the supportive services that will be offered to help participants obtain and retain an unsubsidized job, including transportation assistance (if applicable).**

Supportive services are available to participants and may include but are not limited to counseling in areas such as health, nutrition, and Medicare benefits, etc.; supportive services may also include work shoes, badges, or eyeglasses; in addition, transportation to training or the worksite may be paid for if no other source of payment is available.

All participant supportive services are dependent upon funding and must be pre-approved by the SCSEP staff. The need for supportive services will be identified in the original IEP if possible or the plan will be updated once the need for a specific supportive service is identified. Requests for supportive services must be made in writing or by email and must include the approximate cost of the service. Written approval (letter or fax) or an email approving the supportive service will be sent prior to the service being provided.

#### **10. Termination: describe procedures for terminating a participant, including IEP terminations. Please provide a copy of the current termination procedures.**

The SCSEP Termination Policy sets forth the state's procedures for termination of participants in the SCSEP based on the guidance set forth in the Older Americans Act Amendments of 2006 and the SCSEP Final Rule. The policy is provided in Appendix I8C.

#### **11. Complaints & Grievances: describe the procedures for addressing and resolving participant complaints and grievances related to program termination. Please provide a copy of the current complaint/grievance policies.**

The SCSEP Programmatic Grievances and Complaints Policy sets forth the state's procedures for grievances or complaints alleging violations of the requirements of the Older Americans Act of 1965 (OAA) from participants and other interested or affected parties based on the guidance set forth at OAA sections 306(a)(10) and 307(a)(5)(b) and 20 CFR, 641.910. The policy is provided in Appendix I8D.



12. Maximizing enrollment: describe procedures for fully enrolling all available slots, including over enrolling participants, and how over-enrollments will be balanced with equitable distribution requirements.

The processes described at c.4.A. regarding equitable distribution are used by the state and national grantees to balance slot imbalances statewide. The state grant staff also interact at least monthly with the ten PDDs to ensure that vacant slots are filled timely 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 the next year. The state may also negotiate performance levels in a subsequent modification. At a minimum, states must identify the performance indicators required under the SCSEP Final Rule published on September 1, 2010, and, for each indicator, the state must develop an objective and quantifiable performance goal for the next year. The performance measures include:

entered employment,  
employment retention,  
average earnings,  
service level,  
service to most-in-need, and  
community service

The following are the negotiated performance measures for Program Year 2019:

1. **Employment in 2<sup>nd</sup> Quarter After Exit = 30.0%**
2. **Employment in 4<sup>th</sup> Quarter After Exit = 28.4%**
3. **Median Earnings 2<sup>nd</sup> Quarter After Exit = \$2,820**
4. **Service Level = 150.0%**
5. **Community Service = 79.8%**
6. **Service to Most in Need = 2.88**
7. **Participant Customer Satisfaction = 87.2%**
8. **Host Agency Customer Satisfaction = 87.5%**
9. **Employer Customer Satisfaction = 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.

MDES has not requested an increase in administrative costs.

SCSEP Assurances

	<b>X or N/A</b>	<b>STATEMENT OF ASSURANCE</b>	<b>DOCUMENTATION and COMMENT</b>
<b>1.</b>	<b>X</b>	<p><b>Where SCSEP is included in the Combined Workforce Plan, the State established a written policy and procedure to obtain advice and recommendations on the State Plan from representatives of the State and area agencies on aging; State and local boards under WIOA; public and private nonprofit agencies and organizations providing employment services, including each grantee operating a ACSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Social service organizations providing services to older individuals; Grantees under Title III of OAA, Affected Communities, Unemployed older individuals, Community-based organizations serving older individuals; business organizations; and labor organizations.</b></p>	<p>In writing the SCSEP State Plan, the state followed the procedure outlined in Section 503(a)(2) of the Older Americans Act (OAA) Amendments of 2006 which requires that the State Plans describe the state's process for ensuring the involvement, advice and recommendations from representatives of the State and area agencies on aging; State and local boards under WIOA; public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State.</p> <p>The State Plan described how it ensured an open and inclusive planning process with meaningful opportunity for public comment, per 20 CFR 641.350.</p> <p>The State will establish a written policy to ensure compliance with these requirements.</p>

# 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 Workforce Innovation and Opportunity Act: Mississippi Community College Board, Mississippi Department of Employment Security, Mississippi Department of Human Services, Mississippi Department of Rehabilitation Services, State Workforce Development Board, collectively referred to as the "Partners."

### WHEREAS:

### BACKGROUND

On July 22, 2014, President Barak Obama signed the Workforce Innovation and Opportunity Act ("WIOA")(Pub. L. 113-128), comprehensive legislation that reforms and modernizes the public workforce system. It reaffirms the role of the public workforce system, and brings together and enhances several key employment, education, and training programs. WIOA provides resources, services, and leadership tools for the workforce system to improve employer prospects for success in the global marketplace by helping individuals find good jobs, stay employed and advance their skills. The goal of the legislation is to see that the workforce system operates as a comprehensive, integrated and streamlined system to provide pathways to prosperity for those it serves and continuously improves the quality and performance of its services.

### PURPOSE

The Partners will establish a collaborative framework encouraging cooperation, collaboration, communication, policy and technical guidance and governance to assist the efficient and effective participation in the implementation of WIOA in Mississippi.

The Partners will 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 will collaborate to identify effective services for efficient, consistent customer service delivery.

The required Partners will co-locate, at each of the four comprehensive One-Stop training facilities identified and operated in the four local workforce development areas. Each of the Partners will pay its appropriate share (as defined by the State WIOA board) of the costs of carrying out the



Performance and Accountability measures stipulated in section 166 of WIOA, from funds made available through each of the core programs.

The Partners will not use funds received under WIOA Title I to assist, promote, or deter union organizing.

#### **ROLES, RESPONSIBILITY AND GOVERNANCE STRUCTURE**

Mississippi has established a WIOA Planning and Communication Group composed of the leadership of the Partners. The Planning and Communication Group has participated and developed this MOU to serve as guidance to staff of the local Workforce Development Boards.

The Directors of the lead State agencies with responsibility for the administration of core programs have reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs.

The Mississippi workforce development system, "Mississippi Works", will be utilized by all partners for the enrollment of their program participants, and will hereinafter be referred to as "MS Works."

#### **CONFIDENTIALITY**

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:

1. 29 U.S.C. 2935; as amended by WIOA - Reports, Recordkeeping, and Investigations.
2. 29 U.S.C. 2871(f)(3); as amended by WIOA - Regarding confidentiality.
3. 20 CFR Part 603 - Safeguards and security requirements regarding disclosed information under Unemployment Compensation.
4. 42 U.S.C. 503 - Regarding state laws governing Unemployed Insurance operations.
5. 20 CFR 617.57(b) - Regarding disclosure of information under the Trade Act.
6. 29 U.S.C. 491-2(a)(2); as amended under WIOA - Regarding information to be confidential under the Wagner-Peyser Act.
7. The Privacy Act (5 U.S.C. 552).
8. The Family Educational and Privacy Rights Act (20 U.S.C. 1232g).
9. 34 CFR 361.38 - Protection, use and release of personal information of Vocational Rehabilitation Services participants.
10. HIPAA: 45 CFR 164.500 - 164.534.
11. 2 CFR 200.303 - Regarding reasonable measures to safeguard protected personally identifiable information

Each Partner will ensure 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 in this MOU as part of the Mississippi workforce development system.

Each Partner will ensure 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.

#### **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 effected 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.

#### **GENERAL PROVISIONS**

The laws and regulations listed in this section are generally applicable to most publicly-funded programs. The laws and regulations listed herein do not encompass all of the laws and regulations that govern the Partners in their respective roles under this MOU. All Partners expressly agree to comply with the federal laws and regulations listed below unless the laws and regulations that govern their particular programs state otherwise:

All Partners will follow all State purchasing laws and regulations set forth by the Mississippi Department of Finance and Administration through the Office of Purchasing, Travel and Fleet Management. All Partners will abide by the federal financial management procurement standards set forth and required in 2 CFR Part 200, OMB Uniform Guidance.

As stated in Article III B 1, each Partner agrees to provide priority of service to veterans and covered spouses for any qualified job training program pursuant to 38 USC 2913.



Each Partner, its officers, employees, members, and subcontractors hereby affirm current and ongoing compliance with all statutes and regulations pertaining to The Americans with Disabilities Act of 1990 and section 504 of the Rehabilitation Act of 1973.

For any State workforce activities that call for services to minors, each Partner agrees to comply with the Pro-Children Act of 1994 (45 CFR 98.13) that requires smoking to be banned in any portion of any indoor facility owned, leased, or contracted by an entity that will routinely or regularly use the facility for the provision of health care services, day care, library services, or education to children under the age of eighteen (18).

Each Partner agrees to comply, as applicable, with provisions of the Hatch Act (5 U.S.C. Sections 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with federal funds.

Each Partner agrees to comply with environmental standards which may be prescribed pursuant to the following: (a) Institution of Environmental Quality Control Measures under the National Environmental Policy Act of 1969 (Pub. L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.); (f) conformity of federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (Pub. L. 93-523); (h) The Clean Air Act, Section 306 (42 U.S.C. 1857); (i) Section 508 of the Clean Water Act (33 U.S.C. 1368); (j) Environmental Protection Agency regulations (40 CFR part 15); and (k) protection of endangered species under the Endangered Species Act of 1973, as amended, (Pub. L. 93-205).

Each Partner agrees to comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 CFR Part 900, Subpart F).

Each Partner will comply, or has already complied, with the requirements of Title II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Pub. L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of federal participation in purchases.

The Partners agree to comply, if applicable, with flood insurance purchase requirements of section 102(a) of the Flood Disaster Protection Act of 1973 (Pub. L. 93-234), which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.

Each Partner agrees to comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

The State will assist the awarding agency in assuring compliance with section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection



of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.).

Each Partner agrees to comply with Public Law 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

All Partners will comply with the Laboratory Animal Welfare Act of 1966 (Pub. L. 89-544, as amended, 7 U.S.C. 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

Each Partner agrees to comply with the Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

Each Partner will comply with the Resource Conservation and Recovery Act of 1976, as amended, which states that preference be given to recycled products in procurement activities by State and local governments receiving grants, loans, cooperative agreements, and other federal assistance when procuring goods made from recycled material when the amount of the procurement is equal to or more than \$10,000.

The Partners will comply with the Buy American Act (41 U.S.C. 10a et seq.) in the case of any equipment or product that may be authorized to be purchased with financial assistance provided with WIOA Funds.

All Partners agree to comply with the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

All Partners ensure compliance with Executive Orders 13198 and 13297, which provide for equal treatment in Department of Labor programs for faith-based community organization.

Each Partner ensures that no federal appropriated funds have been paid or will be paid, by or on behalf of the signer, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement. If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the signer shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. (The Governor of the State of Mississippi requires that the aforementioned language be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.)

The Partners assure compliance with the Funding Accountability and Transparency Act of 2006, Public Law 109-282, as amended by section 6202 of Public Law 110-252 (FFATA) and has established necessary processes and systems in place to comply with the reporting requirements of FFATA.



Each Partner will comply, as applicable, with provisions of the Davis-Bacon Act (40 U.S.C. Sections 276a to 276a-7), the Copeland Act (40 U.S.C. Section 276c and 18 U.S.C. Section 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. Sections 327-333), regarding labor standards for federally-assisted construction sub-agreements.

The Partners agree to assure compliance with all mandatory standards and policies relating to energy efficiency contained in the state energy conservation plan issued in compliance with the Energy Policy and Conservation Act (Pub. L. 94-163, 89 Stat. 871).

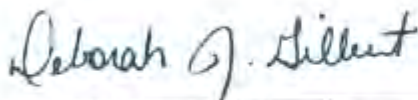
The Partners agree to comply with all applicable Federal and State laws and directives.

#### DURATION

This agreement will begin upon July 1, 2015 and continue until all Partners, agree in writing, to cancel the terms of the MOU.

#### 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.



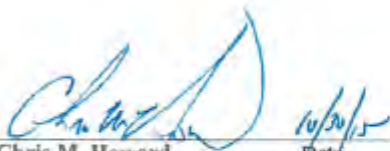
Deborah J. Gilbert, CPA      Date  
Deputy Executive Director  
Mississippi Community College Board



Mark Henry      Date  
Executive Director      Oct. 30, 2015  
Mississippi Department of Employment  
Security

WIOA MOU | State of Mississippi

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Chris M. Howard      Date  
Executive Director  
Mississippi Department of Rehabilitation  
Services



Richard A. Berry      Date  
Executive Director  
Mississippi Department of Human  
Services



Jay Moon      Date  
Chairman  
State Workforce Investment Board



State of Mississippi  
Workforce Innovation and Opportunity Act  
Memorandum of Understanding  
January 25, 2016  
Addendum

Dr. Andrea Mayfield, Executive Director of the Mississippi Community College Board was hired MCCB effective December 1, 2015. Her signature below certifies that she has read, understood, and agreed to the terms and conditions of the State of Mississippi Workforce Innovation and Opportunity Act MOU. This letter shall be added to the original MOU submitted October 30, 2015 for Federal review.

  
Andrea Mayfield, Ph.D.  
Executive Director  
Mississippi Community College Board

  
Governor, State of Mississippi

## Appendix B: SLDS Governing Board Rules & Regulations

### **Title 10: Education Institutions and Agencies**

#### **Part 501: Statewide Longitudinal Data System Governing Board Rules & Regulations**

##### **Part 501 Chapter 1: STATUTORY AUTHORITY**

*Rule 1.1: Statutory Authority.* The SLDS Governing Board was established effective July 1, 2013 through Mississippi Code Annotated § 37-154-1 and 37-154-3.

The SLDS Governing Board is authorized to develop and promulgate all rules and regulations governing the activities of the SLDS in accordance with applicable state and federal laws. The board is authorized to contract with a third party to manage and maintain the system and to insure the policies and procedures developed by the board are enforced.

The SLDS Governing Board shall be responsible for, but not limited to, the following objectives:

- A. Identifying critical research and policy questions that need to be addressed by education (P-20) and workforce programs;
- B. Identifying reports and other information that should be available to education and workforce entities and other public stakeholders;
- C. Developing a funding mechanism for sustaining the system after it is developed;
- D. Defining and maintaining standards for privacy, confidentiality and security of data; and
- E. Performing other advisory functions that are necessary for the successful continuation and management of the longitudinal data system.

A Statewide longitudinal data system is one that collects, connects, and maintains data from distinct systems within governmental entities over time. Longitudinal data extends into the past as well as the present so that progress and outcomes can be measured with reasonable precision rather than relying on a simple snapshot.

*Rule 1.2: Organization and policy and procedure.* Miss. Code Ann. §37-154-3 provides that the SLDS Governing Board shall be composed of a representative from each agency or entity providing data to the system and that each agency or entity will appoint their representative to sit on the Governing Board. For the two (2) years following July 1, 2013, the State Workforce Investment Board Chair will also serve as Chair of the SLDS Governing Board. In subsequent years, the SLDS Governing Board will elect a chair from among its members. 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 insure the policies and procedures developed by the board are enforced. The system shall be referred to as LifeTracks. LifeTracks includes activities within three categories:

- A. Securing and managing data;
- B. Supporting, maintaining, and expanding the online reporting portal ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)); and
- C. Developing research design and methodology for the purpose of conducting scientific research that addresses policy and research questions.

*Rule 2.1: STATE DATA CLEARINGHOUSE.* The SLDS Governing Board shall enter into a five-year memorandum of agreement with a third party to serve as the state data clearinghouse and to ensure the policies and procedures developed by the SLDS Governing Board are enforced. 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; ensuring user-friendly and timely access to a variety of stakeholders; and building and sustaining partnerships with data contributors. The third party shall also be an organization with the knowledge, experience, and resources necessary to provide flexible, streamlined services and to design and implement best practices for data integration and data security. The organization must have experience with SLDS-type architecture and data modeling, and be qualified to provide all necessary technical resources aligned with the scope and objectives of the SLDS.

Source: Miss. Code Ann. §37-154-3

*Rule 2.2: APPLICATION HOST.* The SLDS Governing Board shall select an entity to provide application hosting services for [www.lifetracks.ms.gov](http://www.lifetracks.ms.gov). No data shall reside on application host servers, only summary reports. 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, including, but not limited to:
  - a. Enabling Mississippians to secure and retain employment and receive better pay after completing training or postsecondary degrees;
  - b. Enabling Mississippi to meet the education and job skill demands of business and industry;
  - c. Developing an early warning system, which allows the state to intervene early, improving the graduation rates in high school and college; and
  - d. Linking teachers, teaching methods and programs that lead to positive student outcomes.
4. All data necessary for the successful continuation, management, and development of the online reporting portal ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)); and
5. All data required to fulfill authorized ad hoc research and reporting requests.

B. In an effort to maintain the highest degree of accuracy, LifeTracks shall adopt the business rules, logic, and calculation methodology of the contributing data provider. The third party contractor shall maintain agency/entity specific LifeTracks data dictionaries defining data elements:

1. Included in the development and initial deployment of LifeTracks;
2. Necessary for maintaining the system as deployed; and
3. Necessary for future development.

Copies of all agency/entity specific data dictionaries will be available to the public on the LifeTracks website.

Source: Miss. Code Ann. §37-154-3



*Rule 3.2: SOCIAL SECURITY NUMBERS.* The SLDS Governing Board is cognizant of the fact that it is necessary to transmit and process personal information in the form of Social Security Numbers (SSNs) in order to conduct the business of the board. The SLDS Governing Board takes its responsibilities with respect to the use of SSNs seriously and seeks to provide functional secure systems for the appropriate handling of this information through the use of administrative, technical, and physical safeguards. To comply with Miss. Code Ann. §25-1-111, the following have been established:

- A. Individual governmental entities shall transfer the SSN to the third party contractor for the purpose of creating a 10-digit unique identification number (ID10) created at random using a hardware based true random number generator that replaces the SSN and becomes the common link allowing all data in LifeTracks to be connected across different points in time. In regards to the Mississippi Department of Education, the specific method of transfer of data containing social security numbers or other unique identifiers is subject to written agreement by the SLDS Governing Board and the MDE.
- B. Destruction of SSN information that is no longer needed shall be handled in an approved manner and completed using accepted methods that will not enable inappropriate recovery of data.
- C. Individuals and entities are expected to comply with laws and policies pertaining to the collection and use of SSNs and are expected to take the steps necessary to protect this information.
- D. SSN information is exempt from inclusion as public record information and is never to be provided in response to such requests.

Source: Miss. Code Ann. §37-154-3

*Rule 3.3: IDENTIFICATION NUMBERS.* Agency/entity and/or program specific identification numbers shall also be transferred to the third party contractor for the purpose of conducting data validation and quality control activities and to allow individual governmental entities contributing data to LifeTracks to use information from LifeTracks for internal agency use.

Source: Miss. Code Ann. §37-154-3

#### **Part 501 Chapter 4: STANDARDS FOR PRIVACY, CONFIDENTIALITY & SECURITY OF DATA**

*Rule 4.1: SECURITY OF DATA.* The third party contractor will establish a framework to initiate and control the implementation of security policies and standards for the SLDS Governing Board. The Governing Board will ensure that the State Data Clearinghouse's security posture is adequate and compliant with the Department of Information Technology Services' Enterprise Information Security Plan and that an organizational structure is in place that focuses on information security.



In addition, the third party contractor shall establish processes and procedures for incident reporting objectives, goals and deliverables identified in the ITS Enterprise Security Policy and ITS Enterprise Information Security Plan.

All data transferred from individual governmental entities contributing data to LifeTracks to the third party contractor shall be held in a secure file location that is accessible only by authorized third party contractor personnel. This access limitation shall be enforced by third party contractor and board approved industry standard file access locks and an independent security system. The permissions structure shall be designed to only allow authorized users to access files. The independent security system shall be implemented to guard access to sensitive file storage areas and provide robust augmentation of security provided through file access locks and credentialing.

The third party contractor shall perform appropriate background checks and screening of all employees that have any access to the clearinghouse data.

The third party contractor shall employ technical safeguards to ensure personal information transmitted over an electronic communications network is not accessed by unauthorized persons or groups. Encryption shall be used when PII are in transmit or at rest. Unencrypted PII shall not be transmitted over public networks to third parties.

The third party contractor shall employ data integrity procedures that protect PII including mechanisms to authenticate records and corroborate that they have not been altered or destroyed in an unauthorized manner.

The third party contractor shall implement a risk assessment strategy plan that is updated annually which includes access and control processes, security risks, threats and vulnerabilities assessments, and methods for managing risks and incidents.

The third party contractor shall maintain and update the incident response plan that establishes procedures to follow in case a breach occurs and processes for notifying organizations in the event of unauthorized acquisition of files or documents. The third party contractor shall be subject to an annual external data security audit conducted by the Mississippi Office of the State Auditor.

Source: Miss. Code Ann. §37-154-3

*Rule 4.2: DE-IDENTIFICATION OF DATA.* All de-identification procedures shall be implemented with appropriate physical, technical, and administrative protections in place to maximize security, minimize risk, and ensure regulatory compliance. Data shall be de-identified through the ID10 process instituted in the development of LifeTracks wherein a 10-digit unique identification number (ID10) created from and replacing the SSN becomes the common link across all data in LifeTracks. An encrypted key held in a secure, offline location at the third party contractor's site shall allow for the matching of SSNs to the appropriate ID10 to ensure data can be reliably linked over time and across governmental entities contributing data to LifeTracks. The SSN shall only be used for assigning the ID10.

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: ID10 PROCESS.* A unique 10-digit identification number (ID10) created at random using a hardware-based true random number generator that uses quantum physics to generate random binary data has been assigned to each SSN. For all data transferred from governmental entities contributing data to LifeTracks to the third party contractor, the SSN shall be replaced with the ID10 that becomes the common link allowing all data in LifeTracks to be connected across different points in time.

Source: Miss. Code Ann. §37-154-3

*Rule 4.4: ADDITIONAL STANDARDS FOR PRIVACY AND CONFIDENTIALITY.* Additional privacy and confidentiality safeguards shall include only releasing information generated from the data transferred from individual state agencies and state entities to the third party contractor in tabular form via the online reporting portal ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)) and applying appropriate data suppression techniques when cell sizes fail to meet minimum SLDS Governing Board defined reporting requirements.

The minimum allowable cell size or subgroup contained in any reports shall be not less than ten (10); any cell size or subgroup with a number smaller than ten (10) shall be suppressed.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 5: PROVIDING DATA**

*Introduction:* All data provided to the SLDS shall be provided in accordance with local, state and federal laws governing the protection and sharing of such data.

*Rule 5.1: DATA MANAGER.* All governmental entities contributing data to LifeTracks shall designate a data manager to serve as the primary point of contact for all LifeTracks activities at the beginning of each state fiscal year and communicate this in writing to the SLDS Governing Board Chair and the designated third party contractor.

The third party contractor shall be subject to an annual external audit conducted by the Mississippi Office of the State Auditor for compliance with SLDS Governing Board rules and regulations.

Source: Miss. Code Ann. §37-154-3



*Rule 5.2: MEMORANDUM OF UNDERSTANDING (MOU).* Memorandums of understanding (MOUs) shall be executed between the governmental entity providing data and the third party contractor to ensure the safety, quality, and integrity of data in accordance with state and federal law.

At any such time as the third party contractor shall change, new MOUs shall be executed between individual governmental entities contributing data to LifeTracks and the third party contractor.

Source: Miss. Code Ann. §37-154-3

*Rule 5.3: DATA TRANSFER.* Data shall be transferred from individual governmental entities contributing data to LifeTracks as necessary to meet the requirements of Chapter 3 and in accordance with applicable MOUs but not less than annually and no later than October 15 of each calendar year.

All data shall be transferred from individual governmental entities contributing data to LifeTracks via an SLDS Governing Board approved secure file transfer solution chosen by the third party contractor. The selected managed file transfer solution shall employ industry standard file transfer encryption and include the ability to assign private destination folders to each data exchange partner that shall be locked down with and credentialed to individual source users such that only they can see their own folder. All data received by LifeTracks shall be transferred to a secure work area that is only accessible to authorized staff.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 6: DATA VALIDATION**

*Rule 6.1: DATA INVENTORY.* Governmental entities shall submit data in accordance with state and federal law. Upon receipt of data, the third party contractor shall verify the list of data elements received from data contributors within ten (10) working days of receipt.

Upon verification of the list of fields, tables, and relationships between tables by the data contributor, the data shall undergo the complete LifeTracks data inventory process. The complete data inventory process shall include updating or creating data dictionaries and program data mapping documents. Data dictionaries shall include metadata such as meaning, relationship to other data, origin, usage, and format. Program data mapping documents shall provide information on how data fields relate to other data fields across multiple data sets. The program data mapping document shall be used to compare and contrast data elements collected across multiple governmental entities and over time.

Source: Miss. Code Ann. §37-154-3

*Rule 6.2: DATA VALIDATION.* Data validation shall be the primary responsibility of the third party contractor and undertaken in accordance with SLDS Governing Board rules and regulations and the terms of applicable MOUs. The business rules, logic, and calculation

methodology provided by the governmental entity contributing the data shall be used 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.

Data contributors shall have thirty (30) working days to validate and approve their summary statistics reports prior to that data becoming public, as part of the LifeTracks online reporting system ([www.lifetracks.ms.gov](http://www.lifetracks.ms.gov)).

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 7: REPORTS**

*Rule 7.1: PRE-DEFINED REPORTS.* Access to agreed-upon pre-defined statewide aggregate reports shall be publicly available through the LifeTracks one-stop portal. Access to sub-state level reports shall be subject to role-based credentials. De-identified individual data points shall never be part of pre-defined reports and shall not be accessible through LifeTracks online portal.

Source: Miss. Code Ann. §37-154-3

*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 along the education and workforce pathway. For longitudinal studies, requests can be categorized as one of three types of studies:

- A. Trend studies,
- B. Cohort studies, and
- C. Panel studies.

Trend studies are those requests that examine a given characteristic(s) of some group over time. Cohort studies are those requests that examine or study some specific sub-population (cohort)



over time. Panel studies are those requests that examine how the same members of a group progress along the education and workforce pathway. Trend, cohort, and panel studies will provide a true mechanism to evaluate the impact of policies, programs, and initiatives on education, workforce, and economic outcomes in the state to inform the development of strategic planning.

Requests for reports involving data within a single state agency/entity shall be referred to the relevant state agency/entity.

All requests for studies, reports, or information deemed suitable for LifeTracks shall be classified into one of two review types for processing: Standard Review or Expedited Review.

- A. Standard Review is required for all requests for traditional/basic research studies where a research question or set of research questions is posed that is not subject to predefined or statutorily mandated methodology or reporting requirements. Standard Review is appropriate for requests that require the development of a research design that examines relationships using scientific techniques such as regression analysis or multilevel modeling and where the research design is guided by a conceptual or theoretical framework drawing upon current scholarly research published in peer-reviewed journals and technical reports. All requests for reports or information falling within the Standard Review category are reviewed by all members of the Research Review and Standards Committee.

The eligibility criteria for Standard Review is as follows. All requests for studies, reports, or information wherein a research question or set of research questions is posed and the methodology or parameters of the request are not statutorily defined, specified by rules or regulations, or otherwise clearly specified by the requestor and require the development of a research design that examines relationships using scientific techniques (e.g., regression analysis or multilevel modeling) shall be subject to the Standard Review process.

Standard Review requests shall require:

1. Review of the request feasibility report by each member of the Research Review and Standards Committee
2. Completion of the Research Review and Standards Committee review form by each committee member
3. Request authorization or denial from the Research Review and Standards Committee to the third-party contractor
4. Review of and provision of feedback on draft report by all Research Review and Standards Committee members

5. Authorization of final report by Research Review and Standards Committee chair

The Research Review and Standards Committee shall review the request feasibility report as provided by the third-party contractor and may, at the Research Review and Standards Committee's discretion, seek appropriate input from the identified data contributor(s).

The Research Review and Standards Committee will have ten (10) business days from the receipt of the request feasibility report to complete its review and provide notice to proceed or not to the third-party contractor.

Should the Research Review and Standards Committee not authorize the request, the RRSC will provide written justification for the decision to the SLDS Governing Board.

Upon receipt of authorization to proceed from the Research Review and Standards Committee, the third-party contractor shall propose an estimated timeline for fulfilling the request and share the timeline with all parties involved. The third-party contractor will conduct the study and provide a draft report to the Research Review and Standards Committee.

All members of the Research Review and Standards Committee will review the draft report and provide feedback to be compiled by the Research Review and Standards Committee chair and transmitted to the third-party contractor.

The third-party contractor will address Research Review and Standards Committee feedback and refine the report as necessary and appropriate.

The review and feedback process will continue until the report is approved by the Research Review and Standards Committee.

The report is shared with the appropriate data contributors who will have an opportunity to review and formally comment on the report. The comments should be for clarification and to provide an opportunity for the data contributor to provide substantive meaning of the results that reflects the data contributor's perspective. The third-party contractor will include data contributor comments in the final report.

The final report will be transmitted to the requestor and posted online at [www.lifetracks.ms.gov](http://www.lifetracks.ms.gov).

- B. Requests for reports or information suitable for LifeTracks that meet the Expedited Review eligibility criteria may be classified as Expedited Review. These requests are descriptive in nature and are essentially census-type requests. Expedited Review is appropriate for requests wherein:



1. The methodology, definitions, or reporting requirements are clearly specified
2. The request includes predetermined/mandatory parameters established or provided by the requestor (e.g., Excel files, tables, or applications to be completed)
3. No report is required or requested

Requests classified for Expedited Review will be reviewed by the Research Review and Standards Committee chair or her/his designee and one or more Research Review and Standards Committee members designated by the chair. These reviewers may authorize the request or refer the request to the full Research Review and Standards Committee for consideration. If the request is referred to the full Research Review and Standards Committee, Standard Review procedures will be followed.

The third-party contractor will transmit the final product to the requestor and notify the Research Review and Standards Committee that the request is complete.

To be eligible for Expedited Review, answers to the following questions must be affirmative. If the answer to any of the questions below is "No," the request must be classified as Standard Review.

1. Are the reporting requirements predefined by the requestor?
2. Is the format for results predefined and clearly specified?

Expedited Review requests shall require:

1. Review of the request feasibility report by the Research Review and Standards Committee chair or his/her designee and one or more members of the Research Review and Standards Committee as designated by the chair
2. Completion of the Research Review and Standards Committee review form by each reviewer
3. Authorization of request or referral to full Research Review and Standards Committee and notice to the third-party contractor

The Research Review and Standards Committee shall review the request feasibility report as provided by the third-party contractor and may, at its discretion, seek appropriate input from the identified data contributor(s).

The Research Review and Standards Committee will have ten (10) business days to provide notice to proceed or notice of referral to the full Research Review and Standards Committee to the third-party contractor. Should the expedited review team refer the request to the full Research Review and Standards Committee, standard review procedures shall be followed.

Upon receipt of authorization to proceed from the Research Review and Standards Committee, the third-party contractor shall propose an estimated timeline for fulfilling the request and share the timeline with the Research Review and Standards Committee chair, specific data contributors, and the requestor.

The third-party contractor will transmit the final product to the requestor and notify the Research Review and Standards Committee that the request is complete.

Requests from the following entities will receive priority over any other requests:

- A. SLDS Governing Board Members;
- B. Governor's Office;
- C. Lt. Governor;
- D. All members of the Mississippi Legislature;
- E. Attorney General;
- F. Secretary of State;
- G. State Auditor;
- H. Other state leadership as approved by the SLDS Governing Board.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 8: ONLINE REPORTS**

*Rule 8.1 Online Reports.* To have new reports available on the LifeTracks portal a proposal including a report template, data required for the report and the methodology and/or business rules necessary to create the report shall be presented to the SLDS Governing Board for review and approval.

Upon approval, the SLDS Governing Board shall instruct the third party contractor to make the approved report available through the LifeTracks portal.

Source: Miss. Code Ann. §37-154-3

#### **Part 501 Chapter 9: LIFETRACKS ACCOUNTS**

*Rule 9.1: SLDS GOVERNING BOARD ACCOUNTS.* Requests for LifeTracks accounts to access full online reports shall be made to stakeholders and policymakers by submitting information required via the online account request form available at [www.lifetracks.ms.gov](http://www.lifetracks.ms.gov). The third party contractor shall notify the SLDS Governing Board. Upon approval by SLDS Governing Board, the third party contractor shall create the approved account.

Stakeholders and policymakers are those in state leadership positions with a direct role in developing and supporting state education and workforce objectives. Stakeholders and policymakers that can request LifeTracks accounts for access to full online reports shall be:

- A. SLDS Governing Board Members;
- B. Governor's Office;
- C. Lt. Governor;
- D. All members of the Mississippi Legislature;
- E. Attorney General;
- F. Secretary of State;
- G. State Auditor;
- H. Other state leadership as approved by the SLDS Governing Board.

Source: Miss. Code Ann. §37-154-3

*Rule 9.2: AGENCY/ENTITY ACCOUNTS.* LifeTracks accounts for access to full online reports shall be managed by the governmental entities contributing data to LifeTracks. Each data contributor can provide access to their own LifeTracks reports as it deems appropriate. Each data contributor shall notify the third party contractor of all accounts created and shall be fully responsible for any liability arising therefrom.

Source: Miss. Code Ann. §37-154-3

#### **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 board members.

When the SLDS Governing Board receives a public records request, it shall immediately notify 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 Chair of the SLDS Governing Board. Information is also available on the LifeTracks website at [www.lifetracks.ms.gov](http://www.lifetracks.ms.gov).

Source: Miss. Code Ann. §37-154-3

*Rule 10.3 Availability of public records.* Any person wishing to request access to public records of the SLDS Governing Board is encouraged to view the documents available on the LifeTracks web site prior to submitting a records request.

- A. Any person wishing to inspect or copy public records of the SLDS Governing Board should make the request in writing to the SLDS Governing Board 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 will do one or more of the following:
  - 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 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 or 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 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 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 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 believes that a record is exempt from disclosure and should be withheld, the SLDS Governing Board 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 will redact the exempt portions, provide the nonexempt portions, and indicate to the requestor why portions of the record are being redacted.
  2. Record does not exist or SLDS Governing Board does not have the record. The SLDS Governing Board must only provide access to public records in



existence at the time of the request. If a public record is created or comes into the possession of the SLDS Governing Board after the request is received by the SLDS Governing Board, that record will not be provided. The requestor must make a new request to obtain subsequently-created public records.

- E. Inspection of records. Consistent with other demands and with prior written notice by the requestor to the SLDS Governing Board, it shall promptly provide space to inspect nonexempt public records. No member of the public may remove a document from the viewing area or disassemble or alter any document. The requestor shall indicate which documents he or she wishes the public body to copy.

The requestor must claim or review the assembled records within ten (10) business days of the SLDS Governing Board notification to him or her that the records are available for inspection or copying. The SLDS Governing Board will notify the requestor in writing of this requirement and inform the requestor that he or she should contact the SLDS Governing Board to make arrangements to claim or review the records. If the requestor or a representative of the requestor fails to claim or review the records within the ten-day period or make other arrangements, the SLDS Governing Board may close the request and refile the assembled records. Other public records requests can be processed ahead of a subsequent request by the same person for the same or almost identical records, which can be processed as a new request.

- F. Providing copies of records. After inspection is complete, the SLDS Governing Board shall make the requested copies or arrange for copying. The requestor must provide payment for copies at the time copies are made. Alternatively, the requestor may ask that the SLDS Governing Board provide the requested information directly to the requestor, in printed or electronic form, without prior inspection of the information by the requestor.
- G. Providing records in installments. When the request is for a large number of records, the SLDS Governing Board will provide access for inspection and copying in installments, if he or she reasonably determines that it would be practical to provide the records in that way. If, within ten (10) business days, the requestor fails to inspect the entire set of records or one or more of the installments, the SLDS Governing Board or designee may stop searching for the remaining records and close the request.
- H. Completion of inspection. When the inspection of the requested records is complete and all requested copies are provided, SLDS Governing Board will indicate that it has completed a diligent search for the requested records and made any located nonexempt records available for inspection.
- I. Closing withdrawn or abandoned request. When the requestor either withdraws the request or fails to fulfill his or her obligations to inspect the records or pay



required fees, the SLDS Governing Board will close the request and indicate to the requestor that the SLDS Governing Board has closed the request.

- J. Later discovered documents. If, after the SLDS Governing Board has informed the requestor that it has provided all available records, the SLDS Governing Board becomes aware of additional responsive documents existing at the time of the request, it will promptly inform the requestor and data contributors of the additional documents and provide them on an expedited basis.

Source: Miss. Code Ann. §37-154-3

*Rule 10.5 Processing of public records requests for electronic records.* The SLDS Governing Board process for requesting electronic public records is the same as for requesting paper public records. When a requestor requests records in an electronic format, the SLDS Governing Board will provide the nonexempt records or portions of such records that are reasonably locatable in an electronic format that is used by the SLDS Governing Board and is generally commercially available, or in a format that is reasonably translatable from the format in which the SLDS Governing Board keeps the record. The SLDS Governing Board shall determine the cost of providing access to electronic records.

With the consent of the requestor, the SLDS Governing Board may provide customized access if the record is not reasonably locatable or not reasonably translatable into the format requested. The SLDS Governing Board may charge the actual cost for such customized access.

Source: Miss. Code Ann. §37-154-3

*Rule 10.6 Exemptions.* The Public Records Act, as well as other statutes and court decisions, provide that a number of types of documents are exempt from public inspection and copying. In addition, other statutes or rules of law, such as various privacy restrictions, may prohibit disclosure. Requestors should be aware of the following exemptions, outside the Public Records Act, that restrict the availability of some documents held by the SLDS Governing Board for inspection and copying. This list is provided for informational purposes only and may not be all-inclusive:

- Academic records exempt from public access, see § 37-11-51.
- Appraisal records exempt from access, see § 31-1-27.
- Archaeological records exempt from public access, see § 39-7-41.
- Attorney work product, examination, exemption, see § 25-1-102.
- Birth Defects Registry, see § 41-21-205.
- Bureau of vital statistics, access to records, see § 41-57-2.
- Charitable organizations, registration information, exemption from public access, see § 79-11-527.
- Concealed pistols or revolvers, licenses to carry, records, exemption, see § 45-9-101.

- Confidentiality, ambulatory surgical facilities, see § 41-75-19.
- Defendants likely to flee or physically harm themselves or others, see § 41- 32-7.
- Environmental self-evaluation reports, public records act, exemption, see § 49-2-71.
- Hospital records, Mississippi Public Records Act exemption, see § 41-9-68.
- Individual tax records in possession of public body, exemption from public access requirements, see § 27-3-77.
- Insurance and insurance companies, risk based capital level requirements, reports, see § 83-5-415.
- Judicial records, public access, exemption, see § 9-1-38.
- Jury records exempt from public records provisions, see § 13-5-97.
- Licensure application and examination records exemption from Public Records Act, see § 73-52-1.
- Medical examiner, records and reports, see § 41-61-63.
- Personnel files exempt from examination, see § 25-1-100.
- Public records and trade secrets, proprietary commercial and financial information, exemption from public access, see § 79-23-1.
- Workers' compensation, access to records, see § 71-3-66.
- Records subject to privilege, such as Attorney/Client, Physician/Patient, etc.

SLDS Governing Board will describe why each withheld record or redacted portion of a record is exempt from disclosure.

Source: Miss. Code Ann. §37-154-3

*Rule 10.7 Third party information.* Upon request to inspect or copy any third party document, the SLDS Governing Board shall notify the third party who filed the document. Seven (7) working days after such notice, the document will be made available for public inspection and/or copying unless the third party shall have either (i) obtained a court order protecting such records as confidential pursuant to Section 25-61-9, Miss. Code of 1972 or (ii) furnished the SLDS Governing Board a copy of the filed petition for a protective court order, providing the petition was timely filed upon the third party's receipt of notification from the SLDS Governing Board regarding the request for information.

The third party must prove to the court's satisfaction that the record or portion of the records is exempt from disclosure and must deliver the court order preventing the release of all or part of the information to the SLDS Governing Board prior to the deadline to prevent disclosure of the



information. The third party must name the requestor as a party to any action to enjoin disclosure.

The SLDS Governing Board will not make a determination as to whether a requested record provided by a third party contains trade secrets or confidential commercial or financial information. The SLDS Governing Board will provide the third party notice as outlined above and allow the court to determine if a protective order should be issued.

Documents are frequently produced by the SLDS Governing Board that contain specific information directly obtained from a third party and, as such, may be subject to third party notice as described above.

Source: Miss. Code Ann. §37-154-3

*Rule 10.8 Costs for fulfilling a request.* Costs of providing public records shall be determined in accordance with Miss. Code Ann. §25-61-7(1) that reads as follows: "Except as provided in subsection (2) of this section, each public body may establish and collect fees reasonably calculated to reimburse it for, and in no case to exceed, the actual cost of searching, reviewing and/or duplicating and, if applicable, mailing copies of public records."

- A. A requestor may obtain standard black and white photocopies for 15 cents per page and color copies for 15 cents per page. Copy charges for some specific types of records are set by statute and may exceed the amount stated above. Before copies can be made and/or provided to the requestor, the requestor must pre-pay all reasonably estimated costs of copying all the records selected by the requestor. The SLDS Governing Board may also require the payment of the remainder of the copying costs before providing all the records in an installment before providing that installment. The SLDS Governing Board will not charge sales tax when it makes copies of public records.
- B. Costs for electronic records. The cost of electronic copies of records shall be specified as the media cost for a CD. The cost of scanning existing SLDS Governing Board paper or other non-electronic records will be calculated at the hourly service rate. There will be no charge for e-mailing electronic records to a requestor, unless another cost applies such as a scanning fee or system costs.
- C. Costs of mailing. The SLDS Governing Board may also charge actual costs of mailing, including the cost of the shipping container.
- D. Payment. Payment may be made by cash, check, or money order to the SLDS Governing Board for the amount specified.
- E. Charges for searching, reviewing and redacting. The actual cost of searching for and reviewing and, if necessary, redacting exempt information from public records shall be based upon the hourly service rate multiplied by the actual time to complete the task.

Source: Miss. Code Ann. §37-154-3

*Rule 10.9 Review by Ethics Commission.* Pursuant to Section 25-61-13, if the SLDS Governing Board denies a requestor access to public records, the requestor may ask the Ethics Commission to review the matter. The Ethics Commission has adopted rules on such requests. They may be found at [www.ethics.state.ms.us](http://www.ethics.state.ms.us).

Any person whose request for public records was denied may institute a suit in the chancery court of Hinds County, seeking to reverse the denial, as set forth in Section 25-61-13.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 11: RULEMAKING ORAL PROCEEDINGS**

*Rule 11.1 Rulemaking oral proceedings.* These rules apply to all oral proceedings held for the purpose of providing the public with an opportunity to make oral presentations or written input on proposed new rules, amendments to rules, and proposed repeal of existing rules for the SLDS Governing Board.

When a political subdivision, an agency, or ten (10) persons request an oral proceeding in regards to a proposed rule adoption, the requestor must submit a printed, typewritten, or legibly handwritten request.

- A. Each request must be submitted on 8-1/2" x 11" white paper.
- B. The request may be in the form of a letter addressed to the Chair of the SLDS Governing Board or in the form of a pleading as if filed with a court.
- C. Each request must include the full name, telephone numbers, and mailing address of the requestor(s).
- D. All requests shall be signed by the person filing the request, unless represented by an attorney, in which case the attorney may sign the request.

Notice of the date, time, and place of all oral proceedings shall be filed with the Secretary of State's Office for publication in the Administrative Bulletin. The SLDS Governing Board shall provide notice of oral proceedings to all persons requesting notification of proposed rule adoptions. The oral proceedings will be scheduled no earlier than twenty (20) days from the filing of the notice with the Secretary of State. The Chair of the SLDS Governing Board or designee who is familiar with the substance of the proposed rule shall preside at the oral proceeding on a proposed rule.

Public participation shall be permitted at oral proceedings, as follows:

- A. At an oral proceeding on a proposed rule, persons may make statements and present documentary and physical submissions concerning the proposed rule.



- B. Persons wishing to make oral presentations at such a proceeding shall notify the Chair of the SLDS Governing Board at least three (3) business days prior to the proceeding and indicate the general subject of their presentations. The presiding officer in his or her discretion may allow individuals to participate that have not contacted the SLDS Governing Board prior to the proceeding.
- C. At the proceeding, those who participate shall indicate their names and addresses, identify any persons or organizations they may represent, and provide any other information relating to their participation deemed appropriate by the presiding officer.
- D. The presiding officer may place time limitations on individual presentations when necessary to assure the orderly and expeditious conduct of the oral proceeding. To encourage joint presentations and to avoid repetition, additional time may be provided for persons whose presentations represent the views of other individuals as well as their own views.
- E. Persons making presentations are encouraged to avoid restating matters that have already been submitted in writing. Written materials may be submitted at the oral proceeding.
- F. Where time permits and to facilitate the exchange of information, the presiding officer may open the floor to questions or general discussion. The presiding officer may question participants and permit the questioning of participants by other participants about any matter relating to that rule-making proceeding, including any prior written submissions made by those participants in that proceeding. No participant shall be required to answer any question.

Physical and documentary submissions presented by participants in an oral proceeding shall be submitted to the presiding officer. Such submissions become the property of the SLDS Governing Board, part of the rulemaking record, and are subject to the SLDS Governing Board public records request procedure. The SLDS Governing Board may record oral proceedings by stenographic or electronic means.

Source: Miss. Code Ann. §37-154-3

## **Part 501 Chapter 12: DECLARATORY OPINIONS**

*Introduction.* These rules and regulations govern the form, content, and filing of requests for declaratory opinion, the procedural rights of persons in relation to the written requests, and the SLDS Governing Board's procedures regarding the disposition of requests as required by Miss. Code Ann. §25-43-2.103.

*Rule 12.1 Declaratory Opinions.* The SLDS Governing Board will issue declaratory opinions regarding the applicability to specified facts of:



- A. A statute administered or enforceable by the SLDS Governing Board;
- B. A rule or regulation promulgated by the SLDS Governing Board; or,
- C. An order issued by the SLDS Governing Board.

A request must be limited to a single transaction or occurrence.

When a person with substantial interest, as required by Miss. Code Annotated §25-43-2.103, requests a declaratory opinion, the requestor must submit a printed, typewritten, or legibly handwritten request.

- A. Each request must be submitted on 8-1/2" x 11" white paper.
- B. The request may be in the form of a letter addressed to the Chair of the SLDS Governing Board or in the form of a pleading as if filed with a court.
- C. Each request must include the full name, telephone numbers, and mailing address of the requestor(s).
- D. All requests shall be signed by the person filing the request, unless represented by an attorney, in which case the attorney may sign the request.
- E. Each request must clearly state that it is a request for a declaratory opinion.

Any party who signs the request shall attest that the request complies with the requirements set forth in these rules, including but not limited to a full, complete, and accurate statement of relevant facts and that there are no related proceedings pending before any agency, administrative, or judicial tribunal.

Each request must contain the following:

- A. A clear identification of the statute, rule, regulation, or order at issue;
- B. The question for the declaratory opinion;
- C. A clear and concise statement of all facts relevant to the question presented;
- D. The identity of all other known persons involved in or impacted by the facts giving rise to the request including their relationship to the facts, and their name, mailing address, and telephone number; and,
- E. A statement sufficient to show that the requestor has a substantial interest in the subject matter of the request.

The SLDS Governing Board may, for good cause, refuse to issue a declaratory opinion. The circumstances in which declaratory opinions will not be issued include, but are not necessarily limited to the following:

- A. The matter is outside the primary jurisdiction of the SLDS Governing Board;
- B. There is a lack of clarity concerning the question presented;
- C. There is pending or anticipated litigation, administrative action or anticipated administrative action, or other adjudication which may either answer the question presented by the request or otherwise make an answer unnecessary;
- D. The statute, rule, or order on which a declaratory opinion is sought is clear and not in need of interpretation to answer the question presented by the request;
- E. The facts presented in the request are not sufficient to answer the question presented;
- F. The request fails to contain information required by these rules or the requestor failed to follow the procedure set forth in these rules;
- G. The request seeks to resolve issues which have become moot or are abstract or hypothetical such that the requestor is not substantially affected by the rule, statute, or order on which a declaratory opinion is sought;
- H. No controversy exists or is certain to arise which raises a question concerning the application of the statute, rule, or order;
- I. The question presented by the request concerns the legal validity of a statute, rule, or order;
- J. The request is not based upon facts calculated to aid in the planning of future conduct, but is, instead, based on past conduct in an effort to establish the effect of that conduct;
- K. No clear answer is determinable;
- L. The question presented by the request involves the application of a criminal statute or sets forth facts which may constitute a crime;
- M. The answer to the question presented would require the disclosure of information which is privileged or otherwise protected by law from disclosure;
- N. The question is currently the subject of an Attorney General's opinion request;
- O. The question has been answered by an Attorney General's opinion;



- P. One or more requestors have standing to seek an Attorney General's opinion on the proffered question;
- Q. A similar request is pending before this agency, or any other agency, or a proceeding is pending on the same subject matter before any agency, administrative or judicial tribunal, or where such an opinion would constitute the unauthorized practice of law; or,
- R. The question involves eligibility for a license, permit, certificate, or other approval by the SLDS Governing Board or some other agency and there is a statutory or regulatory application process by which eligibility for said license, permit, or certificate or other approval may be determined.

Within forty-five (45) days after the receipt of a request for a declaratory opinion which complies with the requirements of these rules, the SLDS Governing Board shall, in writing:

- A. Issue an opinion declaring the applicability of the statute, rule, or order to the specified circumstances;
- B. Agree to issue a declaratory opinion by a specified time but no later than ninety (90) days after receipt of the written request; or,
- C. Decline to issue a declaratory opinion, stating the reasons for its action.

The forty-five (45) day period shall begin on the first business day after which the request is received by the SLDS Governing Board.

Declaratory opinions and requests for declaratory opinions shall be available for public inspection and copying at the expense of the viewer during normal business hours. All declaratory opinion and requests shall be indexed by name, subject, and date of issue. Declaratory opinions and requests which contain information which is confidential or exempt from disclosure under the Mississippi Public Records Act or other laws shall be exempt from this requirement and shall remain confidential.

Source: Miss. Code Ann. §37-154-3

### **Part 501 Chapter 13: REVIEW AND AUDIT**

*Rule 13.1 Review and Audit.* These rules and regulations shall be subject to review by an SLDS Governing Board committee on annual basis as set forth by the SLDS Governing Board Chair. The SLDS Governing Board committee shall prepare a report including recommendations for any actions to be considered by the convened governing board.

Source: Miss. Code Ann. §37-154-3



# Appendix C: Local Workforce Development Area Designation Policy. WIOA Policy #1

**MISSISSIPPI**  
**Policy Number 1**  
**LOCAL WORKFORCE DEVELOPMENT AREA DESIGNATION POLICY**  
**Workforce Innovation and Opportunity Act**  
**Office of Grant Management**

## **I. SCOPE AND PURPOSE**

Section 106 of the Workforce Innovation and Opportunity Act (WIOA) requires the Governor to designate Local Workforce Development Areas within the state through consultation with the State Workforce Development Board and after consultation with the chief elected officials and comments from the general public as described in Section 102(b)(2)(E)(ii)(II). For the purposes of this policy, the term “Governor” shall mean the Governor or his designee.

