Workforce Innovation and Opportunity Act (WIOA)

Rhode Island Combined State Plan 2026 Modification

For the period of July 1, 2026, through June 30, 2028

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OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good-paying jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA planning fosters alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system matches employers with skilled individuals. WIOA requires States to plan across core programs and include this planning process in the Unified or Combined State Plans. This unified or combined planning can promote a shared understanding of the workforce needs within each State and foster development of more comprehensive and integrated approaches for addressing the needs of businesses and workers. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

OPTIONS FOR SUBMITTING A STATE PLAN

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

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- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) [1]

[1] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:

- State Strategy Implementation,
- State Operating Systems and Policies,
- Assurances,
- Program-Specific Requirements for the Core Programs, and
- Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.[2] States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

Paperwork Reduction Act: The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the 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 Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

[2] Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

Unified or Combined State Plan. Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

Unified State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

Combined State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below.

This is a Combined State Plan

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COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

Yes

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

Yes

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

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

Yes

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

Yes

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

Yes

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

Yes

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

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B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

Rhode Island's 2024-2028 Combined State Plan and its 2026 Modification reflect the Administration's vision for an integrated workforce, education, and economic development system while also serving as a federal compliance document for the United States Departments of Labor and Education under the federal Workforce Innovation and Opportunity Act (WIOA). The Combined State Plan outlines the principles, goals, and strategies that will guide workforce, education, and training programs in the state of Rhode Island over the next four years.

Rhode Island's economy has demonstrated meaningful resilience over the past several years, maintaining per capita income in the top third of all U.S. states and sustaining GDP growth through an increasingly complex global environment. After recently reaching historic lows, Rhode Island's unemployment rate has risen gradually over the past two years, underscoring the urgency of the work ahead. Automation and artificial intelligence are no longer emerging forces but present realities, already poised to potentially influence industries and the nature of work across every sector of the economy. The cost of living and concerns about future uncertainty continue to pose some risk to Rhode Island's economy and workforce. As a result, we are redoubling our focus on building an industry-driven economy that delivers a strong and talented labor force to employers to power their growth, and allows individuals, no matter their present economic circumstance, to receive the resources and supports necessary to propel them into high-wage jobs and improve the economic condition of themselves and their families.

Present economic conditions demand a coordinated, system-wide response that ensures Rhode Island's workforce development infrastructure is meeting workers and employers where they are. The state must fully utilize the talents, skills, and experience of all Rhode Islanders, with particular urgency for communities and occupations at greatest risk of being left behind. This effort requires an all-hands-on-deck approach that brings together industries, employers, community-based organizations, postsecondary institutions, training providers, workforce boards, and other partners to develop industry-driven and person-centered solutions to our collective workforce challenges.

Through concentrated efforts that promote collaboration and partnership across sectors and systems, and by leveraging federal and state funds and resources; the vision, mission, strategies, and goals laid out in this Plan can be actualized in a way that moves Rhode Islanders into better-paying jobs, while significantly increasing the state's economic competitiveness and powering the growth and success of Rhode Island employers. The state has made some key changes and revisions to increase programmatic collaboration, improve the reach and capacity of the workforce development system, increase and enhance community and business engagement, and enhance the participant experience within core and partner WIOA programs.

Rhode Island believes that shared ownership of the 2024 WIOA State Plan is critical to its success. To that end, the state board utilized an intentional and dynamic community engagement plan that included interdepartmental State staff, businesses, local workforce development boards, and community-based organizations. During implementation of the plan, Rhode Island will continue to welcome and invite input and perspective as we collectively strive to strengthen and elevate the statewide workforce development system.

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II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA) ; individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

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

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which there is existing demand.

II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which demand is emerging.

III. EMPLOYERS' EMPLOYMENT NEEDS

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

1. **Existing Demand Industry Sectors and Occupations.**

Rhode Island's 2024 WIOA plan is based on analysis of the state's current and projected economy and workforce and was crafted in close alignment with the state's economic development strategy.

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That economic development strategy, titled "Rhode Island Innovates," found that the state possesses unique assets that can be leveraged to build an innovative economy. The report identified industry sectors and subsectors which reflect Rhode Island's native strengths, are expected to grow at faster rates than the state average, and offer well-paying jobs. These subsectors are categorized as 'Advanced' — including:

- Biomedical Innovation
- Cybersecurity and Data Analytics
- Maritime Technology and Manufacturing
- Advanced Business Services, and
- Design and Custom Manufacturing

and 'Opportunity' – including:

- Transportation, Distribution, and Logistics
- Arts, Education, Hospitality, and Tourism,
- the 'Blue' (ocean/coastal technology) Economy, and
- Back Office (administrative support functions for large firms) Operations

As of 2024, and excluding territories and the District of Columbia; Rhode Island is the forty-fourth (44th) most populous state (1,112,308 total population); with the second (2nd) highest population density (1,075.9 residents per square mile); the ninth (11th) highest median age (41.0), the fifteenth (12th) highest share of foreign born population (15.7%); and the twenty-sixth(26th) most racially/ethnical diverse (66.1% white non-Hispanic population).