The purpose of this policy is to provide guidance regarding the initial and subsequent designation of Local Workforce Development Areas in Mississippi.

## **II. REQUIREMENTS**

WIOA provides for three types of local workforce development area designation: Initial Designation, Subsequent Designation, and Designation on Recommendation of the State Board. The Governor *shall* approve requests for initial and subsequent designation submitted by chief elected officials, provided the area under consideration meets the applicable eligibility criteria. Under the third designation type, the Governor *may* approve such requests from any unit of general local government on recommendation from the State Workforce Development Board.

### **A. Initial Designation [Section 106(b)(2)]:**

During the first two (2) full program years following the date of enactment of the Act, July 22, 2014, the Governor *shall* approve a request for initial designation as a local area from any area that (a) was designated as a local area for purposes of the Workforce Investment Act of 1998 for the two-year period preceding the date of enactment of this Act, (b) has performed successfully, and (c) sustained fiscal integrity.

1. “The term “performed successfully,” used with respect to a local area, means the local area met or exceeded the adjusted levels of performance for primary indicators of performance described in section 116(b)(2)(A) (or, if applicable, core indicators of performance described in section 136(b)(2)(A) of the Workforce Investment Act of 1998, as in effect the day before the date of enactment of this Act) for each of the last 2 consecutive years for which data are available preceding the determination of performance under this paragraph.” *(The local area has achieved at least 80 percent of their local performance goal on each performance*



*measure for Program Year 2012 and Program Year 2013 as stated in Section 106(e)(1) of the WIOA.)*

2. "The term "sustained fiscal integrity," per Section 106(e)(2) is used with respect to a local area, means that the Secretary has not made a formal determination, during either of the last two (2) consecutive years preceding the determination regarding such integrity, that either the grant recipient or the administrative entity of the area misexpended funds provided under subtitle B (or, if applicable, Title I of the Workforce Investment Act of 1998 as in effect prior to the effective date of such subtitle B) due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration."

**B. Subsequent Designation [Section 106(b)(3)]:**

After the two full program years initial designation period, the Governor *shall* approve a request for subsequent designation from such local area, if such area –

1. performed successfully;
2. sustained fiscal integrity;
3. and in the case of a local area in a planning region, met the requirements described at Section 106(c)(1).

**C. Governor Not Prohibited:**

If justification exists to explain why a local area(s) did not meet or exceed the adjusted levels of performance under the Initial or Subsequent Designation clauses, the Governor *may* approve such local area designation.

Nothing in the requirements to approve certain initial or subsequent designations of local areas shall be construed as prohibiting the Governor from approving such areas as may be recommended by the State board or the chief elected officials and which conform to the majority but not all of the requirements.

**D. Designation on Recommendation of State Board and Approval of Governor [Section 106(b)(1)]:**

The Governor *may* approve a request for a local area designation from any unit of general local government or combination of such units if the State Board determines that such area should be so designated. In making the designation of local areas, the Governor must give considerations consisting of the extent to which the areas:

1. are consistent with labor market areas in the State;
2. are consistent with regional economic development areas in the State; and



3. have available the Federal and non-Federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of WIOA, including whether the areas have the appropriate education and training providers such as institutions of higher education and area career and technical education schools.

**E. Regions [Section 106(a)]:**

Before the second full program year after the date of enactment of the Act, in order for a State to receive an allotment under Section 127(b) or 132(b) and as part of the process for developing the State Plan, a State *shall* identify regions in the State after consultation with the local boards and chief elected officials in the local areas and consistent with the considerations described in Section 106(b)(1)(B). The State *shall* also identify regions consistent with the requirements of Section 106 (a)(2).

**F. State Appeals Process [Section 106(b)(5)]:**

If an existing local workforce area under the WIA requests but is not granted designation as a local workforce development area under WIOA Section 106(b)(2) or Section 106(b)(3), the unit (or combination of units) of general local government or grant recipient may submit an appeal to the State Board under an appeal process established in the State Plan.

The written appeal must explain the appellant's opinion that the denial is contrary to the designation provisions of WIOA Section 106(b)(2) or 106(b)(3). Entities may not appeal a denial if their designation request does not meet the requirements of Section 106(b)(2) or 106(b)(3). The State Workforce Board will issue a determination within thirty (30) days of receipt of an appeal.

If the appeal to the State Board does not result in designation, the appellant, if appealing an initial designation under WIOA Section 106(b)(2) or subsequent designation under Section 106(b)(3), may request review by the Secretary of Labor. An appeal to the Secretary must be submitted by the appellant or grant recipient no later than 30 days after receipt of written notification from the State Board that the appeal has been denied. Appeals must be submitted by certified mail, return receipt requested, to the Secretary, U.S. Department of Labor, Washington, DC 20210, Attention: Assistant Secretary, Employment and Training Administration. A copy of the appeal must be simultaneously provided to the State Board.

If the Secretary determines that the appellant was not accorded procedural rights under the appeal process established under the above section, or that the area meets the requirements for initial or subsequent designation in WIOA Section 106(b)(2) or 106(b)(3), the Secretary may require that the area be designated as a workforce development area. The Secretary must issue a written decision to the Governor.

**III. EFFECTIVE DATE**

This policy shall be effective immediately upon signature.

  
\_\_\_\_\_  
Director  
Office of Grant Management

  
\_\_\_\_\_  
Date

**Attachment: Request for Designation as a Workforce Development Area Checklist**

## Appendix D: State and Regional Economic Analysis

### Current Industry Structure

Table D1: Current Wholesale/Trade Industry Structure

Industry	Total	Percent	Earnings	Establishment
General Merchandise Stores	36,471	21.1	\$22,781	1,151
Food and Beverage Stores	18,656	10.8	\$19,717	1,048
Motor Vehicle and Parts Dealers	18,237	10.5	\$41,832	1,566
Merchant Wholesalers, Durable Goods	17,984	10.4	\$60,475	2,321
Gasoline Stations	14,303	8.3	\$17,216	2,132
Merchant Wholesalers, Nondurable Goods	13,873	8.0	\$55,249	1,338
Building Material and Garden Equipment and Supplies Dealers	13,047	7.5	\$29,777	873
Clothing and Clothing Accessories Stores	10,373	6.0	\$16,130	1,305
Health and Personal Care Stores	9,559	5.5	\$36,704	1,133
Miscellaneous Store Retailers	6,046	3.5	\$23,295	1,032
Sporting Goods, Hobby, Musical Instrument, and Book Stores	4,450	2.6	\$17,624	400
Furniture and Home Furnishings Stores	3,211	1.9	\$29,285	428
Electronics and Appliance Stores	2,795	1.6	\$32,768	363
Wholesale Electronic Markets and Agents and Brokers	2,302	1.3	\$69,496	1,149
Nonstore Retailers	1,586	0.9	\$40,602	306
<b>Totals</b>	<b>172,893</b>	<b>100</b>	<b>\$32,377</b>	<b>16,545</b>

Source: Bureau of Labor Statistics, 2019.

Table D2: Current Manufacturing Industry Structure

Industry	Total	Percent	Earnings	Establishment
Transportation Equipment	27,807	19.1	\$62,376	134
Food	24,123	16.6	\$32,508	217
Furniture	18,452	12.7	\$34,602	201

Machinery	12,496	8.6	\$49,289	163
Fabricated Metal Product	10,137	7.0	\$49,528	350
Wood Product	9,204	6.3	\$45,673	258
Plastics and Rubber Products	7,362	5.1	\$46,981	114
Electrical Equipment	6,541	4.5	\$50,652	40
Chemical Manufacturing	5,925	4.1	\$70,069	134
Paper	4,114	2.8	\$65,889	60
Primary Metal	3,904	2.7	\$68,505	43
Nonmetallic Mineral Product	3,157	2.2	\$47,859	167
Petroleum and Coal Products	2,442	1.7	\$118,583	32
Miscellaneous	2,160	1.5	\$41,184	172
Computer and Electronic Product	1,910	1.3	\$55,196	35
Apparel	1,553	1.1	\$32,881	30
Printing and Related Support Activities	1,253	0.9	\$37,943	173
Textile Mills	1,002	0.7	\$53,298	19
Textile Product Mills	938	0.6	\$31,360	49
Beverage and Tobacco Product	756	0.5	-	36
Leather and Allied Product	246	0.2	-	<10
<b>Total</b>	<b>145,482</b>	<b>100</b>	<b>\$49,098</b>	<b>2,431</b>

Source: Bureau of Labor Statistics, 2019.

Table D3: Current Accommodation and Leisure Industry Structure

Industry	Total	Percent	Earnings	Establishment
Food Services and Drinking Places	96,174	69.9	\$14,638	4,888
Accommodation	31,196	22.7	\$26,516	847
Amusement, Gambling, and Recreation Industries	8,441	6.1	\$17,794	603
Performing Arts, Spectator Sports, and Related Industries	1,174	0.9	\$23,962	139
Museums, Historical Sites, and Similar Institutions	626	0.5	\$33,672	71
<b>Total</b>	<b>137,611</b>	<b>100</b>	<b>\$17,690</b>	<b>6,548</b>

Source: Bureau of Labor Statistics, 2019.

Table D4: Current Healthcare and Social Assistance Industry Structure

Industry	Total	Percent	Earnings	Establishment
Hospitals	61,828	35.0	\$49,918	146
Ambulatory Health Care Services	54,511	30.9	\$57,464	4,914
Nursing and Residential Care Facilities	31,771	18.0	\$27,370	442
Social Assistance	28,302	16.0	\$19,377	2,017
<b>Total</b>	<b>176,412</b>	<b>100</b>	<b>\$43,289</b>	<b>7,519</b>

Source: Bureau of Labor Statistics, 2019.

Table D5: Natural Resources Industry Structure

Industry	Total	Percent	Earnings	Establishment
Crop Production	3,621	22.3	\$27,788	648
Forestry and Logging	3,009	18.5	\$39,153	459
Animal Production and Aquaculture	2,826	17.4	\$43,796	175
Support Activities for Mining	2,608	16.1	\$71,060	358
Support Activities for Agriculture and Forestry	2,545	15.7	\$41,002	386
Mining (except Oil and Gas)	848	5.2	\$62,541	52
Oil and Gas Extraction	531	3.3	\$112,017	55
Fishing, Hunting and Trapping	247	1.5	\$74,369	19
<b>Total</b>	<b>16,235</b>	<b>100</b>	<b>\$46,982</b>	<b>2,152</b>

Source: Bureau of Labor Statistics, 2019.

## Current Occupations

Table D6: Top 10 Occupations in the Wholesale/Retail Industry

Occupation	Total	Percent*	Hourly Wage		
			Minimum	Median	Maximum
Retail Salespersons	41,289	23.1	\$8.06	\$10.52	\$18.65
Cashiers	28,980	16.2	\$7.83	\$9.01	\$11.81

Stock Clerks and Order Fillers	15,224	8.5	\$8.22	\$11.17	\$18.77
First-Line Supervisors of Retail Sales Workers	11,119	6.2	\$9.40	\$16.20	\$28.75
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	6,434	3.6	\$11.86	\$23.61	\$53.97
Laborers and Freight, Stock, and Material Movers, Hand	6,311	3.5	\$8.41	\$11.40	\$17.73
Customer Service Representatives	5,098	2.9	\$8.47	\$11.69	\$20.99
General and Operations Managers	4,402	2.5	\$12.18	\$28.75	\$73.82
Light Truck or Delivery Services Drivers	3,762	2.1	\$8.64	\$13.31	\$26.59
Automotive Service Technicians and Mechanics	3,204	1.8	\$9.51	\$16.83	\$29.86
<b>Total</b>	<b>125,823</b>	<b>70.4</b>	<b>\$9.26</b>	<b>\$15.25</b>	<b>\$30.09</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Wholesale/Retail jobs.

Table D7: Top 10 Occupations in the Manufacturing Industry

Occupation	Total	Percent*	Hourly Wage		
			Minimum	Median	Maximum
Laborers and Freight, Stock, and Material Movers, Hand	5,354	3.6	\$8.41	\$11.40	\$17.73
Meat, Poultry, and Fish Cutters and Trimmers	5,080	3.4	\$8.69	\$12.27	\$15.14
Welders, Cutters, Solderers, and Brazers	4,317	2.9	\$13.15	\$20.70	\$29.60
Inspectors, Testers, Sorters, Samplers, and Weighers	4,177	2.8	\$10.12	\$15.64	\$27.49
Cabinetmakers and Bench Carpenters	3,921	2.6	\$8.40	\$11.37	\$19.12
Helpers--Production Workers	3,189	2.1	\$9.02	\$13.45	\$19.31
Machinists	3,054	2.0	\$11.16	\$19.61	\$29.24



Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	2,905	1.9	\$11.86	\$23.61	\$53.97
<b>Total</b>	<b>54,515</b>	<b>36.3</b>	<b>\$10.61</b>	<b>\$16.83</b>	<b>\$28.05</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Manufacturing jobs.

Table D8: Top 10 Occupations in the Accommodation and Leisure Industry

			Hourly Wage		
Occupation	Total	Percent*	Minimum	Median	Maximum
Combined Food Preparation and Serving Workers, Including Fast Food	27,451	19.4	\$7.91	\$9.01	\$12.35
Waiters and Waitresses	22,221	15.7	\$7.88	\$9.02	\$14.43
Cooks, Restaurant	11,703	8.3	\$8.09	\$10.27	\$14.52
Maids and Housekeeping Cleaners	7,845	5.5	\$7.91	\$9.23	\$12.07
First-Line Supervisors of Food Preparation and Serving Workers	7,126	5.0	\$8.64	\$12.49	\$24.07
Food Preparation Workers	4,174	2.9	\$7.80	\$8.91	\$11.96
Bartenders	4,122	2.9	\$7.81	\$8.83	\$13.51
Hotel, Motel, and Resort Desk Clerks	4,092	2.9	\$7.97	\$9.70	\$12.54
Dishwashers	4,088	2.9	\$7.82	\$8.97	\$11.52
Cooks, Fast Food	4,074	2.9	\$7.76	\$8.73	\$10.22
<b>Total</b>	<b>96,896</b>	<b>68.4</b>	<b>\$7.96</b>	<b>\$9.52</b>	<b>\$13.72</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Accommodation and Leisure jobs

Table D9: Top 10 Occupations in the Healthcare Industry

			Hourly Wage		
Occupation	Total	Percent*	Minimum	Median	Maximum
Registered Nurses	17,707	11.4	\$20.04	\$27.62	\$37.95
Personal Care Aides	15,154	9.8	\$8.01	\$9.96	\$12.19
Nursing Assistants	11,856	7.7	\$8.35	\$10.81	\$14.53

Licensed Practical and Licensed Vocational Nurses	5,555	3.6	\$14.09	\$17.96	\$23.30
Medical Assistants	5,499	3.6	\$10.48	\$13.83	\$18.87
Home Health Aides	4,774	3.1	\$8.10	\$10.54	\$14.57
Medical Secretaries	4,374	2.8	\$9.71	\$14.05	\$21.00
Receptionists and Information Clerks	4,196	2.7	\$8.90	\$12.26	\$17.42
Childcare Workers	3,484	2.3	\$7.82	\$8.92	\$11.82
Preschool Teachers, Except Special Education	3,455	2.2	\$8.94	\$12.35	\$19.91
<b>Total</b>	<b>76,054</b>	<b>49.2</b>	<b>\$10.44</b>	<b>\$13.83</b>	<b>\$19.16</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Healthcare jobs.

Table D10: Top 10 Occupations in the Natural Resources Industry

Occupation	Total	Percent*	Hourly Wage		
			Minimum	Median	Maximum
Farmworkers and Laborers, Crop, Nursery, and Greenhouse	2,656	15.8	\$8.22	\$11.07	\$17.02
Farmers, Ranchers, and Other Agricultural Managers	1,914	11.4	\$25.33	\$34.09	\$48.36
Farmworkers, Farm, Ranch, and Aquacultural Animals	1,647	9.8	\$8.20	\$15.25	\$29.02
Logging Equipment Operators	1,480	8.8	\$10.11	\$17.61	\$30.21
Heavy and Tractor-Trailer Truck Drivers	1,113	6.6	\$11.67	\$18.99	\$30.11
First-Line Supervisors of Farming, Fishing, and Forestry Workers	504	3.0	\$14.20	\$24.28	\$38.85
Agricultural Equipment Operators	438	2.6	\$8.47	\$12.92	\$35.53
Roustabouts, Oil and Gas	395	2.4	\$7.95	\$14.27	\$19.61
Service Unit Operators, Oil, Gas, and Mining	378	2.3	\$14.81	\$21.18	\$47.72
Office Clerks, General	282	1.7	\$8.47	\$12.60	\$19.84
<b>Total</b>	<b>10,807</b>	<b>64.4</b>	<b>\$11.74</b>	<b>\$18.23</b>	<b>\$31.63</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Natural Resources jobs.

## New and Emerging Sectors

Table D11: Current Advanced Manufacturing Industry Structure

Industry	Total	Percent	Earnings	Establishment
Transportation Equipment	27,807	32.0	\$62,376	134
Furniture and Related Product Manufacturing	18,452	21.2	\$34,602	201
Machinery Manufacturing	12,496	14.4	\$49,289	163
Plastics and Rubber Products Manufacturing	7,362	8.5	\$46,981	114
Electrical Equipment, Appliance, and Component Manufacturing	6,541	7.5	\$50,652	40
Chemical Manufacturing	5,925	6.8	\$70,069	134
Primary Metal Manufacturing	3,904	4.5	\$68,505	43
Petroleum and Coal Products Manufacturing	2,442	2.8	\$118,583	32
Computer and Electronic Product Manufacturing	1,910	2.2	\$55,196	35
<b>Total</b>	<b>86,839</b>	<b>100</b>	<b>\$54,626</b>	<b>896</b>

Source: Bureau of Labor Statistics, 2019.

Table D12: Current Healthcare Support Industry Structure

Industry	Total	Percent	Earnings	Establishment
General Warehousing and Storage	14,151	75.6	\$40,188	207
Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers	1,852	9.9	\$86,566	261
Pharmaceutical Preparation Manufacturing	1,024	5.5	\$56,817	13
Drugs and Druggists Sundries Merchant Wholesalers	921	4.9	\$129,017	211
Surgical Appliance and Supplies Manufacturing	297	1.6	\$50,015	21
Surgical and Medical Instrument Manufacturing	238	1.3	\$51,154	<10
Dental Laboratories	178	1.0	-	36
Ophthalmic Goods Manufacturing	69	0.4	-	<10
<b>Total</b>	<b>18,730</b>	<b>100</b>	<b>\$49,816</b>	<b>755</b>

Source: Bureau of Labor Statistics, 2019.

Table D13: Current Tourism Industry Structure

Industry	Total	Percent	Earnings	Establishment
Food Services and Drinking Places	96,174	47.6	\$14,638	4,888
Administrative and Support Services	64,159	31.7	\$25,638	4,017
Accommodation	31,196	15.4	\$26,516	847
Amusement, Gambling, and Recreation Industries	8,441	4.2	\$17,794	603
Performing Arts, Spectator Sports, and Related Industries	1,174	0.6	\$23,962	139
Motion Picture and Sound Recording Industries	978	0.5	\$17,609	105
<b>Total</b>	<b>202,122</b>	<b>100</b>	<b>\$20,163</b>	<b>10,599</b>

Source: Bureau of Labor Statistics, 2019.

### New and Emerging Occupations

Table D14: Top 10 Occupations in the Advanced Manufacturing Industry

Occupation			Hourly Wage		
			Minimum	Median	Maximum
Assemblers and Fabricators, All Other, Including Team Assemblers	12,886	14.3	\$9.92	\$13.96	\$23.68
First-Line Supervisors of Production and Operating Workers	4,036	4.5	\$15.36	\$26.32	\$45.19
Cabinetmakers and Bench Carpenters	3,723	4.1	\$8.40	\$11.37	\$19.12
Welders, Cutters, Solderers, and Brazers	3,215	3.6	\$13.15	\$20.70	\$29.60
Inspectors, Testers, Sorters, Samplers, and Weighers	2,487	2.8	\$10.12	\$15.64	\$27.49
Laborers and Freight, Stock, and Material Movers, Hand	2,406	2.7	\$8.41	\$11.40	\$17.73
Machinists	2,201	2.4	\$11.16	\$19.61	\$29.24
Electrical, Electronic, and Electromechanical Assemblers, Except Coil Winders, Tapers, and Finishers	2,093	2.3	\$8.74	\$13.99	\$22.60
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	1,658	1.8	\$11.86	\$23.61	\$53.97

Industrial Engineers	1,654	1.8	\$25.81	\$37.67	\$58.38
<b>Total</b>	<b>36,359</b>	<b>40.3</b>	<b>\$12.29</b>	<b>\$19.43</b>	<b>\$32.70</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Advanced Manufacturing jobs.

Table D15: Top 10 Occupations in the Healthcare Support Industry

Occupation			Hourly Wage		
	Total	Percent	Minimum	Median	Maximum
Laborers and Freight, Stock, and Material Movers, Hand	4,794	20.5	\$8.41	\$11.40	\$17.73
Industrial Truck and Tractor Operators	2,524	10.8	\$10.53	\$14.83	\$20.06
Stock Clerks and Order Fillers	1,508	6.5	\$8.22	\$11.17	\$18.77
Shipping, Receiving, and Traffic Clerks	1,020	4.4	\$9.91	\$13.66	\$20.96
Packers and Packagers, Hand	998	4.3	\$8.12	\$10.20	\$14.47
Heavy and Tractor-Trailer Truck Drivers	840	3.6	\$11.67	\$18.99	\$30.11
First-Line Supervisors of Transportation and Material Moving Workers, Except Aircraft Cargo Handling Supervisors	659	2.8	\$14.09	\$24.52	\$37.02
Customer Service Representatives	654	2.8	\$8.47	\$11.69	\$20.99
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	527	2.3	\$11.86	\$23.61	\$53.97
Assemblers and Fabricators, All Other, Including Team Assemblers	523	2.2	\$9.92	\$13.96	\$23.68
<b>Total</b>	<b>14,047</b>	<b>60.2</b>	<b>\$10.12</b>	<b>\$15.40</b>	<b>\$25.78</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Healthcare Support jobs.

Table D16: Top 10 Occupations in the Tourism Industry

Occupation			Hourly Wage		
	Total	Percent	Minimum	Median	Maximum

Combined Food Preparation and Serving Workers, Including Fast Food	27,619	13.3	\$7.91	\$9.01	\$12.35
Waiters and Waitresses	22,432	10.8	\$7.88	\$9.02	\$14.43
Cooks, Restaurant	11,751	5.7	\$8.09	\$10.27	\$14.52
Maids and Housekeeping Cleaners	9,087	4.4	\$7.91	\$9.23	\$12.07
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	8,977	4.3	\$7.95	\$9.72	\$14.68
First-Line Supervisors of Food Preparation and Serving Workers	7,166	3.4	\$8.64	\$12.49	\$24.07
Security Guards	6,013	2.9	\$8.24	\$11.15	\$18.81
Laborers and Freight, Stock, and Material Movers, Hand	5,957	2.9	\$8.41	\$11.40	\$17.73
Landscaping and Groundskeeping Workers	4,897	2.4	\$8.50	\$11.72	\$17.32
Customer Service Representatives	4,344	2.1	\$8.47	\$11.69	\$20.99
<b>Total</b>	<b>108,243</b>	<b>52.2</b>	<b>\$8.20</b>	<b>\$10.57</b>	<b>\$16.70</b>

Source: Bureau of Labor Statistics, 2019.

\*Percent of all Tourism jobs.



## Appendix E: Characteristics of Individuals with Employment Barriers

Table E1: Demographic and Economic Characteristics of People with Disabilities

<b>Statewide</b>		
	Number	Percent
Total Disabled Population	476,197	-
Total Age 18-64	260,350	-
<b>RACE (All Ages)</b>		
White	295,271	62.0
Black	168,184	35.3
American Indian	2,894	0.6
Other	295,271	2.1
<b>GENDER (Ages 18-64)</b>		
Female	132,080	50.7
Male	128,270	49.3
<b>AGE (Ages 18-64)</b>		
18-34	50,185	19.3
35-64	210,165	80.7
<b>EDUCATION (Ages 25+)</b>		
Less than High School Graduate	12,036,744	28.4
High School Diploma/GED	14,155,889	33.4
Some College/Associate Degree	16,190,268	38.2
<b>ECONOMIC CHARACTERISTICS</b>		
Employment Rate	-	84.3
Median Earnings	-	\$21,088
<b>TYPE OF DISABILITY* (Ages 18-64)</b>		
Hearing Difficulty	47,708	18.3
Vision Difficulty	55,182	21.2

Cognitive Difficulty	107,221	41.2
Ambulatory Difficulty	145,861	56.0
Self-care Difficulty	49,857	19.1
Independent Living Difficulty	97,562	37.5

Source: U.S. Census Bureau, American Community Survey, 2013-2017, 5 Year Estimates.

Note: May not total to 100 percent due to rounding. \* Individuals may have more than one type of disability, so these numbers and percentages, when added, may be greater than the total number of individuals and 100 percent, respectively.

Table E2: Characteristics of Temporary Assistance for Needy Family (TANF) Program Work-Eligible Recipients

<b>Statewide</b>		
	Number	Percent
Total TANF Recipients	16,095	-
Total Ages 18-64	2,737	-
<b>RACE (Ages 18-64)</b>		
Black	2,400	87.7
White	298	10.9
American Indian	<10	0.3
Others	30	1.1
<b>GENDER (Ages 18-64)</b>		
Female	2,659	97.2
Male	78	2.8
<b>AGE (Ages 18-64)</b>		
18 - 25	1,052	38.4
26 - 35	1,337	48.8
36 - 45	293	10.7
46 - 64	55	2.0
<b>EDUCATION (Ages 18-64)</b>		
Less than High School Graduate	792	28.9
High School Diploma/GED	249	9.1
Some College	1,274	46.5

Not Available	422	15.4
<b>ECONOMIC CHARACTERISTICS (Ages 18-64)</b>		
Employment Rate for the cohort 2019	-	74.5
Median Earnings for the cohort 2019	-	\$10,043
Employment Rate One Year After Exit for the cohort 2018	-	76.7
Average Earnings One Year After Exit for the cohort 2018	-	\$12,747

Source: Mississippi Department of Human Services, Temporary Assistance for Needy Families, 2019.

Note: May not total to 100 percent due to rounding.

Table E3: Characteristics of Supplemental Nutrition Assistance Program (SNAP) Recipients

<b>Statewide</b>		
	Number	Percent
Total SNAP Recipients	637,006	-
Total Ages 18-64	239,383	-
<b>RACE (Ages 18-64)</b>		
Black	143,346	59.9
White	90,633	37.9
American Indian	1,212	0.5
Other	4,192	1.8
<b>GENDER (Ages 18-64)</b>		
Female	156,830	65.5
Male	82,553	34.5
<b>AGE (Ages 18-64)</b>		
18 - 25	37,871	15.8
26 - 35	57,757	24.1
36 - 45	52,517	21.9
46 - 64	91,238	38.1
<b>EDUCATION (Ages 18-64)</b>		
Less than High School Graduate	35,252	14.7
High School Diploma/GED	14,204	5.9

Some College	59,923	25.0
Not Available	130,004	54.3
<b>ECONOMIC CHARACTERISTICS (Ages 18-64)</b>		
Employment Rate for the cohort 2019	-	45.7
Median Earnings for the cohort 2019	-	\$15,458
Employment Rate One Year After Exit for the cohort 2018	-	58.5
Average Earnings One Year After Exit for the cohort 2018	-	\$18,678

Source: Mississippi Department of Human Services, 2019. Note: May not total to 100 percent due to rounding

Table E4: Characteristics of Ex-Offenders

<b>Statewide</b>		
	Number	Percent
Total Ex-Offenders	8,736	-
Total Ages 18-64	8,618	-
<b>RACE (Ages 18-64)</b>		
Black	4,418	51.3
White	4,073	47.3
American Indian	13	0.2
Other	114	1.3
<b>GENDER (Ages 18-64)</b>		
Female	1,110	12.9
Male	7,508	87.1
<b>AGE (Ages 18-64)</b>		
18 - 25	991	11.5
26 - 35	3,367	39.1
36 - 45	2,594	30.1
46 - 64	1,666	19.3
<b>EDUCATION (Ages 18-64)</b>		
Less than High School Graduate	2,986	34.6
High School Diploma/GED	645	7.5

Some College	1,152	13.4
Not Available	3,835	44.5
<b>ECONOMIC CHARACTERISTICS (Ages 18-64)</b>		
Employment Rate for the cohort 2019	-	35.6
Median Earnings for the cohort 2019	-	\$15,691

Source: Mississippi Department of Corrections, 2019. Note: May not total to 100 percent due to rounding.

## Appendix F: Labor Market Trends

Table F1: Top 20 Occupations in Advanced Manufacturing with the Highest Job Growth

Occupation	10-Year Projected Growth <sup>1</sup>	Job Openings in 2019 <sup>2</sup>
Welders, Cutters, Solderers, and Brazers	392	868
Industrial Engineers	265	304
First-Line Supervisors of Production and Operating Workers	253	265
Machinists	192	256
Industrial Machinery Mechanics	180	55
Laborers and Freight, Stock, and Material Movers, Hand	167	675
General and Operations Managers	143	52
Helpers-Production Workers	142	1,150
Sewing Machine Operators	86	240
Industrial Production Managers	77	114
Maintenance Workers, Machinery	72	75
Maintenance and Repair Workers, General	71	99
Mechanical Engineers	62	134
Plumbers, Pipefitters, and Steamfitters	59	228
Production, Planning, and Expediting Clerks	58	74
Electricians	55	87
Textile Cutting Machine Setters, Operators, and Tenders	39	<10
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	31	<10
Shipping, Receiving, and Inventory Clerks	30	240
Millwrights	30	<10
<b>Total</b>	<b>2,404</b>	<b>4,919</b>

Sources: <sup>1</sup>Bureau of Labor Statistics, 2019; <sup>2</sup>Mississippi Works, 2019.



Table F2: Top 20 Occupations in Transportation Support with the Highest Job Growth

<b>Occupation</b>	<b>10-Year Projected Growth<sup>1</sup></b>	<b>Job Openings in 2019<sup>2</sup></b>
Laborers and Freight, Stock, and Material Movers, Hand	515	395
Industrial Truck and Tractor Operators	195	132
Stock Clerks and Order Fillers	66	67
Heavy and Tractor-Trailer Truck Drivers	57	56
Shipping, Receiving, and Inventory Clerks	50	75
General and Operations Managers	37	26
Maintenance and Repair Workers, General	26	49
Packers and Packagers, Hand	25	12
Industrial Engineers	22	46
Customer Service Representatives	20	43
Light Truck Drivers	15	<10
Transportation, Storage, and Distribution Managers	14	12
Tank Car, Truck, and Ship Loaders	14	<10
Production, Planning, and Expediting Clerks	14	<10
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	14	44
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	13	11
First-Line Supervisors of Production and Operating Workers	11	93
Machinists	<10	<10
Computer User Support Specialists	<10	19
Computer, Automated Teller, and Office Machine Repairers	<10	<10
<b>Total</b>	<b>1,131</b>	<b>1,103</b>

Sources: <sup>1</sup>Bureau of Labor Statistics, 2019; <sup>2</sup>Mississippi Works, 2019.

Table F3: Top 20 Occupations in Tourism with the Highest Job Growth

<b>Occupation</b>	<b>10-Year Projected Growth<sup>1</sup></b>	<b>Job Openings in 2019<sup>2</sup></b>
Combined Food Preparation and Serving Workers, Including Fast Food	4,394	6,443
Waiters and Waitresses	2,642	1,504
Cooks, Restaurant	1,936	1,625
First-Line Supervisors of Food Preparation and Serving Workers	1,337	762
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	1,111	1,028
Maids and Housekeeping Cleaners	949	1,130
Landscaping and Groundskeeping Workers	709	591
Food Preparation Workers	707	433
Security Guards	551	1,882
Laborers and Freight, Stock, and Material Movers, Hand	530	1,555
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	350	779
Food Service Managers	327	865
General and Operations Managers	251	204
Dishwashers	238	433
Hotel, Motel, and Resort Desk Clerks	220	593
Customer Service Representatives	203	1,520
Helpers--Production Workers	183	76
First-Line Supervisors of Landscaping, Lawn Service, and Groundskeeping Workers	177	12
Maintenance and Repair Workers, General	175	237
Food Servers, Nonrestaurant	172	484
<b>Total</b>	<b>17,162</b>	<b>22,156</b>

Source: <sup>1</sup>Bureau of Labor Statistics, 2019; <sup>2</sup>Mississippi Works, 2019.

Table F4: Job Growth in Well-Established Sectors

<b>Occupation</b>	<b>10-Year Projected Growth</b>
<b>Wholesale/Retail Trade</b>	
Building Material and Garden Equipment and Supplies Dealers	629
Clothing and Clothing Accessories Stores	547
Food and Beverage Stores	844
Health and Personal Care Stores	488
Merchant Wholesalers, Durable Goods	439
Miscellaneous Store Retailers	250
Motor Vehicle and Parts Dealers	674
Sporting Goods, Hobby, Musical Instrument, and Book Stores	224
Wholesale Electronic Markets and Agents and Brokers	57
<b>Finance</b>	
Funds, Trusts, and Other Financial Vehicles	<10
Real Estate	282
Rental and Leasing Services	66
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	18
<b>Non-Advanced Manufacturing</b>	
Fabricated Metal Product Manufacturing	312
Nonmetallic Mineral Product Manufacturing	87
Textile Mills	27
<b>Transportation and Warehousing</b>	
Couriers and Messengers	266
Support Activities for Transportation	144
Transit and Ground Passenger Transportation	122
Truck Transportation	1,012
Warehousing and Storage	994

Water Transportation	56
Natural Resources	
Crop Production	<10
Forestry and Logging	15
Mining (except Oil and Gas)	10
Healthcare	
Ambulatory Health Care Services	4,519
Hospitals	3,875
Nursing and Residential Care Facilities	3,329
Social Assistance	3,248
Education Services	
Education Services	7,810
<b>Total</b>	<b>30,233</b>

Source: Bureau of Labor Statistics, 2019.

Table F5: Top 20 Occupations in Established Sectors with the Highest Job Growth

Occupation	10-Year Projected Growth <sup>1</sup>	Job Openings in 2019 <sup>2</sup>
Registered Nurses	3,217	2,704
Personal Care Aides	2,873	1,017
Home Health Aides	1,506	1,009
Elementary School Teachers, Except Special Education	1,486	19
Retail Salespersons	1,453	3,603
Nursing Assistants	1,308	2,029
Teacher Assistants	1,058	204
Heavy and Tractor-Trailer Truck Drivers	954	1,216
Secondary School Teachers, Except Special and Career/Technical Education	898	<10
Laborers and Freight, Stock, and Material Movers, Hand	894	846
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	626	282

Nurse Practitioners	578	28
First-Line Supervisors of Retail Sales Workers	573	1,337
Middle School Teachers, Except Special and Career/Technical Education	552	<10
Health Specialties Teachers, Postsecondary	481	<10
General and Operations Managers	441	226
Childcare Workers	425	291
Clergy	376	16
Medical Assistants	360	317
Respiratory Therapists	357	103
<b>Total</b>	<b>20,416</b>	<b>15,256</b>

Sources: <sup>1</sup>Bureau of Labor Statistics, 2019; <sup>2</sup>Mississippi Works, 2019.

## Appendix G: Performance Goals for Core Programs

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

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



Employment (Second Quarter after Exit) <a href="#">21</a>	74	72	75	73
Employment (Fourth Quarter after Exit) <a href="#">22</a>	71	70	72	72
Median Earnings (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	71	70	72	70.50
Measurable Skill Gains	Baseline	Baseline	Baseline	Baseline

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 %	

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

Employment (Second Quarter after Exit) 22	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit) 22	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit <a href="#">23</a> )	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate 22	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains				

	All WIOA Core Programs			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers	Not applicable	Not applicable	Not applicable	Not applicable

Additional Indicators of Performance	
1.	
2.	
3.	
4.	
5.	
6.	

## Appendix H: Sample WIOA Allocation Communication



### Mississippi Department of Employment Security

**Phil Bryant**  
**Governor**

Mark Henry  
Executive Director

**WIOA COMMUNICATION NUMBER: 16-008**

**DATE:** June 12, 2017

**SUBJECT:** Program Year 2017 WIOA Local Area Allocations

#### **I. BACKGROUND:**

##### **A. State Allocations**

The U.S. Department of Labor has published TEGL 27-16 which announces the Workforce Innovation and Opportunity Act (WIOA) state allocation for Program Year (PY) 2017. States are required to distribute the PY 2017 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 27-16 for additional guidance and explanation.

SOURCE	TOTAL STATE	STATE ACTIVITIES	LOCAL ACTIVITIES
Adult	\$10,146,478	\$1,521,972	\$8,624,506
Youth	\$10,648,637	\$1,597,296	\$9,051,341
Dislocated Worker	\$13,860,858	\$5,544,343	\$8,316,515
<b>TOTAL</b>	<b>\$34,655,973</b>	<b>\$8,663,611</b>	<b>\$25,992,362</b>

The allocations to the local areas are calculated based on the formulas described below. The allocation worksheets will be provided via e-mail upon request.

*Helping Mississippians Get Jobs*

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Post Office Box 1699 • Jackson, Mississippi 39215-1699 • (601) 321-6000  
*MDES is an Equal Employment Opportunity Employer*



**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 12.73 percent of funds described below will be available for expenditure no earlier than July 1, 2017. The remaining 87.27 percent will be available for expenditure no earlier than October 1, 2017.



## 4. Allocation

The following allocation was calculated based on the formula described above. The allocation worksheets will be provided via email upon request.

<b>WIOA ADULT</b>			
<b>Local Workforce Development Area</b>	<b>Local Allocation</b>	<b>Available July 1, 2017</b>	<b>Available October 1, 2017</b>
<b>Delta</b>	\$1,952,265	\$248,602	\$1,703,663
<b>MS Partnership</b>	\$2,299,536	\$292,824	\$2,006,712
<b>Southcentral MS</b>	\$1,908,745	\$243,060	\$1,665,685
<b>Twin Districts</b>	\$2,463,960	\$313,762	\$2,150,198
<b>TOTAL</b>	\$8,624,506	\$1,098,248	\$7,526,258

## 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 with an effective date no earlier than April 1, 2017.

## 3. Allocation

The following allocation was calculated based on that formula described above. The allocation worksheets will be provided via e-mail upon request.

<b>WIOA YOUTH</b>		
<b>Local Workforce Development Area</b>	<b>Local Allocation</b>	<b>Available April 1, 2017</b>
<b>Delta</b>	\$2,071,435	\$2,071,435
<b>MS Partnership</b>	\$2,431,907	\$2,431,907
<b>Southcentral MS</b>	\$1,932,987	\$1,932,987
<b>Twin Districts</b>	\$2,615,012	\$2,615,012
<b>TOTAL</b>	\$9,051,341	\$9,051,341

#### **D. Dislocated Workers**

##### **1. Allocation Formula**

The State shall allocate not less than 60 percent based on an allocation formula prescribed by the Governor. The formula shall use the most recent available information and shall include:

- a. Insured unemployment data,
- b. Unemployment concentrations,
- c. Plant closing and mass layoff data,
- d. Declining industries,
- e. Farmer-rancher economic hardship data,
- f. Long term unemployment data.

The formula used by the state is as follows:

<b>ALLOCATION FACTOR</b>	<b>WEIGHT ASSIGNED IN FORMULA</b>
Insured Unemployment Data	10%
Unemployment Concentrations Data	25%
Plant Closing and Mass Layoff Data	10%
Declining Industries Data	20%
Farmer-Rancher Economic Hardship Data	5%
Long-Term Unemployment Data	30%

2. Under WIOA, DOL allows transfer of up to 100% of funds between Dislocated Worker and Adult funding streams

##### **3. Availability**

Approximately 15.80 percent of the funds described below will be available for expenditure no earlier than July 1, 2017. The remaining 84.20 percent will be available for expenditure no earlier than October 1, 2017.

## 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 Job Connections.

## 5. Allocation

WIOA DISLOCATED WORKER			
Local Workforce Development Area	Local Allocation	Available July 1, 2017	Available October 1, 2017
Delta	\$1,638,952	\$258,996	\$1,379,956
MS Partnership	\$2,303,648	\$364,035	\$1,939,613
Southcentral MS	\$1,889,849	\$298,644	\$1,591,205
Twin Districts	\$2,484,066	\$392,546	\$2,091,520
<b>TOTAL</b>	<b>\$8,316,515</b>	<b>\$1,314,221</b>	<b>\$7,002,294</b>

**E. Funds Availability**

The funds described above will be available to the Local Workforce Development Board for expenditure upon receipt of a Notice of Funds Availability (NFA) from the Office of Grant Management.

**II. REQUIRED ACTION AND DUE DATE:** Comments and questions on the allocation process should be provided to the Office of Grant Management (OGM) in writing by June 15, 2017.

**III. CONTACT:** Questions concerning this instruction should be addressed to Laura Ring at 601-321-6017 or [lring@mdes.ms.gov](mailto:lring@mdes.ms.gov) or Celeste Brookshire at 601-321-6599 or [cbrookshire@mdes.ms.gov](mailto:cbrookshire@mdes.ms.gov).

  
 Laura H. Ring, Director  
 Office of Grant Management

# Appendix I: Assurances/Compliances

## Section I1. Common Assurances

### I1A. Conflict of Interest Policy, State Policy #5

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 5**  
**CONFLICT of INTEREST**  
**Workforce Innovation and Opportunity Act (WIOA)**

#### **I. SCOPE AND PURPOSE**

This policy sets forth the requirements to ensure that individuals or representatives of organizations entrusted with public funds do not personally or professionally benefit from the award or expenditure of such funds. Individuals or representatives of organizations entrusted with public funds, as referenced above, shall hereinafter be understood to include a State Workforce Development Board (SWDB) member, SWDB staff, a Local Workforce Development Board (LWDB) member, and local workforce area staff.

The SWDB and each LWDB must develop a conflict of interest policy that incorporates MDES State Policy Number 5 and meets the minimum federal and state requirements described in Section III, herein.

#### **II. LAWS GOVERNING CONFLICTS OF INTEREST**

##### **A. Federal Requirements**

The laws governing conflicts of interest under WIOA are found at *Workforce Innovation and Opportunity Act, 113 P.L. 128, Section 101(f) and 101(h)*. These sections state as follows:

A member of a State board may not:

- (1) vote on a matter under consideration by the State Board (A) regarding the provision of services by such member (or by an entity that such member represents); or (B) that would provide direct financial benefit to such member or the immediate family of such member; or (2) engage in any other activity determined by the Governor to constitute a conflict of interest as specified in the State plan.

A member of a local board may not:

- (1) vote on a matter under consideration by the local board (A) regarding the provision of services by such member (or by an entity that such member represents); or (B) that would provide direct financial benefit to such member or the immediate family of such member; or (2) engage in any other activity determined by the Governor to constitute a conflict of interest as specified in the State plan.

## **B. State Requirements**

State law is more proscriptive than federal law; therefore, the policies of the SWDB or individual LWDBs should include additional State requirements, as outlined below. References to the Ethics Commission Opinions are provided for further clarification.

### **1. State Law**

*Mississippi Code Annotated §25-4-105(1) (1972)*, prohibits a public servant from using his position in government to obtain pecuniary benefit for himself, certain relatives or a “business with which he is associated.” A public servant may avoid using his position, and therefore avoid a violation of *Section 25-4-105(1)*, by recusing himself from the matter giving rise to the conflict of interest. An abstention is considered a vote with the majority and is *not* a recusal.

*Section 109 of the Mississippi Constitution of 1890*, and its statutory parallel, *Mississippi Code Annotated §25-4-105(2)*, prohibit a member of a public board from having any direct or indirect interest in a contract with the government funded or otherwise authorized by that board during his or her term or for one year thereafter.

A recusal will *not* prevent or ameliorate a violation of *Section 109* and *Section 25-4-105(2)*, as these sections do not require any affirmative act by an individual member to give rise to a conflict, but merely action by the board. Accordingly, recusal by the affected SWDB or LWDB member will not prevent a violation of these sections.

### **2. Mississippi Ethics Commission Opinion 13-014-E**

In Advisory Opinion 13-014-E, the Mississippi Ethics Commission interpreted the application of Section 109 and Section 25-4-105(2) as follows:

The LWDB is a public board subject to statutory sections. If the LWDB funds a contract in which a member of that board has a prohibited interest, that member will be in violation of these sections. Any contract, which violates either section, is null and void.

The owner and CEO of a business will have an interest in all contracts entered by the business. Employees of these businesses also presumably have an interest in all contracts entered by their employer. Accordingly, a business whose owner, CEO, or employee

serves on an LWDB is prohibited by *Section 109* and *Section 25-4-105(2)* from receiving any contract that is funded by the LWDB. This prohibition applies to all contracts funded during the LWDB member's term and for one year after the LWDB member's term.

A recusal will not prevent or ameliorate a violation of Section 109 and Section 25-4-105(2), as these sections do not require any affirmative act by an individual member to give rise to a conflict, but merely action by the board. Accordingly, recusal by the affected SWDB or LWDB member will not prevent a violation of these sections. *See also* Ethics Commission Opinion 06-099-E & 04-076-E.

MDES notes that advisory opinions from the Mississippi Ethics Commission, including No. 13-014-E, are merely advisory and they are merely opinions. They do not have the force of law possessed by a statute or a court decision.

### 3. Recusal

A total and complete recusal requires that the public servant not only avoid debating, discussing or taking action on the subject matter during official meetings or deliberations, but also avoid discussing the subject matter with staff or any other person. This includes casual comments, as well as detailed discussions, made in person, by telephone or by any other means.

Furthermore, the minutes or other record of the meeting should state the recusing member left the room before the matter came before the public body and did not return until after the vote.

## III. POLICY REQUIREMENTS

The SWDB and each LWDB shall have a conflict of interest policy, which at a minimum meets the requirements shown below:

1. A written code of standards or conduct governing the performance of persons engaged in the award and administration of WIOA contracts and subgrants.
2. No individual in a decision-making capacity shall engage in any activity, including participation in the selection, award, or administration of a subgrant or contract supported by WIOA funds, if a conflict of interest (real, implied, or apparent) would be involved.



3. No member of the SWDB or LWDB shall cast a vote, or participate in any decision-making capacity, on the provision of services by such member (or any organization which that member directly represents), or on any matter which would provide any direct financial benefit to the member, the immediate family of such member, or to the member's organization.

A conflict of interest under paragraphs 2 or 3 would arise when one of the following persons or groups has a financial or other interest, either through ownership or employment, and participates in the selection or award of funding for themselves, their family, or that organization or firm.

- An individual; i.e., employee, officer, or agent,
  - Any member of the individual's immediate family (parent, spouse, children, or siblings),
  - The individual's business partner, or
  - An organization which employs, or is about to employ any of the above individuals (individual has received a job offer from the organization),
4. The officers, employees, agents, or members of the SWDB or LWDB making the awards will neither solicit nor accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements.
  5. Reference the Mississippi Ethics in Government Laws and their applicability to members of the SWDB and LWDB, including a statement that advises members of all relevant opinions from the Mississippi Ethics Commission and the proper procedure for recusal.
  6. The code of conduct shall contain penalties, sanctions, or other disciplinary actions in accordance with state and local law for violations of the provisions against conflict of interest.

#### **IV. REQUIRED ACTION**

- A. In accordance with Training and Employment Guidance Letter 35-10, issued by the United States Department of Labor, SWDB and LWDB members are encouraged to regularly review and be aware of the relevant Federal, state, and board rules guiding procurement decisions and other board responsibilities.
- B. The SWDB and LWDB must develop a conflict of interest policy that incorporates State Policy Number 5. The SWDB or LWDB policy may be more proscriptive, at the discretion of the board. In either case, the policy and the background information should be reviewed regularly with state and local

boards, and all boards should include this guidance in orientations for new board members.


- C. The SWDB and LWDB must develop a Conflict of Interest Acknowledgement form that must be signed by each member of the SWDB and LWDB and local workforce area staff stating that they have been made aware of the federal and state conflict of interest requirements, and will abide by those requirements in the service of these boards.

**V. REFERENCES**

29 U.S.C. 2821(f) (1998)  
29 U.S.C. 2832 (g) (1998)  
U.S. Department of Labor TEGL 35-10  
Section 109, Mississippi Constitution of 1890  
Section 25-4-103, Mississippi Code of 1972  
Mississippi Ethics Commission Opinion 13-014-E  
Mississippi Ethics Commission Opinion 06-099-E  
Mississippi Ethics Commission Opinion 04-076-E

**VI. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 4**  
**SUNSHINE PROVISION POLICY**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

This policy sets forth the requirements to conduct business in an open manner as mandated by the Workforce Innovation and Opportunity Act (WIOA). Conducting business in an open manner involves making the activities of the State Workforce Development Board (SWDB) and the Local Workforce Development Boards (LWDB) available to the public (including individuals with disabilities) on a regular basis via electronic means and open meetings.

**II. STATUTES GOVERNING SUNSHINE PROVISIONS AND APPLICABLE ACTS**

**A. Federal Requirements**

The legislation outlining the Sunshine Provision under WIOA, as prescribed for the SWDB, is found in *Workforce Innovation and Opportunity Act, 113 P.L. 128, Section 101(g)*.

“Sunshine Provision. – The State board shall make available to the public, on a regular basis through electronic means and open meetings, information regarding the activities of the State board, including information regarding the State plan, or a modification to the State plan, prior to submission of the plan or modification of the plan, respectively, information regarding membership, and, on request, minutes of formal meetings of the State board.”

The legislation outlining the Sunshine Provision under WIOA, as prescribed for the LWDBs, is found in *Workforce Innovation and Opportunity Act, 113 P.L. 128, , Section 107(e)*.

“Sunshine Provision. – The local board shall make available to the public, on a regular basis through electronic means and open meetings, information regarding the activities of the local board, including information regarding the local plan prior to submission of the plan, and regarding membership, the designation and certification of one-stop operators, and the award of grants or contracts to eligible providers of

youth workforce investment activities, and on request, minutes of formal meetings of the local board.”

The laws governing open meeting accessibility for the disabled are found at *Title III of the Americans with Disabilities Act (ADA)*, 42 USC § 12181 et seq. More specifically, the relevant sections, *28 CFR § 36.201(a) (2010)*, *28 CFR § 36.104 (2010)*, *28 CFR § 36.303(a) (2010)*, *28 C.F.R. § 36.104 (2010)*[U.S. Department of Justice Regulation to Title III of the Americans with Disabilities Act, 56 Fed. Reg. 35544 (July 26, 1991)] are as follows:

“No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any private entity who owns, leases (or leases to), or operates a place of public accommodation.” *28 CFR § 36.201(a) (2010)*

“Public accommodation means a private entity that owns, leases [or leases to], or operates a place of public accommodation.” *28 CFR § 36.104 (2010)*

“A public accommodation shall take those steps that may be necessary to ensure that no individual with a disability is excluded, denied services, segregated or otherwise treated differently than other individuals because of the absence of auxiliary aids and services, unless the public accommodation can demonstrate that taking those steps would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations being offered or would result in an undue burden, i.e., significant difficulty or expense.” *28 CFR § 36.303(a) (2010)*

“Qualified interpreter means an interpreter who is able to interpret effectively, accurately and impartially both receptively and expressively, using any necessary specialized vocabulary.” *28 C.F.R. § 36.104 (2010)*

#### **B. State Requirements**

The policies of the SWDB and individual LWDBs must also include State requirements as prescribed in Mississippi’s Open Meetings Acts, *Title 25, Chapter 41, Mississippi Code of 1972* and in Mississippi’s Public Records Act, *Title 25, Chapter 61, Mississippi Code of 1972*. These acts collectively govern public bodies, state and local, that hold meetings on public matters, and ensure the public’s right to access public records. The Mississippi Ethics Commission is given authority to hold hearings, take complaints, issue subpoenas, hold hearings and issue orders subsequent to alleged violations of the Open Meetings Act and the Public Records Act.

1. **State Law- The Open Meetings Act**

**Miss. Code Ann. § 25-41-3(a)**, defines a “public body” as any executive or administrative board, commission, authority, council, department, agency, bureau or any other policy making entity, or committee thereof, of the State of Mississippi, or any political subdivision or municipal corporation of the state, whether such entity be created by statute or executive order, which is supported wholly or in part by public funds or expends public funds, and any standing, interim or special committee of the Mississippi Legislature.

**Miss. Code Ann. § 25-41-5**, outlines official meetings of public bodies specifically as follows:

“(1) All official meetings of any public body, unless otherwise provided in this chapter or in the Constitutions of the United States of America or the State of Mississippi, are declared to be public meetings and shall be open to the public at all times unless declared an executive session as provided in Section 25-41-7.

(2) A public body may conduct any meeting through teleconference or video means. A quorum of a public body as prescribed by law may be at different locations for the purpose of conducting a meeting through teleconference or video means provided participation is available to the general public at one or more public locations specified in the public meeting notice.

(3)(a) Notice of any meetings held pursuant to subsection (2) of this section shall be provided at least five (5) days in advance of the date scheduled for the meeting. The notice shall include the date, time, place and purpose for the meeting and shall identify all locations for the meeting available to the general public. All persons attending the meeting at any of the public meeting locations shall be afforded the same opportunity to address the public body as persons attending the primary or central location. Any interruption in the teleconference or video broadcast of the meeting shall result in the suspension of action at the meeting until repairs are made and public access restored.

(b) Five-day notice shall not be required for teleconference or video meetings continued to address an emergency as provided in subsection (5) of this section or to conclude the agenda of a teleconference or video meeting of the public body for which the proper notice has been

given, when the date, time, place and purpose of the continued meeting are set during the meeting prior to adjournment.

(4) An agenda and materials that will be distributed to members of the public body and that have been made available to the staff of the public body in sufficient time for duplication and forwarding to all locations where public access will be provided shall be made available to the public at the time of the meeting. Minutes of all meetings held by teleconference or video means shall be recorded as required by Section 25-41-11. Votes taken during any meeting conducted through teleconference or video means shall be recorded by name in roll-call fashion and included in the minutes. In addition, the public body shall make an audio recording of the meeting, if a teleconference medium is used, or an audio/visual recording, if the meeting is held by video means. The recording shall be preserved by the public body for a period of three (3) years following the date of the meeting and shall be available to the public.

(5) A public body may meet by teleconference or video means as often as needed if an emergency exists and the public body is unable to meet in regular session. Public bodies conducting emergency meetings through teleconference or video means shall comply with the provisions of subsection (4) of this section requiring minutes, recordation and preservation of the audio or audio/visual recording of the meeting. The nature of the emergency shall be stated in the minutes.”

**Miss. Code Ann. § 25-41-9**, states that the public body convening the meeting may make and enforce rules and regulations pertaining to the conduct of attendees.

**Miss. Code Ann. § 25-41-11**, sets parameters defining minutes and their recording as follows:

“(1) Minutes shall be kept of all meetings of a public body, whether in open or executive session, showing the members present and absent; the date, time and place of the meeting; an accurate recording of any final actions taken at such meeting; and a record, by individual member, of any votes taken; and any other information that the public body requests be included or reflected in the minutes. The minutes shall be recorded within a reasonable time not to exceed thirty (30) days after recess or adjournment and shall be open to public inspection during regular business hours.



(2) Minutes of a meeting conducted by teleconference or video means shall comply with the requirements of Section 25-41-5.

(3) Minutes of legislative committee meetings shall consist of a written record of attendance and final actions taken at such meetings.”

**Miss. Code Ann. § 25-41-13**, states that notice of public meetings will contain the place, date, hour and subject matter, but if a public body has regularly scheduled meetings at certain times and places mandated by statute, then no additional notice is required unless a meeting is recessed, or adjourned. In the case that there is an interim meeting or special meeting called, notice must be posted, in a publicly accessible place, preferably in the building in which the meeting will be held, within one (1) hour of the start of the meeting. This notice must be included in the minutes or other records of the public body. This section also prescribes that public bodies without statutory provisions in place detailing times and places of meetings must detail in the minutes the upcoming times, places and procedure by which its meetings will be held.

## **2. State Law- The Public Records Act**

**Miss. Code Ann. § 25-61-2**, defines the public records policy of the State of Mississippi as allowing the public, unless otherwise specified, access to all non-classified public records. The responsibility of providing access to these records is a duty of each public body. No person, due to automation, shall be denied access to public records. With an increase in technological use and advances, public bodies must provide reasonable access to electronically maintained records, subject to retention policies.

## **III. PROPOSED POLICY REQUIREMENTS**

In order to comply with WIOA’s transparency mandates to conduct business in an open manner and make activities of the board available to the public and to garner public trust, the SWDB and each LWDB shall have a sunshine provision policy which, at a minimum, meets the requirements shown below:

1. A written code of standards or conduct governing the procedural direction of all meetings held by or relating to SWDB and LWDBs as prescribed by WIOA.
  - a. Specifically that these meetings shall be conducted on a regular basis and as open meetings.



- b. Direction of meetings will specifically address the activities of the SWDB and LWDBs in relation to State and local plan activities and modifications. These activities must be addressed, in open meetings, prior to the submission of the plan or modification of the plan, respectively.
- 2. The SWDB and each LWDB shall establish written protocols defining the collection of meeting minutes, whether held in person, via teleconference or video, or any combination of the aforementioned.
  - a. Parameters for storage of these minutes, must also be cited, identified and maintained in a publicly accessible place, preferably in an online format.
  - b. Notation of and information regarding all members of SWDB and each LWDB must be identified and made available and easily accessed by the public.
  - c. Priority must be given to public accessibility.
  - d. All information must also be ADA compliant.
- 3. Each LWDB shall publicly identify the designation and certification of one-stop operators for the public, accessible at all times.
- 4. Each LWDB shall publicly provide all information regarding the award of grants or contracts to eligible providers of youth workforce investment activities.
- 5. The SWDB and each LWDB shall have the ability to provide minutes of formal meetings upon request. All requests for information in braille must be made two weeks in advance to meet the production requirements of the information.
- 6. No meeting shall be held by either the SWDB or any LWDB in a closed capacity, or in any way deny access to the public. This includes making reasonable accommodations for the disabled as outlined in the ADA requirements outlined in this document.
- 7. The officers, employees, agents, and members of the SWDB and LWDBs will make every effort to comply with the transparency requirements as defined by WIOA with the intent of establishing trust among all individuals, agencies and entities involved in the State of Mississippi's workforce development system.

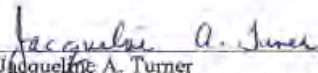
8. The code of conduct shall contain penalties, sanctions, or other disciplinary actions in accordance with state and local law for violations of the provisions against open meetings and the public information.

#### **IV. REQUIRED ACTION**

- A. The SWDB or LWDB must develop a sunshine provision policy that incorporates this State Policy Number 4. The SWDB or LWDB policy may be more proscriptive, at the discretion of the board. In either case, the policy and the background information should be reviewed regularly with state and local boards, and all boards should include this guidance in orientations for new board members.
- B. The State shall include in its monitoring of local areas a review of local adherence to the requirements described in this guidance.
- C. The State shall verify and ensure SWDB adherence to the requirements described in this guidance.

#### **V. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**State Policy Number 8, Revised February 2018**  
**WIOA PROGRAMMATIC and FISCAL MONITORING**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

This policy sets forth requirements for the monitoring of all entities receiving Workforce Innovation and Opportunity Act (WIOA) funds in accordance with Sections 183(a-c) of the Act and Federal regulations 2 CFR Part 200.330 – 200.332, and Federal Acquisition Regulation (FAR) 31.2 of the Final Rule.

Audit Regulations, 2 CFR 200.501-512, shall be applicable for non-profit and for-profit entities who expend \$750,000 a year in federal awards from all sources.

Each Local Workforce Development Area and State sub-recipient shall develop a policy to govern its monitoring activities. This document provides guidelines for developing the policy and describes the minimum elements to be included in the policy.

**II. STATE REQUIREMENTS**

**A. State Monitoring Policy**

The Office of Grant Management (OGM) is responsible for monitoring all Local Workforce Development Areas and State sub-recipients. On-site and/or desk reviews will be conducted pursuant to established standard operating procedures to ensure compliance with the WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and, when applicable, Federal Acquisition Regulations (FAR).

**1. Monitoring Review Process**

- An on-site and/or desk review is conducted consisting of:
- An entry conference or written notification of desk review, as appropriate, to brief agency officials on the scope of the review and to make appropriate arrangements;
- A review of administrative, fiscal, equal opportunity, and programmatic systems and transactions;
- Performance of test work, based on a review and examination of WIOA records and interviews; and
- An exit conference for on-site reviews to inform agency officials of monitoring results.

**2. Monitor the following, as applicable:**

- program goals and objectives

- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

### **3. Monitoring Report**

After each review, a monitoring report will be prepared by OGM detailing the results of the monitoring visit. The report will be completed within three weeks of completion of the review. Indexed working papers will also be prepared to provide supporting documentation for test work performed and for any findings. The monitoring report will be transmitted to the entity for review, and appropriate corrective action will be requested, if necessary.

### **4. Corrective Action Response**

If any findings were noted during the review, a corrective action response will be required within 45 days from date of the monitoring report. Upon receipt of the entity's corrective action plan, the monitors will review the response and comment on the acceptability of the proposed corrective action. If the corrective action plan is deemed acceptable, the file will be closed. If the corrective action plan or any part thereof is unacceptable, additional corrective action shall be requested. The file will remain open until all corrective action has been accepted.

### **5. Acceptance/Non-acceptance of Corrective Action**

Notice of acceptance or non-acceptance of the sub-recipient's proposed corrective action plan will be forwarded by OGM to the sub-recipient within 30 working days of receipt of the plan. If the proposed plan is not accepted, OGM may require submission of a subsequent

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plan to be received within 30 days from the date of the notice.

If the subsequent plan is deemed unacceptable, OGM may again request submission of a new plan within a specified timeframe or take other action as deemed appropriate relevant to the circumstances.

**6. Monitoring Files**

A monitoring file will be maintained by OGM for each monitoring visit or desk review.

**7. Follow-up Visits and Verification of Corrective Action**

Follow-up visits will be conducted by OGM, if deemed necessary.

**8. Unannounced Visits**

Unannounced visits may be conducted by OGM, if deemed necessary.

**III. LOCAL WORKFORCE DEVELOPMENT AREA/ STATE SUB-RECIPIENT REQUIREMENTS**

**A. Local Workforce Development Area/State Sub-recipient Monitoring Policy**

WIOA Section 107(d)(8) requires the local board, in partnership with the chief elected official, to conduct monitoring with respect to local programs of youth activities authorized under section 129(c), adult and dislocated worker local employment and training activities authorized under section 134(b), (c), and (d), and the one-stop delivery system in the local area.

WIOA Section 184(a) (3&4) and 2 CFR 200 parts 330-332 of the Federal regulations require each recipient and sub-recipient of WIOA Title I funds to conduct monitoring of the WIOA activities of its sub-recipients in order to:

- Determine whether expenditures have been made against the cost categories and within the cost limitations specified in WIOA and Federal regulations;
- Determine whether there is compliance with all applicable requirements; and
- Provide technical assistance as necessary and appropriate.

**1. Scope**

The Local Workforce Development Area (LWDA) or State sub-recipient shall develop a monitoring policy describing the procedures that will be implemented to ensure compliance with WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and Federal Acquisition Regulation (FAR).

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Local fiscal monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA or State sub-recipient's determination of "risk" and other factors which should consider whether the sub-recipient is subject to the Single Audit Act; when the most recent previous on-site review was conducted; previous findings or corrective actions required; etc.

LWDA or State sub-recipient programmatic compliance and equal opportunity monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA's determination of "risk" and other factors which should consider the type of WIOA activity performed by the sub-recipients; when the most recent previous on-site review was conducted; previous findings or corrective actions required; the existence of current reviews conducted by the state or its authorized representative that adequately address all criteria in the LWDA or State sub-recipient monitoring instrument, etc.

Monitor the following, as applicable:

- program goals and objectives
- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

## **2. Frequency**

The policy shall include procedures to ensure monitoring is completed in a

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timely manner. Each sub-recipient or State sub-recipient shall be monitored at least once per year during the program year or during the sub-award period.

**B. Local Workforce Development Area/State Sub-recipient Monitoring Procedures**

**1. Annual Monitoring Schedule**

The policy shall include procedures to ensure an annual monitoring schedule is prepared. The schedule should include sub-recipient names and addresses, contact numbers, planned dates of reviews, and names of individuals to perform the reviews. Annual monitoring schedules shall be submitted to OGM.

**2. Review Notification**

The policy shall include procedures to ensure that written notification of the scheduled review is provided to the entity in advance of the actual review, except when unannounced monitoring visits are deemed necessary.

**3. Desk Review Instrument**

A written desk review monitoring instrument must be prepared and should precede an on-site monitoring visit. This process will ensure that all pertinent records are reviewed prior to each visit. The policy shall describe the procedures for completing a desk review instrument before the on-site visit.

**4. Monitoring Instrument**

The policy shall include procedures for the development of an objective monitoring instrument for use in monitoring reviews to ensure that pertinent data can be collected and analyzed for all program activities.

**5. Documentation of Findings**

The policy shall include procedures to ensure findings are adequately documented and include a written description of the deficiency or violation.

**6. Monitoring Report**

The policy shall include procedures to ensure a monitoring report is prepared following each on-site or desk review. The report should be completed within three weeks of the review and should include the following elements:

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- A face page signed by the monitor(s) and the signature of supervisory level staff or the executive director (applicable to on-site visits only);
- The dates of the review and areas covered during the review.
- A listing of findings, if applicable that consists of a narrative description of the deficiency or violation noted; and
- For each finding, a recommendation which sets forth the most appropriate action to correct the deficiency or violation noted.

**7. Corrective Action**

The policy shall include procedures to ensure monitoring reports are forwarded to the sub-recipient with a transmittal letter. If findings were noted in the report, the transmittal letter shall require a written corrective action plan from the sub-recipient within 45 days from the date of the report.

**8. Acceptance/Non-acceptance of Corrective Action**

The policy shall describe the procedures that will be used to determine the acceptance or non-acceptance of the sub-recipient corrective action plan. Notification of the determination shall be provided to the sub-recipient within 30 working days of receipt of the proposed corrective action plan.

**9. Follow-up Monitoring and Verification of Corrective Action**

The policy shall include procedures for follow-up monitoring reviews determined by the risk of the finding and the sub-recipient response to the finding. The policy shall include procedures to determine if corrective action measures taken were adequate to resolve the noted deficiencies.

**9. Unannounced Visits**

The policy shall describe the procedures for conducting unannounced visits of sub-recipients when such visits are deemed necessary.

**10. Monitoring Files**

The policy shall include procedures establishing and maintaining the monitoring files. A separate file shall be maintained for each monitoring review. At a minimum, the files shall contain the following records:


- notification of monitoring dates;
- completed desk review instrument;

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- signed monitoring report;
- completed monitoring instrument;
- transmittal letter, and if applicable, request for a corrective action plan;
- response from sub-recipient, when appropriate;
- letter to sub-recipient accepting/rejecting corrective action; and
- working paper file to include supporting documentation.

#### IV. EFFECTIVE DATE

This policy shall be effective as of February 1, 2018.

  
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Jacqueline A. Turner  
Deputy Executive Director, CFO

Revised 1/2018

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 16**  
**ONE-STOP CERTIFICATION**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

To provide guidance, process, and deadlines for the certification of one-stop centers and the one-stop delivery system that is to be conducted by local workforce development boards, and to set criteria for the development of a local policy for one-stop certification.

**II. BACKGROUND**

The Workforce Innovation and Opportunity Act (WIOA) specifies in section 101(d)(6) and 121 (g)(1) that the State Workforce Development Board (SWDB) shall establish the minimum criteria for certification of one-stop centers and the one-stop delivery system. Certification is required to be done by Local Workforce Development Boards (LWDBs) at least once every three years in order for one-stop centers and the one-stop delivery system to receive infrastructure funding.

LWDBs must assess the effectiveness, physical and programmatic accessibility, and continuous improvement of one-stop centers and the one-stop delivery systems using the criteria in these guidelines. The LWDB may establish additional criteria, or set higher standards for service coordination, than those set by the State criteria. Both State and local WDBs must review and update the criteria every two years as part of the review and modification of the State and local planning process as described in 20 CFR 676.580.

When the local area is the one-stop operator as described in 20 CFR 679.410, the State Workforce Investment Board must certify the one-stop center (20 CFR 678.800).

**III. CERTIFICATION CRITERIA**

In order to be certified, one-stop centers and the one-stop delivery system must meet or exceed the standards established for each of the following areas:

**A. Effectiveness**

Evaluations of effectiveness must include how well the one-stop center integrates available services for participants and businesses, meets the workforce development needs of participants and the employment needs of local employers, operates in a cost-efficient manner, coordinates services among the one-stop partner programs, and provides access to partner program services to the maximum extent practicable, including providing services outside of regular business hours where there is a workforce need, as identified by the LWDB.

**B. Programmatic and Physical Accessibility**



These evaluations must take into account feedback from one-stop customers. They must also include evaluations of how well the one-stop center ensures equal opportunity for individuals, regardless of disability or cultural background, to participate in or benefit from one-stop center services. These evaluations must include criteria evaluating how well the centers and delivery systems take actions to comply with the disability-related regulations implementing WIOA sec. 188 and 29 CFR Part 38. Such actions include, but are not limited to:

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

All one-stop centers must comply with applicable physical and programmatic accessibility requirements, as set forth in 29 CFR part 38, the implementing regulations of WIOA sec. 188.

#### C. Continuous Improvement

Evaluations of continuous improvement must include how well the one-stop center supports the achievement of the negotiated local levels of performance for the indicators of performance for the local area that it serves. Other continuous improvement factors may include a regular process for identifying and responding to technical assistance needs, a regular system of continuing professional staff development, and having systems in place to capture and respond to specific customer feedback.

LWDBs are responsible for assessing the one-stop centers and the one-stop delivery system using the criteria outlined in Attachment A and submitting a record of the assessment and certification determination via email to the Director of the Office of Grant Management within 10 days of completing the certification determination.

Local boards are required to have policies and procedures in place for assessing the one-stop centers and the one-stop delivery system. This State policy requires local workforce boards to develop policies and procedures by June 30, 2017. The policies and procedures:

- Must include the criteria outlined in these guidelines;

- May include additional criteria beyond the items outlined in this policy; and
- Must be incorporated into the Local Area Plans.

Certification should be completed by the local board prior to the end of program year 2016 and at least every three years thereafter. One-stop centers that are certified by the local board within the prescribed timeframes shall be eligible to receive required infrastructure funding.

#### **IV. INQUIRIES**

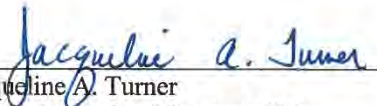
Inquiries regarding this policy may be directed to Laura Ring, [lring@mdes.ms.gov](mailto:lring@mdes.ms.gov) or 601-321-6017.

#### **V. REFERENCES**

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, WIOA Section 101(d)(6), 121(e), and 121(g).
- 20 CFR 678 Subpart F
- TEGL 16-16

#### **VI. EFFECTIVE DATE**

This policy shall be effective as of April 1, 2017.

  
 Jacqueline A. Turner  
 Deputy Executive Director, CFO



## APPLICATION FOR WIN JOB CENTER CERTIFICATION

**Organization Name:**

**Date:**

**Contact Person/Title:**

**Phone:**

**Email:**

**Site to be certified:**

**Address:**

**Website**

**Hours of Operation**

**Current Certification:**

- ☐ Comprehensive      ☐ Affiliate      ☐ Sector Training  
Plus Comprehensive      ☐ None

**If requesting a different certification level, check level requested:**

- ☐ Comprehensive      ☐ Affiliate      ☐ Sector Training  
Plus Comprehensive

specific centers. To achieve the goal of increased access, the State of Mississippi recognizes three levels of sites that can be certified within the one-stop service delivery system.

#### **Comprehensive One-Stop Center**

- Accessible to the general public during regular business days, as well as physically and programmatically accessible to individuals with disabilities
- Portal site for electronic access
- Provider of **basic and individualized career services, and training services**
- **Provider of business services**
- Representation of **five** mandated core partner programs (WIOA Titles I-IV, TANF)
- Additional related employment and training resources

#### **Affiliate One-Stop Center**

- Accessible to the general public and physically and programmatically accessible to individuals with disabilities
- Portal site for electronic access
- Provider of **basic career services**
- Representation of **one** or more mandated partners
- Additional related employment and training resources
- Established working relationship as part of an integrated system of WIN Job Center sites

#### **Sector Training Plus Comprehensive One-Stop Center**

- Provides access to all of the services in the Comprehensive Services
- Provider of **basic and individualized career services, and sector-related training services**
- Additional related employment and training resources
- Established working relationship as part of an integrated system of WIN Job Center sites

Sites seeking certification as a Comprehensive Center, Affiliated, or Sector Training Plus Comprehensive One-Stop Center are required to submit an application and receive a site visit from the Local Workforce Development Board (LWDB) One-Stop Certification Committee. Staff will answer questions about their site and how it functions to add value and provide customers with quality services as a part of the WIN Job Center system. This Committee is comprised of LWDB members and staff as well as other community partners who have specific expertise in serving populations with barriers. Note: In areas where the LWDB functions as the Site Operator, LWDB staff will only serve in an administrative support role to the Certification Committee and will ensure that the process is conducted objectively. Following the site visit, interviews, and final responses to any follow up questions, the Certification Committee will provide a written response within 30 days indicating one of three outcomes:

Attachment A  
One-Stop Certification Checklist

<b>REQUIRED PROGRAMS/PARTNERS</b>	<b>ON-SITE (AVERAGE HOURS/WEEK)</b>	<b>OFF-SITE ELECTRONIC CONNECTION</b>	<b>OFF-SITE BASIC CAREER SERVICES MADE AVAILABLE IN ANOTHER MANNER</b>
WIOA Title 1-B Adult Services			
WIOA Title 1-B Dislocated Worker Services			
WIOA Title 1-B Youth Services			
Wagner-Peyser Title III – Mississippi Department of Employment Security (MDES)			
Adult Education and Family Literacy Title II (ABE)			
Rehabilitation Act Title IV – Mississippi Division of Vocational Rehabilitation (VR)			
Rehabilitation Act Title IV – Mississippi Department of Services for the Blind			
Title V – Older Americans Act/ Senior Community Service Employment Program (SCSEP)			
TANF – Mississippi Department of Human Services (MDHS)			
Trade Adjustment Assistance – Mississippi Department of Employment Security			
Veterans Employment Services – Mississippi Department of Employment Security			
Unemployment Compensation			

**CAREER SERVICES CHECKLISTS**

In the column named "On-Site", check the basic career, individualized career, and training services that are currently available on-site for all job seeking customers who come into the WIN Job Center Comprehensive Site, Affiliate Site, or Sector Training Plus Comprehensive Site.

BASIC CAREER SERVICES	ON-SITE	BASIC CAREER SERVICES	ON-SITE	BASIC CAREER SERVICES	ON-SITE
Initial assessment of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs;		Outreach, intake and orientation to the information and other services available through the one-stop delivery system		Eligibility determination	
Labor exchange services, including job search and placement assistance, career counseling, provision of information on in-demand industry sectors and occupations, provision of information on nontraditional employment		Appropriate recruitment and other business services on behalf of employers, including small employers, which may include providing information and referral to specialized business services not traditionally offered through the one-stop delivery system		Referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and other workforce development programs	



Attachment A  
One-Stop Certification Checklist

INDIVIDUALIZED CAREER SERVICES	ON-SITE	INDIVIDUALIZED CAREER SERVICES	ON-SITE	INDIVIDUALIZED CAREER SERVICES	ON-SITE
Comprehensive and specialized evaluation to identify barriers to employment and employment goals		Development of Individual Employment Plan (IEP)		Group Counseling	
Individual Counseling		Career / Vocational Planning		Short-Term Pre-Employment/ Vocational Services	
Internships and Work Experiences		Workforce preparation activities		Financial Literacy Services	
Out-of-Area Job Search		English Language acquisition and integrated education and training programs		Follow Up Services	
<i>(Insert other Individualized Services as needed)</i>		<i>(Insert other Individualized Services as needed)</i>		<i>(Insert other Individualized Services as needed)</i>	

BUSINESS SERVICES	On-Site
Establish and develop relationships and networks with large and small employers and their intermediaries	
Develop, convene, or implement industry or sector partnerships	
Customized screening and referral of qualified participants in training services to employers	
Customized services to employers, employer associations, or other such organizations, on employment-related issues	
Customized recruitment events and related services for employers including targeted job fairs	
Human resource consultation services, e.g., writing/reviewing job descriptions and employee handbooks; Developing performance evaluation and personnel policies; Creating orientation sessions for new workers; Honing job interview techniques for efficiency and compliance; Analyzing employee turnover; or Explaining labor laws to help employers comply with wage/hour and safety/health regulations;	
Customized labor market information for specific employers, sectors, industries or clusters	
Customized assistance or referral for assistance in the development of a registered apprenticeship program	

Attachment A  
One-Stop Certification Checklist

- **Functional and Programmatic Integration** - It is critical for WIOA in Mississippi that its partners think and act as an integrated system. Workforce partners ensure that client services are aligned to common goals and the customer experience is seamless – regardless of funding streams. Each customer is mutually regarded as a shared customer, with all staff and programs operating at the site having a vested stake in that customer's success. Integration of programs is incorporated into planning, intake, assessment, registration, and service processes, information sharing, resource decisions, actions, results, and analyses.

Check the box where you think the site is with regard to Functional and Programmatic Integration.

☐ 5      ☐ 4      ☐ 3      ☐ 2      ☐ 1

Describe your site's approach to integrated service delivery and the use of functional teams to deliver career services to all customers.

Include a detailed diagram of customer flow, services available, assessment and referrals, and describe how the MS Works and the WIOA Hub System are used to facilitate shared customer management across partner programs.

Describe the procedure used to ensure timely follow-up on partner referrals.

*Please list any best practices to highlight and share for continuous improvement.*

- **Performance and Accountability** - Results and outcomes for the public investment in the Mississippi workforce system are essential to the system's relevance. The effectiveness of the workforce system for employers and job seekers is evident in system performance and service delivery decisions are based on data. On an ongoing basis, customer data from one-stop partners and regional economic data is collected, analyzed, and shared with all workforce system staff and community stakeholders. Plans for improvement, enhancement, or adjustment are established and acted upon.

Check the box where you think the site is with regard to Performance and Accountability.

☐ 5      ☐ 4      ☐ 3      ☐ 2      ☐ 1

Describe how you measure, analyze, review, and improve workforce system performance through the use of data and information.

Describe your wireless internet infrastructure.

How are the needs of populations with barriers met through staff-assisted and other means?

*Please list any best practices to highlight and share for continuous improvement.*

- **Customer Satisfaction** - Performance and value are ultimately judged by customers – businesses and job seekers. Customer-centered design relies upon satisfying customer needs, identifying shortcomings and responding accordingly on a timely and ongoing basis. Tools to obtain feedback are appropriate for each customer's use take into consideration factors including literacy levels, use of technology, disability, and language.

**Check the box where you think the site is with regard to Customer Satisfaction.**

☐ 5      ☐ 4      ☐ 3      ☐ 2      ☐ 1

Describe how the voice of the customer is listened to and how your site incorporates both job seeker and business customer feedback as part of continuous quality improvement? How are the voices of populations with barriers heard and brought to the table when designing services and facilities? How do you inform customers of how their feedback was reviewed and any action taken from their feedback? What metrics are used to show improvement and success?

*Please list any best practices to highlight and share for continuous improvement.*

- **Staff Competence and Staff Training Participation** - Professional development is a key feature in order to ensure that staff are aware of the implications of recent evidence-based research and can implement the latest policies and procedures established at the local, State and Federal levels. Also of vital importance is the use of labor market information by staff to better inform customers' career and training decision-making. The investment in staff development is substantial, ongoing, and focused on cross-training with partner programs, overall skill development, and use of labor market information. Every member of the one-stop staff has the ability and authority to meet customer needs, either directly or, where appropriate, by helping the customer make the right connections to the expertise he or she seeks. Participation in one-stop-sponsored training is required.

**Check the box where you think the site is with regard to Staff Proficiency and Staff Training Participation.**

☐ 5      ☐ 4      ☐ 3      ☐ 2      ☐ 1

- **Employer Engagement** – Business is one of our primary customers and one-stop partners work collaboratively to deliver value-added services and eliminate duplication. Business services staff from all one-stop partners have a comprehensive understanding of labor market conditions, economic development activities, skill needs of the workforce and are connected to regional and local business partnership activities and sector strategies. Employers' human capital needs are communicated to and acted upon by the workforce system. Business services are coordinated to the maximum extent possible to limit duplication and streamline the employer experience.

Check the box where you think the site is with regard to Employer Engagement.

☐ 5      ☐ 4      ☐ 3      ☐ 2      ☐ 1

Describe how partners work to deliver seamless business services. How do business services staff use and share labor market information? What strategies are used to involve employers in identifying skill gaps and developing solutions to meet their workforce needs?

Describe how regional and local sector strategies are used to target services and resources to focus workforce efforts on investments and improve outcomes.

How are career pathways and training modalities such as industry-recognized credentials, apprenticeship, on-the-job training, and other work-based learning opportunities aligned with employers' needs and marketed to support talent development?

*Please list any best practices to highlight and share for continuous improvement.*

## Section I2. Adult, Dislocated Worker, and Youth Program Requirements and Assurances.

### I2A. WIOA Eligible Training Provider Certification. State Policy #9

MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY  
State Policy Number 9  
ELIGIBLE TRAINING PROVIDER CERTIFICATION  
Workforce Innovation and Opportunity Act (WIOA)

#### **I. SCOPE AND PURPOSE:**

This Policy sets forth the State's requirements for application to and inclusion on the Mississippi Eligible Training Provider List (ETPL) website @ [www.etpl.mdes.ms.gov](http://www.etpl.mdes.ms.gov), and prescribes how the State and the Local Workforce Development Areas (LWDA) should compile and maintain the list. The Mississippi Eligible Training Provider Certification Policy will operate under a set of guiding principles as adopted by the State Workforce Development Board. This set of guiding principles for the training procedures is as follows:

- A. The Local Workforce Development Board is responsible for determining the eligibility and suitability of training providers and to monitor their effectiveness.
- B. 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.
- C. Each Local Board will provide training only in demand occupations.
- D. 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 @ <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.
- E. The determination of initial and subsequent eligibility for training providers will include these minimum criteria:
  1. The training provider will be bonded, registered by the applicable state agency, and licensed to do business in Mississippi. Registered Apprenticeship sponsors must be registered with the Office of Apprenticeship with the U.S. Department of Labor (DOL).
  2. The training provider will have a two-year history of providing the training program. Exceptions may be made by the Local Workforce Development Board. WIOA law exempts Registered Apprenticeship sponsors from meeting this requirement.
  3. WIOA-supported trainees shall make up no more than 75% of each class/course's total enrollment, on an annualized basis.
  4. The provider will provide performance and cost information in the application according to a prescribed format.
  5. The duration of WIOA-supported training will be for no more than two years unless the merits of the course require otherwise or unless deemed justifiable by the Local Workforce Development Board.

6. The WIOA funds awarded to a participant and used to assist in the payment of training costs will not exceed \$6,000 annually unless approved for a greater amount by Local Boards.
- 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.
- G. If there is a shortage of training funds, the Local Board should have a set of priorities for referring individuals to training. These priorities should include the current income of the individual, the potential for the training to lead to a permanent job that significantly increases the individual's income, and any other criteria that the Local Board establishes.
- H. There is no inherent guarantee or entitlement to any individual that training will be provided.

## II. REQUIREMENTS

### A. Background

The Workforce Innovation and Opportunity Act (WIOA) emphasizes informed customer choice, system performance, and continuous improvement. The Local Workforce Development Boards (LWDBs), in partnership with the State, will identify training providers whose performance qualifies them to receive WIOA Title-I funds to train adults and dislocated workers. WIOA section 122 requires the Governor to establish a policy for determining eligible training service providers. The WIOA also mandates that LWDBs, in conjunction with the State, develop and disseminate an eligible training service provider list that allows customers to make an informed decision in selecting a training provider. The State's Open Enrollment and Continued Eligibility period is April 1 -15 of each year. All new and recertified training courses will be uploaded to the online system and made available for public access prior to January 1 of the following year. This list is made available through the State's online system referred to as the Eligible Training Provider List system (ETPL) which can be accessed @ [www.etpl.mdes.ms.gov](http://www.etpl.mdes.ms.gov). The WIOA describes three levels of eligibility for training entities: automatic, "other," and continued. The Mississippi Eligible Training Provider Certification Policy addresses:

1. Initial eligibility procedures for training service providers.
2. Procedures for use by the LWDBs to determine the continued eligibility of a provider to receive Title-I funds available under WIOA section 134 (b) for the provision of training services.
3. Procedures for providers of training services to appeal the following:
  - a. A denial of eligibility by the LWDB or the designated State agency under



subsection (b), (c) or (d) of WIOA section 122.

- b. A termination of eligibility or other action by the LWDB or the designated State agency under subsection (f) of WIOA section 122.

#### **B. Identification of Eligible Providers of Training Programs**

1. Eligible providers of training programs shall be:
  - a. Postsecondary educational institutions that:
    - 1) are eligible to receive Federal funds under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et seq.); and
    - 2) provide a program that leads to an associate degree, baccalaureate degree, or certificate; **OR**
  - b. Entities that carry out programs under the Act commonly known as the National Apprenticeship Act; **OR**
  - c. Other licensed public or private providers of training programs, including faith-based and non-profit providers. Other public or private providers are defined as follows:
    - 1) Public or private providers of training programs who are not:
      - a) Postsecondary education institutions eligible to receive Federal funds under title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et seq.) that provide a program leading to an associate degree, baccalaureate degree or certificate; **OR**
      - b) Entities that carry out programs under the Act commonly known as the National Apprenticeship Act;
- **OR** -
2. Postsecondary educational institutions that seek to receive WIOA funding for a program that does not lead to an associate degree, baccalaureate degree or certificate;
- **OR** -
3. Providers that carry out programs under the Act commonly known as the National Apprenticeship Act that seeks to receive funding for a program not covered by the National Apprenticeship Act.
2. A training program is defined as:
  - a. One or more courses or classes that prepare an individual for entry into employment or enable an individual to continue in current employment, and upon successful completion lead to:
    - 1) A certificate, an associate degree, or baccalaureate degree, **OR**
    - 2) A competency or skill recognized by employers;

- OR -

- b. A training regimen that provides individuals with additional skills or competencies generally recognized by employers.
3. Training programs should be directly linked to in demand occupations in the local area as determined by the LWDB. The Local Boards will direct the use of the State's automated Eligible Training Provider List (ETPL) system to assist in determining provider eligibility and to provide guidance to the ITA staff responsible for student placement. The State updates the ETPL system annually with WIOA approved eligible training providers and their respective programs of study.
4. A training program must be occupational skills training for employment. Therefore, programs of basic and literacy skills such as Adult Basic Education (ABE), General Educational Development (GED), workshops, single class offering that do not qualify an individual for an occupation, and pre-employment skills training are to be offered as intensive services and are **NOT** to be included on the State's Eligible Provider List.
5. All training programs must provide the successful completer with an occupational skills, industry-recognized credential and/or a certificate or certification.

**C. Exceptions to the Mississippi Eligible Training Provider Certification System**

1. On-the Job Training and Customized Training
  - Providers of on-the-job training (OJT) and customized training are not subject to the Mississippi Eligible Training Provider Certification System.
2. Eligible Youth Activities Providers
  - Providers of youth activities and services are not subject to the State's Training Service Provider Certification System or its policies.
3. Basic and Literacy Skills Providers
  - As noted above in **B.4**, programs of basic and literacy skills such as Adult Basic Education (ABE), General Educational Development (GED), and pre-employment skills training are to be offered as intensive services and are not to be included on the Eligible Provider List and are not subject to the Mississippi Training Service Provider Certification System or its policies.

### III. INITIAL ELIGIBILITY DETERMINATION POLICY

#### A. Initial Eligibility Application Process

1. The Initial Application Process for Training Service 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 service provider profile, contact and user information, location(s) of training, and all necessary documentation required to show proof of registration, bonding, etcetera, and is required of:
  - a. Postsecondary educational institutions that:
    - 1) are eligible to receive Federal funds under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et seq.); **AND**
    - 2) provide a program leading to an associate degree, baccalaureate degree, or certificate;
  - OR -
  - b. Entities that carry out programs under the Act commonly known as the National Apprenticeship Act:
  - AND -
  - c. All Training Service Providers that are other public and private providers of a training program:
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 Service Providers of training services 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>

Maintain New Provider Request for Access Code - Windows Internet Explorer

https://mde.ms.gov/.../maintainnewproviderrequestforaccesscode.aspx

MD&S  
Mississippi Department of Employment Security

Helping Mississippians Get Jobs

Eligible Training Provider System

Request New Provider Access Code

Add a new Access Code Request

Users Requested for an approval and approval code that they in turn forward to their respective agency for approval.

A. User Personal Information

First Name:   
Last Name:   
Email ID:   
Phone:   
Mobile Phone:   
First Name:   
Last Name:   
Email ID:   
Phone:   
Mobile Phone:

B. Applicant Information

Company Name:   
Tax ID:  (e.g. 99-9999999)  
Address 1:   
Address 2:

Maintain New Provider Request for Access Code - Windows Internet Explorer

https://mde.ms.gov/.../maintainnewproviderrequestforaccesscode.aspx

MD&S  
Mississippi Department of Employment Security

Helping Mississippians Get Jobs

Eligible Training Provider System

Request New Provider Access Code

Add a new Access Code Request

Users Requested for an approval and approval code that they in turn forward to their respective agency for approval.

C. Training Location Information

Location Name:   
Address 1:   
Address 2:   
City:   
State:   
County:

Add More Training Locations...

D. Approval Routing to WIA Locals based on Training Locations

Click here to proceed if you are finished adding locations

In-State Training Locations: Local  
Please select the Local Agency to which you wish to apply for an access code

Out-of-State Training Locations:  
Please select the Local Agency to which you wish to apply for an access code

**Maintain New Provider Requests for Access Code - Windows Internet Explorer**

Home > View > Favorites > Tools > Help

File Edit View Favorites Tools Help

http://ms.gov/... Maintain New Provider Requests for Access Code

☐ Delta  
☐ Mississippi Partnership  
☐ Vocational/Trade/Technical School  
☐ Two-Year College

[View WIA Location Map](#)

**E. Provider Type: (Please Select):**

☐ Post-Secondary educational institution eligible to receive funds under Title IV of the Higher Education Act.  
☐ Registered Apprenticeship Program under the National Apprenticeship Act.  
☐ Proprietary School, (Must attach certification, names and addresses of any employer or accrediting body)  
☐ CBOEP/Other Public (Community Based Org / Faith Based Org or Non-Profit) must meet Commission on Proprietary School and College Registration criteria and attach registration certificate.

Provider Registration Number: (Required for Two-Year College and Registered Apprenticeship institutions only)

**F. Check the documents you will be sending to support your application (REQUIRED):**

☐ Click here to send list of required documents for each provider type  
☐ Certificate of Registration for MS School  
☐ Documentation of Bonding (\$25,000 minimum)  
☐ Documentation of Registration with the MS Secretary of State  
☐ Copy of Master Policy  
☐ Signed Certification of Insurance  
☐ MHA/MS for Non-Profit / FBOs / CBOs

[Print/View Assistance Form](#)

**G. Indicate method of delivery for support documentation:**

☐ Mail  
☐ Fax  
☐ Email  
☐ Other Specify:

MS-13: All required support documents/documents are required prior to issuance of an access code. Support documentation must be sent to MS-13, support email to submit your request.

**PLEASE NOTE: Once this record has been successful and a confirmation page has been generated, you cannot modify the data in this record. Please review the data you entered before you click on Submit.**

Mississippi Department of Economic Security - (202) 369-4141 ext. 200 MS-2013  
Fax: (202) 371-6100

**Maintain New Provider Requests for Access Code - Windows Internet Explorer**

Home > View > Favorites > Tools > Help

File Edit View Favorites Tools Help

http://ms.gov/... Maintain New Provider Requests for Access Code

☐ Documentation of Registration with the MS Secretary of State  
☐ Copy of Master Policy  
☐ Signed Certification of Insurance  
☐ MHA/MS for Non-Profit / FBOs / CBOs

[Print/View Assistance Form](#)

**G. Indicate method of delivery for support documentation:**

☐ Mail  
☐ Fax  
☐ Email  
☐ Other Specify:

MS-13: All required support documents/documents are required prior to issuance of an access code. Support documentation must be sent to MS-13, support email to submit your request.

**PLEASE NOTE: Once this record has been successful and a confirmation page has been generated, you cannot modify the data in this record. Please review the data you entered before you click on Submit.**

Mississippi Department of Economic Security - (202) 369-4141 ext. 200 MS-2013  
Fax: (202) 371-6100

- 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 training service provider selects at the time the application is made. Each LWDB selected on the registration template will receive a copy of the application for review. The applicant must ensure that the required documents are sent to each of the LWDBs selected on the registration



- application. The ETPL system will assign a temporary three-digit code to the training service 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 services, including factors related to the quality of a program of training services, including programs of training services that lead to a recognized postsecondary credential; and Factors concerning alignment of the training services 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 Service Provider's initial registration application and all training program(s) of study associated with the Training Service Provider in the ETPL system.
  - If the LWDB denies the initial registration application, the LWDB will send a letter to the training service 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 training service provider, activate the user ID(s), and send an email notice to the eligible training service provider that their registration application was approved and access has been granted to the ETPL system. At this time, the training service provider can make initial application for their program(s) of study.
  - A State review to verify performance data may be required.
2. Once the Eligible Training Service 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 Service 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 Service Provider will use the automated, on-line application form at <https://etpl.mdes.ms.gov/NewEPLAppEntry.aspx?usrAction=Add>. Training Service Providers will provide the following information in the following template for each training course:



Eligible Training Provider Certification  
Page 9

**MDES** Helping Mississippians Get Jobs  
Mississippi Department of Employment Security

Eligible Training Provider System

**ETPL**  
Home  
ETPL List  
Search  
Registration  
Menu  
WIA  
Partners  
Main Menu  
Logout  
Help/FAQ

**Add a New ETP record**

Hello, Michael Herndon

**A. Primary Provider Information**

Provider Name:

Provider Code:

**B. Training Location Information**

Training Location Name:

Location ID#:

Address 1:

Address 2:

City:  State:  Zip:

County:  County Code:

100% Area:

**C. Program Contact Information**  
(Different from local contact)

Contact Name:

Contact Title:

Phone:  (e.g. 305-555-0000) Ext:

Fax:

Email:

**D. Program Information:**

Note: If you are creating a new record for an existing ETP, please check the "ETPL Provider" checkbox. If you are creating a new record for a new provider, please check the "ETPL Provider" checkbox. If you are creating a new record for a new provider, please check the "ETPL Provider" checkbox.

Course Name:

Course Code:

Code Program Description:  (e.g. mm/dd/yyyy)

TOP Code:

Program Length in Hours:

Program Name & Description (max 50 words):

Program Award (program name of certificate earned from program):

**E. Program Offerings: (Check all that apply)**

☐ Full Time Enrollment

☐ Part Time Enrollment

☐ Daytime Classes

☐ Evening Classes

☐ Weekend Classes

1. Maintain an ETP, Record - Windows Internet Explorer

File Edit View Favorites Tools Help

Go Convert Select

Favorites Maintain an ETP, Record

E. Training Classes

☐ Weekend Classes

☐ English as a Second Language

☐ Instruction Provided in classroom settings

☐ Instruction Provided Over Internet

☐ Labs

☐ Open Entry/Exit

Other Specify:

F. Training Schedule: (Check all that apply)

☐ Monday ☐ Tuesday ☐ Wednesday ☐ Thursday ☐ Friday ☐ Saturday ☐ Sunday

Time of Day:

G. Prerequisites / Entry Level Requirements for the Training: (Check all that apply)

☐ Reading Specify Level:

☐ Math Specify Level:

☐ Language Specify Level:

☐ Writing Specify Level:

☐ Physical Exam Specify Level:

☐ Medical Screening (e.g., drug or alcohol) Specify Level:

☐ High School/GED? Specify:

☐ Pre-Apprenticeship Program Specify:

☐ Prerequisite Course(s) Specify Course:

☐ Specific Skills / Competencies Specify:

☐ Other Educational Requirements Specify:

Done

start

State Policy, Inc.

Documents - 1A

Essentials - 1A

Maintain an ETP...

Trusted sites

100%

[illegible]

Maintain an ETP Record - Windows Internet Explorer

https://data.ms.gov/ETPL/ASSETS/etpl/etpl.asp?auth=etpl

File Edit View Favorites Tools Help

Convert Select

Favorites Maintain an ETP Record

Supplies:	Supplies:
Perf Processing:	Perf Processing:
Occupational Fees:	Occupational Fees:
Uniform & Shoes:	Uniform & Shoes:
Tools & Equipments:	Tools & Equipments:
Personal & Transport:	Personal & Transport:
Room & Board:	Room & Board:
Other:	Other:
Total:	Total:

Calculate Totals

If WIA Costs are the same as Catalog Costs, Click here to copy Costs

Please Specify "Other" Costs:

Is Program Perf Eligible? ☐ Yes ☐ No

**J. Performance Data - Section 1 - ALL Participants Section (Complete for All Participants)**

Language Performance Data with Personal Record

Note: If you do not provide the performance data, your application may not be reviewed.

Period from Which Program Information is Derived: (month/year)

From: To:

WIA Funded participants Percentage Rate: Total Participants: Total WIA Funded:

Maintain an ETP Record - Windows Internet Explorer

https://data.ms.gov/ETPL/ASSETS/etpl/etpl.asp?auth=etpl

File Edit View Favorites Tools Help

Convert Select

Favorites Maintain an ETP Record

WIA Funded Percentage:

Search Tools / Percentage

**K. Performance data - Section 2 - WIA Participants Section (Complete for WIA Participants Only)**

Period from Which Program Information is Derived: (month/year)

From: To:

Completion Rate for WIA:

Participants who should have completed the program during the 12-month period in Section J:

Employment, Employment Retention and Average Wage for this Training Course:

Completion Rate:

Completion Percentage:

Employment Percentage:

Retention Rate:

Total WIA Participants:

WIA Completers:

# of Completers Employed:

Total WIA Completers:

Employment Percentage:

Retention Rate:

Total Completers Employed:

6 months or longer:

Retention Percentage:

Average Earnings:

Total 6 Months Earnings \$:

Average Monthly Wage \$:

Search Tools / Earnings

**L. Local Workforce Investment Areas:**

☐ Delta

☐ Mississippi Partnership

☐ Gulfcoastal Matched Works

[View WIA Location Map](#)



- 1) All Eligible Training Service Providers will provide the following institution and program information:
  - a) Name, mailing address, and physical address of the training facility;
  - b) Name and description of the program(s) of study;
  - c) Total hours of instruction associated with the program of study;
  - d) Cost of the training program, including tuition, fees, books, and any required tools, uniforms, equipment or supplies, as well as all unmet needs costs;
  - e) Detailed description of the training program;
  - f) Information on whether students in the program are eligible for Title IV of the Higher Education Act funding (e.g., Pell Grant);
  - g) Signed assurance that **no more than** 75% of your class/course enrollment are WIOA-funded on an annualized basis;
    - i. 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,
    - ii. The LWDB may issue an exception to the provider, if it feels the imbalance is justified.
    - iii. The LWDB may choose to locally increase the ratio of non-WIOA to WIOA-funded participants.
  - h) 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;

- i. 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.
  - ii. 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 **hi**, 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>.
  - iii. Registration with the Secretary of the State of Mississippi.
- i) 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
  - j) Any additional information required by the LWDB.
- 2) Performance Data for eligible training providers' programs of study applications must include (with the exception of Registered Apprenticeship sponsors) the following:
- a) 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 service provider and annotated in Section J of the on-line training course application in the State's ETPL system @ [www.etpl.mdes.ms.gov](http://www.etpl.mdes.ms.gov), both in the initial application and annually during each open enrollment and recertification period held beginning April 1 and ending April 15 of each year. The ETPL administrator will send an ETPL system generated email



to all active users prior to the open enrollment and recertification period to remind the service providers that the open enrollment and recertification period is approaching and to inform training service providers of the 12-month data range. Additionally, the following information should be kept for each training course or program for review by the LWDB:

- i. The program completion rates for individuals participating in the program(s);
  - ii. The percentage of individuals participating in the program(s) who obtained unsubsidized employment; and
  - iii. Wages at placement in employment of individuals participating in the program(s).
- b) State 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 training service provider, and name of the training course. This data file will be used to match all trained participants to the state and national wage data bases using the State's Unemployment Insurance Wage Records and the national Wage Record Information System (WRIS), 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 Office of Grant Management will key the following data on each training course application where WIOA activity occurs:
- 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.

- 3) 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 training service 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 service providers regarding the data that is required of the participants served through their institution.

4) 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>.

- a. 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 WIA Title I-financially assisted program or activity;
- b. Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color and national origin;
- c. Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
- d. The Americans with Disabilities Act (ADA) of 1990 which prohibits discrimination against qualified people with disabilities based on disability;
- e. The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age;
- f. Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs;
- g. 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;

- h. WIOA trainees shall make up no more than 75% of each class;
- i. As an eligible training service provider to WIOA participants you will provide industry-recognized certificates and certifications, offer quality programs of training services that lead to recognized postsecondary credentials, and provide indicators that you provide training services to individuals who are employed and individuals with barriers to employment;
- j. As an approved WIOA eligible training service provider you will provide indicators of effectiveness in serving employers, factors that indicate high-quality training services, factors concerning alignment of the training services with in-demand industry sectors and occupations, and you are in partnership with businesses.