Rhode Island's economy operated as a full-employment economy during 2025. The unemployment rate was 4.5% percent as of September 2025. The September 2025 Labor Force Participation rate was 63.8%, down four-tenths of a percentage point from the 64.2% rate in February 2020 just prior to the Coronavirus pandemic (https://fred.stlouisfed.org/series/LBSNSA44).

Existing Demand Industry Sectors and Occupations

Analysis by the state's Labor Market Information division provides preliminary distribution of current employment seasonally adjusted, by industry for Rhode Island for September 2025. Education and Health Services comprise the largest industry in Rhode Island, employing 112,900 individuals, accounting for 21.9% of total nonfarm employment. The second largest industry in the state is Trade, Transportation, and Utilities, employing 77,600 individuals, accounting for 15.1% of total employment. Professional and Business Services combine to form the third largest industry sector in Rhode Island, employing 72,100 individuals, accounting for 14.0% of the state's total employment.

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Rhode Island Establishment Employment - Seasonally Adjusted – September 2025

	Seasonally Adjusted – November 2023	Seasonally Adjusted – September 2025
Total Nonfarm	**496.9**	**514.7**
Total Private	**431.9**	**448.0**
Education & Health Services	108.2	112.9
Trade, Transportation & Utilities	75.4	77.6
Professional & Business Services	66.9	72.1
Government	65.0	66.7
Leisure & Hospitality	56.9	59.5
Manufacturing	40.2	40.4
Financial Activities	35.5	34.6
Construction	21.6	22.8
Other Services	21.5	22.7
Information	5.5	5.2
Mining & Logging	0.2	0.2

https://dlt.ri.gov/labor-market-information/data-center/current-employment-statistics-ces

The Rhode Island economy is represented by a large number of companies employing a comparatively small number of workers; and a small number of companies employing a large number of workers. Smaller companies, those employing less than 20 people, represented 92.4% of all private Rhode Island employers and employed 26.6% of the workforce in 2025. Rhode Island's mid-sized companies (20-99 employees) accounted for 6.3% of all private Rhode Island employers and employed 26.5% of the workforce in the same period. The largest firms in Rhode Island, those employing 100 or more, represent just 1.3% of employers but they employ almost half of the private sector workforce at 46.9%.

Of the 30 largest employers (those employing 1000 workers or more; seven (7) are found in Health Care and Social Assistance, another six (6) are in Finance and Insurance (6), five (5) are institutions of Private Education, and five (5) are in Retail Trade (5).

Rhode Island has more small establishments as a share of private employers than the national average; and fewer large establishments. In 2024, Rhode Island ranked 8th nationally in terms of its percentage of small establishments (those employing less than 20 people). Conversely, Rhode Island ranked 43rd in the nation in the percentage of large establishments (those employing 100 or more).

Based on the most recently available information; the top ten occupations by employment in the following table account for 74.2% of all jobs and total 366,640 jobs in Rhode Island. Office and Administrative Support Occupations employ 11.4% of total state population. Food Preparation and Serving Related Occupations as well as Sales and Related Occupations as well as account for 10.1% and 8.3% of the state's employment respectively.

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State Occupational Employment and Wage Estimates- Rhode Island	May 2022	May 2024
Office and Administrative Support Occupations	61,060	56,420
Food Preparation and Serving Related Occupations	46,470	50,040
Sales and Related Occupations	43,090	41,130
Business and Financial Operations Occupations	37,440	36,330
Healthcare Practitioners and Technical Occupations	33,250	34,790
Transportation and Material Moving Occupations	32,010	32,900
Educational Instruction and Library Occupations	31,590	33,290
Production Occupations	28,190	28,180
Healthcare Support Occupations	23,520	25,240
Management Occupations	21,670	28,320

https://dlt.ri.gov/labor-market-information/data-center/occupational-employment-and-wage-statistics-oews ***Source: Occupational Employment and Wage Statistics Program, USDOL***

ii. Emerging Demand Industry Sectors and Occupation

Emerging Demand Industry Sectors

The table below shows the top 10 industries with the highest annual percent change in Rhode Island for the 2022-2032 time period.

NAICS CODE	Industry Title	2022 Average Employment	2032 Projected Employment	Numeric Change	Percent Change
	Total All Industries	531,287	564,230	32,943	6.2
22	Utilities	1,362	1,600	238	17.5
48-49	Transportation and Warehousing	11,655	13,460	1,805	15.5
71	Arts, Entertainment, and Recreation	7,625	8,650	1,025	13.4
11	Agriculture, Forestry, Fishing and Hunting	1,093	1,225	132	12.1

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54	Professional, Scientific, and Technical Services	29,738	32,800	3,062	10.3
62	Health Care and Social Assistance	80,816	89,030	8,214	10.2
53	Real Estate and Rental and Leasing	6,428	7,045	617	9.6
23	Construction	21,006	22,955	1,949	9.3
81	Other Services (except Government)	17,176	18,540	1,364	7.9
72	Accommodation and Food Services	49,758	53,200	3,442	6.9