#### **B. Initial Application Timeline and Requirements**

1. Advertisement: Local Workforce Development 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 service providers to make application and modify existing training courses during this period. This enrollment allows for initial and continued eligibility processes to take concerning training service providers' programs of study. No additional applications or modifications will be accepted after midnight April 15<sup>th</sup> of each year.
  - b. Beginning on April 16<sup>th</sup> of each year following the open enrollment and continued eligibility, the ETPL Administrator will begin the automated processes which will assign the applications to the respective LWDB for review.
  - c. The LWIB 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 service 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 training service provider's program sites.

- e. All approved course applications will be included as part of the system data upload January 1 of the following year and becomes the new eligible training service 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/](http://mdes.ms.gov/i-need-a-job/job-searching-resources/training-education/eligible-training-provider-list-(etpl)-system/).

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 January 1<sup>st</sup> of the following 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 January 1<sup>st</sup> of the following year after the April 1- 15 open enrollment and continued eligibility period.

#### IV. CONTINUED ELIGIBILITY DETERMINATION POLICY

##### A. Continued Eligibility Determination Process

Program of study applications must be submitted via the State's online system at [www.etpl.mdes.ms.gov](http://www.etpl.mdes.ms.gov) during the open enrollment and continued eligibility period held between April 1 – 15 each year, at such time, in such a manner, and containing such information as necessary to adequately fulfill the LWDB's and State's performance information requirements for each training program of study. The continued eligibility process is required of each training service provider. The Registered Apprenticeship program sponsors are exempt from the performance indicators and outcome measures. On April 16<sup>th</sup> the ETPL Administrator will administer the online processes to assign the training course applications to the respective LWDBs for review.

- 1. All 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 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:
    - 1) Program completion rates;
    - 2) Percentage who obtained unsubsidized employment; and
    - 3) Average wage at placement in employment.
    - 4) 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
  - c. 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).
  - d. All approved program of study course application(s) will be included as part of the system data upload on or before January 1 of each year and becomes the new eligible training service provider 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/>. 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 @ [www.mdes.ms.gov](http://www.mdes.ms.gov) and selecting the Customer/Public Access link in the bottom right corner. The public may search by selecting the Local Workforce Area map, the certified training course list by course name, training provider, etc.
- 4. 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.
  - 5. Alternate procedures may be used to collect and verify supplemental outcome training performance information.

#### **B. Performance Measures**

The LWDB shall annually adopt its standards within 90 calendar days after the State issues its standards of performance. LWDB standards must meet or exceed the standards adopted by the State. The baseline State Performance Measures are included as Attachment A of this policy.

#### **C. Continued Eligibility Timeline**

- 1. Continued eligibility certification will be performed annually at the anniversary of the initial eligibility application. As of April 1, 2013, the State will have one continued eligibility period each year. The continued eligibility period will be held April 1 – 15 each year. Failure to apply for continued eligibility of training course(s) or programs of study will result in the expiration of the current certification and removal from the

statewide approved training provider list. The course will then be stored in the ETPL system archives as an inactive course. The training provider may request to activate inactive programs of study outside of the continued eligibility period, but only with the prior consent of the LWDA. Once the LWDA agrees that the course(s) may be modified, the LWDA must notify the ETPL Administrator at [etpladmin@mdes.ms.gov](mailto:etpladmin@mdes.ms.gov) that approval has been granted by the LWDA. The ETPL Administrator will ensure that the processes are initiated that move the course(s) to an active status.

2. Training service providers seeking continued eligibility certification will key the total number of participants who entered training in Section J 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 service provider stating the reason or reasons for denial (only one reason is needed for denial), and provide the timeline in which the appeal is required, and to whom it is to be directed.
4. During the review period, the LWDA or its designated representative(s) may, as determined reasonable by the LWDA, make an on-site visit to the eligible training provider program sites for the purpose of confirming information.
5. Once all of the LWDA's have annotated their approvals in the ETPL system for each training course application assigned, and the 10 day window for appeal has expired, the ETPL Administrator will conduct the upload of the new list and data for each program of study application on or before January 1 of the new 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 January 1<sup>st</sup> of the following 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 January 1<sup>st</sup> of the following 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 services, including the extent to which the annual standards of performance established by the LWDB have been achieved;
  - e. Cost of training services;
  - 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.

**V. 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 training service provider and shall comply with the following requirements:

- 1) Notification by email to each active user in the ETPL system for the eligible training provider;
  - 2) Indicate the “date mailed” on the system generated email denial notice;
  - 3) Identify the program and project code that was denied;
  - 4) Describe the specific reason or reasons for the denial; and
  - 5) 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 January 1. 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 service provider of the reversal. If the course(s) was not included in the mass data upload on or before January 1, 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.

**VI. COMPLIANCE AND REQUIREMENTS**

**A. Local**

The Local Areas shall be responsible for:

1. accepting, reviewing, and approving or denying training service 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 Service 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 Providers, their respective courses, training locations etcetera can be accessed by the public at <http://mdes.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 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 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.

## VII. EFFECTIVE DATE

This policy is effective immediately.

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Laura Ring  
Director, Office of Grant Management

Attachments: A – State Performance Levels  
B – State Refund Policy  
C – System Access Confidentiality Agreement

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 7**  
**PRIORITY of SERVICE for**  
**WIOA ADULT PROGRAM PARTICIPANTS**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

To establish a policy for determining priority of services for adults receiving direct, monetary services such as support services or training under the Workforce Innovation and Opportunity Act (WIOA).

**II. REQUIREMENTS**

WIOA section 134(c)(3)(E) establishes the need for the local Workforce Investment Area to have a system of priority for services to adults:

“With respect to funds allocated to a local area for adult employment and training activities ... priority shall be given to recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for receipt of career services ... and training services. The appropriate local board and the Governor shall direct the one-stop operators in the local area with regard to making determinations related to such priority.”

Proposed § 680.600(b) requires States and local areas to establish criteria for providing priority to individualized career services and training services with WIOA adult funds under title I. The criteria may include other resources and funds for providing career and training-related services in the local area, as well as the needs of specific groups in the local area, as well as other factors the local areas determines appropriate.

Proposed § 680.600(c) clarifies that while priority must be given under WIOA adult funds to low-income individuals, public assistance recipients, or individuals who are basic skills deficient for individualized career services and training services, the Local Board and Governor may establish a process that also gives priority to other individuals.

**A. Background**

The Adult Program under Title I of WIOA provides workforce development services to adults to increase their employment, retention in employment, and earnings and also support their occupational skill attainment and career advancement. Local workforce development boards are charged with strategic



planning and oversight activities in support of workforce and economic development.

WIOA specifies that services for adults will be provided through One-Stop Career Centers. Services such as career guidance and workforce information may also be provided virtually. WIOA authorizes two types of service that are potentially available to job seekers:

1. Career Services - includes outreach, job search and placement assistance, provision of labor market information, comprehensive assessments, development of individual employment plans, counseling and career planning, and other services specified in §134(c)(2).
2. Training Services - includes Occupational Skills Training, On-the-Job Training activities, Customized Training, Individual Training Accounts, and other training services specified in §134(c)(3)(D).

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

Funds allocated for WIA Dislocated Workers or TAA eligible individuals are not subject to this Policy.

#### **B. Compliance with the Jobs for Veterans Act**

Mississippi's workforce system will provide priority of service to veterans and eligible spouses, as specified in the Jobs for Veterans Act and its implementing regulations at 20 CFR part 1010, and articulated in State Policy Number 6 - Priority of Service for Veterans and Eligible Spouses.

When Veterans Priority is applied in conjunction with Priority of Service for WIOA Adult Program Participants, veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient will receive first priority. The second priority would be recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient who are not veterans or eligible spouses.

#### **C. Local Board Requirements**


Local Workforce Development Boards are required to develop and include in their local plan, policies that implement Priority of Service for WIOA Adult Program Participants for the one Stop Centers and a service delivery plan for the local training providers.



**III. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

**IV. APPROVAL**

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**State Policy Number 11**  
**WIOA ALLOCATION POLICY**  
**Workforce Innovations and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to provide guidance and information to Local Workforce Development Areas regarding the Workforce Innovation and Opportunity Act (WIOA) Title 1 allotments for operating Adult, Dislocated Worker, Youth and Rapid Response activities. The funds allocated to the local areas for youth, adult, and dislocated worker activities will be allocated based on the formulas specified in WIOA Section 128(b)(2)(A)(I) and 132(b)(2)(A)(I), respectively. The State will consult with the State Workforce Development Board (SWDB) on the development of allocation formulas for the distribution and operation of approved WIOA activities.

**II. REQUIREMENTS FOR WIOA ALLOCATION AND DISTRIBUTION**

**A. Adult**

The WIOA allows the following allocation process:

1. Standard Allocation Formula
  - a. 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each area, compared to the total number of unemployed individuals in areas of substantial unemployment in all areas. The term "area of substantial unemployment" means any area that is of sufficient size and scope to sustain a program of workforce investment activities carried out under this subtitle and that has an average rate of unemployment of at least 6.5 percent for the most recent 12 months.
  - b. 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each area, compared to the total excess number of unemployed individuals in all areas. The term "excess number" means, used with respect to the excess number of unemployed individuals within a State, a higher of: (1) the number that represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force; or (2) the number that represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment.
  - c. 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged adults in each area, compared to the total number of disadvantaged adults in all areas. The term "disadvantaged adult" means

an adult who received income, or is a member of a family that received a total family income that, in relation to family size, does not exceed the higher of: (1) the poverty line; or (2) 70 percent of the lower living standard income level.

**B. Youth**

The WIOA allows for the following allocation process:

**1. Standard Allocation Formula**

- a. 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each area, compared to the total number of unemployed individuals in areas of substantial unemployment in all areas;
- b. 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each area, compared to the total excess number of unemployed individuals in all areas; and
- c. 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged youth in each area, compared to the total number of disadvantaged youth in all areas.

**C. Dislocated Worker**

**1. Allocation Formula**

The State shall allocate not less than 60 percent based on an allocation formula prescribed by the Governor. The formula shall use the most recent available information and shall include:

- a. Insured unemployment,
- b. Unemployment concentrations,
- c. Plant closing and mass layoff,
- d. Declining industries,
- e. Farmer-rancher economic hardship,
- f. Long term unemployment.

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. Transfer Authority

DOL allows transfer of up to 100% of funds between Dislocated Worker and Adult funding streams.

**D. Distribution of Rapid Response Funds**

As described in WIOA Part 682, the State will reserve up to 25% of dislocated worker funds for rapid response activities. Once the State has reserved adequate funds for rapid response activities, the remainder of the funds may be used by the state to provide funds to local areas that experience increased numbers of unemployed individuals due to natural disasters, plant closings, mass layoffs or other events for provision of direct services to participants.

**III. EFFECTIVE DATE**

This policy is effective July 1, 2015.

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 6**  
**PRIORITY OF SERVICE**  
**For VETERANS and ELIGIBLE SPOUSES**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to articulate the procedures for providing priority of service to veterans and the eligible spouses of veterans with respect to qualified job training programs.

**II. REQUIREMENTS**

The requirement to provide priority of service applies to all Workforce Innovation and Opportunity Act (WIOA) and Wagner-Peyser funded activities, including technology-assisted activities; the Senior Community Service Employment Program (SCSEP); Indian and Native American Programs (INAP); National Farmworker Jobs Training Programs (NFJP); Trade Adjustment Assistance Programs (TAA); job training programs funded through the Women's Bureau, and any other current or future qualified job training program.

Additionally, all program operators are required to ensure that priority of service is applied by all sub-recipients of DOL funds. All program activities issued or executed by program operators, regardless of how they are procured, must be administered in compliance with priority of service requirements.

**A. Background**

The Jobs for Veterans Act (JVA), Public Law (P.L.) 107-288 was signed into law in November 2002, establishing a priority of service requirement for covered persons, as defined by this statute, in qualified job training programs.

The Department of Labor, in December 2008, published 20 CFR Part 1010 to reflect the statutory requirement of section 605 of the Veteran's Benefits, Health Care, and Information Technology Act of 2006, (P.L. 109-461), implementing priority of service via regulation.

The Final Rule took effect in January 2009, stating that recipients of funds subject to these regulations should review and, if necessary, enhance their current policies to ensure adequate protocols are in place.

## **B. Definitions**

### **1. Priority of Service**

With respect to any qualified job training program, a covered person shall be given priority over a non-covered person for the receipt of employment training and placement services provided under that program.

### **2. Covered Person**

As defined in Federal Rule (20 CFR Part 1010), a covered person means a veteran or eligible spouse of a veteran.

### **3. Veteran**

A veteran is defined as a person who served in the active military, naval, or air service, who was discharged or released under conditions other than dishonorable.

### **4. Eligible Spouse**

- a. The spouse of any persons who died of a service-connected disability
- b. The spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - missing in action
  - captured in the line of duty by hostile force; or
  - forcibly detained or interned in the line of duty by a foreign government or power
- c. The spouse of any persons who have a total disability permanent in nature resulting from a service-connected disability; or
- d. The spouse of a veteran who died while a disability so evaluated was in existence.

The United States Department of Labor (USDOL) has indicated for clarification concerning (a) and (d) above that the re-marriage of the spouse would not terminate their eligibility. However, if a spouse



becomes divorced from a veteran under (b) and (c) above, eligibility for priority of service is terminated.

It is further understood that this policy does not exclude from eligibility spouses who were not citizens at the time that the veteran was discharged or retired, nor does it stipulate that a spouse had to be married to a veteran at the time of his or her discharge or retirement.

#### 5. Qualified Job Training Program

Any program or service for workforce preparation, development or delivery that is directly funded, in whole or in part, by the USDOL.

### C. Implementing Priority of Service

The regulations provide that priority of service means the right of eligible covered persons to take precedence over eligible non-covered persons in obtaining services. They further specify that taking precedence may mean:

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

The regulations specify how priority of service is to be applied across three different types of qualified job training programs:

- Universal access programs that do not target specific groups;
- Discretionary targeting programs that focus on certain groups but are not mandated to serve target group members before other eligible individuals; and,
- Statutory targeting programs that are mandated by federal law to provide priority or preference to certain groups.

### D. Identifying and Informing Covered Persons

All recipients of funds for qualified job training programs are required to identify covered persons at the point of entry to programs to enable them to take full advantage of priority of service. The USDOL will not prescribe how this is to be done. Program operators are reminded, however, that self-registration systems are not, at this stage, to require documents to be produced that verify status, unless the point of entry is also the point at which program eligibility determination and registration or enrollment takes place. Even then, the

applicant should be permitted to enroll and follow-up subsequently with the verification of his or her status. Point of entry will include physical locations as well as websites and other virtual service delivery resources.

Protocol should require that the receptionist or office manager ask each applicant if he or she is a veteran or eligible spouse. Staff should also explain to each applicant that veterans and eligible spouses get priority of service, and describe any eligibility requirements for those services or programs.


**E. Local Board Requirements**

Local Workforce Development Boards are required to develop and include in their local plan, policies which implement priority of service for the one Stop Centers and a service delivery plan for the local training providers.

**III. EFFECTIVE DATE**

This policy shall be effective as of July 1, 2015.

**IV. APPROVAL**

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

## I2E. WIOA Programmatic and Fiscal Monitoring

**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**State Policy Number 8, Revised February 2018**  
**WIOA PROGRAMMATIC and FISCAL MONITORING**  
**Workforce Innovation and Opportunity Act (WIOA)**

### **I. SCOPE AND PURPOSE**

This policy sets forth requirements for the monitoring of all entities receiving Workforce Innovation and Opportunity Act (WIOA) funds in accordance with Sections 183(a-c) of the Act and Federal regulations 2 CFR Part 200.330 – 200.332, and Federal Acquisition Regulation (FAR) 31.2 of the Final Rule.

Audit Regulations, 2 CFR 200.501-512, shall be applicable for non-profit and for-profit entities who expend \$750,000 a year in federal awards from all sources.

Each Local Workforce Development Area and State sub-recipient shall develop a policy to govern its monitoring activities. This document provides guidelines for developing the policy and describes the minimum elements to be included in the policy.

### **II. STATE REQUIREMENTS**

#### **A. State Monitoring Policy**

The Office of Grant Management (OGM) is responsible for monitoring all Local Workforce Development Areas and State sub-recipients. On-site and/or desk reviews will be conducted pursuant to established standard operating procedures to ensure compliance with the WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and, when applicable, Federal Acquisition Regulations (FAR).

#### **1. Monitoring Review Process**

- An on-site and/or desk review is conducted consisting of:
- An entry conference or written notification of desk review, as appropriate, to brief agency officials on the scope of the review and to make appropriate arrangements;
- A review of administrative, fiscal, equal opportunity, and programmatic systems and transactions;
- Performance of test work, based on a review and examination of WIOA records and interviews; and
- An exit conference for on-site reviews to inform agency officials of monitoring results.

#### **2. Monitor the following, as applicable:**

- program goals and objectives

- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

### **3. Monitoring Report**

After each review, a monitoring report will be prepared by OGM detailing the results of the monitoring visit. The report will be completed within three weeks of completion of the review. Indexed working papers will also be prepared to provide supporting documentation for test work performed and for any findings. The monitoring report will be transmitted to the entity for review, and appropriate corrective action will be requested, if necessary.

### **4. Corrective Action Response**

If any findings were noted during the review, a corrective action response will be required within 45 days from date of the monitoring report. Upon receipt of the entity's corrective action plan, the monitors will review the response and comment on the acceptability of the proposed corrective action. If the corrective action plan is deemed acceptable, the file will be closed. If the corrective action plan or any part thereof is unacceptable, additional corrective action shall be requested. The file will remain open until all corrective action has been accepted.

### **5. Acceptance/Non-acceptance of Corrective Action**

Notice of acceptance or non-acceptance of the sub-recipient's proposed corrective action plan will be forwarded by OGM to the sub-recipient within 30 working days of receipt of the plan. If the proposed plan is not accepted, OGM may require submission of a subsequent

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plan to be received within 30 days from the date of the notice.

If the subsequent plan is deemed unacceptable, OGM may again request submission of a new plan within a specified timeframe or take other action as deemed appropriate relevant to the circumstances.

**6. Monitoring Files**

A monitoring file will be maintained by OGM for each monitoring visit or desk review.

**7. Follow-up Visits and Verification of Corrective Action**

Follow-up visits will be conducted by OGM, if deemed necessary.

**8. Unannounced Visits**

Unannounced visits may be conducted by OGM, if deemed necessary.

**III. LOCAL WORKFORCE DEVELOPMENT AREA/ STATE SUB-RECIPIENT REQUIREMENTS**

**A. Local Workforce Development Area/State Sub-recipient Monitoring Policy**

WIOA Section 107(d)(8) requires the local board, in partnership with the chief elected official, to conduct monitoring with respect to local programs of youth activities authorized under section 129(c), adult and dislocated worker local employment and training activities authorized under section 134(b), (c), and (d), and the one-stop delivery system in the local area.

WIOA Section 184(a) (3&4) and 2 CFR 200 parts 330-332 of the Federal regulations require each recipient and sub-recipient of WIOA Title I funds to conduct monitoring of the WIOA activities of its sub-recipients in order to:

- Determine whether expenditures have been made against the cost categories and within the cost limitations specified in WIOA and Federal regulations;
- Determine whether there is compliance with all applicable requirements; and
- Provide technical assistance as necessary and appropriate.

**1. Scope**

The Local Workforce Development Area (LWDA) or State sub-recipient shall develop a monitoring policy describing the procedures that will be implemented to ensure compliance with WIOA, Federal regulations, State laws, contractual agreements, State policies, OMB circulars, cost principles, and Federal Acquisition Regulation (FAR).

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Local fiscal monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA or State sub-recipient's determination of "risk" and other factors which should consider whether the sub-recipient is subject to the Single Audit Act; when the most recent previous on-site review was conducted; previous findings or corrective actions required; etc.

LWDA or State sub-recipient programmatic compliance and equal opportunity monitoring of sub-recipients may consist of one of the following: 1) on-site; 2) desk review; 3) both on-site and desk review for the same period. The method used to conduct the monitoring and the frequency required for each shall be based on the LWDA's determination of "risk" and other factors which should consider the type of WIOA activity performed by the sub-recipients; when the most recent previous on-site review was conducted; previous findings or corrective actions required; the existence of current reviews conducted by the state or its authorized representative that adequately address all criteria in the LWDA or State sub-recipient monitoring instrument, etc.

Monitor the following, as applicable:

- program goals and objectives
- program quality
- procurement
- fiscal accountability
- labor standards
- audit/audit resolution
- actual expenditures against cost categories and limitations
- grievance procedures
- equal opportunity
- provisions of the Americans with Disabilities Act
- eligibility verification as applicable
- property management
- internal monitoring of entity's sub-recipients
- administrative procedures
- program performance
- other programmatic areas
- programmatic accountability

## **2. Frequency**

The policy shall include procedures to ensure monitoring is completed in a

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timely manner. Each sub-recipient or State sub-recipient shall be monitored at least once per year during the program year or during the sub-award period.

**B. Local Workforce Development Area/State Sub-recipient Monitoring Procedures**

**1. Annual Monitoring Schedule**

The policy shall include procedures to ensure an annual monitoring schedule is prepared. The schedule should include sub-recipient names and addresses, contact numbers, planned dates of reviews, and names of individuals to perform the reviews. Annual monitoring schedules shall be submitted to OGM.

**2. Review Notification**

The policy shall include procedures to ensure that written notification of the scheduled review is provided to the entity in advance of the actual review, except when unannounced monitoring visits are deemed necessary.

**3. Desk Review Instrument**

A written desk review monitoring instrument must be prepared and should precede an on-site monitoring visit. This process will ensure that all pertinent records are reviewed prior to each visit. The policy shall describe the procedures for completing a desk review instrument before the on-site visit.

**4. Monitoring Instrument**

The policy shall include procedures for the development of an objective monitoring instrument for use in monitoring reviews to ensure that pertinent data can be collected and analyzed for all program activities.

**5. Documentation of Findings**

The policy shall include procedures to ensure findings are adequately documented and include a written description of the deficiency or violation.

**6. Monitoring Report**

The policy shall include procedures to ensure a monitoring report is prepared following each on-site or desk review. The report should be completed within three weeks of the review and should include the following elements:

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- A face page signed by the monitor(s) and the signature of supervisory level staff or the executive director (applicable to on-site visits only);
- The dates of the review and areas covered during the review.
- A listing of findings, if applicable that consists of a narrative description of the deficiency or violation noted; and
- For each finding, a recommendation which sets forth the most appropriate action to correct the deficiency or violation noted.

**7. Corrective Action**

The policy shall include procedures to ensure monitoring reports are forwarded to the sub-recipient with a transmittal letter. If findings were noted in the report, the transmittal letter shall require a written corrective action plan from the sub-recipient within 45 days from the date of the report.

**8. Acceptance/Non-acceptance of Corrective Action**

The policy shall describe the procedures that will be used to determine the acceptance or non-acceptance of the sub-recipient corrective action plan. Notification of the determination shall be provided to the sub-recipient within 30 working days of receipt of the proposed corrective action plan.

**9. Follow-up Monitoring and Verification of Corrective Action**

The policy shall include procedures for follow-up monitoring reviews determined by the risk of the finding and the sub-recipient response to the finding. The policy shall include procedures to determine if corrective action measures taken were adequate to resolve the noted deficiencies.

**9. Unannounced Visits**

The policy shall describe the procedures for conducting unannounced visits of sub-recipients when such visits are deemed necessary.

**10. Monitoring Files**

The policy shall include procedures establishing and maintaining the monitoring files. A separate file shall be maintained for each monitoring review. At a minimum, the files shall contain the following records:


- notification of monitoring dates;
- completed desk review instrument;

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- signed monitoring report;
- completed monitoring instrument;
- transmittal letter, and if applicable, request for a corrective action plan;
- response from sub-recipient, when appropriate;
- letter to sub-recipient accepting/rejecting corrective action; and
- working paper file to include supporting documentation.

#### IV. EFFECTIVE DATE

This policy shall be effective as of February 1, 2018.

  
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Jacqueline A. Turner  
Deputy Executive Director, CFO

Revised 1/2018

**MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY**  
**Revised State Policy Number 13**  
**YOUTH ELIGIBILITY POLICY**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to provide guidance to the local workforce development boards and state subgrantees for use in developing policies and/or procedures for youth eligibility. Each Local Workforce Development Board (LWDB) or state subgrantee shall have appropriate procedures to ensure that only eligible individuals are served in programs funded under Title I of the Workforce Innovation and Opportunity Act (WIOA).

WIOA sections 3(18) and 129 (a) (1) (B) and (C) describe eligibility for the Title I youth formula-funded program, which includes two groups: In-School Youth (ISY) and Out-of-School Youth (OSY), and establishes specific criteria for each group. In addition, the Notice of Final Rulemaking, 20 CFR Part 681.220 provides additional clarification that should be considered when determining eligibility. The eligible WIOA Title I youth population represents youth who face challenges and barriers to success in the labor market.

**II. REQUIREMENTS**

Local Workforce Development Boards, in consultation with chief elected officials, must establish WIOA Title I eligibility policies and procedures consistent with the guidance provided herein.

The following provisions of WIOA shall apply when determining eligibility to participate in Title I youth programs funded by WIOA.

Youth eligible for services must be U. S. citizens or otherwise legally entitled to work in the U.S. and registered for selective service, if applicable. WIOA establishes separate criteria for Out-of-School Youth and In-School Youth.

**A. Out-of-School Youth** is defined as an individual who is:

- 1) Not attending any school (as defined under State law). In addition, WIOA includes a new criterion: a youth who is within the age of compulsory school attendance but has not attended school for at least the most recent school year calendar quarter. Because school districts differ in what they use for school year quarters, the time period of a school year quarter is based on how a local school district defines its school year quarter.

**NOTE:** State law does not define **not attending** school.

- 2) Not younger than 16 or older than 24 at the time of enrollment; **and** meets one of the following conditions:
  - School Dropout;
  - Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar is based on how a local school district defines its school year quarters.
- 3) Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner;
- 4) Subject to the juvenile or adult justice system;
- 5) A homeless child or youth, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
- 6) Pregnant or parenting;
- 7) An individual with a disability;
- 8) Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. (WIOA sections 3(46) and 129(a)(1)(B)).

**B. In-School Youth** is defined as an individual who is:

- 1) Attending school (as defined by State law);
- 2) Not younger than 14 or (unless an individual with a disability who is attending school under State law) older than 21 at the time of enrollment;
- 3) Low-income; **and**
- 4) Meets one or more of the following conditions:
  - Basic Skills Deficient
  - An English Language Learner
  - An Offender

- Homeless, a runaway, in foster care or has aged out of foster care system, a child eligible for assistance under 477 of the Social Security Act (42 U.S.C), or in an out-of-home placement.
- Pregnant or parenting
- An individual with a disability
- Requires additional assistance to complete an educational program or to secure or hold employment.

### C. Definitions

- 1) Youth Requiring Additional Assistance to enter or complete an educational program or to secure and hold employment is defined as an In-School Youth (ISY) or Out-of-School Youth (OSY) who is low income **and** meets one of the following documented criteria:

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

The list below contains examples Local Workforce Development Areas (LWDAs) can use during the eligibility process if a youth participant "Requires Additional Assistance".

- Has a court/agency referral mandating school attendance (ISY);
- A victim of or resides in an abusive environment;
- Has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided (OSY)
- Has been fired from a job within six (6) months (or longer) prior to application (OSY);
- Has never held a full-time job (30+ hours per week) for more than thirteen (13) consecutive weeks (OSY);
- Has a currently incarcerated parent; and
- Has been referred to or treated by an agency for substance abuse/psychological problems.

If a Local Workforce Development Area (LWDA) elects to include additional criteria as a part of its policy and local plan; the criteria must be approved by the Local Workforce Development Board. The criteria must be reasonable, quantifiable, and based on evidence that the specific characteristic of the youth identified in the policy objectively required additional assistance. Supporting



documentation and/or strong case notes are necessary when documenting all eligibility criteria.

**Note:** WIOA Section 129(a)(3)(B) states that in each local area, not more than five percent (5%) of ISY assisted may be eligible based on paragraph (1)(C)(iv)(VII), which refers to the barrier for an ISY who requires additional assistance to complete an education program or to secure or hold employment.

2) Low income is defined as in individual who:

- Receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program;
- Received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (inclusive of unemployment compensation, child support payments, payments described in subparagraph (A), and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402)) that, in relation to family size, does not exceed the higher of—
  - the poverty line, for an equivalent period; or
  - 70 percent of the lower living standard income level, for an equivalent period;
- Is a member of a household that receives (or has been determined within the 6-month period prior to application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.);
- Qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302);
- Is a foster child on behalf of whom State or local government payments are made; or
- Is an individual with a disability whose own income meets the requirements of (3b).
- WIOA contains a new provision that allows for youth living in a high-poverty area to automatically meet the low-income criterion that is one of the eligibility criteria for ISY and for some OSY.
- In addition, an ISY who receives or is eligible to receive free or reduced price lunch would meet the low-income requirement.

**Note:** When a school does not use individual eligibility criteria to determine who is eligible for free or reduced price lunch, whole school receipt of free or reduced price lunch cannot be used to determine WIOA low-income status for ISY. In schools where the whole school automatically receives free or reduced price lunch, WIOA programs must base low-income status on an individual

student's eligibility to receive free or reduced price lunch or on meeting one of the other low-income categories under WIOA.

Local programs can check with their local school districts for determining whether individual students are eligible to receive free or reduced price lunch. While the free/reduced lunch low-income category primarily applies to ISY, there is one exception where it could apply to an OSY.

If an OSY is a parent living in the same household as a child who receives or is eligible to receive free or reduced price lunch based on their income level, then such an OSY would meet the low-income criteria based on his/her child's qualification.

#### **D. Exception to Low Income**

WIOA Section 129(3)(A)(ii) allows local areas to serve youth who are not low income who meet all other criteria listed for OSY and ISY except low income. However, because not all OSY are required to be low-income, the five percent (5%) low-income exception under WIOA is calculated based on five percent (5%) of newly enrolled youth in a given program year who would ordinarily be required to meet the low-income criteria.

#### **E. Documentation**

Local Boards must maintain documentation that demonstrates a youth's eligibility to participate in WIOA Title I activities.

### **III. PROGRAM SERVICE ELEMENTS**

Local Boards must ensure that all 14 program service elements are available to youth in the local area, although individual youth participants need not participate in all 14 program service elements. Participation in the program service elements is based on a youth's objective assessment and individual service strategy.

Providers of youth services do not need to provide all 14 program service elements with WIOA funds if certain services are already accessible for all eligible youth in the local area.

Local Boards should identify the extent to which the 14 program service elements are available or already being provided in the local area through a combination of resource mapping, competitive selection of providers, or through community partnerships. Local Boards may leverage partner resources to provide program elements that are available in the local area. If a local program does not fund an activity with WIOA Title I youth funds, the local area **must** have an agreement in place with the partner to offer the program element and ensure that the activity is closely connected and coordinated with the WIOA youth program if enrolled youth participate in the program element.

To support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, service providers shall provide services consisting of the following elements:

- 1) Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;
- 2) Alternative secondary school services, or dropout recovery services, as appropriate;
- 3) Paid and unpaid work experiences that have as a component academic and occupational education, which may include:
  - summer employment opportunities and other employment opportunities available throughout the school year;
  - pre-apprenticeship programs;
  - internships and job shadowing; and
  - on-the-job training opportunities.
- 4) Occupational skills training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area;
- 5) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;
- 6) Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
- 7) Supportive services;
- 8) Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
- 9) Follow-up services for not less than 12 months after the completion of participation, as appropriate;
- 10) Financial Literacy Education;
- 11) Entrepreneurial Skills Training;

- 12) Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services;
- 13) Activities that help youth prepare for and transition to postsecondary education and training;
- 14) Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.

#### IV. CAREER PATHWAYS DEVELOPMENT

WIOA places an emphasis on the development of career pathways for youth. A connection to a career pathway must be included as part of a youth's individual service strategy or *MS Works* Success plan. Local Workforce Development Boards are encouraged to adopt and implement the *MS Works* Career Pathways model. This model is an integrated compendium 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.

#### V. EFFECTIVE DATE

This policy shall be effective immediately. This policy will be revised and reissued as additional DOL/ETA guidance is received.

Jacqueline A. Turner      1-15-2020  
Jacqueline A. Turner      Date  
Executive Director

**MISSISSIPPI**  
**Policy Number 20**  
**LOCAL ONE-STOP INFRASTRUCTURE POLICY**  
**Workforce Innovation and Opportunity Act**  
**Office of Grant Management**

**I. SCOPE AND PURPOSE**

To provide guidance to Mississippi's local workforce development boards (LWDBs), Chief Elected Officials (CEOs), and all one-stop partners regarding the establishment of a local one-stop center operating budget and the negotiation of infrastructure and additional cost funding agreements between LWDBs and all Workforce Innovation and Opportunity Act (WIOA) required one-stop partners to jointly support the costs associated with local one-stop centers<sup>1</sup> and one-stop delivery systems. The funding agreements of local one-stop centers are attachments to the memoranda of understanding (MOU) between LWDBs and all WIOA required one-stop partners.

**II. REFERENCES**

- Workforce Innovation and Opportunity Act (WIOA) Sections 121, 134
- WIOA Regulations §361.300-§361.435, §361.500-§361.510, §361.700-§361.760, §678.400-§678.430, §678.700-§678.760,
- Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR Parts 200 and 2900
- U.S. Dept. of Education One-Stop Infrastructure Costs FAQs, Released: December 28, 2016
- TEGL 17-16: Infrastructure Funding of the One-Stop Delivery System, Released January 18, 2017

**III. DEFINITIONS**

**Comprehensive One-Stop Center**

- (a) A comprehensive one-stop center is a physical location where job seeker and employer customers can access the programs, services, and activities of all required one-stop partners. A comprehensive one-stop center must have at least one title I staff person physically present.
- (b) The comprehensive one-stop center must provide:
  - (1) Career services, described in WIOA Sec. 134(c)(2);
  - (2) Access to training services described in § 680.200 of the WIOA regulations;
  - (3) Access to any employment and training activities carried out under sec. 134(d) of WIOA;
  - (4) Access to programs and activities carried out by one-stop partners listed in §§ 678.400 through 678.410 of the WIOA regulations, including the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA title III (Wagner-Peyser Act Employment Service program); and
  - (5) Workforce and labor market information.
- (c) Customers must have access to these programs, services, and activities during regular business days at a comprehensive one-stop center.

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<sup>1</sup> Local one-stop centers include comprehensive, affiliate, and specialized centers in a local workforce development area.



#### **Affiliate One-Stop Center**

- (a) An affiliated site, or affiliate one-stop center, is a site that makes available to job seeker and employer customers one or more of the one-stop partners' programs, services, and activities. An affiliated site does not need to provide access to every required one-stop partner program. The frequency of program staff's physical presence in the affiliated site will be determined at the local level. Affiliated sites are access points in addition to the comprehensive one-stop center(s) in each local area. If used by local areas as a part of the service delivery strategy, affiliate sites must be implemented in a manner that supplements and enhances customer access to services.
- (b) As described in WIOA regulations § 678.315, Wagner-Peyser Act employment services cannot be a stand-alone affiliated site.

#### **Specialized One-Stop Center**

Specialized centers address specific needs, including those of dislocated workers, youth, or key industry sectors, or clusters.

#### **Access**

"Access" to each partner program and its services means:

1. Having a program staff member physically present at the one-stop center;
2. Having a staff member from a different partner program physically present at the one-stop center appropriately trained to provide information to customers about the programs, services, and activities available through partner programs; or
3. Making available a direct linkage through technology to program staff who can provide meaningful information or services.
  - i. A "direct linkage" means providing direct connection at the one-stop center, within a reasonable time, by phone or through a real-time Web-based communication to a program staff member who can provide program information or services to the customer.
  - ii. A "direct linkage" cannot exclusively be providing a phone number or computer Web site or providing information, pamphlets, or materials.

#### **One-Stop System**

The one-stop delivery system brings together workforce development, educational, and other human resource services in a seamless customer-focused service delivery network that enhances access to the programs' services and improves long-term employment outcomes for individuals receiving assistance. One-stop partners administer separately funded programs as a set of integrated streamlined services to customers.

#### **State Funding Mechanism**

The state funding mechanism is the formula the state will develop and apply that will determine the infrastructure costs of all WIOA required one-stop partners in a local area when one or more partners fail to reach consensus locally.

### **IV. REQUIREMENTS**

WIOA requires each LWDB to develop and finalize a Memorandum of Understanding (MOU) among itself and its WIOA-required partners with the agreement of the CEO for the Local Workforce Development Area (LWDA). The MOU coordinates operation of the local one-stop delivery system, provision of programs and services, and apportionment of costs. The MOU must include two types of funding agreements pertaining to the costs of the local one-stop centers and delivery system in each LWDA: Infrastructure Funding Agreement(s) (IFA) and Additional Cost Funding Agreement(s).



**A. One-Stop Center Operating Budget**

The local one-stop center operating budget is a financial plan in which one-stop partners, with approval from the LWDB in each LWDA, will agree upon and use to determine each partner's contribution to certain costs contained therein. The local one-stop center operating budget will contain a set of components that consists of costs that are specifically identified in WIOA: infrastructure costs and additional costs.

**B. Funding Agreements**

Once the local one-stop center operating budget has been established and agreed upon by all one-stop partners, with approval from the LWDA, negotiations of partner contributions towards infrastructure and additional costs of local one-stop centers will begin.

**1. Infrastructure Funding Agreement**

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

**2. Additional Cost Funding Agreement**

The agreed upon contributions by each partner towards *additional* costs shall be memorialized in an Additional Cost Agreement and attached to the MOU.

All funding agreements shall be products of good faith local discussion and negotiation amongst the partners. Each required one-stop partner must contribute to the infrastructure and additional costs of local one-stop centers and the one-stop delivery system based on the program's proportionate use and benefit received, consistent with the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200 (Uniform Guidance). LWDBs and one-stop partners may define their own methodology to determine contribution amounts, so long as it is based on the partner's proportionate use and benefit received, consistent with the Uniform Guidance, and WIOA regulations.

**C. Mississippi's WIOA One-Stop Partners**

One-stop partners shall contribute towards infrastructure costs and additional costs of local one-stop centers.

Mississippi's Combined State Plan Core Partners (as listed on page 4 of Mississippi's approved Combined State Plan) include:

- Programs authorized under the Wagner-Peyser Act (29 U.S.C. 49 et seq.);
- Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.);
- Jobs for Veterans State Grants programs authorized under chapter 41 of title 38 of the U.S.C.;
- Programs authorized under State unemployment compensation laws (in accordance with applicable Federal law);
- Vocational Rehabilitation programs authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.) (other than section 112 or part C of title I of such Act (29 U.S.C. 732, 741);
- Temporary Assistance to Needy Families (TANF) activities authorized under part A of title IV

- of the Social Security Act (42 U.S.C. 601 et seq.), subject to subparagraph (C);
- Programs authorized under Title I of WIOA, including:
  - Adult
  - Dislocated worker
  - Youth
- Adult Education and Literacy activities authorized under title II of WIOA; and
- The Senior Community Service Employment Program (SCSEP) authorized under Title V of the Older Americans Act (42 U.S.C. 3056 et seq.).

Mississippi's Combined State Plan Strategic Partners (page 4 of state plan) include:

- Postsecondary career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.);
- Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.);
- Employment and training activities carried out by the Department of Housing and Urban Development; and
- Programs authorized under Section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532).

Additional programs and entities that carry out activities as part of the one-stop delivery system may be included as one-stop partners with the approval of the LWDB and chief elected official. All partners, including additional partners, must be identified in the MOU and funding agreements. All one-stop partners shall negotiate funding agreements with the LWDB or its designee through their respective governing entities as specified by Federal and/or State law. Additional partners are only required to contribute towards infrastructure costs. Additional partners MAY contribute towards additional costs, but they are not required to do so.

#### **D. Roles and Responsibilities**

##### **1. Local Workforce Development Boards**

The LWDB may designate an individual to carry out the LWDB's roles and responsibilities outlined herein. The designee must consult with the LWDB on a regular basis throughout the negotiation process. LWDBs shall be responsible for the following:

- Serving as a consult to MDES Office of Grant Management (OGM), as needed, in the development of this guidance;
- Acting as the convener for the purpose of negotiating funding agreements;
- Ensuring the one-stop partners adhere to all applicable guidance;
- Working with the one-stop partners to achieve consensus and informally mediate any possible conflicts or disagreements;
- Providing technical assistance to new one-stop partners and local grant recipients to ensure they are informed and knowledgeable of the elements contained in the MOU and funding agreements;
- Developing a local one-stop center operating budget as a starting point for the negotiations;
- Ensuring the negotiations include an agreed upon budget and methodology for allocating infrastructure and additional costs amongst all partners;
- Ensuring allocation methodology complies with the Uniform Guidance and be based on



- proportionate use and benefit received by each partner program;
- Ensuring that all of the infrastructure and additional costs are paid according to the provisions of the MOU; and
- Informing OGM if there is an impasse.

## **2. One-Stop Partners**

Each one-stop partner in the local workforce area shall be responsible for the following:

- Designating an individual(s) who is knowledgeable about the partner programs and activities and has the authority to commit the partner programmatically and financially to act on its behalf in the negotiations, if applicable;
- Acting in good faith to negotiate infrastructure and additional costs in accordance with this guidance; and
- Entering into the local MOU and attached funding agreements.

## **3. MDES Office of Grant Management**

OGM shall be responsible for the following:

- Providing guidance and technical assistance to each LWDB and partners throughout the infrastructure and additional cost negotiation process;
- Convening state-level partner teams, in coordination with the LWDB, to negotiate each local funding agreement if needed; and
- Monitoring of IFA and Additional Cost Agreements.

## **4. State Workforce Investment Board**

The SWIB shall be responsible for the following:

- Serving as a consult to OGM, as needed; and
- Developing the formula to be used under the state funding mechanism to determine a local one-stop center's operating budget (if not agreed upon locally or rejected) and determine each partner's contribution to infrastructure costs of the local one-stop centers.

## **5. Infrastructure Costs**

Each partner that carries out a program or an activity as part of the one-stop delivery system must use a portion of the funds available for the program or activity to contribute to the infrastructure costs of local one-stop centers based on their proportional use relative to the benefit received by the partner through their participation in the local one-stop center. Each partner's contribution must adhere to that partner program's Federal authorizing statute and to the Federal Cost Principles requiring that costs are reasonable, necessary, and allocable. WIOA specifies infrastructure costs of local one-stop centers as non-personnel costs that are necessary for the general operation of the local one-stop center. Local one-stop center infrastructure costs may include, but are not limited to:

- Facility rental;
- Utilities and maintenance;
- Equipment (including assessment-related products and assistive technology for individuals with disabilities);

- Technology to facilitate access to the local one-stop centers, including technology used for the center's planning and outreach activities; and
- Common identifier costs, such as the cost of signage for local one-stop centers.

#### **6. Additional Costs**

Each partner that carries out a program or an activity as part of the one-stop delivery system should use a portion of the funds available for the program or activity to contribute to the additional (non-infrastructure) costs of the local one-stop centers based on their proportional use relative to the benefit received by the partner through their participation in the one-stop delivery system. Additional costs must include applicable career services (identified in the WIOA regulations §678.430) and may include shared operating costs and shared services that are necessary for the general operation of the local one-stop center. Required partners must contribute to additional costs, however; additional partners are encouraged to contribute though they are not required to do so. Shared service costs may include:

- Initial intake;
- Assessment of needs;
- Appraisal of basic skills;
- Identification of appropriate services to meet such needs;
- Referrals to other one-stop partners;
- Business services; and
- LWDB staff functions not otherwise paid using WIOA Title I funds and support the general operations of the local one-stop centers.

Each partner's contribution must adhere to that partner program's Federal authorizing statute and to the Federal Cost Principles requiring that costs are reasonable, necessary, and allocable.

#### **7. Types of Funds a One-Stop Partner May Use to Make Infrastructure and Additional Cost Contributions**

Infrastructure and additional costs can be funded through cash, non-cash, third-party in-kind contributions, and can include any funding from philanthropic organizations or other private entities, or through other alternative financing options. Funding must be stable and equitable. The one-stop partner's proportionate share must be calculated in accordance with the Uniform Guidance based upon a reasonable cost allocation methodology whereby infrastructure and additional costs are charged in proportion to use of the local one-stop center/system, relative to the benefit received. Costs must also be allowable, reasonable, necessary, and allocable. (For more information, see §678.720, §678.760).

#### **8. Examples of Reasonable Infrastructure and Additional Cost Allocation Methodologies**

Examples of reasonable cost allocation methodologies for infrastructure costs may include using a partner's square footage footprint within a local one-stop center, number of full-time equivalents available to a local one-stop center, or number of clients served by the partner within the one-stop delivery system, and/or a combination of all of the above.



## 9. Infrastructure and Additional Funding Agreement Content

Each funding agreement must specify:

- The effective time period;
- The infrastructure and additional costs budget for each comprehensive and affiliate center;
- The LWDB entering into the agreement;
- The name and signatures of the required one-stop partner designee entering into the agreement;
- The allocation methodology used and each partner's contribution based on an appropriate cost-allocation methodology and reconciliation;
- A description of the quarterly review and reconciliation process to ensure equitable benefit among partners; and
- A description of the process to be used among partners to resolve issues related to infrastructure funding during the MOU duration period when consensus cannot be reached.

## 10. Impasse

### Extension of Time

If the LWDB and a one-stop partner(s) do not believe they will be able to reach an agreement on appropriate levels of infrastructure cost funding contributions by July 1 of each program year, the LWDB may request an extension of time (Attachment A) if the LWDB can demonstrate they have made sufficient progress towards reaching an agreement. The request must be submitted to OGM no later than **June 15 of each program year**. OGM will review the request and make a determination to grant or deny the extension of time. If the extension is granted, the LWDB will have up to sixty (60) days to continue negotiations and reach an agreement on infrastructure cost contributions. OGM will provide technical assistance as requested by the LWDB.

### Impasse

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

### *Review and Reconciliation*

#### Periodic Review

Each local one-stop center operating budget/funding agreements shall be reviewed quarterly and

reconciled against actual costs incurred to ensure that costs charged to any one-stop partner are proportionate to the use of the local one-stop center and one-stop delivery system and relative to the benefit received by the one-stop partner. If any significant changes to the operating budget/funding agreements are required following the quarterly review, the LWDB must reconvene all partners to reach an agreement on the necessary budget and/or allocation changes.<sup>2</sup> If there is disagreement amongst partners to accommodate for these changes, the LWDB or affected partner shall contact the OGM for assistance. Any changes not deemed significant may be charged to each partner so long as there is an agreement amongst the partners to do so.

#### **Annual Re-Negotiation**

Each local one-stop operating budget and funding agreements shall be fully reviewed and re-negotiated on an annual basis.

#### **Modification**

Each time a funding agreement is modified, the associated MOU must also be reviewed to determine if modification or re-signing will be necessary.

### **V. Action**

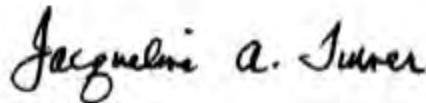
Finalized Infrastructure and Additional Cost Funding Agreements consistent with this policy must be complete and available for OGM review no later than July 1 of each program year. Additional resource information can be found in Attachments C-F.

### **VI. Inquiries**

Contact Robert DeYoung at [rdeyoung@mdes.ms.gov](mailto:rdeyoung@mdes.ms.gov) or 601-321-6477 with questions concerning this policy.

### **VII. Effective Date**

This policy shall be effective January 1, 2018, and shall remain in effect until modification or rescission.



Jacqueline A. Turner  
Deputy Executive Director, CFO

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<sup>2</sup> Significant change is defined as a twenty percent (20%) change to the dollar number of a single cost category or to a partner's cost within the existing funding agreement. These significant changes may occur as a result of losing/gaining office space, adding an additional one-stop partner, etc.



## **Attachments**

Attachment A – Request for Extension of Time

Attachment B – Report of Outcomes from Local Infrastructure Funding Agreement Negotiations

Attachment C – One-Stop Center Operating Budget Breakdown

Attachment D – One-Stop Operating Costs

Attachment E – Examples of Cost Pools and Possible Allocation Bases

Attachment F – Infrastructure Costs: Funding Sources

**Attachment A**  
**REQUEST FOR EXTENSION OF TIME**

Local Workforce Development Area: \_\_\_\_\_

Local Workforce Development Board Contact  
Person: \_\_\_\_\_

Contact's Phone Number: \_\_\_\_\_

Contact's Email: \_\_\_\_\_

Notice is hereby provided that, the LWDB and each one-stop partner(s) have made progress towards reaching agreement on funding infrastructure costs; however, agreement will not be reached by July 1, \_\_\_\_\_ and the LWDB is requesting an extension of time to continue negotiations and reach an agreement.

Please describe the LWDB's progress in reaching agreement on infrastructure costs thus far:

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Please explain why the LWDB does not believe they will be able to reach an agreement by July 1, \_\_\_\_\_:

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How much additional time is the LWDB requesting to reach an agreement?: \_\_\_\_\_

Does the LWDB need technical assistance from OGM to reach an agreement? If so, please describe assistance needed:

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Signature      Printed Name

\_\_\_\_\_  
Chair, Local Workforce Development Board

\_\_\_\_\_  
Printed Name

## Attachment B

### REPORT OF OUTCOMES FROM LOCAL INFRASTRUCTURE FUNDING AGREEMENT NEGOTIATIONS

Local Workforce Development Area: \_\_\_\_\_

Local Workforce Development Board Contact Person: \_\_\_\_\_

Contact's Phone Number: \_\_\_\_\_

Contact's Email Address: \_\_\_\_\_

Notice is hereby provided as required by §678.725 that, despite every effort, the required partner(s) in this local area did not reach consensus on a local Infrastructure Funding Agreement for the period beginning July 1, \_\_\_\_\_. The inability to reach agreement was because one or more required partners do not agree with how local one-stop center infrastructure costs will be funded. Listed below are the program partner(s) that did not agree to the Infrastructure Funding Agreement.

Program Partner Name	Reasons for Failure to Agree
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	

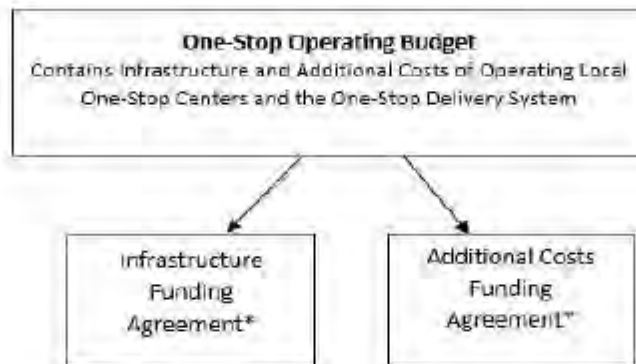
Signature

Printed Name

\_\_\_\_\_  
Chair, Local Workforce Development Board

\_\_\_\_\_  
Printed Name

### Attachment C



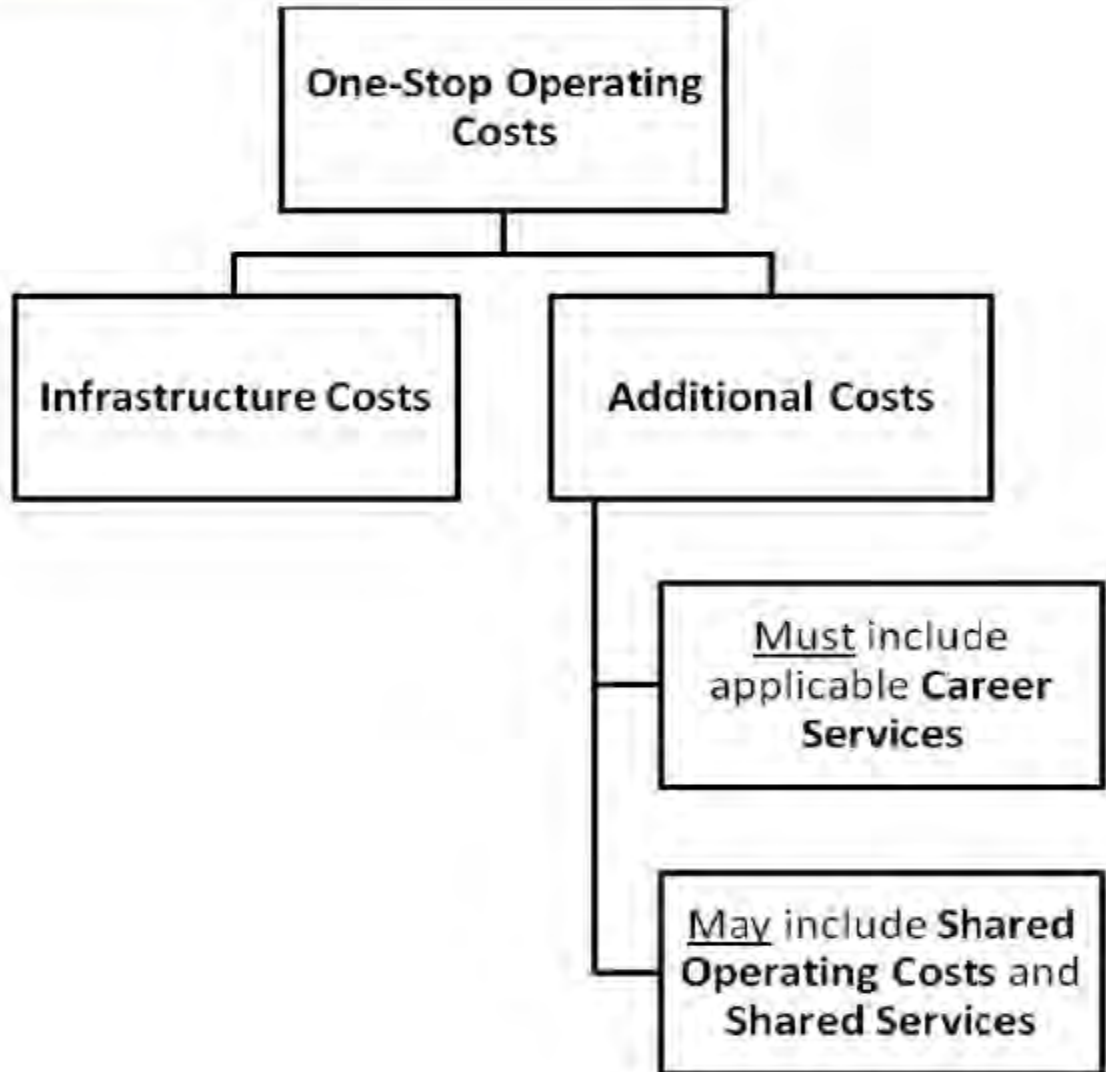
\*Both funding agreements must be included as attachments to the Memoranda of Understanding between the local Workforce Development Board (WDB) and its partners. There may be one or more of each type of agreement for each local workforce development area (LWDA). For example, a LWDA may choose to have a separate infrastructure funding agreement for each center or combine all centers into one agreement.

**Please note: The state funding mechanism ONLY applies to failure to reach an agreement on Infrastructure Funding Agreements.**

### Attachment D

Cost Pool	Possible Allocation Bases
<b>Facilities:</b> Building rent, maintenance costs, utilities, tenant improvements, or any other similar costs related to the physical structure housing the one-stop center.	Square footage occupied by each partner agency as compared to the total space. Workstation usage by partners as compared to total workstations.
<b>Telecommunications:</b> Monthly telephone costs, telephone system equipment, data lines, T-1 lines, and other similar costs.	Dedicated telephone units as compared to all units.
<b>Information Technology:</b> Shared equipment, software, IT maintenance costs, Internet access, and other similar costs.	Number of dedicated computers (including all necessary equipment) as compared to total.
<b>Resource Center:</b> Costs of shared equipment, displays, computer learning, specialized software for computer learning, furniture, copier, fax machine; may also include related staff costs.	Number of program participants or reportable individuals utilizing the resource center.
<b>Common Intake System:</b> Costs of developing common intake data formats, preparation and interview of customers, and similar costs.	Use of common data formats and data elements required for each program. Use of number of customer or participant records maintained by each partner program.
<b>One-Stop Center Management Staff:</b> Costs of the center director.	Number of partner program staff FTEs. Square footage of partner program benefit or number of program participants and reportable individuals served.
<b>One-Stop Center General Operations Staff:</b> Costs of the receptionist, staff of the resource center.	Number of partner program participants.
<b>Shared Equipment and Supplies:</b> Staff copier, fax, associated supplies, and furniture.	Usage by staff of each partner program. Occupancy (square footage) basis; numbers of staff workstations.
<b>Career Services:</b> Staff and benefit costs, development of common forms for case management, and similar costs.	Time distribution system (time sheets, work sampling, time and motion studies); numbers of clients eligible for specific program; weighted participation numbers.

Attachment E





## Attachment F

Dept.	Partner Program	Required/ Additional Partner	Admin. Funds to Pay for Infrastructure Costs <sup>1</sup>	Program Funds to Pay for Infrastructure Costs	State Funding Mechanism Applicable <sup>2</sup>
DOL	WIOA Title I programs:	Required	Yes	Yes	Yes
	• Adult, Dislocated Worker, & Youth				
DOL	• Job Corps	Required	No	Yes	Yes
DOL	• YouthBuild	Required	Yes	Yes	Yes
DOL	• NEJP	Required	Yes	Yes	Yes
DOL	• Native American programs <sup>3</sup>	Required	Yes	Yes	No
DOL	Wagner-Peyser Act ES	Required	N/A <sup>4</sup>	Yes	Yes
DOL	SCSEP	Required	Yes	Yes	Yes
DOL	TAA program	Required	Yes	Yes	Yes
DOL	UC programs	Required	N/A <sup>4</sup>	Yes	Yes
DOL	JVSG programs	Required	N/A <sup>4</sup>	Yes	Yes
DOL	REO programs authorized under sec. 212 of the Second Chance Act of 2007 (42 U.S.C. 17532) and WIOA sec. 169	Required	Yes	Yes	Yes
ED	AEFLA program, authorized under WIOA title II	Required	Yes	No	Yes
ED	The State VR program authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), as amended by WIOA title IV	Required	N/A <sup>4</sup>	Yes	Yes
ED	Career and technical education programs at the postsecondary level, authorized under the Carl D. Perkins Career and Technical Education Act of 2006	Required	Yes	No	Yes
HUD	Employment and training activities carried out by HUD	Required	Consult partners' authorizing documents.	Consult partners' authorizing documents.	Yes
HHS	Employment and training activities carried out under the CSBG programs	Required	Consult partners' authorizing documents.	Consult partners' authorizing documents.	Yes
HHS	TANF	Either <sup>5</sup>	Yes	No	Yes/No <sup>6</sup>
Other	Partners as outlined by WIOA sec. 121(b)(2)(B) and 20 CFR 678.410 <sup>7</sup>	Additional	Consult partners' authorizing documents.	Consult partners' authorizing documents.	No

**LIMITATIONS:**

<sup>1</sup> Partners' funding contributions for infrastructure costs are subject to the partner programs' administrative cost limitations and restrictions.

<sup>2</sup> The definition of administrative costs may also differ from one partner program to the next.

<sup>3</sup> Statutory caps for infrastructure funds is applicable only if the State Funding Mechanism is being implemented.

<sup>4</sup> Native American programs, as required One-stop partners, are strongly encouraged to contribute to infrastructure costs, but they are not required to make such contributions under WIOA.

<sup>5</sup> These programs do not distinguish between program or administrative funds since there is only one allotment from which all expenditures — administrative costs and program costs — must be paid. Although the VR program imposes no limits on the amount of funds that may be spent on administrative costs, VR agencies must report funds spent for infrastructure costs as administrative costs.

<sup>6</sup> At the discretion of the Governor, in accordance with WIOA sec. 121(b)(1)(C) and 20 CFR 678.405.

<sup>7</sup> The Governor may determine that TANF will not be a required partner.

<sup>8</sup> Additional partners are required to share in infrastructure costs when participating in the one-stop service delivery system; however, the State funding mechanism is not applicable to additional partners.

**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
**State Policy Number 21**  
**RAPID RESPONSE - LAYOFF AVERSION POLICY AND PROCEDURES**  
**Workforce Innovation and Opportunity Act (WIOA)**

**I. SCOPE AND PURPOSE**

This policy sets forth the procedures and requirements for providing Layoff Aversion activities. This policy applies to Local Workforce Development Area (LWDA), and other entities that receive Rapid Response funds by the allocation, pass-through, and subgrant award methods unless otherwise instructed by the Office of Grant Management (OGM).

Each LWDA must develop a Layoff Aversion activity plan that incorporates Mississippi Department of Employment Security (MDES) State Policy Number 21 and meets the minimum federal and state requirements described in Section II, herein.

**II. PROCEDURES**

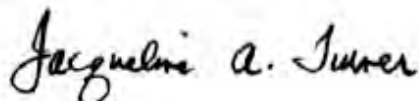
- A. The Rapid Response unit must work in conjunction with local workforce development boards, chief elected officials, and other stakeholders.
- B. State and local Rapid Response programs have the discretion to determine which strategies and activities are applicable in given situations, based upon specific needs, policies, and procedures within the State or Local area.
- C. Layoff Aversion includes the strategies and activities that are designed to prevent, or minimize the duration of, unemployment. The US Department of Labor Employment and Training Administration encourages state and local Rapid Response operators to design innovative solutions, including those described below, for both businesses and workers in transition. Layoff Aversion may include a wide array of possible strategies or activities, including but not limited to:
  - 1. Ongoing engagement, partnership, and relationship-building activities with businesses in the community, in order to create an environment for successful layoff aversion efforts and to enable the provision of assistance to dislocated workers in obtaining reemployment as soon as possible;
  - 2. Providing assistance to employers in managing reductions in force, which may include early identification of firms at risk of layoffs, assessment of the needs of and options for at-risk firms, and the

delivery of services to address these needs;

3. Funding feasibility studies to determine if a company's operations may be sustained through a buyout or other means to avoid minimize layoffs;
4. Developing, funding, and managing incumbent worker training programs or other worker upskilling approaches as part of a layoff aversion strategy or activity;
5. Connecting companies to: Short-time compensation or other programs designed to prevent layoffs or to reemploy dislocated workers quickly, available under Unemployment Insurance programs; Employer loan programs for employee skill upgrading; and other Federal, State and local resources as necessary to address other business, needs that cannot be funded with resources provided under this title;
6. Establishing linkages with economic development activities at the Federal, State and local levels, including Federal Department of Commerce programs and available State and local business retention and expansion activities;
7. Partnering or contracting with business-focused organization to assess risks to companies, propose strategies to address those risks, implement services, and measure impacts of services delivered;
8. Conducting analyses of the suppliers of an affected company to assess their risks and vulnerabilities from a potential closing or shift in production of their major customer;
9. Engaging in proactive measures to identify opportunities for potential economic transition and training needs in growing industry sectors or expanding businesses; and
10. Connecting businesses and workers to short-term, on-the-job, or customized training programs and registered apprenticeships before or after layoff to help facilitate rapid reemployment.

- D. For more information on allowable layoff aversion strategies and activities, see Training and Employment Notice (Code of Federal Regulation) title 20, *Employment and Training Administration, Department of Labor*.

### III. APPROVAL



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Jacqueline A. Turner  
Executive Director



## Section I3. Wagner-Peyser Assurances

### I3A. Memorandum of Understanding (MOU) between MDES and MDRS

**MEMORANDUM OF UNDERSTANDING  
BETWEEN  
THE MISSISSIPPI DEPARTMENT OF REHABILITATION SERVICES  
&  
THE MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY  
CONCERNING  
IMPLEMENTATION AND ENFORCEMENT OF THE PROVISIONS OF THE  
WORKFORCE INNOVATION AND OPPORTUNITY ACT OF 2014 SECTION 504  
AND THE AMERICANS WITH DISABILITIES ACT**

This Memorandum of Understanding (hereafter MOU) outlines a partnership between THE MISSISSIPPI DEPARTMENT OF REHABILITATION SERVICES (MDRS) and the MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY (MDES), entered into on a voluntary, non-legally binding basis, expressing a mutual agreement to work together in a positive spirit to continually improve the lifestyle, acceptance and accessibility of persons within the Mississippi Workforce Investment Network with a disability. This MOU will become effective upon execution by both parties, and will remain in effect until June 30, 2021.

#### **Background:**

The MDRS and the MDES have, over the years, demonstrated their commitment to persons with disabilities in many ways and in various programs. With the enactment of the Workforce Innovation and Opportunity Act of 2014 and the Mississippi Comprehensive Workforce Training and Education Consolidation Act of 2004, a partnership was forged to ensure that all stakeholders in Mississippi's Workforce system are afforded the same services, rights, privileges and benefits. The goal is to continue to strengthen awareness of contributions in the workforce and society in general by people with disabilities.

#### **General areas of partnership:**

A major focus of the partnership is the obligation to eliminate discrimination on the basis of disability. The guiding principle in this partnership is to ensure that each individual with a disability participates in the most integrated setting appropriate to that individual.

The partnership agreement includes the following:

- MDES provides assurances that communication with persons with disabilities is as effective as with others - (List of certified interpreters of Sign Language for the State of Mississippi, <http://www.odhh.org/interpreter-registration/>).
- MDES provides assurances that accessible computer workstations, including adaptive software, currently located in WIN Job Centers and the MDES State Office will be evaluated at the same time as all other computer workstations for the latest technology and software updates, and will install any needed upgrades as resources permit.
- MDRS performs Accessibility Surveys in WIN Job Centers and the MDES State Office to determine if there are any structural accessibility barriers that are architectural and/or communicational in nature, upon request and as MDRS resources and staff workload permits.
- MDRS provides limited general advice and guidance with assistive technology which allows equal access to information, services, and activities within the Mississippi Workforce Investment Network to people with disabilities. MDRS will direct MDES and other partners in the State's workforce network to other available resources for more in-depth advice and guidance pertaining

to assistive technology. Other available resources include, but are not limited to, the following: 1) Job Accommodation Network (JAN), askjan.org 2) Alliance for Technology Access (ATA), ataccess.org; and, 3) Southeast ADA Center, ADAseouteast.org

- MDRS provides limited general advice and guidance regarding adaptive hardware and software used to accommodate disabilities. MDRS staff will answer general questions regarding computers and adaptive software. (Examples are workstation setup for adaptive software and hardware such as Screen Reader software (JAWS), Screen Magnification software (ZoomText), adaptive mice and keyboards, and adjustable height desks.) More in-depth questions should be directed to other assistive technology resources such as those resources listed above or to vendors of assistive technology such as computers and adaptive software.
- The partnership provides educational and outreach activities with the goal of improving quality of life for those with a disability and building awareness of those without disabilities.

### Other Terms and Conditions

**A. Termination.** Notwithstanding any other provision of this Agreement to the contrary, this Agreement may be terminated by either party within thirty (30) days written notice at any time during the performance period of this MOU.

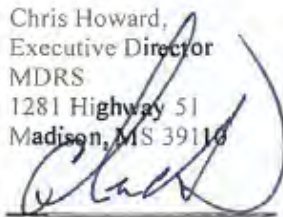
**B. Amendment.** This MOU may not be amended or modified in any respect except by an instrument in writing signed by both parties hereto.

**C. Best Efforts.** MDES agrees to exert its best efforts in the performance of its obligations under this MOU. However, MDES disclaims any liability associated with the performance or non-performance of this MOU, or the consequences of any error or mistake on its part. Moreover, the execution by MDES of this MOU shall not be construed to create a cause of action for any party, whether public and/or private.

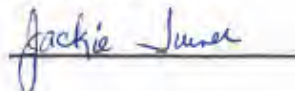
**D. Confidentiality.** The use or disclosure of any information deemed confidential under State or Federal law is prohibited, except to the extent necessary to administer the terms and conditions of this MOU, or to the extent required by law. In addition, any individual who is in possession of said information will take all necessary precautions to prevent disclosure to unauthorized individuals.

IN WITNESS WHEREOF, the parties hereto have caused this MOU to be duly executed on this the 3<sup>rd</sup> day of February, 2020.

Chris Howard,  
Executive Director  
MDRS  
1281 Highway 51  
Madison, MS 39110



Jackie Turner  
Executive Director  
MDES  
1235 Echelon Parkway  
Jackson, MS 39213

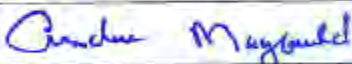




## Section 14. Adult Basic Education Program Specific Requirements

### 14A. Adult Education and Family Literacy Act Program Certifications and Assurances

#### ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS AND ASSURANCES

<b>States must provide written and signed certifications that:</b>	
1.	The plan is submitted by the State agency that is eligible to submit the plan;
2.	The State agency has authority under State law to perform the functions of the State under the program;
3.	The State legally may carry out each provision of the plan;
4.	All provisions of the plan are consistent with State law;
5.	A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;
6.	The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
7.	The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
8.	The plan is the basis for State operation and administration of the program;
<b>The State Plan must include assurances that:</b>	
1.	The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);
2.	The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;
3.	The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;
4.	Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.
5.	The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).
I do hereby certify that all statements made by me are true and correct, to the best of my knowledge, information and belief, further, I understand that in the event that I have knowingly and willfully made any false statements, I will be liable for punishment in accordance with all applicable state and federal laws and statutes.	
Signature	
Printed Name	Dr. Andrea Mayfield
Title of Signatory	Executive Director, Mississippi Community College Board
Date Signed	1/17/2020

### CERTIFICATION REGARDING LOBBYING

**Certification for Contracts, Grants, Loans, and Cooperative Agreements** The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the execution, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the solicited documents for all subawards at all times including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements, and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Statement for Loan Guarantees and Loan Insurance**

The undersigned certifies, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to make or guarantee a loan, the undersigned shall complete and submit Standard Form LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

<b>* APPLICANT'S ORGANIZATION</b>			
MS COMMUNITY COLLEGE BOARD			
<b>* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>			
Prefix:	DR	* First Name:	ANDREA
		Middle Name:	SCOTT
		* Last Name:	MAYFIELD
		Suffix:	
		* Title:	EXECUTIVE DIRECTOR
<b>* SIGNATURE:</b>		<b>* DATE:</b>	
Andrea Mayfield		1-17-2020	

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**Note:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management, and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States, and if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§728-765) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §94), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with the provisions of the Hatch Act (5 U.S.C. §§501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§ 276a to 276a-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. § 874) and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327-333), regarding labor standards for federally assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-254) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11888; (e) assurance of project consistency with the approved State management programs developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. § 1401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended, (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 721 et seq.) related to protecting components in potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 100 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. § 469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§ 1331 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 2801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, Audits of States, Local Governments, and Non-Profit Organizations.
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL <i>Andrew Mayhew</i>		TITLE EXECUTIVE DIRECTOR
APPLICANT ORGANIZATION MS COMMUNITY COLLEGE BOARD		DATE SUBMITTED 1.17.2020

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**GEPA Section 427 Statement:**

*"The Department of Education's General Education Provisions Act (GEPA) applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382)."*

*"The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in the Federally-funded project or activity."*

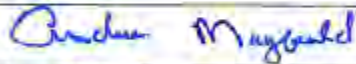
The Equal Employment Opportunity Commission enforces five statutes that prohibit job discrimination by private employers and state and local government agencies:

1. Title VII of the Civil Rights Act of 1964 (Title VII),
2. The Age Discrimination in Employment Act of 1967 (ADEA)
3. The Equal Pay Act of 1963 (EPA)
4. The Americans with Disabilities Act of 1990 (ADA)
5. Sections of the Civil Rights Act of 1991 (CRA) which amended provisions of Title VII, the ADEA, and the ADA.

The Mississippi Community College Board, in its capacity as the coordinating Board of the community and junior colleges of the State of Mississippi, strongly urges each of the colleges to comply fully with federal and state nondiscrimination laws and executive orders which constitute the legal mandate for equal employment opportunity. The Board also strongly urges each community and junior college to ensure that no one shall be excluded from participating in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity of the college on the grounds of race, sex, age, color, creed, national origin, religion, disability, or any other protected group. The Board itself further adheres to the principle of equal educational and employment opportunity as mandated by each of these statutes.

The Office of Adult Education will ensure to the fullest extent possible equitable access to, participation in, and appropriate educational opportunities for all federally funded local adult education programs to include faculty, staff and students with special needs. Activities, programs and services will be accessible to all teachers, students, and other program beneficiaries with special needs allowing them to participate fully in the projects. The Office of Adult Education does not discriminate on the basis of age, color, religion, creed, disability, marital status, veteran status, socio-economic status, national origin, race, gender or sexual orientation in its education and research programs, or its services and activities. It provides reasonable and appropriate accommodations to meet the learning and evaluation needs of a diverse group of students, faculty, community members and other participants.

All funded AEFLA programs submitted a GEPA plan as part of the application process for the WIOA Competition. The Office of Adult Education will monitor each local program on the plan submitted as part of the application.

Signature	
Printed Name	Dr. Andrea Mayfield
Title of Signatory	Executive Director, Mississippi Community College Board
Date Signed	1.17.2020

## I4B. Monitoring Checklist

MS Adult Education Monitoring Tool for Program Year 2019-2020

### Adult Education Monitoring Tool Fiscal Years 2017-18, 2018-19, and 2019-20



**Provider:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Reviewer Name:** \_\_\_\_\_

**Vision:** The vision of the MCCB OAE is to provide leadership, training, and technical assistance to adult education and literacy programs and ensure that quality educational services are available to adults and out-of-school youth across Mississippi.

**Mission:** The adult education system will provide research-proven instruction and college and career readiness pathways that allow adults to master academic and technical skills in order to attain their career and educational goals, become full partners in the educational development of their children, and successfully navigate education and employment opportunities.

**Goals:**

1. Implement and scale comprehensive, innovative college and career pathways to accelerate student completion and foster economic growth.
2. Guide and support transformational instructional practices that accelerate student completion to certificates, and AA/BA degrees leading to family sustaining employment.
3. Contextualize adult education courses to support transition to high school completion & equivalency certification, postsecondary education, and employment.
4. Strengthen and maintain a culture of rigorous instruction and evidence of increased performance.
5. Create and maintain strategic alliances to leverage local resources and increase navigational support to participants.
6. Foster student self-efficacy.

Key: ☐ Review materials for evidence of activity

Page 1



This tool is based on our state's Strategic Workforce Plan, with specific detail on the implementation of the *Workforce Innovation and Opportunity Act (WIOA)*, the *Adult Education and Family Literacy Act (AEFLA)*, and the Adult Education and Integrated English Literacy and Civics Education (IELCE) Grants. This tool will guide discussion about the implementation of the minimum components and other compliance requirements for providers receiving funding from MCCB – Office of Adult Education (MS OAE).

#### Before the Visit

- **It is highly recommended that you fill out this tool prior to the visit. The check boxes indicate specific evidence is needed.** In preparation for the monitoring (team) visit, the Monitoring Tool must be answered and submitted to the Program Specialist for Technical Assistance and Support, a minimum of **two weeks** prior to the date of the visit.
- Labeled documentation folders need to be available for the team the day(s) of the visit addressing each of the monitoring items.
- Prepare materials/records to share with the review team. Examples of materials needed for this review include:
  - Student records showing daily attendance and distance education proxy hours, Intake Forms, Assessment records, Tuition Waivers (if applicable)
  - Memorandums of Understanding (MOU) with Core Partners and Community-based Organizations
  - Pathway diagrams, IET Single Set of Learning Objectives, written policies and procedures, data flowchart, materials driven by the College and Career Readiness Standards published by provider
  - Time and Effort forms, job descriptions, non-MS OAE trainings attended, and AE staff credentials
  - Accounting and enrollment records (invoices, inventory lists, budgets, class sign-ins sheets, and class schedules)
- Ensure meeting space is reserved and appropriate AE program staff are included as needed.

#### During the Visit

- Discuss program responses to each item/prompt in the tool and share materials/records. **The tool and other materials/records will not be collected but may be copied for follow-up and feedback.** The sections can be discussed in any order to accommodate program staff needing to return to other duties.
- The Compliance Team will mark a check box after evidence is reviewed and determined to meet requirements. If the evidence does not meet requirements or is not available, corrective action may be required.
- At the end of the visit, preliminary results will be shared in an Exit Interview format.

#### After the Visit

- Within **four (4) weeks** of the visit, a letter will be sent to the program director noting any commendations, recommendations, and findings for areas that need corrective action. If corrective action is required, the letter will outline the timeline for a reply from the program.
- **One (1) week** after the follow-up letter is sent, the AE program director will receive a request for evaluation of the monitoring visit conducted. Responses are required to be submitted within **one (1) week** of receipt. Responses should be honest and informative in order to be used to improve the monitoring process and enhance the services provided to all programs funded by the Office of Adult Education.

Key: ☐ Review materials for evidence of activity

Page 2

Section 1 – Program Overview, Coordination with State Plan, and Program Intake & Orientation (State Plan Goals 1,2,3,4,5, 6,7 & NRS reporting)				
Questions	Compliant			Comments
	YES	NO	N/A	
<b>Program Overview</b>				
1. How does your host institution support your program (funding, facilities, equipment, and technology)?				
2. How does your program select, orient, and retain qualified staff and instructors. How do you ensure instructors maintain or increase skills necessary to provide up-to-date and evidence-based instructional practices that accelerate student completion?				
<input type="checkbox"/> <i>Requirements outlined in the MS OAE Program Guidelines</i> <input type="checkbox"/> <i>Job Descriptions</i> <input type="checkbox"/> <i>Professional Development (PD) Training records</i> <input type="checkbox"/> <i>Improvement Plans</i> <input type="checkbox"/> <i>Confidentiality Agreement</i> <input type="checkbox"/> <i>Termination/Resignation letter</i> <input type="checkbox"/> <i>Degree/Credentials</i> <input type="checkbox"/> <i>Staff Evaluations</i> <input type="checkbox"/> <i>Technology Use Policy</i> <input type="checkbox"/> <i>Other: _____</i>				
3. Describe the educational needs of the community your program serves and what services you offer to foster self-efficacy and economic improvement. Include activities that support our MS State Plan goals.				

Key: ☐ Review materials for evidence of activity

Page 3

MS Adult Education Monitoring Tool for Program Year 2019-2020

<p><input type="checkbox"/> <i>Provide services to individuals who have low levels of literacy in content domains of reading, writing, mathematics, and English language acquisition</i></p> <p><input type="checkbox"/> <i>Provide services that lead to unsubsidized employment, attainment of a secondary school diploma or equivalent, and transition to post-secondary education and training</i></p> <p><input type="checkbox"/> <i>Services provided that align with the MS State Plan in regards to concurrent enrollment in programs and activities under Title I of WIOA, as appropriate</i></p> <p>4. What processes and procedures does your program have in place to ensure equitable access to and participation in program services for participants, teachers, and other stakeholders regardless of gender, race, national origin, color, disability or age?</p> <p><input type="checkbox"/> <i>General Education Provisions Act (GEPA)</i></p> <p><input type="checkbox"/> <i>Americans with Disabilities Act and the Americans with Disabilities Amendments Act (ADAAA) policy</i></p> <p><input type="checkbox"/> <i>Coordination with MDRS and/or community partners</i></p> <p>5. Briefly describe the program planning process used to assess the needs of the adult education program, including developing site locations and creating class schedules.</p> <p><input type="checkbox"/> <i>Counties served by program</i></p> <p><input type="checkbox"/> <i>Staff placement</i></p> <p><input type="checkbox"/> <i>Availability of instruction for low-level literacy skills, English language learners, and integrated education and training (IET) services</i></p> <p><input type="checkbox"/> <i>Core partner referrals</i></p> <p>6. What services is the program providing to address the components of the IET/MIBEST program?</p>				
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Key: ☐ Review materials for evidence of activity

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<p><input type="checkbox"/> Activities, programs, or services that are designed to help an individual acquire a combination of basic academic skills, critical thinking, digital literacy, and self-management skills</p> <p><input type="checkbox"/> Employability skills that address competencies in using resources and information, working with others, understanding systems, and obtaining skills necessary to successfully transition to and complete postsecondary education, training, and employment</p> <p><input type="checkbox"/> Other employability skills that increase an individual's preparation for the workforce</p> <p><input type="checkbox"/> Services are integrated, concurrent, and contextualized</p> <p><b>Coordination with State Plan</b></p> <p>7. How does the program ensure / demonstrate alignment between AE activities and services and the strategy and goals of the MS State Plan and WIOA, as well as the activities and services of the one-stop partners to expand access to employment, education and other services for individuals with barriers to employment through career pathways?</p> <p><input type="checkbox"/> Memoranda of Understandings (MOUs) or similar agreements among critical WIOA partners such as: Workforce Centers, DRS local offices, Support Service Providers (i.e. transportation, childcare, financial aid, counseling, and career advising), or Business and Industry</p> <p><input type="checkbox"/> MOUs contain a description of duration, procedures, and services to be provided by both entities and/or through the one-stop delivery system</p>				
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Key: ☐ Review materials for evidence of activity



MS Adult Education Monitoring Tool for Program Year 2019-2020

<p><input type="checkbox"/> <i>One-Stop MOUs contain operating budgets identifying the costs of services and the operating costs of the system</i></p> <p><input type="checkbox"/> <i>Contains methods of referring individuals between the partner agencies</i></p> <p><input type="checkbox"/> <i>Contains methods to ensure that the needs of workers, youth, and individuals with disabilities, are addressed in providing access to services and technology</i></p> <p>8. What processes and procedures does your program have in place to evaluate the effectiveness of core partner collaborative efforts?</p> <p>9. Is there a WIOA resource list/guide of available support services to foster retention, recruitment, and student transition accessible to participants?</p> <p>10. Does the program have an active Advisory Council?</p> <p><input type="checkbox"/> <i>Copies of agendas/sign-in sheets/minutes of advisory council meetings)</i></p>				
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Key: ☐ Review materials for evidence of activity

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Section 1 – continued (State Plan Goals 1,2,3,4,5, 6,7 & NRS reporting)				
Questions	Compliant			Comments
	YES	NO	N/A	
11. Describe the career and college pathways at your organization and detail how you promote or advertise transition options for college, training, and careers with participants and the community. <input type="checkbox"/> <i>Materials used with participants exploring pathways, for example program maps, meta-major diagrams, courses designed &amp; sequenced for a pathway, etc.</i> <input type="checkbox"/> <i>Smart Start</i> <input type="checkbox"/> <i>Integrated Education and Training</i> <input type="checkbox"/> <i>Integrated English Literacy and Civics Education</i>				
12. Once in your program, how do you guide and support participants along a career or college pathway? Describe the navigational, advising, counseling or other supports available to participants to mitigate educational and employment barriers. Include goal-setting procedures related to fostering student self-efficacy. <input type="checkbox"/> <i>Examples can include goal-setting activities, advising documentation, the Transition Specialist activity log, etc.</i> <input type="checkbox"/> <i>MS OAE Student Success Plan (SSP)</i> <input type="checkbox"/> <i>Transition Activity Log</i>				
13. How often do you have participants reevaluate education and career goals to ensure participants are on track to complete and transition? <input type="checkbox"/> <i>Materials used with participants when revisiting goals</i> <input type="checkbox"/> <i>Materials used with participants tracking progress towards transitions</i>				

Key: ☐ Review materials for evidence of activity

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<p>14. Based on transition data, what will you do to improve transitions?</p> <p><input type="checkbox"/> <i>Federal Table 5</i></p> <p><input type="checkbox"/> <i>IET/MIBEST enrollments (Verified by Navigator Signature)</i></p> <p><input type="checkbox"/> <i>Collaborative partnerships with Core Partners and/or Business and Industry</i></p> <p><b>Intake &amp; Orientation</b></p> <p>15. Does the program have samples of current marketing materials available for review?</p> <p><input type="checkbox"/> <i>Materials used for recruiting ABE ,ESL, and IET/IELCE participants</i></p> <p>16. What form do you use to collect intake data?</p> <p><input type="checkbox"/> <i>Using MS OAE Student Success Plan (SSP)</i></p> <p>17. Describe the program's intake and orientation process. Include how your program provides education services to English language learners, including professionals with degrees and credentials in their native countries, that enables them to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens.</p> <p><input type="checkbox"/> <i>Written policy and procedure for intake and orientation</i></p> <p>18. How does the program's intake process ensure proper student placement in regards to ABE, ESL , and IET/IELCE procedures?</p> <p><input type="checkbox"/> <i>Written placement policy</i></p>				
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Key: ☐ Review materials for evidence of activity

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MS Adult Education Monitoring Tool for Program Year 2019-2020

<p>19. How is the program assisting adults to become literate, and obtain the knowledge and skills necessary for employment and economic self-sufficiency?</p> <p><input type="checkbox"/> <i>Number of ABE and ESL participants (EFLs 1-4 &amp; ESL 1-6) served for the last three (3) program years. (Table 1)</i></p> <p><input type="checkbox"/> <i>IET Bridge Programs</i></p> <p><input type="checkbox"/> <i>Apprenticeships</i></p>				
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Key: ☐ Review materials for evidence of activity

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**Section 2 – Data Quality and Achievement & Performance Feedback**  
 (State Plan Goal 1, 4, 6, 7, & NRS)

Questions	Compliant			Comments
	YES	NO	N/A	
<b>Data Quality</b>				
20. Has the program established written data collection policy and procedures as stated in the Technical Assistance Guide of the National Reporting System? How do you verify staff understand the data flow process and staff responsibility? <input type="checkbox"/> <i>Written Data Collection Process to include:</i> <ul style="list-style-type: none"><li>➤ <i>Data flowchart including job responsibilities</i></li><li>➤ <i>Use of the Data Management System</i></li><li>➤ <i>Timely input of data</i></li><li>➤ <i>Includes demographics</i></li><li>➤ <i>Barriers to employment</i></li><li>➤ <i>Verification of withdrawal for 16-17 year olds</i></li><li>➤ <i>Assessment</i></li><li>➤ <i>Attendance data</i></li><li>➤ <i>Data review and correction</i></li><li>➤ <i>Performance reviews</i></li><li>➤ <i>Student cumulative folder review</i></li><li>➤ <i>Competency-based diploma verification</i></li></ul>				
21. Describe how staff confirm data quality and accomplish reporting requirements (I.e. database error-checking function, data match through external data systems, Integrated Education and Training (IET) participants, multiple Periods of Participation, ESL needs, Integrated English Literacy and Civics Education (IELCE), etc.). <input type="checkbox"/> <i>Does the data on student demographics raise any issues?</i> <input type="checkbox"/> <i>Does the proportion of students served in ABE, ASE, and ESL appear reasonable based on program needs?</i>				

Key: ☐ Review materials for evidence of activity

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MS Adult Education Monitoring Tool for Program Year 2019-2020

<input type="checkbox"/> Does the student outcome data on Table 4 indicate adequate performance? <input type="checkbox"/> Identification of technical assistance needs				
22. Has the program developed a process to implement the MS Office of Adult Education (OAE) Assessment Policy to meet Measurable Skills Gains? <input type="checkbox"/> Use of state-approved assessments outlined in the MS OAE Program Guidelines <input type="checkbox"/> Completion of TABE certification by all staff <input type="checkbox"/> Track participants with 12 or more instructional hours <input type="checkbox"/> Correction of out-of-range scores <input type="checkbox"/> Use of locator for guidance <input type="checkbox"/> Use of alternate testing forms <input type="checkbox"/> MS OAE Program Guidelines assessment resources for NRS educational functioning levels <input type="checkbox"/> Post-test Rate report showing evidence of maintaining a post-test rate of at least 65% <input type="checkbox"/> Use Table 4B				
23. Do appropriate staff participate in required trainings on NRS data collection, review, and reporting, the Data Management System, and TABE? <input type="checkbox"/> PD is properly titled and hours entered properly <input type="checkbox"/> Agendas with training topics <input type="checkbox"/> Documentation of resources				
24. What data are used for individuals, business, and industry as part of the career pathways development? <input type="checkbox"/> Job skills of participants <input type="checkbox"/> Local workforce sectors <input type="checkbox"/> Employment trends <input type="checkbox"/> Available pathways within the program				

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<p>26. What demographic or other data were used to determine the target population for this IELCE program?</p> <p>27. How do you ensure IET/MIBEST and IECLE program data quality in the following areas:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Local process outlined (if applicable)</li> <li><input type="checkbox"/> List of IETP/MIBEST participants (Verified by Navigator)</li> <li><input type="checkbox"/> List of IECLE participants</li> <li><input type="checkbox"/> Attendance captured accurately</li> <li><input type="checkbox"/> IETP/MIBEST participants post-tested</li> <li><input type="checkbox"/> IECLE participants post-tested</li> </ul> <p><b>Achievement &amp; Performance Feedback</b></p> <p>28. Does your program have a history of meeting MS performance indicator targets?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Table 4 outcomes for past three years</li> </ul> <p>29. Are you demonstrating continual improvements in outcomes, consistent with WIOA performance accountability requirements?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Smart Start credential attainment</li> <li><input type="checkbox"/> IETP/IELCE completion</li> <li><input type="checkbox"/> Increase in participants on Table 5</li> </ul> <p>30. Does the average number of instructional hours indicate that programs are of sufficient intensity and duration to produce Measurable Skill Gains?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> MS OAE Desktop Monitoring Tool, Column M</li> </ul>				
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<p>31. What is your plan to increase credential accrual rates for all participants?</p> <p><input type="checkbox"/> <i>Participants with no Earned Credentials in the Smart Start and/or IET/MIBEST/IELCE options</i></p> <p>32. How will you maintain or increase your enrollment and attendance hours? Compare the number of participants the program proposed to serve in its MS OAE Grant application to actual service levels.</p> <p><input type="checkbox"/> <i>Enrollment Proposed by provider in MS OAE Grant application.</i></p>				
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Key: ☐ Review materials for evidence of activity



Section 3 – Curriculum & Instructional Practices (State Plan Goals 2, 3, 5 & 6)				
Questions	Compliant			Comments
	YES	NO	N/A	
33. Provide a list of software programs purchased with adult education funds and explain how the software is used to differentiate instruction. <input type="checkbox"/> <i>Document student usage from July to June (if applicable)</i>				
34. How do instructors use assessments (i.e. TABE Profile Report, WorkKeys, practice and official high school equivalency (HSE) test, instructor-designed instrument, etc.) to identify and analyze competency and skill gaps in order to inform instructional practices? <input type="checkbox"/> <i>Examples of assessments used and how they inform instruction</i>				
35. Describe how your program embeds College and Career Readiness Standards (CCRS), contextualized instruction, and problem solving in technology rich environments in all instructional practices. <input type="checkbox"/> <i>Examples of rubrics, outcomes, or syllabi/lesson plans</i> <input type="checkbox"/> <i>IET Single Set of Learning Objectives(SSLOs)</i>				
36. Explain how your program offers sufficient rigor, intensity, and duration for participants to achieve substantial learning gains in basic skills, IET/IELCE, and ESL programs. <input type="checkbox"/> <i>Integrated with training and civics</i> <input type="checkbox"/> <i>IET included in IELCE</i> <input type="checkbox"/> <i>Use occupationally relevant instructional materials</i> <input type="checkbox"/> <i>Specific adult education content</i> <input type="checkbox"/> <i>IET Single Set of Learning Objectives(SSLOs)</i>				

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<p><input type="checkbox"/> <i>Workforce preparation activities (Smart Start)</i></p> <p><input type="checkbox"/> <i>Workforce training competencies</i></p> <p>37. How does instruction provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement?</p> <p><input type="checkbox"/> <i>Activities, programs, or services that are designed to help an individual acquire a combination of basic academic skills, critical thinking, digital literacy, and self-management skills</i></p> <p><input type="checkbox"/> <i>Course schedules/syllabi/lesson plans</i></p> <p><input type="checkbox"/> <i>Employability skills that address competencies in using resources and information, working with others, understanding systems, and obtaining skills necessary to successfully transition to and complete postsecondary education, training, and employment</i></p> <p><input type="checkbox"/> <i>IET Single Set of Learning Objectives (SSLO)</i></p> <p><input type="checkbox"/> <i>Other employability skills that increase an individual's preparation for the workforce</i></p> <p><input type="checkbox"/> <i>Job readiness training</i></p> <p><input type="checkbox"/> <i>On-the-job training</i></p> <p><input type="checkbox"/> <i>Programs that combine workplace training with related instruction, which may include cooperative education programs</i></p> <p><input type="checkbox"/> <i>Skill upgrading and retraining</i></p> <p><input type="checkbox"/> <i>Entrepreneurial training</i></p> <p>38. How does the single set of IET learning objectives identify specific adult education content, workforce preparation activities, and workforce training competencies</p>				
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<p>39. Describe the literacy, English language, and IELCE instruction.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>Include instruction in literacy and English language acquisition</i></li> <li><input type="checkbox"/> <i>Include instruction on the rights and responsibilities of citizenship and civic participation</i></li> <li><input type="checkbox"/> <i>Delivery in combination with the IET activities</i></li> <li><input type="checkbox"/> <i>Prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency</i></li> <li><input type="checkbox"/> <i>Integrate with the local workforce development system and its functions to carry out the activities of the program</i></li> </ul>				
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Key: ☐ Review materials for evidence of activity

Section 4 – Fiscal Review (State Plan Goals 1, 4, & 6, NRS)				
Questions	Compliant			Comments
	YES	NO	N/A	
40. Obtain and Review the Program's most recent financial audit <i>(if applicable)</i> . <input type="checkbox"/> <i>Identify any findings or other issues noted that are relevant</i> <input type="checkbox"/> <i>Review Program Response and documentation to determine whether appropriate corrective action has been taken to resolve findings and questioned costs</i>				
41. Is the budget set up in the WESS system for financial reporting required by the MS Office of Adult Education?				
42. Does the Program Director work with the Financial Officer in preparing the budget for the next fiscal year to include program's host institution match? <input type="checkbox"/> <i>Examples of braided funding sources</i> <input type="checkbox"/> <i>Negotiated indirect funds</i> <input type="checkbox"/> <i>Verified allowable costs to the AEFLA grant</i>				
43. Have allowable Career and Training Services expenditures been identified and reported properly? <input type="checkbox"/> <i>Verified allowable costs to the AEFLA grant for outreach, assessment, referral and coordination activities with core partners and eligible providers, and barrier elimination activities by navigator or transition specialist, and IETP.</i>				

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<p>44. Indicate from the following list the journals and ledgers, etc. used in the Subgrantee's accounting system. These will need to be available during the review.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> General ledger</li> <li><input type="checkbox"/> Cash receipts journal</li> <li><input type="checkbox"/> Cash disbursements journal</li> <li><input type="checkbox"/> General Journal</li> <li><input type="checkbox"/> Payroll register</li> <li><input type="checkbox"/> Career Services expenditures (Attachment 7- Table C of OCTAE Program Memorandum 17-2)</li> <li><input type="checkbox"/> One Stop Infrastructure costs</li> <li><input type="checkbox"/> Accounts receivable ledger</li> <li><input type="checkbox"/> Account payable ledger</li> <li><input type="checkbox"/> Purchase Journal</li> <li><input type="checkbox"/> Travel expenditures</li> <li><input type="checkbox"/> Obligation control ledger</li> </ul> <p>45. Are separate, accurate, and complete accounting records kept for adult education funds?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> All budget requests and expenditures for FY ____ and ____ documented.</li> <li><input type="checkbox"/> Personnel files for those paid with AE grant funds.</li> <li><input type="checkbox"/> Time and Effort reports for all staff paid with AEFLA grant funds</li> <li><input type="checkbox"/> Approved Grants and modifications for FY ____ and ____.</li> </ul> <p>46. Written procurement procedures are followed.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Requisition – dated prior to purchase order;</li> <li><input type="checkbox"/> Purchase order – dated prior to invoice and payment;</li> <li><input type="checkbox"/> Invoice – approved by program director;</li> <li><input type="checkbox"/> Record of payment</li> </ul>				
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Key: ☐ Review materials for evidence of activity

MS Adult Education Monitoring Tool for Program Year 2019-2020

<p>47. Has the charge been properly allocated to the appropriate budget category, or in the case of charges shared between programs, to the appropriate program?</p> <p><input type="checkbox"/> <i>Integrated English literacy and civic education (IELCE)</i></p> <p><input type="checkbox"/> <i>Integrated education and training (IET)/MIBEST</i></p> <p><input type="checkbox"/> <i>Basic Skills</i></p> <p><input type="checkbox"/> <i>ESL</i></p> <p><input type="checkbox"/> <i>Drop Out Recovery</i></p> <p><input type="checkbox"/> <i>Other</i></p> <p>48. Who are authorized signatory officials?</p> <p><input type="checkbox"/> <i>Copy of fidelity bond and listing of authorized signature(s) for purchases, disbursements, and cash receipts</i></p> <p>49. An updated equipment list maintained that includes a description, serial number, acquisition date, funding source, purchase price, location use and condition.</p> <p><input type="checkbox"/> <i>Updated inventory list</i></p>				
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**Student Records Review Checklist (2018-2019)**

Record #	1	2	3	4	5	6	7	8	9	10
<i>Marks: Yes = Y; No = N; Not Applicable = N/A</i>										
Is student record Federally Reportable (FR)?										
Tuition waiver (if applicable)										
General Release of Information Forms										
Technology Acceptable Use Policy										
Completed Core Partner Referral Form										
Copy of state-issued picture I.D.										
Verification of Withdrawal										
Student Goal Setting Document										
Goal Setting Follow-up										
Student Success Plan										
Educational Plan										
Student Work Samples										
Smart Start Student Record/Syllabus										
College Transcript										
Documentation of accommodations										
<b>Is data reported in LACES identical to program records in the following areas :</b> <i>Marks: Does Not Match = X; Provided/Matches = √; Data Missing from Both Areas = O; Not Applicable = N/A</i>										
Complete Data Form										
TABE Pre/Post										
Smart Start Credential or Certificate										
Career Readiness Transcript or Certificate										
High School Equivalency Transcript										

Key: ☐ Review materials for evidence of activity

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MS Adult Education Monitoring Tool for Program Year 2019-2020

<i>Attendance Hours by Type-</i>										
Total AE Instructional Hours										
Total Smart Start Hours										
Distance Education Hours										

Record #	Notes

Key: ☐ Review materials for evidence of activity

**Student Records Review Checklist (2019-2020)**

Record #	1	2	3	4	5	6	7	8	9	10
<i>Marks: Yes = Y; No = N; Not Applicable = N/A</i>										
Is student record Federally Reportable (FR)?										
General Release of Information Forms										
Technology Acceptable Use Policy										
Copy of state-issued picture I.D.										
Verification of Withdrawal										
Student Success Plan										
Educational Plan										
Student Work Samples										
Smart Start Student Record/Syllabus										
Documentation of accommodations										
Is data reported in DATA MANAGEMENT SYSTEM identical to program records in the following areas : <i>Marks: Does Not Match = N; Provided/Matches = Y; Data Missing from Both Areas = O; Not Applicable = N/A</i>										
Complete Data Form										
TABE Pre/Post										
Smart Start Credential or Certificate										
Career Readiness Transcript or Certificate										
High School Equivalency Transcript										
<i>Attendance Hours by Type-</i>										
Total AE Instructional Hours										
Total Smart Start Hours										
Distance Education Hours										

Key: ☐ Review materials for evidence of activity

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MS Adult Education Monitoring Tool for Program Year 2019-2020

Record #	Notes

Key: ☐ Review materials for evidence of activity



**Student Smart Start Records Review Checklist (2018-2019)**

Record #	1	2	3	4	5	6	7	8	9	
Name										
Verification of the following in folder:										
Smart Start Student Record (Instructor dated/signature)										
Registered in MS Works										
Professional Email										
ACT WorkKeys Pretests										
ACT WorkKeys Test (Summary Report)										
Activity – What is Career Readiness?										
Activity – Career Cluster Interest Survey										
Activity – Career Cluster Res & Job Profile										
Activity – SMART Goals Worksheet										
Resume										
Exercise – Preparing for an Interview										
Exercise – Managing a Checking Account										
Exercise – Online Banking										
Career Awareness Post-test										
Quiz – Customer Service										
Quiz – Communication Quiz										
Quiz – Work Discipline										
Exercise – Team Building										
Necessary Skills Post-Test										
SSS Credential/Certificate										

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Is data reported in LACES identical to program records in the following areas :										
<i>Marks: Does Not Match = X; Provided/Matches = V; Data Missing from Both Areas = O; Not Applicable = N/A</i>										
SS Credential/Certificate—Education Tab										
ACT WorkKeys Scores – Outcomes Tab										
NCRC – Education Tab										
Attendance Hours by Type-										
Total Smart Start Hours										
SS Distance Education Hours										

Record  
#

Notes – Smart Start


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**Student Smart Start Records Review Checklist (2019-2020)**

Record #	1	2	3	4	5	6	7	8	9	10
Name										
Verification of the following in folder:										
Smart Start Student Record (Instructor sign & date)										
Registered in MS Works										
Professional Email										
ACT WorkKeys Pretests										
ACT WorkKeys Tests (Summary Report)										
Activity – Career Cluster Survey										
Activity – Career Cluster Res & Job Profile										
Activity – SMART Goals Worksheet										
Activity – Resume										
Activity – Resume Checklist										
Activity – Resume Rubric										
Activity – Tell me About Yourself										
Activity – Checking Account										
Activity – Make a Budget										
Quiz – Customer Service										
Activity – Customer Service Review										
Activity – Communication Review										
Activity – Work Discipline Review										
Activity – 5 Minute Personality Quiz										
Career Awareness Post-Test										
Financial Awareness Post-Test										
Necessary Skills Post-Test										

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Is data reported in DATA MANAGEMENT SYSTEM identical to program records in the following areas : Marks: Does Not Match = N; Provided/Matches = Y; Data Missing from Both Areas = O; Not Applicable = N/A										
SS Credential/Certificate—Education Tab										
ACT WorkKeys Scores – Outcomes Tab										
NCRC – Education Tab										
Attendance Hours by Type-										
Total Smart Start Hours										
SS Distance Education Hours										

Record  
#

Notes – Smart Start


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**MS Competency-based Diploma Record Review Checklist**

Marks: Yes = Y; No = N; Not Applicable = N/A												
Is student record Federally Reportable (FR)?												
Tuition waiver (if applicable)												
General Release of Information Forms												
Technology Acceptable Use Policy												
Copy of state-issued picture I.D.												
Verification of Withdrawal												
Student Success Plan												
Educational Plan												
Student Work Samples												
College Transcript												
Documentation of accommodations												
Is data reported in DATA MANAGEMENT SYSTEM identical to program records in the following areas : Marks: Does Not Match = N; Provided/Matches = Y; Data Missing from Both Areas = O; Not Applicable = N/A												
Complete Data Form												
TABE Pre/Post Level 5/6 in two areas												
Smart Start Credential												
Career Readiness Transcript or Certificate												
Industry Credentials												
<i>Attendance Hours by Type-</i>												
Total AE Instructional Hours												
Total Smart Start Hours												
Distance Education Hours												

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Record #	Notes

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- ☐
- ☐

## Section 15. Vocational Rehabilitation Assurances

I5A. VR/VRB Policy 1.4 – Public Hearing Proceedings on Proposed Policy Changes that Substantially Impact Service to Clients

### 1.4

#### **PUBLIC HEARING PROCEEDINGS ON PROPOSED POLICY CHANGES THAT SUBSTANTIALLY IMPACT SERVICES TO CLIENTS**

1. **Scope.** - The following policy and procedures apply to all public hearings held for the purpose of providing the public with an opportunity to make oral presentations on proposed new policies and amendments to existing policies before the Department (MDRS) that substantially impact services to clients.



2. When Public Hearing Proceedings will be Scheduled on Proposed Policies. The Department will conduct a public hearing proceeding within thirty (30) days after the first notice of public hearing is run in certain regional and statewide newspapers on proposed policy or amendment to existing policies that substantially impact services to clients.

3. Requested Format. Each request to comment must be printed or typewritten, or must be in legible handwriting. Each request to comment must be submitted on standard business letter-size paper (8-1/2 inches by 11 inches). Requests to comment may be in the form of a letter addressed to the MDRS Executive Director and signed by the requestor(s).

4. Notification of Public Hearing Proceedings. The date, time and place of all public hearing proceedings will be announced via notice in certain regional and statewide newspapers, public service announcements via Mississippi Public Radio, notice on the MDRS website, and press releases to numerous consumer organizations who represent or serve people with disabilities. The public hearing proceeding will be scheduled within thirty (30) days after the first notice of public hearing is run in certain regional and statewide newspapers.

5. Presiding Officer. The Executive Director, or his/her designee, who is familiar with the substance of the proposed policy, shall preside at the public hearing proceeding on a proposed policy.

6. Public Presentations and Participation.

(a) At a public hearing proceeding on a proposed policy, persons may make oral statements and make documentary and physical submissions, which may include data, views, comments or arguments concerning the proposed policy.

(b) Persons wishing to make oral presentations at such a proceeding shall notify the Department at least one business day prior to the proceeding and indicate the general subject of their presentations. The presiding officer at his or her discretion may allow individuals to participate that have not previously contacted the Department.

(c) At the proceeding, those who participate shall indicate their names and addresses, identify any persons or organizations they may represent, and provide any other information relating to their participation deemed appropriate by the presiding officer.

(d) The presiding officer may place time limitations on individual oral presentations when necessary to assure the orderly

and expeditious conduct of the public hearing proceeding. To encourage joint oral presentations and to avoid repetition, additional time may be provided for persons whose presentations represent the views of other individuals as well as their own views.

(e) Persons making oral presentations are encouraged to avoid restating matters that have already been submitted in writing.

(f) There shall be no interruption of a participant who has been given the floor by the presiding officer, except that the presiding officer may in his or her discretion interrupt or end the participant's time where the orderly conduct of the proceeding so requires.

## **7. Conduct of Oral Proceeding.**

(a) **Presiding officer.** The presiding officer shall have authority to conduct the proceeding at his or her discretion for the orderly conduct of the proceeding. The presiding officer shall (i) call proceeding to order; (ii) give a brief synopsis of the proposed policy, a statement of the statutory authority for the proposed policy; (iii) call on those individuals who have contacted the Department about speaking on or against the proposed policy; (iv) allow for rebuttal statements following all participant's comments; (v) adjourn the proceeding.

(b) **Questions.** The presiding officer, where time permits and to facilitate the exchange of information, may open the floor to questions or general discussion. The presiding officer may question participants and permit the questioning of participants by other participants about any matter relating to that policy-making proceeding, including any prior written submissions made by those participants in that proceeding; but no participant shall be required to answer any question.

(c) **Physical and Documentary Submissions.** Submissions presented by participants in a public hearing proceeding shall be submitted to the presiding officer. Such submissions become the property of the Department and are subject to the Department's public records request procedure.

(d) **Recording.** The Department may record oral proceedings by stenographic or electronic means.

## **1.1      General Policies**

**All policies in this manual were reviewed by the State Rehabilitation Council in accordance with the Rehabilitation Act of 1973, as amended in the 2014 Workforce Innovation and Opportunity Act (WIOA), and with applicable federal regulations.**

**1.1.9 Agreements with Other Agencies and Organizations, including the Mississippi Workforce Investment System**

Counselors shall comply with the provisions of agreements between MDRS and other agencies and organizations; including those in the Mississippi Workforce Investment System. These agreements provide for interagency cooperation which may include establishing interagency working groups; coordinating policies, practices, and procedures; identifying available resources; setting up a comprehensive information and referral system; and defining the financial responsibility of each agency for paying for necessary services and resolving disputes. (Section 101(a)(11) of the 1998 Rehabilitation Act Amendments)

The Mississippi Department of Rehabilitation Services will make available an information and referral system adequate to ensure that individuals with disabilities, including eligible individuals who do not meet the Agency's order of selection criteria for receiving vocational rehabilitation services if the Agency is operating on an order of selection, are provided accurate vocational rehabilitation information and guidance (which may include counseling and referral for job placement) using appropriate modes of communication to assist them in preparing for, securing, retaining, or regaining employment; and will refer individuals with disabilities to other appropriate Federal and State programs, including other components of the statewide workforce investment system.

In making these referrals, MDRS will refer the individual to Federal or State programs, including programs carried out by other components of the statewide workforce investment system, best suited to address the specific employment needs of an individual with a disability, and provide the individual who is being referred—

1. A notice of the referral by MDRS to the agency carrying out the program;
2. Information identifying a specific point of contact within the agency to which the individual is being referred; and
3. Information and advice regarding the most suitable services to assist the individual to prepare for, secure, retain, or regain employment.

In providing the information and referral services under this section to eligible individuals who are not in the priority category or categories to receive vocational rehabilitation services under an order of selection, if one is in effect, MDRS will maintain and report data on the number of eligible individuals who did not meet the Agency's order of selection criteria for receiving vocational rehabilitation services and did receive information and referral services.

4. MDRS shall maintain a list of interpreters fluent in languages spoken by the targeted populations.
5. District Managers shall maintain formal relationships with historically Black Colleges and Universities in their service area by assigning a liaison person(s) to encourage referrals, job placement, training, outreach, and recruitment.

MDRS has an agency-wide Cultural Diversity Committee that is responsible for the following:

1. developing strategies for outreach in the district offices to be implemented by the staff designated outreach workers;
2. establishing reporting formats for each district office to summarize outreach activities, which occurred during the quarter;
3. reviewing the quarterly outreach reports and submitting a summary to the MDRS Executive Director; and,

**1.1.1 Nondiscrimination**

**No individual or group of individuals is excluded or found ineligible on the basis of sex, age, race, creed, color, religion, or, national origin, type of disability, duration of residence in Mississippi, public assistance status, citizenship, type of expected employment outcome, source of referral, particular service needs or anticipated costs of services required, or income level of an applicant or applicant's family. This applies to all locations in which rehabilitation services are provided by this agency, including one-stop centers.**



## **SERVICES**

## **Section 08**

### **08.0 Services**

#### **Substantiality of Services Policy:**

The definition of substantiality of services includes all the needs that should be met in the IPE, its amendments, and otherwise in the case record. These needs should include both those pertaining to the vocational abilities of the individual and those relating to the barriers to employment posed by the disability or disabilities. Substantial services are those services that address an individual's major needs as identified in the assessment process or later in the case record that the counselor and the client agree have to be met in order for the individual to achieve an employment outcome consistent with that individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. The services required to meet the needs of an individual should be planned on the IPE and/or its amendments, regardless of the source of payment or service provider. The source of payment and service provider must be listed on the IPE for each service.

Specific Vocational Rehabilitation Services are any services described in an Individualized Plan for Employment (IPE) necessary to assist an individual in preparing for, securing, retaining, advancing in, or regaining an employment outcome that is consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual, including:

1. Assessment for determining eligibility and priority for services by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;
2. An assessment for determining vocational rehabilitation needs by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;
3. Vocational rehabilitation counseling and guidance, including information and support services to assist an individual in exercising informed choice as defined in the OVR/OVRB Resource Guide, Section 4.4;
4. Referral and other services necessary to assist applicants and eligible individuals to secure needed services from other agencies, including other components of the statewide workforce development system and to advise those individuals about Client Assistance Programs (OVR/OVRB Policy Manual Section 1.1.9 & 1.3; OVR/OVRB Resource Guide

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**Section 4.4 & Form MDRS-VR-02, Information and Referral located on Connect;**

- 5. Physical and mental restoration services, to the extent that financial support is not readily available from a source other than the Agency (such as through health insurance or a comparable service or benefit);**
- 6. Vocational and other training services, including the provision of personal and vocational adjustment, advanced training in a field of science, technology, engineering, medicine, law, business, or mathematics including computer science, books, tools, and other training material, except that no training services provided at an institution of higher learning shall be paid with funds under this title unless maximum efforts have been made by the counselor and the individual to secure grant assistance, in whole or in part, from other sources to pay for such training;**
- 7. Maintenance for additional costs incurred while participating in an assessment for determining eligibility and rehabilitation needs or while under an IPE as defined in the *OVR/OVRB Resource Guide, Section 4.4*;**
- 8. Transportation, including adequate training in the use of public transportation vehicles and systems, that is provided in connection with the provision of any other service described in this section and needed by the individual to achieve an employment outcome as defined in the *OVR/OVRB Resource Guide, Section 4.4*;**
- 9. Vocational rehabilitation services to family members of an applicant or eligible individual if necessary to enable the applicant or eligible individual to achieve an employment outcome;**
- 10. Interpreter services, including sign language and oral interpreter services, for individuals who are deaf or hard of hearing and tactile interpreting services for individuals who are deaf-blind provided by qualified personnel;**
- 11. Reader services, rehabilitation teaching services and orientation and mobility services for individuals who are blind;**
- 12. Supported employment services in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4*;**

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## **SERVICES**

## **Section 08**

13. Personal assistance services in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4*;
14. Post-employment services in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4*;
15. Occupational licenses, tools, equipment, and initial stock and supplies;
16. Rehabilitation technology services including vehicular modifications, telecommunications, sensory and other technological aids and devices in accordance with the definition in the *OVR/OVRB Resource Guide, Section 4.4 & Section 3.2*;
17. Transition services for students and youth with disabilities, that facilitate the transition from school to postsecondary life, such as achievement of an employment outcome in competitive integrated employment, or pre-employment transition services for students.
18. Technical assistance and other consultation services to conduct market analysis, develop business plans, and otherwise provide resources, to the extent such resources are authorized to be provided through the statewide workforce development system, to eligible individuals who are pursuing self-employment or telecommuting or establishing a small business operation as an employment outcome;
19. Business development services, community based job tryout, on-the-job training, Work Opportunity Tax Credit, and employability skills training as addressed in the *OVR/OVRB Resource Guide, Section 3.11*;
20. Customized employment in competitive integrated employment based the individual's unique strengths, needs and interests, designed to meet the specific abilities of the individual and the business needs of the employer by customizing a job description based on current employer needs or on previously unidentified and unmet employer needs.
21. Other goods and services determined necessary for the individual with a disability to achieve an employment outcome.

(Authority: Section 103(a) of the Act; 29 U.S.C. 723(a))

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## **FINANCIAL ACCOUNTABILITY**

## **Section 09**

### **09.0 Financial Accountability Policy Statement**

The Mississippi Department of Rehabilitation Services is committed to ensuring all funds are handled using sound financial management and proper accounting practices. These practices should facilitate the goals and objectives of the program. Only those funds necessary for diagnostic, evaluation and other services, which lead to the attainment of a vocational goal, should be expended.

Authorizations and expenditures for services will be made in accordance with all applicable Agency fee schedules; Agency operating agreements and contracts; State contract rates; vendor's usual and customary charges; and state/federal laws, regulations, policies, and procedures. Rates of payment for services provided in agency-operated facilities shall be determined by the Agency's facility cost reporting system.

Documentation supporting the decision to obligate funds, change amounts obligated, and recommended payment must be present in the case file.

### **09.1 Financial Needs Tests / Comparable Services and Benefits**

MDRS chooses to consider the financial need of clients or applicants who are receiving services through Trial Work Experiences or during an Extended Evaluation for purposes of determining the extent of their participation in the costs of vocational rehabilitation services, other than those services identified below. The *OVR/OVRB Resource Guide* explains the method for determining the financial need of an eligible individual; and specifies the types of vocational rehabilitation services for which MDRS has established a financial needs test;

Policies are applied uniformly to all individuals in similar circumstances. Policies do not require different levels of need for different geographic regions in the State, and policies ensure that the level of an individual's participation in the cost of vocational rehabilitation services is:

1. reasonable;
2. based on the individual's financial need, including consideration of any disability-related expenses paid by the individual; and,

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3. not so high as to effectively deny the individual a necessary service.

MDRS does not apply a financial needs test, or require the financial participation of the individual as a condition for furnishing the following vocational rehabilitation services:

1. assessment for determining eligibility and priority for services, except those non-assessment services that are provided to an individual with a significant disability during either an exploration of the individual's abilities, capabilities, and capacity to perform in work situations through the use of Trial Work Experiences or an Extended Evaluation;
  - a. assessment for determining vocational rehabilitation needs;
  - b. vocational rehabilitation counseling and guidance;
  - c. referral and other services;
  - d. interpreter services;
  - e. reader services;
  - f. job-related services;
  - g. personal assistance services; or
2. as a condition for furnishing any vocational rehabilitation service if the individual in need of the service has been determined eligible for Social Security benefits under Title II or Title XVI of the Social Security Act.

Comparable Services and Benefits are defined in the *OVR/OVRB Resource Guide*.

In all cases full consideration will be given to any comparable services and benefits available under any other program including those of other workforce agencies. This includes maximum utilization of public or other vocational/ technical training facilities to meet, in whole or part, the cost of any vocational rehabilitation service(s) provided to the individual. MDRS cannot supplement

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## **FINANCIAL ACCOUNTABILITY**

## **Section 09**

payments from any other source(s) in excess of the prevailing fee for services being purchased.

Appropriate comparable benefits must be used when purchasing services, as long as the determination of whether comparable services and benefits are available under any other program would interrupt or delay:

1. the progress of the individual toward achieving the employment outcome in the individualized plan for employment of the individual;
2. an immediate job placement; or,
3. the provision of such service to any individual at extreme medical risk.

Exceptions are as follows:

1. assessment for determining eligibility and vocational rehabilitation needs by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;
2. counseling and guidance, including information and support services to assist an individual in exercising informed choice;
3. referral and other services to secure needed services from other agencies including other workforce agencies through cooperative agreements, if such services are not available through this agency;
4. job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services;
5. rehabilitation technology, including telecommunication, sensory, and other technological aids and devices; and,
6. post-employment services consisting of the aforementioned services (in items 1– 5 in this list.)

### **09.2 Fee Schedule**

The Agency has established a Fee Schedule that represents the Department's "*maximum allowable fee*" for medical services,

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equipment, supplies, and the like. The Fee Schedule Manual offers guidelines on authorizing for these types of services and must be adhered to when the Agency is providing these services.

**09.3      State Vendor Contracts**

The State of Mississippi enters into contracts with vendors for certain goods and services on an annual basis. When State contracts are in effect, these items must be obtained from the vendor indicated on the contract. No bids are required.

**09.4      State Purchasing Regulations**

Items not covered by the Agency Fee Schedule or a State Contract are subject to the Mississippi Public Purchases law. This law requires the following for all client service purchases authorized by the counselor:

1. Purchases of \$5,000.00 or under, exclusive of freight or shipping charges, may be authorized to any vendor with no bids or approval required (except for Computer /telecommunication related purchases).
2. Purchases over \$5,000.00, but not in excess of \$25,000.00, exclusive of freight or shipping charges, require at least two written quotes or certification that the vendor is a single source\*. The Request for Purchase form (DRS-FIN 1) or client authorization and quotes or certification are to be submitted to the District Manager. Purchases will be made from the lowest and best overall quote that meets the specifications. **DO NOT ISSUE AUTHORIZATIONS UNTIL NOTIFIED OF APPROVAL.** After receiving written approval, the Authorization and Statement of Account may be issued. A copy of the approval document and quotes must be attached to the Statement of Account when submitted to the Finance Office for payment.

*\*Single source vendor considerations - Do other companies make similar commodities that will do the same job or meet the same goals? If so, why is this commodity unique from all others? What can it do that the others can't? Is there a*

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copyright or patent on this commodity? Will the company write a letter certifying this to be true? Are there distributors outside of Mississippi or will the manufacturer give you a quote?

3. For purchases over \$25,000.00, exclusive of freight and shipping charges, you must send the specifications for the items being purchased or construction projects being proposed to the District Manager, who will then submit the request to the Finance Office. (See *Section 6.2.7 of the OVR/OVRB Resource Guide* for requirements for AT related purchases). IT IS UNLAWFUL TO SPLIT A PURCHASE TO CIRCUMVENT THE REQUIREMENTS FOR ADVERTISING. The Finance Office will arrange for the advertising in the newspaper, provide guidance in obtaining the bids, and obtain approval from the Bureau of Purchasing (P-1). Purchases will be made from the lowest and best overall bidder that meets the specifications. AUTHORIZATIONS SHOULD NOT BE ISSUED UNTIL NOTIFICATION IS RECEIVED.

#### **09.5      Purchase of Computer/Telecommunication Equipment and/or Services**

The Mississippi Department of Information Technology Services (ITS) governs the acquisition of any computer/telecommunications equipment, word processing equipment, computer software, or computer/telecommunications services. Requests for purchase of any of the above for clients, regardless of cost, must be sent to the District Manager, prior to submission to the Agency's Office of Management Information Services (MIS). Approval from MIS must be secured before further action is taken.

#### **09.6      Purchase of Drugs**

Drugs and medication may be authorized when necessary for the treatment of a condition that affects the rehabilitation program. They may also be provided as part of a broader physical rehabilitation program.

The Agency will approve drugs that comply with rates established by the State Division of Medicaid. If a prescription is not on the Medicaid Formulary, the authorization will be based on the pharmacist's usual and customary charge. Similar benefits must be considered before the Agency can pay for this type of service.

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**09.7      Authorizations**

Authorizations will be issued only after a case has been placed in application status. A written authorization for services shall be made either before or at the same time as the purchase of the services. After eligibility has been determined, in emergency situations that might cause extreme medical risk or loss of placement, or like circumstances, an authorization may be made orally. In such instances there must be prompt documentation and the authorization must be confirmed in writing and forwarded immediately to the provider of the services.

**09.8      Statement of Accounts**

Payment of a valid obligation may be approved when the authorized goods or services have been received by the client or authorized agency personnel and the vendor has signed, returned our Statement of Account and supplied an invoice when required. State purchasing law requires payment within 45 days of receipt of authorized goods and services.

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## **IPE**

## **Section 07**

### **07.0      Individualized Plan for Employment (IPE)**

#### **07.1      IPE Policy Statement**

The Mississippi Department of Rehabilitation Services is required to initiate an Individualized Plan for Employment, periodically update it, and conduct an annual IPE review for each eligible individual being provided services. Vocational rehabilitation services must be provided in accordance with the IPE. The IPE sets forth the specific employment outcome, services to be provided, time frames, service providers, evaluation criteria, and dates of review. The client will have informed choice throughout the vocational rehabilitation process including selecting a specific employment outcome, specific vocational rehabilitation services, and the provider and methods by which these services will be provided.

#### **07.2      Scope of the IPE**

The intended purpose of the IPE is to document and describe the required rehabilitation services necessary for the client to prepare for, secure, retain, or regain employment. It shall be presumed that an individual can benefit in terms of a specific employment outcome through specific vocational rehabilitation services provided under the IPE, unless the Agency can demonstrate by clear and convincing evidence documented in the case file that the individual is incapable of benefiting from services in terms of a specific employment outcome due to the severity of the disability of the individual.

Each IPE shall be designed to achieve the specific employment objective chosen by the individual, consistent with his/her unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice. Clients will be active and full partners in the vocational rehabilitation process, making meaningful and informed choices during assessments for vocational rehabilitation needs and in the selection of specific employment outcomes, services needed to achieve the outcomes, entities providing such services, and the methods used to secure such services. Eligible individuals will be informed about their options for developing an IPE, including the option for the individual to develop an IPE on agency forms without assistance from anyone.

#### **07.3      Initiation of the IPE**

The IPE must be initiated after eligibility determination by a qualified rehabilitation counselor has occurred. The Agency shall determine whether an individual is eligible for vocational rehabilitation services within a reasonable period of time, not to exceed 60 days after the individual has submitted an

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application for services. The eligibility determination period may be extended if: (a) exceptional and unforeseen circumstances beyond the control of the Agency preclude the making of the eligibility determination within 60 days and the Agency and the individual agree to a specific extension of time, or (b) if the Agency is exploring an individual's abilities, capabilities, and capacity to perform in work situations through the use of Trial Work Experiences. Such experiences should be of sufficient variety and over a sufficient period of time to determine the eligibility of an individual.

#### **07.4      Development of the IPE**

When an individual is determined to be eligible for vocational rehabilitation services, the IPE shall be completed. An IPE shall be a written document prepared on current forms provided by the Agency as outlined in Section 361.45(b)(2) of the 1998 Rehabilitation Act Amendments regarding general requirements.

The eligible individual or his/her representative will be provided information, in writing and in an appropriate mode of communication, regarding the individual's options for developing an IPE including:

1. information on the availability of assistance, to the extent determined to be appropriate by the eligible individual, from a qualified vocational rehabilitation counselor in developing all or part of the IPE for the individual, and the availability of technical assistance in developing all or part of the IPE for the individual;
2. a description of the full range of components as defined in Section 361.48 that shall be included in an IPE; and,
3. as appropriate--
  - a. an explanation of Agency guidelines and criteria associated with financial commitments concerning an Individualized Plan for Employment;
  - b. additional information the eligible individual requests or the Agency determines to be necessary;
  - c. information on the availability of assistance in completing designated Agency forms required in developing an IPE; and,
  - d. a description of the rights and remedies available to such an individual including, if appropriate, a description of the availability of a Client Assistance Program and information about how to contact the CAP.

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An IPE for a student with a disability receiving special education services is developed--

- a. In consideration of the student's IEP; and
- b. In accordance with the plans, policies, procedures, and terms of the interagency agreement between MDRS and the local school district.

In planning transition services for students, the IPE for a student determined to be eligible for vocational rehabilitation services must be developed and approved (i.e., agreed to and signed by the individual and the counselor) before the student leaves the school setting and as early as possible during the transition planning process.

#### **07.5      Informed Choice**

An IPE shall be developed and implemented in a manner that affords eligible individuals the opportunity to exercise informed choice in selecting a specific employment outcome, the specific vocational rehabilitation services to be provided under the plan, the entity that will provide the vocational rehabilitation services, and the methods used to procure the services. Informed Choice implies that the specific employment outcome be both realistic and achievable for the individual.

The specific employment outcome should be based upon an objective assessment of specific vocational rehabilitation needs and reflecting the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice. The IPE should reflect specific vocational rehabilitation services necessary to achieve the individual's chosen employment outcome and the case file should reflect how the client was informed about and involved in choosing among alternative services. All available comparable benefits should be applied toward each service.

Information regarding available vendors, certified/licensed vendors, cost and duration of all planned services, and like information, shall be provided to the client in the appropriate accessible mode of communication. Accessibility of the vendor's location will be discussed with the client. All rehabilitation services will be provided in the least restricted and most integrated setting compatible with the client's interest and abilities.

#### **07.6      Individualized Plan for Employment Form Completion**

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The IPE is organized into the following sections--

**Part 1      General Information**

This section includes the plan number, general plan type (i.e. training, physical restoration), the client's specific employment outcome/objective, and the anticipated date for achievement of the employment outcome.

**Part 2      Planned Services**

This section describes services needed, dates of initiation, provider(s) of choice, and the estimated costs for each service and the total plan (including comparable benefits).

**Part 3      Participant Responsibilities**

This section will include a list of the client's responsibilities toward completion of the plan; including any financial responsibilities.

**Part 4      Plan Documentation**

This section must contain the agreed-upon criteria for evaluating progress toward the goal.

**Part 5      Terms and Conditions**

This section contains post-employment services and the identification of the extended services provider for Supported Employment cases only.

**Part 6      Statements of Mutual Understanding**

The counselor will complete the information under Review Process and Client Assistance Program. The counselor will review all information in this section in detail with each client and/or his/her representative.

**Part 7      Plan Certification**

The IPE is finalized and signed by the client or his/her representative and the counselor prior to service(s) being initiated.

**07.7 Basic IPE Contents**

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Regardless of the approach selected by an eligible individual to develop an Individualized Plan for Employment, an IPE shall, at a minimum, contain mandatory components consisting of--

1. a description of the specific employment outcome that is chosen by the eligible individual, and, to the maximum extent appropriate, results in employment in an integrated setting and for which the individual is compensated at, or above, the minimum wage;
2. a description of the specific vocational rehabilitation services that are-
  - a. needed to achieve a specific employment outcome, including, as appropriate, provision of assistive technology devices and services, and personal assistance services, including training in the management of such services;
  - b. provided in the most integrated setting that is appropriate for the service involved and is consistent with the informed choice of the eligible individual; and,
  - c. time lines for the achievement of the employment outcome and for the initiation of the services;
3. a description of the entity chosen by the eligible individual or, as appropriate, the individual's representative, that will provide the vocational rehabilitation services, and the methods used to procure such services;
4. a description of criteria to evaluate progress toward achievement of the employment outcome;
5. the terms and conditions of the IPE, including, as appropriate, information describing;
  - a. the responsibilities of the Agency;
  - b. the responsibilities of the eligible individual, including--
    - i. the responsibilities the eligible individual will assume in relation to the employment outcome of the individual;
    - ii. if applicable, the participation of the eligible individual in paying for the costs of the plan;
    - iii. the responsibility of the eligible individual with regard to applying for and securing comparable benefits; and,

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c. the responsibilities of other entities as the result of arrangements made pursuant to comparable services or benefit requirement;

6. for an eligible individual with the most significant disabilities for whom an employment outcome in a supported employment setting has been determined to be appropriate, information identifying--

a. the extended services needed by the eligible individual; and,

b. the source of extended services or, to the extent that the source of the extended services cannot be identified at the time of the development of the IPE, a description of the basis for concluding that there is a reasonable expectation that such source will become available; and,

7. as determined to be necessary, a statement of projected need for post-employment services.

#### **07.7.1 Amendments to the IPE.**

The IPE is amended, as necessary, by the applicant or client or, as appropriate, his or her representative, in collaboration with a representative of MDRS or a qualified vocational rehabilitation counselor (to the extent determined to be appropriate by the individual), if there are substantive changes in the employment outcome, the vocational rehabilitation services to be provided, or the providers of the vocational rehabilitation services.

Amendments to the IPE do not take effect until agreed to and signed by the applicant or client or, as appropriate, his or her representative and by a qualified vocational rehabilitation counselor employed by MDRS.

#### **07.8 Conclusion**

The Individualized Plan for Employment should include the appropriate outcomes and services necessary to achieve the individual's specific chosen employment outcome. Outcomes and services should be consistent with the client's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice. No service(s) that is a part of the client's IPE should be initiated until the plan has been finalized and signed by the client and counselor.

Each IPE should include time frames for employment outcome completion and service initiation. Additionally, the IPE should include use of all available comparable benefits. Even with careful evaluation and planning, circumstances may occur which precipitate a need for additional outcomes, evaluation criteria, or services. In such cases, a plan amendment should be considered.

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**A qualified rehabilitation counselor shall furnish a copy of the IPE and plan amendments to the individual with a disability or, as appropriate, a parent, other family member, guardian, advocate, or other authorized representative of the individual.**

**The counselor and client or, as appropriate, the client's representative shall review the IPE at least annually.**

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### **1.1.2 Informed Choice**

**MDRS provides applicants and clients with opportunities to exercise informed choice throughout the VR process, including making decisions about the employment goal, VR services, service providers, settings for employment and service provision, and methods for procuring services.**

**To enable an individual to make such decisions, MDRS provides information, support and assistance needed by the individual. MDRS has implemented policies, procedures, and practices and developed resources that enable applicants and clients to exercise informed choice throughout the entire VR process; these policies, procedures, and practices are consistent with Federal statutory and regulatory requirements.**

**Specifically, MDRS ensures that the individual, or if appropriate, the individual through his or her representative:**

- makes decisions related to the assessment process and to selection of the employment outcome and the settings in which employment occurs, vocational rehabilitation services, service providers, the settings for service provision, and the methods for procuring services;**
- has a range of options from which to make these decisions or, to the extent possible, the opportunity to create new options that will meet the individual's specific rehabilitation needs;**
- has access to sufficient information about the consequences of various options;**
- has skills for evaluating the information and for making decisions, or, to the extent possible, the opportunity to develop such skills or support and assistance in carrying out these functions;**
- makes decisions in ways that reflect the individuals strengths, resources, priorities, concerns, abilities, capabilities, and career interests; and**
- takes personal responsibility, to the extent possible, for implementing the chosen options.**

**For individual Areas of Responsibility, see the *OVR/OVRB Resource Guide*.**

5. Each district shall provide in-service training periodically to increase awareness, sensitivity, and attitudinal shift or change on multi-cultural issues for counselors and support staff.
6. MDRS shall recruit qualified staff of various ethnic origins to fill professional staff vacancies.



**1.1.8 Services to American Indians Who Are Disabled**

**MDRS will provide vocational rehabilitation services to American Indians with disabilities residing in the State to the same extent as the State provides such services to other significant segments of the population of individuals with disabilities residing in the State. Vocational rehabilitation services will continue to be provided, including as appropriate, services traditionally used by Indian tribes, to American Indians with disabilities on reservations eligible for services by special tribal programs under other sections of the Rehabilitation Act. (Section 101(a) (13) and 130 of the 1998 Rehabilitation Act Amendments)**

#### **1.1.12 Establishment and Construction Authority**

**MDRS through its Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind officially exercises the option of Establishment or Construction Authority as provided for in the 1998 Amendments to the Rehabilitation Act. In utilizing such special authority, MDRS will adhere to all applicable rules and regulations as set forth by the State of Mississippi, the Rehabilitation Services Administration, and the U.S. Department of Education.**

**MDRS will use this authority for the establishment, development, or improvements of community rehabilitation programs, including, under special circumstances, the construction of a facility and the provision of other services (including services offered at community rehabilitation programs) which promise to contribute substantially to the rehabilitation of a group of individuals but which are not related directly to the individualized rehabilitation program of any one individual with a disability. Such programs will be used to provide services that promote integration and competitive employment. (Section 103(b)(2) and Section 104 of the 1998 Rehabilitation Act Amendments)**

## **5.5      Comprehensive Assessment**

A comprehensive assessment shall be performed, to the extent necessary, in the most integrated setting possible consistent with the individual's needs and informed choice, to determine eligibility for and the scope of, vocational rehabilitation and supported employment services. The assessment shall be sufficient to determine, and the case record shall document, whether an individual has a physical or mental impairment that for the individual constitutes or results in a substantial impediment to employment. The assessment will include an appraisal of the individual based, to the extent possible, on available medical information, and, as appropriate, evaluation by qualified personnel of the potential to benefit from rehabilitation services.

To the extent additional data is necessary to make a determination of the employment outcomes, and the objectives, nature, and scope of vocational rehabilitation services, to be included in the individualized plan for employment of an eligible individual, a comprehensive assessment will be conducted.

The comprehensive assessment may include:

1.     Diagnostic testing;
2.     The provision of rehabilitation technology services;
3.     The assessment of an assortment of work-related factors in "real job" situations where possible and/or appropriate to determine the unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice, including the need for supported employment of the eligible individual.
4.     To the degree needed, an assessment of the personality, interests, career choices, interpersonal skills, intelligence and related functional capacities, educational achievements, work experience, vocational aptitudes, personal and social adjustments, and employment opportunities of the individual, and the medical, psychiatric, psychological, and other pertinent vocational, educational, cultural, social, recreational, and environmental factors, that affect the employment and rehabilitation needs of the individual;
5.     To the degree needed, an appraisal of the patterns of work behavior of the individual and services needed for the individual

to acquire occupational skills, and to develop work attitudes, work habits, work tolerance, and social behavior patterns necessary for successful job performance, including the utilization of work in real job situations to assess and develop the capacities of the individual to perform adequately in the work environment.

6. An exploration of the individual's abilities, capabilities, and capacity to perform in work situations, which shall be assessed periodically during Trial Work Experiences, including experiences in which the individual is provided appropriate supports and training.

In all cases of mental or emotional disorders an examination will be provided by a physician skilled in the diagnosis and treatment of such disorders, or by a psychologist licensed or certified in accordance with state laws and regulations. Any assessment to determine eligibility for supported employment must be supplementary to an assessment to determine eligibility for vocational rehabilitation services. Whether performed to ascertain the scope of rehabilitation services or to determine eligibility, a comprehensive assessment is limited to information necessary to identify the rehabilitation needs of and develop the Individualized Plan for Employment.

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### 3.19 SUPPORTED EMPLOYMENT PROGRAM

Supported Employment (SE) is a specialized placement and training program for the most significantly disabled individual.....the individual for whom competitive employment has not traditionally occurred due to the severity of his/her disability.

The program is a cooperative effort between the Agency, community programs, agencies, and individuals called "third parties" with which the Agency has signed agreements for referrals and the provision of extended services.

If it is determined that the individual's disability is such that he/she needs on-going support services in order to maintain employment, consideration should be given to the Supported Employment program. Supported Employment clients are eligible for any of the traditional vocational rehabilitation services available to other Agency clients.

#### 3.19.1 SE TERMINOLOGY

**Competitive Employment** means work---

- (i) In the competitive labor market that is performed on a full-time or part-time basis in an integrated setting; and
- (ii) For which an individual is compensated at or above the minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals who are not disabled.

Supported Employment requires no more than eight individuals with disabilities be clustered in an employment setting.

**Extended Employment** means — work in a non-integrated or sheltered setting for a public or private nonprofit agency or organization that provides compensation in accordance with the Fair Labor Standards Act. Extended employment may also be used as a support service to enable an individual to continue to train or prepare for competitive employment, unless the individual through informed choice chooses to remain in extended employment.

**Extended Services** are on-going supports which are provided to an individual who is successfully rehabilitated into employment. These services are provided by third-party entities, and they are needed in order to support and maintain an individual with a most significant disability in supported employment.

**Integrated work setting** means job sites where most co-workers are not disabled and individuals with disabilities are not part of a work group of other individuals with disabilities.



Supported Employment services will include placement in an integrated work setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice of individuals with the most significant disabilities.

**Job Trainers** provide one-on-one intensive job skills training and support, both on and off the job, for individuals with mental retardation, severe learning disabilities, cerebral palsy and other developmental disabilities and mental illness. This training includes social skills, along with other training that would be essential to a person with a most significant disability obtaining and maintaining a job. Job trainers are hired on a part-time, temporary, as needed basis.

**Natural Supports** are those formal and informal mechanisms existing in a work environment that can be drawn upon to increase and sustain an employee's performance through the use of active assistance and/or approval or sanctioning of a worker's achievements.

**Person Centered Planning (PCP)** is a process of profiling and planning with an individual in order to increase self-management opportunities, community involvement and life satisfaction for the individual. A plan of action is adopted in order to determine and achieve goals by addressing the needs, strengths and experiences of the individual.

**Successful Rehabilitation** occurs when the individual maintains a supported employment placement for 90 days after making the transition to permanent employment.

**Support** means any appropriate service such as job site training, short-term transportation assistance, family support, or any other service necessary for job success, throughout the "term of employment".

**Supported Employment** means competitive work in an integrated work setting for individuals with the most significant disabilities.

**Transitional Employment** is a series of temporary job placements in competitive work, in integrated work settings with on-going supports until job permanency is achieved for individuals with Serious Mental Illness.

**Vocational Training Instructors (VTI)** are responsible, in coordination with the supported employment counselor, for job development and placement for supported employment eligible clients. Although the supported employment counselor has the primary responsibility of securing a trainer, VTIs primarily handle the hiring of trainers and day-to-day management of the placement and trainer.



### **3.19.2      SERVICES**

Supported Employment services mean on-going support and other appropriate services needed to support and maintain an individual with the most significant disability in employment.

Person-centered planning should be considered for every Supported Employment client as a possible means for providing both the client and the counselor with additional information. This information can be utilized for a number of purposes, e.g., as a means of gathering additional information for eligibility determination, for development of a plan for employment, for determining support needs that will require referral to other agencies or organizations, and to map out future career options, etc..

Supported Employment services are generally provided for a period not to exceed 18 months, unless due to special circumstances a longer period is necessary to achieve job stabilization. This must be jointly agreed to by the individual and the rehabilitation counselor and established in the Individualized Plan for Employment (IPE) before an individual with the most significant disabilities makes the transition to extended services. Counselors should carefully document the cases when joint agreement arrangements are finalized to go beyond the 18-month period of time. If a longer period of time is warranted, the following should be given consideration: only when the client has made substantial progress toward meeting the hours-per-week work goal provided for in the IPE, the client is stabilized on the job, and extended services are available and can be provided without a break in services.

The use of a Job Trainer at the work site is an integral part of supported employment services. This individual is responsible for learning the job prior to the client coming to work, then teaching the job to the client. The trainer not only teaches the work skills needed at the job site but will help the client become adjusted to the new work environment. The trainer will help the client develop relationships with co-workers and supervisory staff. The trainer will also identify and promote the utilization of natural supports in the work environment. If the client cannot meet production standards, the trainer is there to ensure the employer that the work will be done to the business' quality and quantity standards. As the client becomes more independent at the work site and is able to perform most of the job tasks with minimum intervention by the trainer, the trainer will fade assistance until the case can be closed.

Personal assistance services (PAS) enable the employee to perform the daily living activities on or off the job that the individual would typically perform without assistance if the individual did not have a disability. Examples of these services are job functions such as activities of daily living aid, business travel companion, office services specialist or meeting assistant. The services must be necessary to the achievement of an employment outcome and may be provided only while the individual is receiving other vocational rehabilitation services. They are not to be construed to be supports that are considered a reasonable accommodation and therefore paid for by the employer or supports considered personal in nature and funded by Medicare or other

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funding sources. PAS are to be authorized for in the same manner as that a job trainer. In some instances, it may be possible for the job trainer to also perform the duties of the personal assistant. The same fee schedule used in paying job trainers will be utilized in paying for the PAS. In developing the IPE, an agreement will be made addressing each of the following issues:

- The name of the extended service provider -- specifically addressing the provision of Personal Assistant Services to be provided following VR case closure (If no extended service provider has been identified at the time of the development of the IPE, refer to the Flow Chart for SE Services - I.B.4.and III.B.5);
- The specific Personal Assistant Services that will be provided;
- The duration of the provision of Personal Assistant Services by VR

### 3.19.3 FLOW-CHART FOR SE SERVICES

#### I. Referral

##### A. Referral received from Third-Party Agency

1. Schedule appointment for application.
2. Conduct interview, advise client of services available and discussion of client's informed choice in these services; get client release form to obtain records from other sources, (mental health center, state hospital, physician/hospital, etc.).
3. Conduct evaluation for VR services, authorizing for services or information not available through other agencies.

##### B. Referral received from General VR program, Deaf Services, Deaf/Blind or Transition counselor.

1. General VR or Specialty counselor staffs the case with the SE counselor.
2. SE counselor assesses the case for eligibility for SE services. If the two counselors agree that SE should serve the case, the case will be transferred to the SE counselor using the established case transfer procedures. Cases transferred from any specialty area, for example, Deaf/Blind program, if determined eligible for SE services should be retained by the SE counselor. The Specialty counselor and the SE counselor should work closely on the case and the Specialty counselor should provide technical assistance to the SE counselor to ensure the client receives appropriate services.

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3. If any questions arise about the eligibility of the client for SE services, the two counselors will refer the case to their respective supervisors who will, together, determine the feasibility of the client for SE, the adequacy of the evaluation process, need for additional evaluating information, etc., and decide how the case will be handled.
4. In those cases when a client needs Supported Employment services but is not being served by a third-party, the SE counselor will explain the SE Program, services and options to the client as soon as possible after the referral has been made to the SE Program. The SE counselor will also, advise the client about the availability of third-party resources in that area. The counselor will assist the client with obtaining a third-party sponsor for extended services and must include on the IPE the source and description of the on-going support needed by the client to maintain the employment. Third-party agreements will be initiated by the SE counselor and negotiated at the local level regardless of whether there is a Cooperative Agreement with the Parent State Agency. Third-party agreements will be finalized by State Office staff. If no third-party can be located who is willing to provide needed services, the case may be closed as Unsuccessfully Rehabilitated after staffing with the District Manager. The SE counselor will document the attempts to assist the client in this way in the closure letter.

C. Referral received from VRB counselor:

Generally, it is appropriate for all SE eligible individual's cases to be handled by the SE counselor. In specialty areas, such as deaf, deaf/blind and blind, the case is handled with consultation from the appropriate specialty disability counselor on specific issues related to the individual's needs. However, in those instances where it is advisable, and is the client's choice, for their case to be retained by the VRB counselor for the receipt of supported employment services, the SE counselor will work closely with the VRB counselor to advise and consult on matters related to the use of SE funds for the hiring, managing and paying for job trainers and any other procedural matters related to SE services. The decision to transfer the SE case to the VRB counselor should be made after staffing with the District Manager. Upon transfer of the SE case to the VRB counselor, the State Coordinator for Supported Employment will be notified by the District Manager, and an allotment of SE funds will be made to the VRB counselor who will handle the case.

**NOTE:** After any referral to supported employment, the counselor should check the appropriate place on the Special Programs page in AACE indicating this is now a supported employment case. (In the instance of a transferred case,

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where the IPE has already been developed, the IPE should be amended with the client to reflect appropriate SE services; the counselor should record this as an SE case on the IPE and also on the Special Programs page in AACE.)

## **II. ELIGIBILITY**

Individuals with severe disabilities who are appropriate to receive supported employment services must meet the eligibility requirements established for the VR program and meet the Order of Selection, Category I –

- A. Be an individual who has never been competitively employed; and/or
- B. traditional competitive employment has been interrupted or intermittent as a result of a severe disability; and
- C. who, because of the nature and severity of the disability, needs intensive on-going support services that may include job trainer services, in order to obtain and maintain competitive employment, and
- D. who, because of the nature and severity of the disability needs extended services that continue after VR services ends, in order to maintain successful employment.

## **III. IPE DEVELOPMENT**

- A. IPE Meeting - At the time of the IPE development the SE counselor should meet either individually or jointly with the following entities:
  - 1. Client and, if necessary, client's parents or guardian, advocate or representative.
  - 2. If possible, a representative from the source who will be providing and/or funding the extended services.
  - 3. Representative(s) from the Mental Health Center who will be providing Transitional Employment/Supported Employment services.
- B. Writing of the IPE.
  - 1. The SE counselors need to utilize the information from assessments, including information gathered from Person Center Planning, and input from the client in establishing a vocational goal. The IPE should include a brief rationale as to the reason that the particular vocational goal was selected. The SE counselor, along with the client, will estimate an anticipated time during which the client is expected to reach the goal.

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2. Each service that will be provided will be listed. These services should include all the supports needed by the supported employment client in order to reach the stated goal and should include at a minimum, two of the following:
  - a. Placement Services
  - b. Training; Supportive Services (inc. Job Coach)
  - c. Counseling and Guidance
  - d. Extended Employment
  - e. Extended Services (this service may be listed under "Other Goods and Services" and then customize the service by specifying Extended Services.
  - f. Other appropriate services

**Every Supported/Transitional Employment IPE should include Extended Services and Rehabilitation Counseling.**

3. The source of funding for each service, the estimated cost of the service(s) or the utilization of comparable benefits must be listed.
4. Information should be included which indicates any understandings and responsibilities between the client and the SE counselor or any other individual or entity deemed critical to the success of the vocational program.
5. Extended Services, which are on-going services, should be indicated as such on the IPE. A Memorandum of Understanding-Extended Services Agreement should be developed for each Supported/Transitional Employment client and a copy should be kept in the client's file. These agreements should be coordinated through the State Office. Extended Services can be provided by more than one source. Sources for Extended Service provision may include:
  - a. state agencies,
  - b. private non-profit organizations,
  - c. employers, co-workers, families or friends,
  - d. any other appropriate resource not funded by the Agency.

Counselors have the primary responsibility for negotiating these agreements; however, they must be formalized and signed by the Director of the Agency. Telephone or write the State Coordinator for Supported Employment to obtain copies of the agreements and to obtain details on putting these agreements in place. The beginning date for extended services should coincide with the date of movement of the case into employed status. Generally it is best to have these agreements in place at the time of the IPE development, or before, however they are required before closure of a successfully rehabilitated case and a copy of said



signed Extended Service Agreement should be placed in client's file upon closure as successfully rehabilitated. If it is not possible to identify the source of the extended service provider at the time the IPE is developed, a statement describing the basis for concluding that there is a reasonable expectation that such sources will become available, should be addressed in the IPE.

#### IV. PLACEMENT

The responsibility for placement of SE clients lies primarily with the SE counselor with assistance by the Vocational Training Instructors (VTIs). The decision to place a client into a TEP versus a permanent employment situation will be done after careful consideration of the client's condition and with input from the third party representative. The decision to place a client in a particular job must be based on an assessment and documented in the case file.

#### V. TRAINING

- A. Securing Job Trainer, as well as overseeing work performance of the trainer regarding the actual knowledge and implementation of training, will be the primary responsibility of the SE counselor. However, the VTI will need to be responsive to the day-to-day management of the placement, contacting the SE counselor assistance when needed.
- B. The SE counselor, with assistance of the VTI, will be responsible for ensuring that all trainers are adequately educated in how to provide appropriate training.

#### VI. AUTHORIZATIONS FOR TRAINER SERVICES

- A. The vendor for all job trainer authorizations will be AbilityWorks - Jackson-Reimbursement
- B. The following forms should be completed and mailed to Pen Mayfield, MDRS Finance Department, P. O. Box 1698, Jackson, MS 39215-1698 - upon appointment of a Job Trainer to work with a client:
  - 1. Application for Employment
  - 2. I-9 form, with copies of driver's license and social security card. (The Counselor should sign the I-9 Form under Section 2 "Signature of Employer or Authorized Representative).
  - 3. W-4 Federal Withholding Form
  - 4. State Withholding Tax Form
  - 5. Drug-Free Workplace Form



**These forms may be sent either in advance of, or along with the initial Authorization for Services for a Job Trainer. It should be noted that a copy of the Workers' Compensation Notice of Coverage should be furnished to the Job Trainer when hired.**

- a. After authorizing for a planned service indicate the Job Trainer's name in the General Comments – Section 3 of the Authorization.
- b. A 13.57 percent processing fee to AbilityWorks – Jackson-Reimbursement should be added to the unit cost (per hour rate) for job trainers and added to the total estimated cost for job trainer services. The processing fee should be calculated in the following manner:

$$\frac{(\text{per hour rate}) \times 13.57\%}{(\text{hourly service fee}) \times (\text{no. of hours})} = \frac{(\text{processing fee}) + (\text{per hour rate})}{(\text{total service cost})}$$

- c. The procedures for processing payments through AbilityWorks – Jackson-Reimbursement are as follows:

**Step 1:** Upon completion of a work period (2 weeks in most instances) the SE counselor will obtain signatures of the Job Trainer and the client on the Job Trainer Time Sheet. The Time Sheet should also be verified for accuracy and signed by a VR/SE staff member. After checking the Job Trainer Time Sheet for accuracy, a Statement of Account should be prepared that matches the amount of the Job Trainer Time Sheet. If the original Authorization does not match the amount to be paid indicated on the Job Trainer Time Sheet, the Authorization should be modified to agree with the amount on the Job Trainer Time Sheet.

**Step 2:** The SOA should be completed indicating the type, the amount and dates of service. Then the SOA should be approved for payment in AACE, signed by the approving SE counselor, attached to the Job Trainer Time Sheet and mailed as previously instructed (mail only one Authorization/SOA, and one original Time Sheet per client).

**Step 3:** Finance will write the check to the Job Trainer based on the information they receive after checking it for accuracy, (if errors are found by Finance they will mail the documents back to the counselor for corrections, delaying payment to the Job Trainer).

**Finance will process payments to job trainers on Thursday of each week. All Authorizations/SOAs received by 10:30 a.m. on Thursday will be processed and**

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**mailed by 5:00 P.M. that day. Authorizations/SOAs received after noon on Thursday will be held over to the next Thursday for processing.**

#### VII. STATUS MOVEMENT

Supported Employment cases should be moved through the VR case statuses as indicated below:

- A. After eligibility determination is completed place the case in eligibility status.
- B. After the IPE is planned, developed, and signed, the case will be moved to service status.
- C. The case is moved to employment status when the client meets the criteria for movement into extended services and the Job Trainer has faded completely. This occurs when the client has demonstrated that he/she can perform the job to the employer's expectations. Also, there should be a concurrent agreement between client, counselor, VTI, job trainer and extended service provider that the client can perform the essential functions of his job with the provisions of extended services. This agreement should be the outcome of a meeting between the above parties and any other appropriate parties. Also, at this time, if the Extended Service Agreement has not been previously executed, it can be executed by the appropriate parties and placed in the file. In every instance, a copy of the Extended Service Agreement should be placed in the client's file upon being determined successfully rehabilitated.
- D. The case is closed rehabilitated when the client has been in employed status for at least 90 days and continues to perform the job with minimal assistance from the extended service provider and is considered successful by the employer.

#### VIII. SUPPORTED EMPLOYMENT CLOSURES

The following Supported Employment special outcome criteria must be met in order to close a case rehabilitated in Supported Employment:

- working in the competitive labor market;
- working in an integrated work setting; and
- receiving extended services at the time of closure.

It is an integral part of the closure process that the SE counselor ensures that the client is transitioned to the appropriate third party for on-going support services. The case file will be well documented showing this effort.

**NOTE:** When supported employment cases are closed in AACE, the counselor needs to be sure the SE outcome is completed correctly on the closure page.

#### **3.19.4 SE Clients in Community Rehabilitation Programs**

VR clients who are determined to be eligible for supported employment while receiving services of a CRP should be referred to the appropriate Supported Employment counselor (The SE counselor should be involved in routine staffing at AbilityWorks when informed by the vocational evaluator that Supported Employment is being considered as a service option for a client). When the supported employment counselor determines that the client is eligible, the case should be transferred to a Supported Employment caseload. The client should be fully informed about the Supported Employment Program before the case transfer is made. The client should be informed whether continued evaluation at the CRP is needed. If the placement is not appropriate the client should be terminated from the CRP before or simultaneously with transfer to the SE caseload.

Generally, placement at a CRP is not appropriate for a SE client because it is not consistent with the place/train model, however in some instances placement of a SE client at a CRP may be appropriate for a particular assessment to, for example, observe behaviors, work habits, build rapport with the client, etc., or in rare instances remediate functional limitations. This may be done while the case is in eligibility status for the purpose of gathering information for IPE development, or in service status to provide specific training for remediation of functional limitations discovered after a client has been in a regular supported employment job and it has been determined that the CRP is the **only suitable environment** in which this remediation can take place.

The decision to refer a client to a CRP should be made in consultation with the District Manager. An assessment or remediation plan should be developed that is specific to address the needs of the client and should coincide with the time limitations which apply to all CRP referrals. The client should be fully informed of the reason for the referral and that the placement is not a permanent job. Since the client is SE eligible a job trainer will be provided while in the CRP to assist the client and the CRP staff in the assessment. It is expected that referrals of SE clients to CRPs will be limited and should be made only when placement in a competitive, community based job is not a timely and feasible option.

To refer a client to a CRP follow the procedures outlined in the CRP section of this manual that describes the referral process. Referral of a SE client to a CRP requires District Manager review.

### **3.19.5      TRANSITIONAL EMPLOYMENT**

Under the definition of Supported Employment, **Transitional Employment** is an allowable service option for individuals with **Serious Mental Illness (SMI)**. Transitional Employment is a series of temporary placements in competitive work, in integrated work settings, with on-going support services. In transitional employment, the provision of on-going support services must include **continuing sequential job placements until job permanency is achieved**.

Transitional employment may be the best service option for an individual with chronic mental illness whom:

- is uncertain about choosing an appropriate vocational goal,
- is fearful or tentative about his/her abilities to maintain employment, and/or,
- is an individual for whom traditional work adjustment services would have been considered the best pre-employment preparation service.

If a permanent job is not procured before the end of the 18-month period of VR time limited services, the extended services provider is responsible for procuring and maintaining the permanent job placement. There are few vocational services for individuals with mental illness (outside of the services offered through the Agency) that can fund job development or placement activities. Consequently, counselors should encourage permanent placement for most individuals prior to case closure, to ensure that the individual has access to funding for permanent job placement.

Generally, individuals who are motivated to work and have clear ideas regarding the type of work they would like to do should be treated as regular Supported Employment placements.

## Section 16. Jobs for Veterans State Grants Requirements

### 16A. Addendum for Mandatory Training Requirements

JVSG Personnel as of 9 JAN 2020 Authorized for FY19: <b>25</b> (17 DVOPS-8 LVERS)				National Veterans' Training Institute-REQUIRED (VPL 05-18)				
	Name	Location	Position	Day-Life #9635	Legal Guid #9636	Gap #9637	LVER Core #9609	DVOP Core #9608
1	Anderson, Chasity	State Office	SVC	Completed	Completed	Completed	Completed	
2	Amos, Stanford	Grenada	DVOP	Completed	Completed	Completed	n/a	
3	Arnold, Deirdre	Brookhaven	LVER	Completed				na
4	Bradley, Latricia	Meridian	LVER	Completed	Completed	Completed	Completed	na
5	Brown, Calvin	Greenville	LVER	Completed	Completed	Completed	Completed	na
6	Cannon, Gloria	Pascagoula	LVER	Completed	Completed	Completed	Completed	na
7	Fair, William	Greenville	DVOP	Completed	Completed	Completed	na	Completed
8	Fett, Edward	Corinth	DVOP	Completed	Completed	Completed	na	Completed
9	Forrest, Riley	Greenwood	DVOP				na	
10	Holifield, Jerry	Hattiesburg	DVOP	Completed	Completed	Completed	na	
11	Ivory, Thessaol	Pearl	DVOP				na	
12	Mann, David	West Point	LVER	Completed	Completed	Completed	Completed	na
13	Mays, Bianca	Mayhew	DVOP	Completed	Completed	Completed	na	Completed
14	Olson, John	Gulfport	DVOP	Completed	Completed	Completed	na	Completed
15	Petro, Marvin	Vicksburg	DVOP	Completed	Completed	Completed	na	Completed
16	Robinson, Lawrence	Gulfport	DVOP	Completed	Completed	Completed	na	Completed
17	Smith, Demetria	Pascagoula	DVOP	Completed	Completed	Completed	na	Completed
18	Smith, Johnny	Tupelo	LVER	Completed	Completed	Completed	Completed	na
19	Williams, Antoine	Jackson	LVER	Completed		Completed		na

## Section 17. Unemployment Insurance Program Specific Requirements

### 17A. Unemployment Insurance Transmittal Letter



#### Mississippi Department of Employment Security

**Phil Bryant**  
**Governor**

Jacqueline A. Turner  
Executive Director

August 16, 2019

Winston Tompoe  
Acting Regional Administrator  
U. S. Department of Labor/ETA  
Atlanta Federal Center  
61 Forsyth Street, S. W., Room 6M12  
Atlanta, Georgia 30303-3104

Dear Mr. Tompoe:

Please find attached the Fiscal Year 2020 Unemployment Insurance State Quality Service Plan (SQSP) for the State of Mississippi.

If you have any questions regarding this report, please contact Tarvose Johnson at 601-321-6005.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Rush".

Timothy Rush  
Director, Office of Reemployment Assistance



First | Prev | Next | Last 1 of 1 Records [Field Help](#)

## ETA UII Staff Hours

Report For Period

Ending: 09/30/2020

State: MS Region: 03

Creation Date: 09/25/2019 10:15 Revision Date: 01/22/2020 15:58

Transmit Date: 09/25/2019  
10:15

\*\*\* TRANSMITTED \*\*\*

ANNUAL HOURS PER STAFF YEAR AND QUARTERLY DISTRIBUTION					
	Annual	First Quarter	Second Quarter	Third Quarter	Fourth Quarter
Hours Worked	1,787.56	446.89	446.89	446.89	446.89
Hours Paid	2,096.00	524.00	524.00	524.00	524.00

Comments: (Maximum size of the comment is approximately 150 words.)

Revised 1/22/2020 RL.. per Bus Mngt GP

**OMB No.:** 1205-0132 **OMB Expiration Date:** 02/28/2021 **OMB Burden Minutes:** 53

**OMB Burden Statements:** O M B Burden Statement: These reporting instructions have been approved under the Paperwork reduction Act of 1995. Persons are not required to respond to this collection of information unless it displays a valid OMB control number. Public reporting burden for this collection of information includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Submission is required to obtain or retain benefits under SSA 303(a)(6). Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Security, Room S-4231, 200 Constitution Ave., NW, Washington, DC, 20210.

[Home](#) [Feedback](#) [Help](#)<http://204.144.92.2:8080/UIR-WS-ENTRY/transmit-action.do>

1/24/2020

WORKSHEET UI-1		UI STAFF HOURS			
State		Fiscal Year		Date	
MS		2019		9/11/2018	
Annual Hours Per Staff Year and Quarterly Distribution					
Hours Per Staff Year	Annual	First	Second	Third	Fourth
a. Hours Worked	1758.27	439.57	439.57	439.57	439.56
b. Hours Paid	2088.00	522.00	522.00	522.00	522.00
Comments					

9/11/18  
A

## **STATE PLAN NARRATIVE**

### **MISSISSIPPI**

#### **FY 2020 Biennial SQSP**

The Mississippi Department of Employment Security (MDES) is dedicated to improving the Unemployment Insurance (UI) program to provide superior *service* to our customers. Mississippi has included a Corrective Action Plan, CAP, in its FY 2020 SQSP for Effective Audit Measure and Detection of Overpayments. Mississippi addresses First Payment Promptness, Detection of Overpayment, Establish Tax Accounts Promptly and UI Reporting Requirements in the narrative.

The Mississippi Department of Employment Security, the state's workforce agency, has a straightforward mission, "Helping Mississippians Get jobs." Our goal is to expand employment, improve workforce skills and enhance productivity in our state.

MDES has contributed to the economic growth and stability of our state by providing vital employment *services* to Mississippi residents and employers. We are meeting the needs of our workforce through partner *services*, analyzing and disseminating actionable Labor Market Information and administering Unemployment Insurance programs geared to help participants return to work sooner.

MDES will continue to partner with Mississippi employers to procure and fulfill job listings. Our staff will identify and refer the most qualified candidate for each job opening in our system. If no trained candidates are available, we will act as a conduit between business and training providers to identify candidates with training potential for those jobs. During the past year, Mississippi recorded historically high numbers of jobs available and historically low unemployment levels in the state. *Over* this past year, 26,316 employers submitted 143,457 job orders to MDES. We *served* 127,195 people through our WIN Job Centers and 57,414 through our online systems.

The agency will continue to be good stewards of the Unemployment Insurance (UI) trust fund, keeping it one of the most solvent UI trust funds in the nation. We will do this by collecting UI taxes in a timely fashion, ensuring people who are eligible for benefits *receive* them and improving processes to prevent and *recover* improper payments.

MDES will continue to use technology and innovation to provide accurate, efficient, timely customer *service* as we operate within the regulation set forth by the United States Department of Labor .

.....

## Workforce Innovation and Opportunity Act, WIOA

### Workforce Innovation and Opportunity Act (WIOA) Partners

MDES has continued to achieve success implementing Workforce Innovation and Opportunity Act (WIOA) strategies this year through partnerships to meet Mississippi's workforce needs. WIOA partner *services* are harmonized to help Mississippians seeking employment find the training necessary to qualify for occupational opportunities that bring self-sufficiency.

Mississippi's WIOA Combined Plan vision is to create a workforce system that acts and functions as an ecosystem. The local areas created plans for their areas that will further develop that vision. The Reemployment and System Integration and the Workforce Data Quality Initiative grants *have* made it possible for the state to create a data hub aligning partner services for participants. This hub allows WIOA partner systems to communicate to make electronic referrals and share records necessary for case management, federal reporting and continual performance improvement dashboards. MDES's workforce system has been modified to interact with the centralized 'WIOA Hub' system.

A key concern of the original plan was closing the gap between the demand and supply of workers with specialized skills beyond high school. It had become clear that filling these openings is the key to shifting Mississippi's workforce landscape and keeping the state on a path of long-term, sustainable economic growth. The state's strategy to prepare Mississippians for occupational opportunities has been further developed to include a well-organized apprenticeship program. MDES works diligently with the Mississippi Community College Board on the Mississippi Apprenticeship Program. Since receiving the grants from USDOL, Mississippi has achieved: 529 new registered apprentices, 125 new businesses engaged expressing interest in the registered apprenticeships program, 5 new registered apprenticeships and 2 existing registered apprenticeship programs expanded .

### Make Timely Benefits Payments

The GPRA goal for intrastate first payments made timely within 14/21 days is 87.0%. For the performance year ending March 31, 2019, Mississippi achieved a *level* of 91.0%. First payment timeliness has continued to improve as evidenced by our increased score for the performance year ending March 31, 2019. This was primarily due to ongoing staff training and development, system enhancements and a concerted focus on timely nonmonetary decisions. MDES constantly seeks ways to optimize processes to ensure timely first payments.

### Establish Tax Accounts Promptly

The goal for the new employer status determinations made within 90 days of the last day of the quarter in which the business became liable is 70%. For the performance year ending March 31, 2019, Mississippi was at 86.4%. For the quarter ending June 30, 2019, Mississippi was at 91.1% which exceeded the established goal by 21.1%. While we are pleased with this improved score, our ultimate goal is to achieve 100.0%. We will continue our efforts to provide information regarding reporting liability to the employer community using methods such as employer seminars, presentations, and social media. Staffing continues to be a concern. An additional tax field representative was hired on June 1, 2019. Staffing vacancies are expected to be filled by the end of October 2019. The focus is to process the federal employer identification number (FEIN) extract provided by the Internal Revenue Service. This will aid efforts to locate and register liable employers in a timely manner.

### Detection of Benefits Overpayments

The GPRA goal for overpayments detected is 54.5% of the estimated detectable, recoverable overpayments. For the performance period ending of March 31, 2019 the estimated amount of BAM overpayments and amounts established by BPC was 152.73%. MDES continues to analyze the Benefits Accuracy Measurement monthly report and meet with staff to define ways to prevent overpayments.

### UI Reporting Requirements

The ETA 9051p was not submitted for March 2019 because of a transmittal error. The reporting issue has been resolved and the report has been submitted. Mississippi has implemented electronic reminders to double check report submissions prior to the

required deadlines to prevent this oversight in the future.

**Assurances:**

- a. Assurance of Equal Opportunity (EO).
- b. Assurance of Administrative Requirements and Allowable Cost Standards.
- c. Assurance of Management Systems, Reporting, and Recordkeeping.
- d. Assurance of Program Quality.
- e. Assurance on Use of Unobligated Funds.
- f. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93).
- g. Drug-Free Workplace (29 CFR Part 98).
- h. Assurance of Contingency Planning.

Provide the most recent dates for the following:

- Information Technology (IT) Contingency Plan Implemented: June 2019
- IT Contingency Plan Reviewed/Updated: June 2019
- IT Contingency Plan Tested 2: January 2019

I. Assurance of Conformity and Compliance.

J. Assurance of Automated Information Systems Security.

Provide the most recent dates for the following:

- Risk Assessment Conducted<sup>3</sup>:
- System Security Plan Reviewed! Updated<sup>4</sup>:

K. Assurance of Confidentiality

I. At a minimum, an IT Contingency Plan must be reviewed and/or updated annually.

2 At a minimum, an IT Contingency Plan must be tested annually.

3 At a minimum, a Risk Assessment should be conducted once every three (3) years.

4 At a minimum, a System Security Plan must be reviewed and/or updated annually.

April 2019

September 2018



<b>Effective Audit Measure (EAM) - Score <math>\geq 7</math>; exceed all 4 factors</b>												
<b>State: Mississippi</b>				<b>Federal Fiscal Year: 2020-2021 SQSP Corrective Action Plan &amp; Progress Report</b>								
<a href="#">Back to Biennial Overview 2020</a>	<a href="#">Back to Alternate Overview 2021</a>			<a href="#">Instructions</a>								
Performance Measure	ALP	CAP Based on SQSP 2020 Performance Level	State's Target/Actual Performance	12/31/2019 Quarter 1	3/31/2020 Quarter 2	6/30/2020 Quarter 3	9/30/2020 Quarter 4	12/31/2020 Quarter 5	3/31/2021 Quarter 6	6/30/2021 Quarter 7	9/30/2021 Quarter 8	
EAM - Factor 1 (Contributory Employers Audited)	Score $\geq 1$		Target	$\geq 1$	$\geq 1$	$\geq 1$	$\geq 1$	$\geq 1$	$\geq 1$			
			<b>Actual</b>									
EAM - Factor 2 (Change in Total Wages from Audits)	Score $\geq 2$		Target									
			<b>Actual</b>									
EAM - Factor 3 (Total Wages)	Score $\geq 1$		Target	$\geq 1$	$\geq 1$	$\geq 1$	$\geq 1$	$\geq 1$	$\geq 1$			
			<b>Actual</b>									

Audited)											
EAM - Factor 4 (Avg # of Misclassified Workers Detected per Audit)	Score ≥ 1		Target								
			Actual								
Effective Audit Measure Total Score	Score ≥ 7		Target	Pass	Pass	Pass	Pass	Pass	Pass		
			Actual								
<b>Regional Office Comments in cell below:</b>											
<b><u>Corrective Action Plan Summary:</u></b>											
The Summary must provide:											
A. The Reason for the deficiency.											
The audit unit continued to experience audit staff vacancies over the last year compounded by delays in the hiring of new staff. MDES has filled all of the auditor positions as of 5/1/2019. The training is ongoing. The new auditors will gain the experience needed to work independently to reach expected and maximized performance levels.											
Alternate Year Plan Updates											
B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.											
With all staff positions are filled, the expectation is that these auditors will slowly progress in productivity over the next year and will be at full productivity by 5/1/2020. Ongoing training through exposure to large and or complex audits will be provided through shadowing of experienced auditors on audits of that nature. Ongoing feedback and review will be detailed and provided by the audit supervisor in order to assist the auditors in gaining the necessary skills to perform at expected levels. Audit unit policies and procedures are being examined to assist in the productivity of the unit as a whole.											

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.	
While continued vacancies in auditor positions over the past year as well as delays in the hiring process lead to underperformance of the audit unit as a whole, MDES has made strides to utilize its auditors to meet the necessary standards through changes in audit policy and procedures. MDES has managed to meet one of the CAP items from the previous year through these steps in spite of continued vacancies in the unit. Ongoing examination of policies and procedures along with having a fully staffed audit unit should allow the unit to meet and exceed productivity expectations.	
D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.	
The audit supervisor maintains a spreadsheet that documents the performance of each individual auditor as well as the performance of the unit as a whole in regards to each of the EAM factors as well as the size of each audit performed. Monthly monitoring of this information allows for detection of underperforming individuals, areas of deficiency across the entire unit and identifies individuals who are exceeding standard performance levels. Auditors who are exceeding the performance measures will be assisting the less experienced audit staff to ensure that the audit measures are met.	
<b>NOTE:</b> Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.	
<i>(Remaining Major Actions in this cell.)</i>	
<b>Milestones</b>	
1. Provide continuing training to audit staff.	<b>Completion Date</b> 
<b>Quarter 1 status report (12/31/2019):</b>	
<b>Quarter 2 status report (3/31/2020):</b>	
<b>Quarter 3 status report (6/30/2020):</b>	
<b>Quarter 4 status report (9/30/2020):</b>	
<b>Quarter 5 status report (12/31/2020):</b>	

<b>Quarter 6 status report (3/31/2021):</b>	
<b>Quarter 7 status report (6/30/2021):</b>	
<b>Quarter 8 status report (9/30/2021):</b>	
2. Provide shadowing opportunities to staff that have been with the unit less than one year.	<b>Completion Date</b>
<b>Quarter 1 status report (12/31/2019):</b>	
<b>Quarter 2 status report (3/31/2020):</b>	
<b>Quarter 3 status report (6/30/2020):</b>	
<b>Quarter 4 status report (9/30/2020):</b>	
<b>Quarter 5 status report (12/31/2020):</b>	
<b>Quarter 6 status report (3/31/2021):</b>	
<b>Quarter 7 status report (6/30/2021):</b>	
<b>Quarter 8 status report (9/30/2021):</b>	
3. Examine internal audit policies and procedures for opportunities for increased productivity and automation.	<b>Completion Date</b>
<b>Quarter 1 status report (12/31/2019):</b>	

<b>Quarter 2 status report (3/31/2020):</b>
<b>Quarter 3 status report (6/30/2020):</b>
<b>Quarter 4 status report (9/30/2020):</b>
<b>Quarter 5 status report (12/31/2020):</b>
<b>Quarter 6 status report (3/31/2021):</b>
<b>Quarter 7 status report (6/30/2021):</b>
<b>Quarter 8 status report (9/30/2021):</b>

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

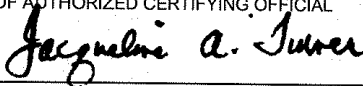
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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 		TITLE Executive Director
APPLICANT ORGANIZATION Mississippi Department of Employment Security		DATE SUBMITTED August 20, 2019

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Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s): <input type="text"/>	
* 3. Date Received: 08/06/2019		4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>			
* a. Legal Name: Mississippi Department of Employment Security			
* b. Employer/Taxpayer Identification Number (EIN/TIN): 64-6000765		* c. Organizational DUNS: 8781931500000	
<b>d. Address:</b>			
* Street1:	1235 Echelon Parkway		
Street2:	<input type="text"/>		
* City:	Jackson		
County/Parish:	Hinds		
* State:	MS: Mississippi		
Province:	<input type="text"/>		
* Country:	USA: UNITED STATES		
* Zip / Postal Code:	39213-0000		
<b>e. Organizational Unit:</b>			
Department Name: Office of Reemployment Asst.		Division Name: <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
Prefix:	Mr.	* First Name:	Timothy
Middle Name:	<input type="text"/>		
* Last Name:	Rush		
Suffix:	<input type="text"/>		
Title:	Director of Reemployment Assistance		
Organizational Affiliation: <input type="text"/>			
* Telephone Number:	601-321-6301	Fax Number:	<input type="text"/>
* Email:	trush@mdes.ms.gov		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="A: State Government"/> <b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/> <b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/> <b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Labor"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="17.225"/> <b>CFDA Title:</b> <input type="text" value="Unemployment Insurance"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="UIPL 8-19"/> <b>* Title:</b> <input type="text" value="Guidelines for Fiscal Year (FY) 2019 State Agency Unemployment Insurance Resource Allocations, Supplemental Budget Requests, and above base funding."/>	
<b>13. Competition Identification Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Unemployment Insurance"/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant <span style="border: 1px solid black; padding: 2px;">Second</span>	* b. Program/Project <span style="border: 1px solid black; padding: 2px;">all</span>
Attach an additional list of Program/Project Congressional Districts if needed.	
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="display: flex; justify-content: space-between;"> <div><span style="border: 1px solid black; padding: 2px;">Add Attachment</span></div> <div><span style="border: 1px solid black; padding: 2px;">Delete Attachment</span></div> <div><span style="border: 1px solid black; padding: 2px;">View Attachment</span></div> </div>
<b>17. Proposed Project:</b>	
* a. Start Date: <span style="border: 1px solid black; padding: 2px;">10/01/2019</span>	* b. End Date: <span style="border: 1px solid black; padding: 2px;">09/30/2022</span>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<span style="border: 1px solid black; padding: 2px;">16,374,331.00</span>
* b. Applicant	<span style="border: 1px solid black; padding: 2px;">0.00</span>
* c. State	<span style="border: 1px solid black; padding: 2px;">0.00</span>
* d. Local	<span style="border: 1px solid black; padding: 2px;">0.00</span>
* e. Other	<span style="border: 1px solid black; padding: 2px;">0.00</span>
* f. Program Income	<span style="border: 1px solid black; padding: 2px;">0.00</span>
* g. TOTAL	<span style="border: 1px solid black; padding: 2px;">16,374,331.00</span>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <span style="border: 1px solid black; padding: 2px;"></span>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="display: flex; justify-content: space-between;"> <div><span style="border: 1px solid black; padding: 2px;">Add Attachment</span></div> <div><span style="border: 1px solid black; padding: 2px;">Delete Attachment</span></div> <div><span style="border: 1px solid black; padding: 2px;">View Attachment</span></div> </div>
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)</b>	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <span style="border: 1px solid black; padding: 2px;">Mrs.</span>	* First Name: <span style="border: 1px solid black; padding: 2px;">Jacqueline</span>
Middle Name: <span style="border: 1px solid black; padding: 2px;">A</span>	
* Last Name: <span style="border: 1px solid black; padding: 2px;">Turner</span>	
Suffix: <span style="border: 1px solid black; padding: 2px;"></span>	
* Title: <span style="border: 1px solid black; padding: 2px;">Executive Director</span>	
* Telephone Number: <span style="border: 1px solid black; padding: 2px;">601-321-6346</span>	Fax Number: <span style="border: 1px solid black; padding: 2px;"></span>
* Email: <span style="border: 1px solid black; padding: 2px;">jturner@ndes.ms.gov</span>	
* Signature of Authorized Representative:	<div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 10px; margin-right: 10px;"> <i>Jacqueline A. Turner</i> </div> <div> * Date Signed: <span style="border: 1px solid black; padding: 2px;">08/20/2019</span> </div> </div>

OMB Number: 4040-0006  
Expiration Date: 02/28/2022

**BUDGET INFORMATION - Non-Construction Programs**

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Unemployment Insurance	17.225	\$	\$	\$ 16,374,331.00	\$	\$ 16,374,331.00
2.						
3.						
4.						
5. Totals		\$	\$	\$ 16,374,331.00	\$	\$ 16,374,331.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
	Unemployment Insurance				
a. Personnel	\$ 7,079,900.00	\$	\$	\$	7,079,900.00
b. Fringe Benefits	2,598,981.00				2,598,981.00
c. Travel	175,000.00				175,000.00
d. Equipment	35,000.00				35,000.00
e. Supplies	590,452.00				590,452.00
f. Contractual	1,849,351.00				1,849,351.00
g. Construction					
h. Other	1,838,930.00				1,838,930.00
i. Total Direct Charges (sum of 6a-6h)	14,167,614.00			\$	14,167,614.00
j. Indirect Charges	2,206,717.00			\$	2,206,717.00
k. TOTALS (sum of 6i and 6j)	\$ 16,374,331.00	\$	\$	\$	16,374,331.00
7. Program Income	\$	\$	\$	\$	

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SECTION C - NON-FEDERAL RESOURCES					
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS	
8. Unemployment Insurance	\$	\$	\$	\$	\$
9.					
10.					
11.					
12. TOTAL (sum of lines 8-11)	\$	\$	\$	\$	\$

SECTION D - FORECASTED CASH NEEDS				
Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal \$ 15,874,331.00	\$ 3,968,583.00	\$ 3,968,583.00	\$ 3,968,583.00	\$ 3,968,582.00
14. Non-Federal \$				
15. TOTAL (sum of lines 13 and 14) \$ 15,874,331.00	\$ 3,968,583.00	\$ 3,968,583.00	\$ 3,968,583.00	\$ 3,968,582.00

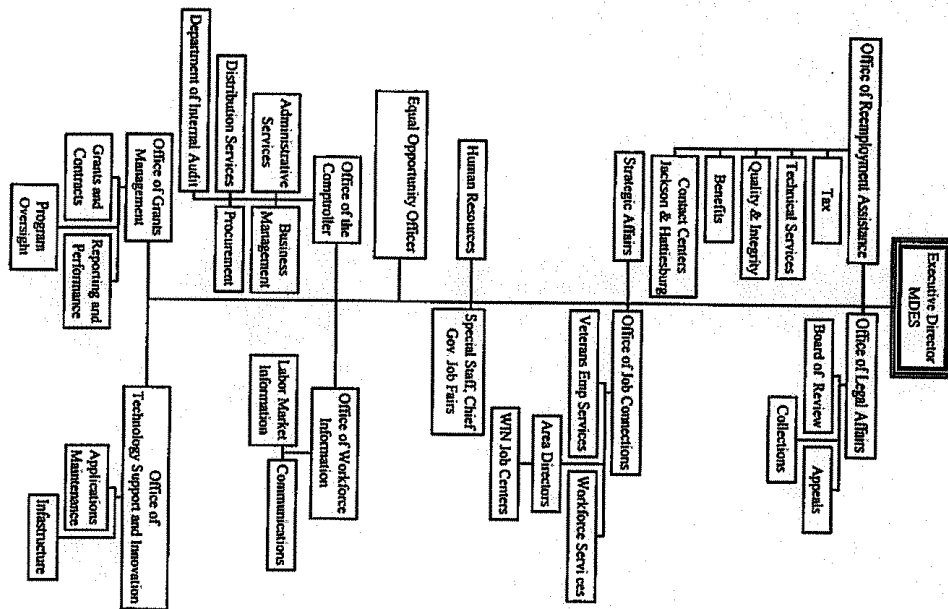
  

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16. Unemployment Insurance	\$ 250,000.00	\$ 250,000.00	\$	\$
17.				
18.				
19.				
20. TOTAL (sum of lines 16 - 19)	\$ 250,000.00	\$ 250,000.00	\$	\$

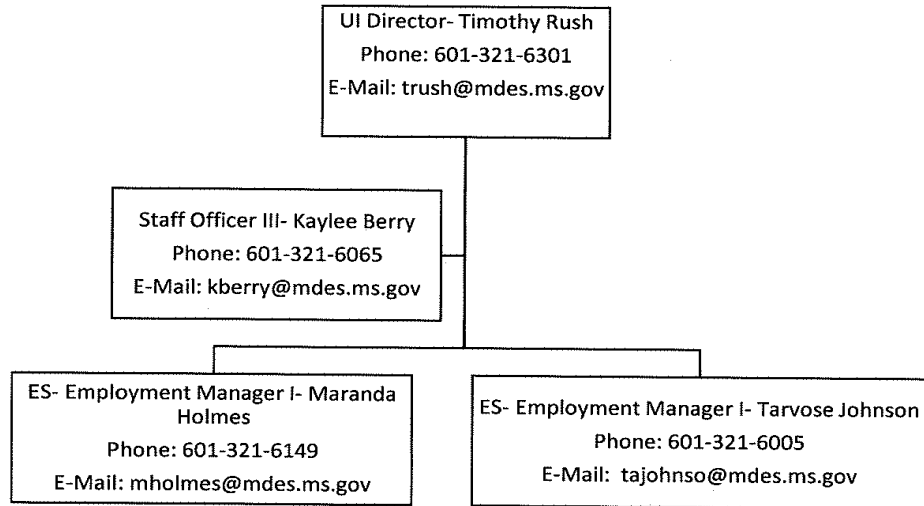
SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges: 14,167,614	22. Indirect Charges: 2,206,717
23. Remarks:	

MISSISSIPPI DEPARTMENT OF EMPLOYMENT SECURITY-OFFICE OF THE GOVERNOR

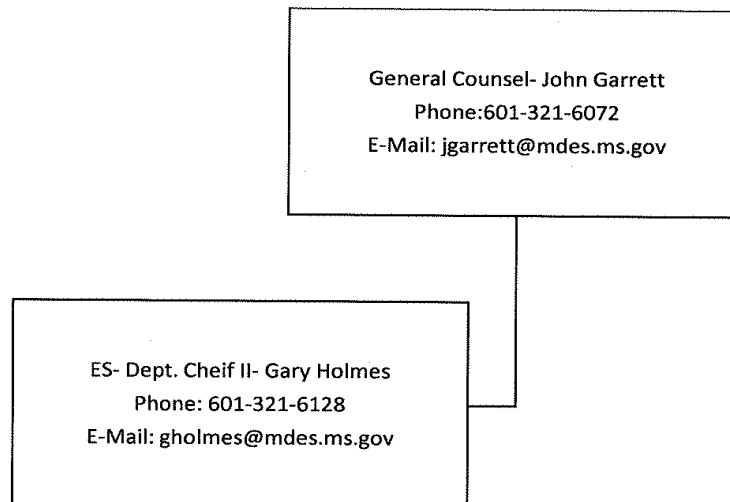


*Macquie A. Jones*  
 MDES-651  
 Fiscal Year FY 20  
 PAGE 1 OF 77

### UI Department



### Appeals



## RESEA

Director Office Job Connections-Robin Stewart  
Phone: 601-321-6049  
E-Mail: rstewart@mdes.ms.gov

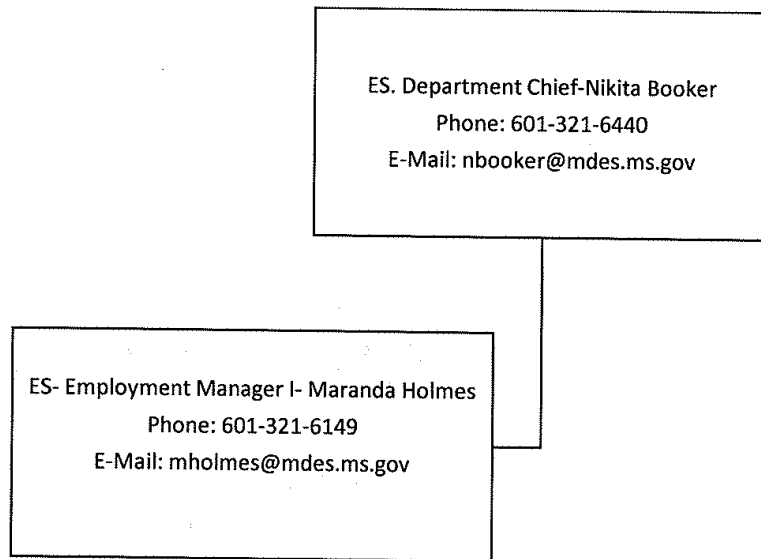
ES- Area Director- Renwick Amos  
Phone: 662-563-7318  
E-Mail: ramos@mdes.ms.gov

## Fiscal/ Finance Department

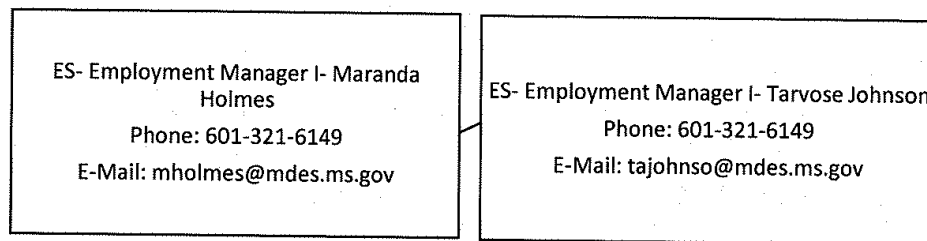
ES- Associate Director- Guy Martin  
Phone: 601-321-6113  
E-Mail: guymart@mdes.ms.gov

Acct./Aud/ Bureau Director- Tyler Berch  
Phone: 601-321-6214  
E-Mail: tberch@mdes.ms.gov

## DUA



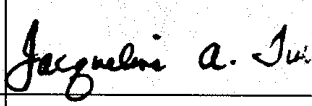
## Data Validation



**U.S. Department of Labor  
SQSP SIGNATURE PAGE**

OMB Control No.: 1205-0132

Expiration Date: 02/28/2021

U.S. DEPARTMENT OF LABOR Employment and Training Administration	FEDERAL FISCAL YEAR	STATE Mississippi
<b>UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE</b>		
<p>This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and</p> <p align="center"><b><u>Mississippi Department of Employment Security</u></b></p> <p>The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.</p> <p>All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.</p>		
<b>TYPED NAME AND TITLE</b>	<b>SIGNATURE</b>	<b>DATE</b>
<b>Jacqueline A. Turner</b> <b>Printed Name of STATE ADMINISTRATOR</b>		<b>8/20/19</b>
<b>Printed Name of DOL APPROVING OFFICIAL (Regional Office)</b>		
<b>Printed Name of DOL APPROVING OFFICIAL (National Office) (if required)</b>		



## 17J UI Integrity Action Plan (IAP)

UI Integrity Action Plan (IAP)			
<a href="#">Back to Biennial Overview 2020</a>		<a href="#">Back to Alternate Overview 2021</a>	
State	Federal Fiscal Year	Accountable Agency Official(s):	
Mississippi	2020	(Enter the name and title of the staff person who is accountable for reducing UI improper payments.)	
	Top Three Root Causes (Calendar Year 2018) <a href="https://www.dol.gov/general/maps/data">https://www.dol.gov/general/maps/data</a>	Calendar Year 2017 (% of \$ Overpaid)	Calendar Year 2018 (% of \$ Overpaid)
Root Cause #1:	Benefit Year Earnings	40.45%	53.40%
Root Cause #2:	Separation Issues	29.49%	23.82%
Root Cause #3:	Able+Available	6.42%	6.39%
State	Federal Fiscal Year	Accountable Agency Official(s):	
Mississippi	2021	(Enter the name and title of the staff person who is accountable for reducing UI improper payments.)	
	Top Three Root Causes (Calendar Year 2019) <a href="https://www.dol.gov/general/maps/data">https://www.dol.gov/general/maps/data</a>	Calendar Year 2018 (% of \$ Overpaid)	Calendar Year 2019 (% of \$ Overpaid)
Root Cause Alternate Year #1:			
Root Cause Alternate Year #2:			
Root Cause Alternate Year #3:			
Summary: (Provide a summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.)			
<p>The UI Integrity Taskforce is being reorganized with changes in personnel. The taskforce will meet regularly to identify and implement strategies to prevent improper payments for the three root causes. The taskforce will continue educating employers and claimants as well as UI and Workforce staff on the importance of properly reporting issues and earnings information.</p>			

**Instructions for the following section:** In each individual section below, enter a Root Cause, from above, and the top three focused Strategies that will be employed to correct or reduce this cause of overpayments. An additional line is available in each section to include other significant strategies that target the root cause.

**Root Cause #1: Benefit Year Earnings**

Strategies	Actions	Targets & Milestones	Resources
1. Employer Education	Focus outreach on MS employers linked to the highest percentage of improper payments due to benefits year earnings. Educate all employers on the importance of timely reporting new hire and rehire information.	Ongoing	Human Capital and Technology
2. Claimant Education	Generate messages advising the importance of properly reporting earnings and return to work date at the time of filing weekly certifications.	Ongoing	Technology
3. Staff Training	Training UI and Workforce staff on MDES integrity plan and the importance of claimants reporting earnings and employers reporting new hire/rehire timely.	Ongoing	Human Capital and Technology
<b>Additional:</b>			

**Root Cause #2: Separation Issues**

Strategies	Actions	Targets & Milestones	Resources
1 Educate employers on timely and adequately requirements	Generate emails and mail correspondence educating the employer on the consequences of timely and adequately providing separation information.	Ongoing	Technology and Human Capital
2 Analyze self-service separation questionnaires	Analyze self-service separation questionnaires for claimant and employer to obtain all pertinent information during initial statement	9/30/2020	Technology and Human Capital
3 Educate Claimants	Generate messages advising the importance of adequately reporting reason for separation.	Ongoing	Technology and Human Capital
<b>Additional:</b>			

**Root Cause #3: Able+Available**

Strategies	Actions	Targets and Milestones	Resources
1 Individualized review of eligibility requirements	Assessing ways to incorporate Work Search Audit and Eligibility Review into one appointment to provide more one on one service with the claimants regarding continue eligibility requirements	9/30/2020	Technology
2 Claimant Educations	Generate texts, emails and mail correspondences through the duration of the claim advising/reminding claimants of the eligibility requirements	Ongoing	Technology and Human Capital

## Section 18. Senior Community Service Employment Program Specific Requirements and Assurances

### 18A. Program Year 2018 Equitable Distribution List by National and State Grantee with Counties

County	MDES State Grant Modified Positions	MDES State Grant Enrolled	MDES State Grant Variance	AARP Modified Positions	AARP Enrolled	AARP Variance	National Council on Black Aging Modified Positions	National Council on Black Aging Enrolled	NCBA Variance	Senior Service America Modified Positions	Senior Service America Enrolled	Senior Service America Variance	Institute for Indian Development (Set-Aside) Modified Positions	Institute for Indian Development (Set-Aside) Enrolled	Institute for Indian Development (Set-Aside) Variance
Adams	3	2	-1							5	6	1			
Alcorn	7	5	-2												
Amite										4	2	-2			
Attala							5	3	-2						
Benton							2	2							
Bolivar							7	7							
Calhoun							4	4							
Carroll							3	3							
Chickasaw							4	6	2						
Choctaw							2	1	-1						
Claiborne										3	7	4			
Clarke										5	3	-2			
Clay							5	4	-1						
Coahoma							6	7	1						
Copiah										6	8	2			
Covington	4	2	-2												
DeSoto	4	4					7	4	-3						
Forrest	4	5	1							9	8	-1			
Franklin										2		-2			
George										3	1	-2			
Greene										2	2				
Grenada	4	4													
Hancock										7	6	-1			
Harrison	5	9	4							20	16	-4			
Hinds	4	6	2							25	28	3			
Holmes							6	4	-2						
Humphreys							3	4	1						
Issaquena															
Itawamba							5		-5						
Jackson					2	2				14	12	-2			

PY 2018 Equitable Distribution List by National and State Grantee with Counties

County	MDES State Grant Modified Positions	MDES State Grant Enrolled	MDES State Grant Variance	AARP Modified Positions	AARP Enrolled	AARP Variance	National Council on Black Aging Modified Positions	National Council on Black Aging Enrolled	NCBA Variance	Senior Service America Modified Positions	Senior Service America Enrolled	Senior Service America Variance	Institute for Indian Development (Set-Aside) Modified Positions	Institute for Indian Development (Set-Aside) Enrolled	Institute for Indian Development (Set-Aside) Variance
Jasper										4	2	-2			
Jefferson										2	3	1			
Jefferson Davis	4	3	-1												
Jones	4	4								9	9		2	0	-2
Kemper										3		-3	1	0	-1
Lafayette							5	5							
Lamar										6	6				
Lauderdale	3	3								9	16	7			
Lawrence										3	3				
Leake							5	4	-1				5	7	2
Lee	9	7	-2												
Leflore							7	9	2						
Lincoln										6	7	1			
Lowndes	9	10	1												
Madison							9	6	-3						
Marion										7	7				
Marshall							7	4	-3						
Monroe							8	7	-1						
Montgomery							3	2	-1						
Neshoba										5	1	-4	21	23	2
Newton	4		-4										5	5	0
Noxubee							4	4							
Oktibbeha							5	4	-1						
Panola							5	3	-2						
Pearl River	5	3	-2							6	5	-1			
Perry										3	3				
Pike										8	7	-1			
Pontotoc	5	4	-1												
Prentiss		2	2				5	4	-1						
Quitman							2	3	1						
Rankin	3		-3							9	1	-8			
Scott										5	5		1	0	-1
Sharkey							1		-1						
Simpson										6	4	-2			
Smith										4		-4			
Stone										2	4	2			
Sunflower	2	2					4	4							
Tallahatchie	3	1	-2												
Tate							5	1	-4						
Tippah	5	5													
Tishomingo							4	4							
Tunica							2	3	1						
Union	5	1	-4												
Walshall										5	4	-1			
Warren										8	5	-3			
Washington	4	3	-1				8	9	1						
Wayne										5	4	-1			
Webster							2	2							
Wilkinson										2	1	-1			
Winston							5	5					2	0	-2
Yalobusha							4	4							
Yazoo							6	5	-1						

## Mississippi's Area Agencies Aging

Area Agencies on Aging were created under the Older Americans' Act of 1965. The overall purpose of an area agency on aging is to develop a comprehensive system of services whereby older adults will be able to remain in their own home as long as possible, thereby avoiding premature institutionalization. Mississippi has ten (10) area agencies on aging and all of them are housed in Planning and Development Districts.



Area Agency On Aging	Directors	Phone Number	Website	Counties Served
Central MS Area Agency on Aging Post Office Box 4935 Jackson, MS 39296	Chelsea Crittle	(601) 981-1511 1-800-315-3103	<a href="http://www.cmpdd.org">www.cmpdd.org</a>	Copiah, Hinds, Madison, Rankin, Simpson, Warren, Yazoo
East Central Area Agency on Aging Post Office Box 499 Newton, MS 39345	Rosie Coleman	(601) 683-2401 1-800-264-2007		Clarke, Jasper, Kemper, Lauderdale, Leake, Neshoba, Newton, Scott, Smith
Golden Triangle Area Agency on Aging Post Office Box 828 Starkville, MS 39760-0828	Bobby Gann	(662) 324-4650 (662) 323-2636 (toll free within a 55 mile radius) 1-888-324-9000	<a href="http://www.gtpdd.com">www.gtpdd.com</a>	Choctaw, Clay, Lowndes, Noxubee, Oktibbeha, Webster, Winston

North Central Area Agency on Aging 711 South Applegate Winona, MS 38967	Darlana Allen	(662) 283-2675 (662) 283-2771 (toll free within a 55 mile radius) 1-888-427-0714		Attala, Carroll, Grenada, Holmes, Le Flore, Montgomery, Yalobusha
North Delta Area Agency on Aging Post Office Box 1488 Batesville, MS 38601-1488	Rod Gordon	(662) 561-4100 1-800-844-2433	<a href="http://www.ndpdd.com">www.ndpdd.com</a>	Coahoma, Desoto, Panola, Quitman, Tallahatchie, Tate, Tunica
Northeast MS Area Agency on Aging Post Office Box 600 Booneville, MS 38829	Jane Perrigo	(662) 728-7038 1-800-745-6961		Alcorn, Benton, Marshall, Prentiss, Tippah, Tishomingo
South Delta Area Agency on Aging Post Office Box 1776 Greenville, MS 38702-1776	Sylvia Jackson	(662) 378-3831 1-800-898-3055	<a href="http://www.sdpdd.com">www.sdpdd.com</a>	Bolivar, Humphreys, Issaquena, Sharkey, Sunflower, Washington
Southern MS Area Planning & Development District 9229 Highway 49 Gulfport, MS 39503	Tee McCovey, Workforce Director	(228) 868-2326 1-800-444-8014	<a href="http://www.smpdd.com">www.smpdd.com</a>	Covington, Forrest, George, Greene, Hancock, Harrison, Jackson, Jefferson Davis, Jones, Lamar, Marion, Pearl River, Perry, Stone, Wayne
Southwest MS Area Agency on Aging 100 South Wall Street Natchez, MS 39120	Yolanda Campbell	(601) 446-6044 1-800-338-2049		Adams, Amite, Claiborne, Franklin, Jefferson, Lawrence, Lincoln, Pike, Walthall, Wilkinson
Three Rivers Area Agency on Aging Post Office Box 690 Pontotoc, MS 38663	Cleveland Joseph	(662) 489-2415 (662) 489-6911 (toll free within a 55 mile radius) 1-877-489-6911	<a href="http://www.trpdd.com">www.trpdd.com</a>	Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc, Union



Chelsea Crittle  
Central MS Area Agency on Aging  
Post Office Box 4935  
Jackson, MS 39296

Jane Perrigo  
Northeast MS Area Agency on  
Aging  
Post Office Box 600  
Booneville, MS 38829

Rosie Coleman  
East Central Area Agency on Aging  
Post Office Box 499  
Newton, MS 39345

Sylvia Jackson  
South Delta Area Agency on Aging  
Post Office Box 1776  
Greenville, MS 38702-1776

Bobby Gann  
Golden Triangle Area Agency on  
Aging  
Post Office Box 828  
Starkville, MS 39760-0828

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Southern MS Planning &  
Development District  
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711 South Applegate  
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Rod Gordon  
North Delta Area Agency on Aging  
Post Office Box 1488  
Batesville, MS 38601-1488

Cleveland Joseph  
Three Rivers Area Agency on Aging  
Post Office Box 690  
Pontotoc, MS 38663

**Mississippi Department of Employment Security  
Senior Community Service Employment Program (SCSEP)  
State Termination Policy**

**I. SCOPE AND PURPOSE**

This policy sets forth the State's procedures for termination of participants in the SCSEP based on the guidance set forth in the Older Americans Act Amendments of 2006 and the SCSEP Final Rule.

**II. PARTICIPANT INVOLUNTARY TERMINATION POLICY**

There are six (6) reasons a participant may be involuntarily terminated from the SCSEP. The reasons are listed below along with an explanation. This Termination Policy will be followed fairly and equitably when involuntarily terminating participants. Participants will not be terminated based on age; there is no upper age limit for participation in the SCSEP. Except as noted below in the case of serious violations, participants will receive progressive discipline and an opportunity for corrective action before a formal termination notice is issued. In all cases, participants will receive a 30 day termination letter notifying them of the date of exit, the reason for the termination, and the right to appeal under Mississippi Department of Employment Security grievance procedure. A copy of the grievance procedure will be attached to the termination letter. Participants will receive both a copy and a verbal explanation of the Involuntary Termination Policy during orientation. This policy is based on the Older Americans Act Amendments of 2006 and the SCSEP Final Rule.

**Types of Involuntary Terminations**

A participant can be involuntarily terminated from the SCSEP for six (6) reasons. The reasons are:

1. Knowingly providing false information in the eligibility process
2. Being incorrectly determined eligible at enrollment or the annual recertification
3. Being determined no longer eligible at recertification
4. Reaching the maximum 48 months enrollment limit
5. Becoming employed during enrollment
6. For cause, including refusing to accept a reasonable number of job offers or referrals to unsubsidized employment based on the Individual Employment Plan (IEP) (with no extenuating circumstances hindering the participant from moving to unsubsidized employment)

### **1. Termination Due to Knowingly Providing False Information in the Eligibility Process**

A participant may be terminated for fraudulent actions, such as intentionally providing inaccurate information to qualify for the SCSEP. If this occurs, the participant will be placed on Leave without Pay immediately, and a 30 day notification of termination will be sent to the participant.

### **2. Termination Due to Being Incorrectly Determined Eligible**

A participant will be terminated if found ineligible for participation in the SCSEP either after enrollment or after the annual recertification through no fault of the participant. A participant may be enrolled or deemed eligible for continued enrollment based on an error in determining program eligibility, e.g. income may be recorded or calculated inaccurately. When this occurs, the participant will be notified regarding the error and immediately sent a 30 day notification of termination letter. The participant will be able to continue participating in the program until the date of exit as noted in the letter.

### **3. Termination Due to No Longer Being Eligible**

Annually, or more frequently if there is a substantial change in circumstances, each participant is recertified to determine if he or she continues to be eligible for participation. During the recertification, a participant may be determined no longer eligible due to a change in eligibility criteria such as income, family of one due to a change in disability status, employment status, and number of household members. The participant will be notified and immediately sent a 30 day notification of termination letter. The participant will be able to continue participating in the program until the date of exit as noted in the letter.

### **4. Termination Due to 48 Month Participation Limitation**

A participant will be terminated when he or she meets the 48 month maximum participation date. The Mississippi Department of Employment Security's Individual Durational Limit Policy does NOT provide for the issuance of waivers. A waiver factor qualifies the participant for a temporary 12 month extension. When a participant approaches the 48 month maximum participation limit, he or she will be sent a 30 day notification of termination letter 30 days before the 48 month maximum participation date. The participant will be able to continue participating in the program until the date of exit as noted in the letter.

### **5. Termination Due to Becoming Employed During Enrollment**

To qualify for enrollment in the SCSEP, a participant has to be unemployed; all participants are informed that they may not be employed while participating in the program and that they must notify the program representative immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the program of the employment will be terminated from the program. If this



occurs, the participant will be placed on Leave without Pay immediately, and a 30 day notification of termination will be sent to the participant.

## **6. Termination for Cause**

There are several reasons to terminate a participant “for-cause.” When warranted, a participant may be terminated for certain behaviors and/or conduct. The following are specific reasons; however, other similar reasons that demonstrate willful misconduct or an intentional disregard of program rules may cause involuntary termination:

- IEP related reasons: Refusing to accept a reasonable number of job offers or referrals to unsubsidized employment or for not complying with the Individual Employment Plan (IEP). A participant may be subject to disciplinary action up to and including termination when he or she refuses a total of three job offers and/or referrals to job openings and/or to follow through with objectives to achieve goals that are based on the IEP. If the participant fails, without good cause, to cooperate fully with the Mississippi Department of Employment Security’s subgrantee staff to accomplish the goals of his or her service strategy, an IEP-related termination “for-cause” may be in order. Examples of lack of cooperation with staff to accomplish IEP service strategies may include but are not limited to the following when provided for in the participant’s IEP:
  - Refusing to search for a job
  - Sabotaging a job interview, for example, a participant tells the interviewer that he or she is not interested in the job or tells the interviewer that he or she is not qualified.
  - Refusing or not participating fully in training opportunities
  - Refusing to transfer to a new community service training assignment
  - Refusing to register at the One-Stop/Job Service
  - Refusing to take advantage of WIA opportunities
  - Refusing to accept or lack of follow-through in obtaining supportive services that will enhance the participant’s ability to participate in a community service assignment consistent with the IEP
  - Refusing to cooperate with other IEP-related referrals
  - Refusal to cooperate with the assessment or IEP process, e.g., refusing to participate in completing the assessment and training development plan
- Non-IEP related reasons:
  - Refusal to cooperate in recertifying eligibility, for example, refusing to provide required document to determine continued eligibility or refusing to attend or be available for the recertification appointment.
  - Failure or refusal to perform assigned duties, e.g., refusing without good cause to do assignments that are part of the training description and required to increase skills and knowledge.

- Falsification of official records, such as timesheets, for example, intentionally signing the signature of the host agency supervisor on a timesheet or other official document, or including hours on a time sheet that are not accurate.
- Intentional disclosure of confidential or private information obtained from the host agency, grantee, or local project, for example, informing others of information that is supposed to be kept private or confidential.
- Frequent tardiness or unauthorized absences, including reporting to the assignment late or not reporting to the assignment and not informing the supervisor. Generally, three instances of absence without good cause or without proper notice may warrant termination.
- Insubordination, defined as intentionally refusing to carry out the direction or instructions of a host agency supervisor or MDES subgrant staff member, provided there were no extenuating circumstances and the directions or instructions were reasonable.
- Workplace harassment or discrimination on the basis of sex, race, color, religion, national origin, age, marital status, or disability.
- Obscene, abusive, harassing, or threatening language or behavior.
- Physical violence or intentional destruction of property, for example, being violent and threatening to or carrying out threats that physically harm individuals or property.
- Theft, meaning illegal taking or withholding the property of another without permission.
- Causing an imminent threat to health or safety of self or others.
- Non-compliance with the drug and alcohol free policy of the Host Agency, which prohibits participants from consuming, selling, purchasing, manufacturing, distributing, possessing or using any illegal or non-prescribed drug or from being under the influence of alcohol and or drugs while performing their host agency assignment or while carrying out objectives required by the IEP. Legally prescribed medications are excluded if they do not affect the participant's ability to perform his or her duties or protect the safety of the participant or others.
- Exceeding approved Leave without Pay by failing to return from an approved break by the required date without due notice or good cause.

### **III. Participant Corrective Action and Warning**

A participant will be given an opportunity to correct his or her behavior or conduct, or his or her failure to comply with the IEP requirements, except in cases involving serious harm or imminent threat to health, safety, property, etc. At any point, if a participant makes positive efforts or the participant's lack of action is justified, corrective action will be discontinued. The following steps for corrective action will be taken:

- Step 1: First Formal Warning



If a participant displays behavior or conduct outlined in the reasons for “for-cause” terminations or refuses to comply with the IEP requirements, the participant will be given a verbal warning and counseled to correct his or her actions. Absent extenuating circumstances, the participant will be informed in writing by the State Manager or State Director of the requirement to correct his or her behavior or conduct.

- **Step 2: Second Formal Warning**

When a participant for a second time displays behaviors or conduct outlined in the reasons for “for-cause” terminations or refuses to comply with the IEP requirements, the participant will be verbally warned and counseled to correct his or her actions. Absent extenuating circumstances, the State Director will send the participant a written warning that he or she has 30 days from the date of the letter to correct his or her behavior or conduct. In the case of an IEP violation, the participant may be directed to complete specific IEP-related task. The written warning will include a statement that failure to make improvement or complete the IEP-related tasks will result in termination.

- **Step 3: When a participant does not make improvement in his or her actions or for a third time displays behavior or conduct outlined in the reasons for “for-cause” terminations, a letter will be sent notifying the participant that he or she will be exited 30 days from the date of the letter.**

For example, a participant’s training goal is to become computer literate in preparation for a clerical position. First the Employment and Training Coordinator (ETC) identified a community service assignment at the library but the participant refused it because she wouldn’t have her own cubicle (she would be in an open area) so she turned down that opportunity. Next, the ETC identified a training site in a school, but the participant turned down that opportunity. Finally, the ETC tried the local museum, and the participant refused the training assignment at the museum, too. The ETC spoke with the participant, and she had no legitimate reason for refusing the training offered at various assignments. After the first refusal, the ETC asked the State Director to send the participant the first written warning letter. The State Director sent her the second warning letter stating that she risked being terminated if she continued to fail to follow her IEP or to take corrective action. When Ms. Short turned down a third assignment and there was no extenuating circumstance, the State Director sent a 30-day notification of termination letter.

#### **IV. For-Cause Terminations that Require Immediate Removal from Host Agency and Leave without Pay Pending Termination**

When a participant’s violation of the SCSEP Termination Policy is of a serious nature, immediate action to remove the participant from the host agency may be required. In this case, the participant will be placed on leave without pay and a written 30-day notice of termination sent. Examples of circumstances warranting immediate removal from the host agency and leave without pay include, but are not limited to:



- Gross misconduct such as violating the Host Agency's Drug and Alcohol Policy or intentionally endangering the lives of themselves or others, or
- Violence, including but not limited to physical or extreme verbal violence at the training site.

**V. EFFECTIVE DATE:**

This policy is effective April 1, 2013.

**Mississippi Department of Employment Security  
Senior Community Service Employment Program (SCSEP)  
State Programmatic Grievances and Complaints Policy**

**I. SCOPE AND PURPOSE**

This policy sets forth the State's procedures for grievances or complaints alleging violations of the requirements of the Older Americans Act of 1965 (OAA) from participants and other interested or affected parties based on the guidance set forth at OAA sections 306(a)(10) and 307(a)(5)(B) and at 20 CFR, 641.910.

**II. PARTICIPANTS' RIGHT TO FILE A GRIEVANCE OR COMPLAINT**

Participants in Older Americans Act programs, including SCSEP, have the right to file grievances or complaints regarding specific actions or activities affecting their personal participation in the program or the conduct of the program as it relates to all participants at a given site or location without fear of reprisal.

- 1) Participants may file grievances orally or in writing.
- 2) Presentation of the grievance: An authorized representative, including a caregiver, may present a grievance on behalf of a participant. If the client chooses this option, s/he shall accompany the representative to every meeting at which the complaint is discussed.
- 3) Resolution: Every effort shall be made to resolve grievances at the lowest level of authority to avoid the creation of burdensome documentation and ineffective use of staff time. Complaints shall be directed as appropriate to the situation to the following authorities in the order indicated:
  - site manager or director or case manager;
  - program or project director;
  - subcontract agency director;
  - area agency on aging director;
  - the State SCSEP Director or her/his designee.
- 4) Grievances relating to alleged violations of a client's rights provided by law may be directed to the Office of Grant Management of the Mississippi Department of Employment Security, only after efforts to resolve the matter locally have failed. This does not remove the

right of the individual to pursue other avenues of redress, such as filing with the Office of Civil Rights of the U.S. Department of Health and Human Services.

5) Timeframes for filing: Grievances may be filed at any time. If the issue is related to an event which occurred at a specific time and place, the participant(s) shall notify the site manager or other appropriate authority within ten days of the event having occurred of the intent to file the complaint.

### **III. FORM AND CONTENT OF GRIEVANCES**

#### **A. Oral grievances**

An oral grievance shall state in sufficient detail the basis for the complaint and the reasons the participant objects to the action or circumstances in question. AAAs/providers shall supply to a written outline to prepare for the oral filing to assure the coverage of the following points:

- the notice, document, policy, situation or event which is the reason for the complaint;
- significant dates pertaining to the complaint;
- the names of organizations and individuals involved;
- reference to any provision of the Older Americans Act or other laws, regulations or policies believed to have been violated by site management, subcontract agency, or area agency on aging.
- the action or decision desired by the participant to resolve the issue.

#### **B. Written grievances**

A participant may choose to make the complaint/grievance in written form, which will contain all elements of an oral complaint as specified in A.1., preceding.

### **IV. REQUIREMENTS**

#### **A. General Requirements**

Each Area Agency on Aging (AAA), State, and direct recipient of funds under Title V of OAA must establish and maintain a procedure for grievances and complaints (20 CFR 641.910).

Each AAA, State, and direct recipient must:

- 1) Provide information about the content of the grievance and complaint procedures to participants and other interested parties affected by the Senior Community Service Employment Program (SCSEP), including One-Stop partners and service providers;



- 2) Require that every entity to which it awards Title V funds must provide information about the content of the grievance and complaint procedures to participants receiving Title V-funded services from such entities; and
- 3) Must make reasonable efforts to assure that the information about the content of the grievance and complaint procedures will be understood by affected participants and other individuals, including those who are limited-English speaking individuals (OAA Section 306(a)).

**B. Area Agency on Aging Requirements**

AAA procedures must provide:

- 1) A process for dealing with grievances and complaints from participants and other interested parties affected by the Senior Community Service Employment Program, including service providers;
- 2) An opportunity for an informal resolution and a hearing to be completed within 60 days of the filing of the grievance or complaint;
- 3) A process which allows an individual alleging a labor standards violation to submit the grievance to a binding arbitration procedure, if a collective bargaining agreement covering the parties to the grievance so provides; and
- 4) An opportunity for a local level appeal to a State entity when:
  - No decision is reached within 60 days; or
  - Either party is dissatisfied with the local hearing decision.

**C. State Requirements**

State procedures must provide:

- 1) A process for dealing with grievances and complaints from participants and other interested parties affected by the SCSEP;
- 2) A process for resolving appeals from the local area level;
- 3) A process for remanding grievances and complaints related to the local SCSEP programs to the Area Agency on Aging grievance process; and
- 4) An opportunity for an informal resolution and a hearing to be completed within 60 days of the filing of the grievance or complaint.

**V. POLICY AND PROCEDURES**

**A. Disposition of Grievances**

- 1) If the facts support the grievance, the responsible authority shall, within 30 working days of the receipt of the written grievance, make the changes necessary to resolve the issue.

- 2) If the site manager's/service provider director's response is not satisfactory to the participant, the participant may, within ten working days, take the matter for further consideration to the next higher authority as specified in II.3., relating to resolving issues at the lowest possible level of authority.
- 3) The site manager or service provider director, and each level of authority at which the grievance/complaint remains unresolved, shall within ten working days following receipt of a request (oral or written) for continuing grievance action, develop a memorandum detailing the circumstances of the grievance, attach all pertinent documentation regarding the findings and actions taken at that level of authority and forward it to the next level with a request for a meeting of the parties concerned with the issue.
- 4) A participant may withdraw a grievance at any time.
- 5) When the grievance is resolved, all parties shall provide joint written notification of having reached agreement to each level of authority involved.

**B. Area Agency on Aging Level Grievances and Complaints**

The State requires AAAs to establish and maintain a policy and procedures for grievances and complaints. The AAA process must allow participants and other interested parties affected by the local SCSEP system an opportunity for an informal resolution and hearing to be completed within 60 days of the filing of the grievance or complaint.

**C. State Level Grievances and Complaints**

All grievances and complaints from participants and other interested parties affected by the SCSEP programs that are not resolved at the AAA level should be forwarded to the Mississippi Department of Employment Security (MDES) as the next higher authority as specified in II.3.

Grievances and Complaints should be addressed to:

Mississippi Department of Employment Security  
Office of Grant Management  
OAA/SCSEP Grievances and Complaints  
P.O. Box 1699  
Jackson, MS 39215-1699

Grievances and complaints should include the following information:

- The name, address, and telephone number of the participant or other affected party filing the grievance or complaint;
- The name and address of the designated State agency to which the grievance or complaint is being submitted;



- A statement documenting the nature of the grievance or complaint and noting all relevant parties; and
- A signature and date signed.

MDES will review the grievance or complaint and notify the involved parties within 15 days. MDES will provide the involved parties an opportunity for an informal resolution.

**D. Fair Hearings**

If a grievance/complaint regarding a denial, reduction, suspension or termination of services cannot be resolved through informal means, including mediation, at the lower levels of authority, MDES, within 30 days of receipt of the grievance or complaint, will schedule a hearing before an Administrative Law Judge (ALJ). MDES will notify the involved parties at least 10 days prior to a scheduled hearing.

The hearing notice will include:

- The date of the notice;
- The name and address of the participant or other affected party filing the grievance or complaint and all other involved parties;
- A statement documenting the nature of the grievance or complaint and noting all relevant parties;
- The date, time, and place of the hearing; and
- The name, address, and telephone number of the contact person issuing the notice.

The hearing shall be conducted in an informal manner with strict rules of evidence not being applicable. The parties involved shall have the right:

- to present written and/or oral testimony under oath and arguments;
- to call and question witnesses;
- to request and examine records and documents relevant to the issues, and
- to be represented by a friend, advocate or attorney at his/her own expense.

The hearing will be recorded electronically. The ALJ shall follow the applicable procedures set forth at Benefit Appeal Regulations, Section 200 of the MDES Regulations.

Following completion of the hearing, the ALJ will present the findings of fact to the State Review Panel. The State Review Panel shall be made of members designated by the Executive Director or his designee. The State Review Panel will listen to the recording of the hearing and review the findings of fact presented by the ALJ. The State Review Panel



may accept, reject, or modify the ALJ's recommendation and shall issue a written decision to the involved parties within 60 days of receipt of the grievance or complaint.

## **VI. APPEALS**

### **A. Area Agency on Aging Level Appeals to the State**

All appeals must be made in writing and filed with MDES within 30 days of the AAA level decision or 30 days from the date on which the decision should have been received (60 days after filing the original grievance or complaint with the local AAA).

Appeals should be addressed to:

Mississippi Department of Employment Security  
Office of Grant Management  
OAA/SCSEP Grievances and Complaints  
P.O. Box 1699  
Jackson, MS 39215-1699

Appeals should include the following information:

- The name, address, and telephone number of the participant or other affected party filing the appeal;
- The original grievance or complaint filed at the AAA level, documenting the nature of the alleged incident and noting all relevant parties;
- The original decision reached at the local level;
- The grounds on which the appeal is sought; and
- A signature and date signed.

MDES will review the appeal and notify the involved parties within 15 days of the receipt of the appeal. MDES may affirm, modify, set aside, or remand any decision made at the local level, or at its sole discretion, direct that additional evidence be taken.

If a hearing was held at the local AAA, MDES shall request a record of the hearing. The State Review Panel will review the record of the AAA hearing, and a State level hearing will not be scheduled. The State Review Panel may accept, reject, or modify the local AAA's decision and will issue a written decision to the involved parties within 60 days of receipt of the appeal.

If a hearing was not held at the AAA, MDES shall instruct the AAA to hold a hearing within 30 days of receipt of the appeal. If the AAA fails to hold a hearing within the

required timeframe, MDES will schedule a State level hearing before an ALJ. MDES will notify the involved parties at least 10 days prior to a scheduled hearing.

The hearing notice will include:

- The date of the notice;
- The name and address of the participant or other affected party filing the appeal and all other involved parties;
- A statement documenting the nature of the appeal, including: information about the original grievance or complaint filed, the original decision reached at the AAA level, and the grounds on which the appeal is being sought;
- The date, time, and place of the hearing; and
- The name, address, and telephone number of the contact person issuing the notice.

The hearing shall be conducted in an informal manner with strict rules of evidence not being applicable. Parties shall have the right to present written and/or oral testimony under oath and arguments; the right to call and question witnesses; the right to request and examine records and documents relevant to the issues, and the right to be represented. The hearing will be recorded electronically. The ALJ shall follow the applicable procedures set forth at Benefit Appeal Regulations, Section 200 of the MDES Regulations.

Following completion of the hearing, the ALJ will present the findings of fact to the State Review Panel. The State Review Panel will listen to the recording of the hearing and review the findings of fact presented by the ALJ. The State Review Panel may accept, reject, or modify the ALJ's recommendation and shall issue a written decision to the involved parties within 60 days of receipt of the appeal.

Statewide procedures provide for a State level appeal to DOL when:

- No decision is reached within 60 days; or
- Either party is dissatisfied with the State hearing process.

**B. State Level Appeals to the U.S. Department of Labor**

All appeals must be made in writing and filed with DOL within 60 days of the State level decision or the date on which the decision should have been received (60 days after filing the original grievance, complaint, or appeal with the State). DOL will make a final decision no later than 120 days after receiving a formal appeal. DOL will only investigate grievances, complaints, or appeals arising through the established procedures.

Appeals should be addressed to:

Regional Administrator  
U.S. Department of Labor  
Employment and Training Administration  
1371 Peachtree Street, N.E.  
Atlanta, GA 30367

**VII. EFFECTIVE DATE:**

This policy is effective April 1, 2013.



**Mississippi Department of Employment Security  
Senior Community Service Employment Program (SCSEP)  
Individual Durational Limit Policy**

**I. SCOPE AND PURPOSE**

The purpose of this policy is to provide guidance to SCSEP subgrantees and participants concerning the duration of participation in SCSEP.

**II. BACKGROUND**

Section 641.570 (a)(1) of the SCSEP final rules states that SCSEP eligible individuals may participate in the program for a maximum duration (Participant's Individual Durational Limit) of 48 months in the aggregate (whether or not consecutive) from the date of the individual's enrollment in the program.

**Mississippi Individual Durational Limit Policy:**

The state of Mississippi Department of Employment Security implemented a policy in 2012 which states that the individual participant durational limit shall be 48 months without the possibility of extensions. This means that no participant will be offered an extension beyond the 48-month time limit for participation in SCSEP.

**III. IMPLEMENTATION INSTRUCTIONS**

July 1, 2007, changes were implemented which reduce the time a participant may be enrolled in SCSEP. *Individual enrollments must average no more than 27 months in duration.* In addition, participants have *48 months life-time* to utilize the services of this program. This means that it is imperative that participants find unsubsidized employment as quickly as possible – hopefully within 3 to 9 months of enrollment – allowing for time remaining for additional assistance, should it be needed in the future. This time allowance will be monitored by the DOL SCSEP database, known as SPARQ, and will take into account all work-training time accumulated from all SCSEP providers in the country for each participant. *It is vital to the success of each participant in the attainment of their employment goals that they understand these restrictions, and that they work to achieve unsubsidized employment as quickly as possible.*

Subgrantees must inform SCSEP participants of the maximum 48-month time limit for participating in the program at the time of their enrollment in the program. It is imperative that participants receive this information, as they must plan for their lives and incomes after their SCSEP eligibility ends. *To the extent possible, subgrantees must*

*operate the program so that employment in an unsubsidized job within the 27-month average enrollment is the ultimate goal for each enrollee.*

Participants also need to be made aware that there will not be any extension beyond the maximum 48 months. Subgrantees must develop a form that the participant will sign that states that he/she is aware of this durational limit that is mentioned in the SCSEP Participant Handbook. This signed form must be kept in the participant's file.

**Transition Planning:**

Appropriate transition plans must be in place for each participant affected by a durational limit, and will be implemented in a timely manner to ensure the best possible outcome for each participant. Sub-grantees should identify other relevant community partners and should collaborate with SCSEP partners, including WIN Job Centers, to ensure that participants have opportunities during the transition process to use SCSEP partner services. The WIN Job Centers provide employment services, resume writing, interviewing workshops, Career Readiness Certificate testing, and education training opportunities.

Sub-grantees should invite community partners and WIN Job Center partners to meetings to discuss services provided and eligibility requirements and to also introduce participants to the partners prior to exiting the program.

**Participant Notification Requirement:**

Sub-grantees are required to send a 90 day and 30 day notice to participants who are about to reach their durational limit.

**IV. EFFECTIVE DATE:**

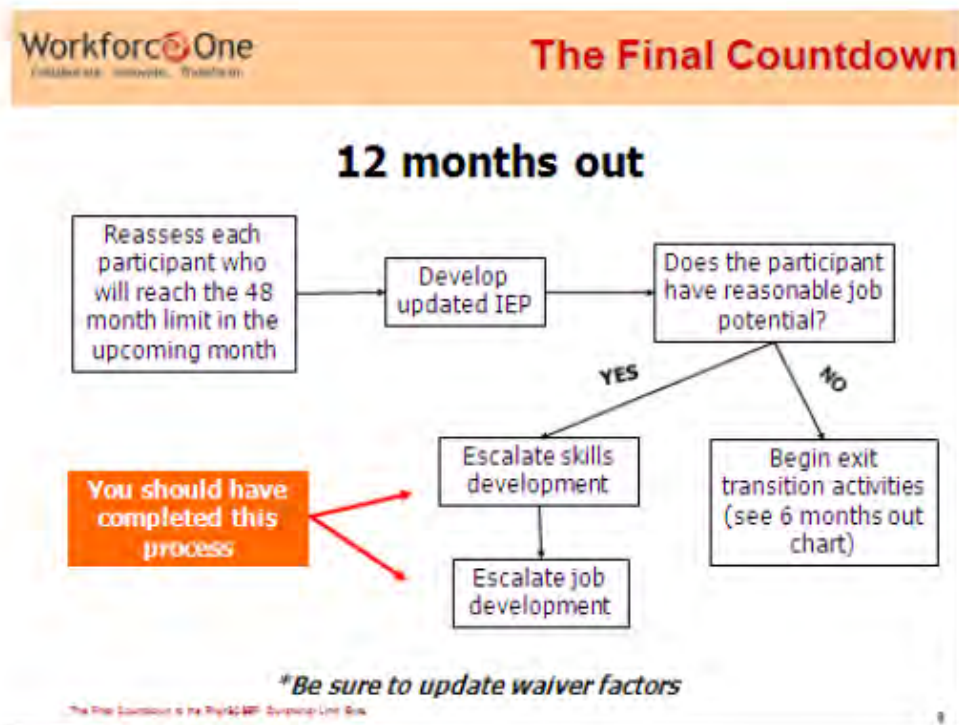
This policy is effective April 2017 until modified or rescinded.

**V. ATTACHMENT:**

Process Chart for Participant Final Year in SCSEP

***For participants approaching durational limit in 1 Year:***

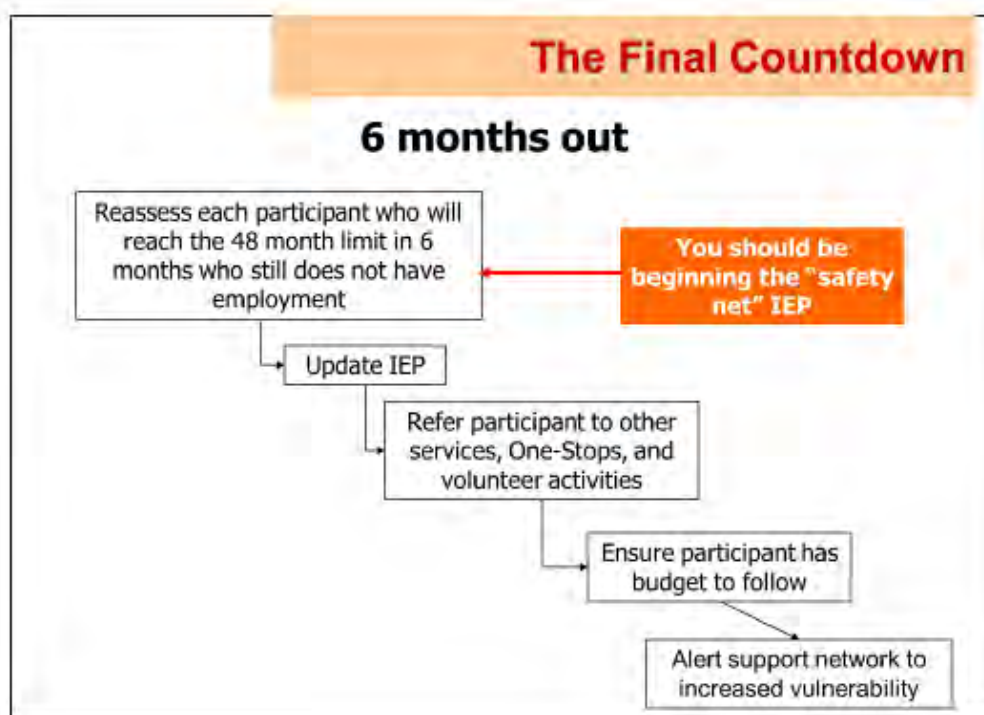
You should send a 1 year letter to each participant at the beginning of their 4<sup>th</sup> year. **All participants on current WDL list should have gotten a letter by now.**





***For participants approaching durational limit in 6 Months:***

- 1) Develop transition plans and include those plans in the participants' IEPs.
- 2) Send a letter to the participants to remind them they will be leaving the program in six months. **Call in those participants to discuss their transition plans.**



***For participants approaching durational limit within 30 Days:***

Participants **must** be given 30 days' written notice of their termination and **must** be informed that the termination is subject to appeal under the grantee's grievance policy.

- A copy of the grievance policy should be attached to the written termination notice.
- On the Exit Form, "Durational Limit" should be checked as the reason for exit.

# Appendix J: Local Workforce Development Area Guidelines

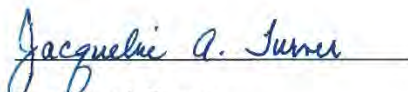


**MISSISSIPPI DEPARTMENT of EMPLOYMENT SECURITY**  
OFFICE OF THE GOVERNOR  
MARK HENRY  
EXECUTIVE DIRECTOR

**WIOA COMMUNICATION NUMBER: 15-014**

**DATE: January 15, 2016**

- I. SUBJECT:** Local Workforce Development Area Four-Year Strategic Plans
- II. BACKGROUND:** On July 22, 2014, President Barack Obama signed the Workforce Innovation and Opportunity Act (WIOA), comprehensive legislation that reforms and modernizes the public workforce system. In accordance with WIOA Section 103, the State of Mississippi submitted a combined plan to meet the requirements of the Act. The Plan was submitted to the U.S. Department of Labor on October 30, 2015. A kickoff meeting was held December 10, 2015 to begin the planning process for the local area plans that will align with the State Plan. Each Local Workforce Development Board must develop and submit to the Governor a comprehensive four-year local plan in accordance with WIOA Section 108.
- III. REQUIRED ACTION AND DUE DATE:** Local area plans should be developed according to the instructions provided in this communication and any subsequent instruction issued by MDES. The local plans should be submitted **by May 31, 2016**, for review by the Office of Governor Phil Bryant, MDES Office of Grant Management, and by Core and Strategic Partners included in the State Plan.
- IV. CONTACT:** Questions concerning this instruction should be addressed to Laura Ring at 601-321-6017 or [lring@mdes.ms.gov](mailto:lring@mdes.ms.gov) or to Bob DeYoung at 601-321-6477 or [rdeyoung@mdes.ms.gov](mailto:rdeyoung@mdes.ms.gov).
- V. ATTACHMENTS:** Timeline from December 10<sup>th</sup> Kickoff Meeting  
Local Workforce Development Board Plan Guidelines

  
Jacqueline A. Turner  
Deputy Executive Director, CFO

HENRY J. KIRKSEY BUILDING  
1235 ECHELON PARKWAY • JACKSON, MISSISSIPPI 39213  
TELEPHONE: 601-321-6002 • [mdes.ms.gov](http://mdes.ms.gov)

Workforce Innovation and Opportunity Act

Guidelines for Mississippi Local Workforce  
Development Board Plans

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## **Introduction**

Program Year 2015 marks the first year of the Workforce Innovation and Opportunity Act (WIOA). WIOA requires each workforce development board to develop a comprehensive four-year plan, in partnership with the local chief elected official, and submit to the state. The WIOA four-year plan will be effective July 1, 2016 - June 30, 2020. At the end of each year of the four-year local plan, each local board shall review the local plan and prepare and submit modifications to the local plan to the MDES Office of Grant Management. Modifications should reflect changes in labor market and economic conditions or in other factors affecting the implementation of the local plan.

The Mississippi Department of Employment Security (MDES), as designated by the Office of the Governor, is issuing these instructions for local plans. The local plan shall support the alignment strategy described in the state plan in accordance with WIOA Section 102(b)(1)(E), and otherwise be consistent with the state plan. Local Workforce Development Boards may obtain a copy of the Mississippi WIOA Plan from MDES. Workforce Development Boards shall also comply with WIOA, Section 108 in the preparation and submission of the plan. Additional information about the WIOA, Public Law 113-128, enacted July 22, 2014, may be obtained from the U.S. Department of Labor Employment and Training Administration website: [www.doleta.gov](http://www.doleta.gov).

These guidelines have been written to assist the Local Workforce Development Areas (LWDAs) in structuring their workforce plan to meet to federal WIOA regulations and alignment with the overarching workforce goals of the state. Any future advisement will be provided by the Office of Grant Management (OGM) via WIOA communications.

## **Public Comment Requirements**

In accordance with the Workforce Innovation and Opportunity Act, Section 108(d), the Workforce Development Board shall make copies of the proposed local plan available to the public through electronic and other means, such as public hearings and local news media; allow for public comment not later than the end of the 30 day period beginning on the date the proposed plan is made available; and, include with submission of the local plan any comments that represent disagreement with the plan.

## **Submission Requirements**

Local plans must be submitted to the MDES Office of Grant Management no later than 5:00 PM CDT on May 31, 2016. Local plans should be submitted electronically in PDF format and uploaded via JScape with an email notification to [rdeyoung@mdes.ms.gov](mailto:rdeyoung@mdes.ms.gov) that the plan has been uploaded. The original plan and attachments should be retained by each local area.



## Plan Outline

### A. Local Workforce Development Area Overview

The purpose of this section is to provide an overview of the local area and identify the individuals and entities responsible for general operations within the local area.

- A.1. Provide the Local Area's official (legal) name established to administer the Workforce Innovation and Opportunity Act (WIOA). Name document: *"(insert local area name) Re-designation Approval Letter."*
- A.2. Provide the name, title, organization name, address, telephone number and e-mail address of the Workforce Development Director.
- A.3. Provide the name, elected title, local government affiliation, address, telephone number and e-mail address of the Local Area's Chief Elected Official.
- A.4. Provide the name, title, business name, address, telephone number and e-mail address of the individual authorized to receive official mail for the Chief Elected Official, if different than A.3.
- A.5. Provide the name, address, and telephone number of the Administrative/Fiscal Agent responsible for disbursing Local Area WIOA grant funds. This is the entity responsible for the disbursement of grant funds. [WIOA Sections 107(d)(12)(B)(i)(III) and 108(b)(15)].
- A.6. Provide the name, title, organization name, address, telephone number and e-mail address of the Administrative/Fiscal Agent's signatory official.
- A.7. Attach a copy of the Administrative Entity/Local Workforce Development Area/Fiscal Agent's organizational chart with an effective-as-of date. Include position titles of Local Area staff. Name document: *"(insert name of administrative entity name/local workforce development area/fiscal agent name) Organizational Chart."*
- A.8. Provide the Administrative Entity's Data Universal Numbering System (DUNS) number and assurance that the 'System for Award Management' (SAM) status is current. Administrative Entities must register at least annually on the SAM website (<https://www.sam.gov/ccr/>) to receive federal funding [required by Federal Acquisition Regulation (FAR) Section 4.11 and Section 52.204-7].
- A.9. Provide the Local Workforce Development Board (LWDB) Chairperson's name, business title, business name and address, telephone number and e-mail address.
- A.10. Attach the LWDB's Membership List. The first block is reserved to identify the Board Chairperson. Indicate all required representation and indicate if vacant. [WIOA Section 107(b)(2)]. Name document: *"(insert local area name) Local Workforce Development Board Membership List."*
- A.11. Attach the LWDB By-laws including date adopted/amended. Name document: *"(insert local area name) Local Workforce Development Board By-laws."*

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## 4

### Guidelines for Mississippi Local Workforce Development Board Plans

**A.12.** Attach a copy of the signed 'Certification Regarding Debarment, Suspension, and other Responsibility Matters-Primary Covered Transactions.'<sup>1</sup> [Required by the Regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, participants' responsibilities.] Document must bear the original signature of the Administrative Entity signatory official. Name document: *"(insert local area name) Debarment Form."*

**A.13.** The local plan must include the LWDB and Chief Elected Official (CEO) Signatory Submission Page, bearing the original signatures of the Chief Elected Official(s) and the LWDB Chairman. Include a signed copy with the submission of the Local Plan. Name document: *"(insert local area name) Signatory Submission Page."*

## **B. Regional Strategic Planning**

If the local area is part of a planning region that includes other local areas, the local boards and chief elected officials of the local areas represented shall collaborate to prepare and submit a regional plan as described in Section 106(c)(2).

As outlined in the State Plan, the State Board and the local boards will work together to define regions that occupy space in one or more workforce areas. These regions will be defined according to industry and sector needs and these regional concerns will be taken into account in training and other local administration of WIOA priorities.

For the purpose of this section, regions are currently identified as the Local Workforce Development Areas.

The purpose of this section is to identify businesses and industries that operate within major enterprises that might cross jurisdictional boundaries (e.g., county boundaries, state borders) and might involve multiple LWDAs. Through analysis of the regional needs and market trends, this section is designed to levy the strengths of the local areas in order to create strategies for meeting the needs of employers for in-demand industries across the region.

**B.1.** Include the following statement: For the purpose of this section, regions are currently identified as the Local Workforce Development Areas.

**B.2.** Describe how the regional vision aligns with the "Mississippi Works Smart Start Career Pathway Model" as outlined in the Mississippi WIOA Plan.

**B.3.** Provide an analysis of the regional economic conditions to include: a) existing and emerging in-demand industry sectors and occupations; and, b) knowledge and skills needed to meet the employment needs of employers in those industry sectors and occupations. Include sources used and business involvement in determining needs. [WIOA Section 108 (b)(1)(A)(i)(ii) and (B)].

**B.4.** Provide an analysis of the workforce in the region, including current labor force employment and unemployment data, and information on labor market trends, and the educational and skill

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<sup>1</sup> [https://www.sba.gov/sites/default/files/articles/SBA\\_Form\\_1623\\_Debarment\\_and\\_Suspension.pdf](https://www.sba.gov/sites/default/files/articles/SBA_Form_1623_Debarment_and_Suspension.pdf)

levels of the workforce in the region, including individuals with barriers to employment. [WIOA Section 108 (b)(1)(C)].

**B.5.** Describe strategies to facilitate engagement of businesses and other employers, including small employers and in-demand industry sector occupations. Describe methods and services to support the workforce system in meeting employer needs. [WIOA Section 108 (b)(4)(A)(i)(ii)].

**B.6.** Describe strategies and services used to coordinate workforce development programs and economic development. [WIOA Section 108 (b)(4)(A)(iii)].

**B.7.** Outline regional transportation issues related to workforce development and ways the region is/will address needs identified. Include a description and/or map of the regional commuting patterns. [WIOA Section 108(b)(11)].

**B.8.** Describe how the region coordinates with area secondary education, community colleges and universities to align strategies, enhance services and avoid duplication of services. [WIOA Section 108(b)(10)].

**B.9.** Provide details on how the region addresses workforce issues specifically related to its: a) cities and/or towns; b) suburban areas; and, c) rural areas.

**B.10.** Provide details on how the region connects military skills to occupational demands to serve military veterans and families.

### **C. Local Area Planning**

Mississippi's State Plan includes the Combined Plan Programs and Strategic Programs. The purpose of this section is to explain how the LWDA will prepare and support an educated and skilled workforce for all eligible job seekers. This section includes descriptions of the local workforce development system and the role the local board plays in coordinating with workforce development partners and stakeholders.

**C.1.** Provide a description of the LWDB's strategic vision and goals for preparing an educated and skilled workforce including youth and individuals with barriers to employment. Include goals relating to the performance accountability measures based on primary indicators of performance in order to support regional economic growth and economic self-sufficiency. [WIOA Section 108 (b)(1)(E)].

**C.2.** Taking into account the analyses described in the Regional Strategic Planning section, describe strategies to work with the entities that carry out the core programs that align resources available to the local area to achieve the strategic vision and goals described in C.1. [WIOA Section 108 (b)(1)(F)].

**C.3.** Describe local area's workforce development system, including identifying the programs included in the system, and how the local board will work with the entities administering core programs and other workforce development programs to support alignment and provision of

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### **Guidelines for Mississippi Local Workforce Development Board Plans**

services, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.). [WIOA Section 108 (b)(2)].

**C.4.** Provide a description of how the LWDB, working with the entities carrying out core programs, will expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. Include how the LWDB will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and improve access to activities leading to a recognized postsecondary credential including a credential that is an industry-recognized certificate or certification, portable, and stackable. [WIOA Section 108 (b)(3)].

**C.5.** Describe the LWDB's use of initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies, designed to meet the needs of employers in the corresponding region in support of the regional strategy to meet the needs of businesses. [WIOA Section 108 (b)(4)(B)].

**C.6.** Describe how the LWDB coordinates and promotes entrepreneurial skills training and microenterprise services. [WIOA Section 108(b)(5)].

**C.7.** Describe how the local board enhances the use of apprenticeships to support the regional economy and individuals' career advancement.

**C.8.** Provide a description of how the LWDB coordinates workforce investment activities carried out in the local area with statewide rapid response activities as described in WIOA Section 134(a)(2)(A). [WIOA Section 108 (b)(8)].

**C.9.** Provide a description of plans, strategies and assurances concerning maximizing coordination of services provided under the Wagner-Peyser Act and services provided in the local area through the WIN Job Center system. Include how improved service delivery and avoidance of duplication of services will be achieved. [WIOA Section 108 (b)(12)].

**C.10.** Provide a description of how the LWDB coordinates workforce investment activities carried out in the local area with the provision of Adult Education and Literacy activities. [WIOA Section 108 (b)(13)].

**C.11** Provide a description of cooperative agreements, as defined in WIOA Section 107(d)(11), between the LWDB or other local entities described in Section 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination. [WIOA Section 108 (b)(14)].

**C.12.** Provide a description of the competitive process used to award sub-grants and contracts in the local area for activities carried out under WIOA Title I. [WIOA Section 108 (b)(16)].

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### Guidelines for Mississippi Local Workforce Development Board Plans

**C.13.** Describe methods used to track Adult, Dislocated Worker and Youth performance measures throughout Program Year 2015 and plans for continuous improvement of performance.

**C.14.** Provide a brief description of the actions the LWDB will take toward becoming or remaining a high-performing board, consistent with the factors developed by the State Board. [WIOA Section 108 (b)(18)].

**C.15.** Describe the role of the local board in coordinating with local economic developers to attract target industries as defined by the Mississippi Development Authority.

**C.16.** Describe the process for preparing and submitting modifications of the plan that reflect changes in local and/or state priorities or target industries on an annual basis.

### **D. WIN Job Centers (One-Stop Delivery System) and Programs**

*Note: Section 121 of the Workforce Innovation and Opportunity Act focuses on the establishment of one-stop centers.*

The purpose of this section is to describe how the job centers in the LWDA will operate and deliver program services.

**D.1.** Provide a brief description of the WIN Job Center system in the local area. [WIOA Section 108 (b)(6)].

**D.2.** Attach the Memorandum of Understanding (MOU) among the local LWDB and partners concerning operation of the WIN Job Center system. [WIOA Section 121(b)(A)(iii)]. Name document: *"(insert local area name) WIN Job Center MOU."*

**D.3.** Describe how WIN Job Centers will use the Mississippi Works integrated, technology-enabled intake and case management information system for programs carried out under WIOA and programs carried out by WIN Job Center partners. [WIOA Section 108 (b)(21)].

**D.4.** Describe how WIN Job Center staff will be trained in integrated services delivery and have appropriate access to Mississippi Works ([wings.mdes.ms.gov](http://wings.mdes.ms.gov)) technology. Include methods and timeline for accomplishing training for both.

**D.5.** Describe the LWDB's method for planning oversight of the WIN Job Center system in the local area, including processes for ensuring quality customer service. Include the review/oversight process and frequency of review. [WIOA Section 121(a)(3)].

**D.6.** Identify WIN Job Center location(s) including Sector Training Plus Comprehensive, Comprehensive, Affiliate, and Virtual-Access sites; program services offered in each; how WIN Job Center operator(s) are designated; provider(s) of WIOA career services and youth services and method of selection. [WIOA Section 121 (b)(1)(A) and (b)(1)(B)]. Name document: *"(insert local area name) WIN Job Centers."*



**D.7.** Describe the steps that will be taken to prepare for the development and eventual creation of a Sector Training Plus Comprehensive One-Stop Center. [MS WIOA Plan]

**D.8.** Describe how career services are provided through the WIN Job Centers. [WIOA Section 134(c)(2)].

**D.9.** Describe the integrated customer service process for participants. Attach a flow chart for services to include initial one-on-one interviews with customers, including Mississippi Works registration, skills assessments, and determination of further services. Name document: "*(insert local area name) Service Flow Chart 2015.*"

**D.10.** Describe how the LWDB facilitates access to services provided through the WIN Job Center delivery system, including remote areas, through the use of technology and through other means. [WIOA Section 108 (b)(6)(B)].

**D.11.** Describe how the LWDB uses a portion of funds available to the local area to maintain the WIN Job Center system, including payment of the infrastructure costs of job centers. [WIOA Section 121 (b)(1)(A)(ii) and (h)].

**D.12.** Describe the roles and resource contributions of the WIN Job Center partners. [WIOA Section 108 (b)(6)(D)].

**D.13.** Provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area. [WIOA Section 108 (b)(7)].

#### **Youth Services**

**D.14.** Will the LWDB have a standing committee to provide information and to assist with planning, operational, and other issues relating to the provision of services to youth? [WIOA Section 107(b)(4)(A)(ii)].

If yes, please provide the committee's purpose/vision, planning meeting schedule, and list of members to include members' agency/organization, one of which must be a community based organization with a demonstrated record of success in serving eligible youth. [WIOA Section 107(b)(4)(A)(ii)].

If no, will the LWDB have a formal Youth Council or Youth Advisory group?

Provide a description and assessment of the type and availability of youth workforce activities in the local area, including activities for youth who are individuals with disabilities. Include identification of successful models of such youth workforce investment activities being used and/or planned. [WIOA Section 108 (b)(9)].

Provide the LWDB's approach to meeting the required: a) 75% minimum youth expenditures on out of school youth and include planned program design; and b) required 20% minimum for work experience. [WIOA Section 129 (a)(4)(A) and (c)(4)].

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### **Guidelines for Mississippi Local Workforce Development Board Plans**



**D.15.** Describe local area strategies and services that will be used to strengthen linkages between the WIN Job Center system and unemployment insurance programs. [WIOA Section 108 (b)(4)(A)(iv)].

**D.16.** Provide a description of how the LWDB coordinates workforce investment activities carried out in the Local Area with the provision of TANF activities.

**D.17.** Describe strategies and services to strengthen K-12 career pathways and expand high school programs to reflect the employment needs of the local area and how these strategies and services will address the findings from the analysis that is required for each local board referenced in Section 108(b)(1)(A-D). Describe how these services and strategies align and support the core strategies of the Mississippi WIOA plan.

**D.18.** Describe how the local area will integrate services for:

- a) persons with disabilities;
- b) veterans;
- c) Temporary Assistance to Needy Families (TANF) recipients
- d) Senior Community Service Employment Program (SCSEP) participants;
- e) individuals with other barriers to employment; and
- f) additional specific populations, if applicable

**D.19.** Describe how entities within the WIN Job Center system, including center operators and partners, will comply with Section 188, if applicable, and provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities. [WIOA Section 108 (b)(6)(C)].

## **E. Sector Strategy Plan**

Sector strategies are regional, industry-focused approaches to building skilled workforces that result in job opportunities for all workers across a range of industries. The purpose of this section is to describe the processes that the LWDA will follow to create a local sector strategy(s) plan that will help existing business and industry prosper and aid in the recruitment of new businesses to the state. This section should include how the local area plans to: 1) engage new and emerging industries along with those already established in the area; and 2) promote the programs and services that better meet the demand of the workforce needs of the industries in the area.

**E.1.** Identify the sectors and their respective supporting industries that best define the current and future economic identity of the local workforce area. Describe how the identified sectors make up the economic identity of the area, why they are relevant for the growth of the area and the region, and how they support the implementation of statewide strategies and support the core strategies State Plan. Clearly identify sectors that are of particular importance to the region versus those that have a more statewide relevance. In this regard, describe how the target industries defined by the Mississippi Development Authority fit within the economic identity of the local area.

**E.2.** Describe the local area plan for engaging local businesses reflective of the main sector(s) along with those supporting the main sector(s) to identify priorities for workforce development. Also include the role state and local economic developers will play in establishing sustainable partnerships with local businesses.

**E.3.** Describe how the local area plans to map local assets including identify critical stakeholders and the roles they will play in the realization of workforce strategies in support of the local economic identity. Stakeholders should include entities and organizations such as the Mississippi Development Authority, local economic developers, foundations, local school districts, community colleges, and community based organizations.

**E.4.** Taking into account the strategies to work with the entities that carry out the core programs, describe the steps the local area will take to increase the awareness of services offered at the WIN Job Center and increase the utilization of the WIN Job Center by the target-industries.

**E.5.** Describe how the local area will meet the training and employment needs of businesses within the target-industries, especially those not currently offered through the WIN Job Center, that emphasizes industry-focused short-term, credential based training programs and two-year degree programs that provide a qualified and quantifiable labor pool.

**E.6.** Describe the steps the local area will take to align basic education credentials with the skills necessary to meet the middle-skill needs of employers in the target-industries. Explain the steps the Local Area will take to objectively assess training and ensure that the skills and credentials earned through training are both portable and stackable.

## **F. Business Plan**

The purpose of this section is to describe how the LWDA will align resources to accomplish the strategies and goals outlined in the overall plan as well as define a timeline for the completion of each component below. The information reported in the business plan will be used as part of each LWDA's annual plan review.

**F.1.** List the workforce goals and intended outcomes for the Local Area, and how they contribute to the primary goals of the State Plan.

**F.2.** Describe how the goals and intended outcomes will be achieved and the proposed activities support the core strategies of the State Plan.

**F.3.** Identify the procedures the local area will take to achieve activities listed in G.2, including specific steps and achievements for planning, implementation, and evaluation.

**F.4.** Provide a timetable of milestones for the duration of the plan that the local area will maintain to ensure timely achievement of the workforce goals and outcomes.

**F.5.** Describe the procedures for reporting progress and performance on reaching the goals and achievements set by the local area including steps to be taken for lack of progress and underperformance in relation to achieving milestones.

**F.6.** Gauge the LWDA capacity to meet the workforce needs of the area and the region. This should take into consideration everything the local area plans to do to support a workforce necessary to maintain and grow economic opportunities in the area. This should include an estimate of the magnitude of the need and the size of the target population to be served. Also describe how the LWDA will achieve the necessary capacity to fully meet local needs.

**F.7.** Map out and provide a matrix of the resources of each stakeholder and describe how these resources can be aligned to achieve the main goals of the local and state WIOA plans.

## **G. Policies**

### **Oversight and Monitoring**

**G.1.** Provide a description of the local area's oversight and monitoring procedures including processes for program and fiscal monitoring. [WIOA Section 107(d)(8)]. Attach a copy of monitoring document(s). Name document: *"(insert local area name) LWDB Oversight and Monitoring PY 2015."*

**G.2.** Provide a brief description of how the local area will ensure the continuous improvement of eligible providers of services and ensure that such providers meet the employment needs of local employers, workers and jobseekers. [WIOA Section 108(b)(6)(A)].

### **Equal Opportunity**

**G.3.** Describe processes to ensure individuals are not discriminated against on the basis of age, disability, sex, race, color or national origin. [WIOA Section 188].

**G.4.** Attach the local area's current Equal Opportunity (EO) Complaint Grievance Procedure to address EO requirements [29CFR Part 37.71]. Name document: *"(insert local area name) EO Complaint Grievance Procedure 2015."*

**G.5.** Describe methods to ensure local Equal Opportunity procedures are updated.

### **Other Policies**

**G.6.** Provide the local area policy(ies) on supportive services for Adults, Dislocated Workers and Youth (i.e., amount, duration, qualifying criteria). [WIOA Section 134(d)(2)]. Name document: *"(insert local area name) Supportive Services Policy."*

**G.7.** Provide the local area policy(ies) on Needs-Related Payments for Adults, Dislocated Workers and Youth. (i.e., amount, duration, qualifying criteria). [WIOA Section 134(d)(3)]. Name document: *"(insert local area name) Needs-Related Payments Policy."*

**G.8.** Provide the local area policy for local Incumbent Worker Training.

The policy should include eligibility and the non-Federal share for employers. The local area may use not more than 20 percent of WIOA Adult and Dislocated Worker funds to pay for the federal share of the cost of training through a training program for incumbent workers. [WIOA Section 134(d)(4)]. Name document: *"(insert local area name) Incumbent Worker Training Policy."*

**G.9.** Provide the local area policy for local Transitional Jobs. The local area may use not more than 10 percent of Adult and Dislocated Worker funds to provide transitional jobs. [WIOA Section 134(d)(5)]. Name document: *"(insert local area name) Transitional Jobs Plan."*

**G.10.** Describe the local area's planned use of On-the-Job Training (OJT). Provide the local area's On-the-Job Training policy(ies). [WIOA Section 134 (c)(3)(H)]. Name document: *"(insert local area name) OJT Policy."*

**G.11.** Provide the local area's process to meet priority of service requirements and include policy. Name document: *"(insert local area name) Priority of Service Policy."*

**G.12.** Provide the local area's Individual Training Account (ITA) Policy and include the following elements in summary. [WIOA Section 108(b)(19)]. Name document: *"(insert local area name) ITA Policy."*

**G.13.** Provide the local area's process to avoid conflict of interest. Name document: *"(insert local area name) Conflict of Interest Policy."*

**G.14.** Provide the local area's Sunshine Provision Policy. Name document: *"(insert local area name) Sunshine Provision Policy."*

**G.15.** Specify if the Local Area plans to offer incentives for youth. If yes, attach the Youth Incentive Policy to include: a) criteria to be used to award incentives; b) type(s) of incentive awards to be made available; c) whether WIOA funds will be used and d) the Local Area has internal controls to safeguard cash/gift cards. Name document: *"(insert local area name) Youth Incentive Policy."*

### **Local Area Plan Attachment Checklist**

1. Local Area Re-designation Approval Letter
2. Administrative Entity/Local Workforce Development Area/Fiscal Agent Organizational Chart
3. Local Workforce Development Board Membership List
4. Local Workforce Development Board By-laws
5. Local Area Certification Regarding Debarment
6. Local Area Signatory Submission Page
7. Local Area WIN Job Center Memorandum of Understanding
8. Local Area WIN Job Centers
9. Local Area Services Flow Chart
10. Local Area Oversight Monitoring Policies and Tools
11. Local Area Equal Opportunity Procedures
12. Local Area Supportive Services Policy
13. Local Area Needs-Related Payments Policy
14. Local Area Incumbent Worker Training Policy
15. Local Area Transitional Jobs Policy (optional)
16. Local Area OJT Policy
17. Local Area Priority of Service Policy
18. Local Area ITA Policy
19. Local Area Conflict of Interest Policy
20. Local Area Sunshine Provision Policy
21. Local Area Youth Incentive Policy (optional)





STATE OF MISSISSIPPI

# **WORKFORCE INNOVATION & OPPORTUNITY ACT**

Mississippi Works Smart Start Career Pathway