To assess the emerging demand industry sectors, a 10-year projection (2022-2032) was utilized. Of the highest expected growth sectors, the five sectors with the largest gains in total projected employment are:

- Health Care and Social Assistance
- Accommodation and Food Services
- Professional, Scientific, and Technical Services
- Construction
- Transportation and Warehousing

Emerging Demand Occupations

Using a ten- year projection to assess emerging demand occupations reveals that the top ten occupations in terms of projected growth are:

SOC	Title	2022 Average Employment	2032 Projected Employment	Numeric Change	Total Exits	Total Transfers	Total Openings
35-3023	Fast Food and Counter Workers	11,281	11,642	361	12,657	13,510	26,528
41-2011	Cashiers	10,589	10,355	-234	10,072	10,148	19,986
41-2031	Retail Salespersons	12,373	13,098	725	8,360	10,083	19,168
35-3031	Waiters and Waitresses	8,273	8,176	-97	7,076	9,938	16,917

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31-1120	Home Health and Personal Care Aides	8,065	9,998	1,933	7,225	6,025	15,183
31-1131	Nursing Assistants	9,064	10,008	944	6,035	7,465	14,444
43-4051	Customer Service Representatives	10,694	10,294	-400	5,865	8,229	13,694
35-2014	Cooks, Restaurant	7,110	8,763	1,653	5,413	6,471	13,537
53-7065	Stockers and Order Fillers	6,526	7,508	982	4,365	6,870	12,217
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	7,631	7,928	297	5,418	5,409	11,124

Rhode Island currently has the thirteenth highest cost of living in the United States (as of third quarter 2025 - https://meric.mo.gov/data/cost-living-data-series). As the cost-of-living increases nationally and in Rhode Island, it is important to consider not just jobs, but jobs that pay a sustainable wage. The Massachusetts Institute of Technology regularly publishes their 'living wage' calculator. Per the MIT webpage, the 'living wage' is defined as the "wage rate that a full-time worker requires to cover the costs of their family's basic needs where they live." In 2025, a parent in a two adult, two child household with both adults working would need to make $30.85 to meet their basic needs. Of those occupations for which wages were available, 24% of all projected job openings (growth and replacement) in Rhode Island are in major occupational groups identified as paying a median wage at or above the MIT-calculated living wage. Among those jobs, only 26% are attainable without some form of postsecondary training and/or credential. This state plan recognizes the importance of focusing on building pathways into these family-sustaining occupations, while also recognizing the value in identifying occupations with momentum and potential that could lead to higher growth and higher wages in the future.

This plan also recognizes the importance of post-secondary credential attainment for the current and emerging job market. Jobs requiring college degrees (Associate, Bachelor's, Master's or Doctoral) currently represent nearly thirty three percent (31.9%) of the current occupational distribution in Rhode Island, higher than the national average (31.2%). During the ten-year projection period it is estimated that there will be more than 135,000 openings for occupations requiring a minimum of an Associate degree in Rhode Island.

Typical Education Needed for Job	**Total Openings (2022-2032)**
Doctoral or professional degree	10,162
Master's Degree	12,840
Bachelor's Degree	101,102
Associate Degree	11,131

Postsecondary Non-degree Award	45,576
Some College, No Degree	12,807
High School Diploma or Equivalent	237,662
No Formal Educational Credential	193,795

Source https://dlt.ri.gov/labor-market-information/data-center/2032-industry-occupational-projections

iii. Employers' Employment Needs

The table below compares needed levels of educational achievement according to statewide projections for the year 2032 compared to Rhode Island's current levels of educational achievement. The state has made progress in increasing its rate of high school and Baccalaureate graduation to meet the needs of the future workforce, though still has room for improvement in this area.

Education	**RI Percent of Projected 2032 Employment at each level**	**Current RI Educational Achievement per Projections**
No formal educational credential	22.9%	21.7%
High school diploma or equivalent	39.1%	37.2%
Postsecondary non-degree award, some college- no degree, and associate's degree	7.5%	6.9%
Bachelor's degree	25.1%	23.3%
Master's, doctoral or professional degree	3.3%	2.9%

For the occupations identified in both the LMI data the state's Economic Development strategy, a majority require high levels of one or more STEM (Science, Technology, Engineering and Math) fields. This suggests that a number of STEM competencies are highly valuable to employers and are associated with jobs with above average growth rates and typically pay a living wage. During the ten-year Projection period for Rhode Island, employment in STEM occupations is projected to grow at 11.9%, much faster than the 6.2% growth rate projected for all occupations in the state. During the projection period, RI employers will seek to fill over 21,000 STEM openings resulting from both occupational growth and the need to replace workers who leave their occupation.

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions, including for populations with barriers to employment described in the first paragraph of Section II. Analysis must include—

I. EMPLOYMENT AND UNEMPLOYMENT

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

II. LABOR MARKET TRENDS

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

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

Provide an analysis of the educational and skill levels of the workforce.

i. Employment and Unemployment

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

Key Statistics	**November 2023**	**September 2025**
RI Monthly Jobs	496,900	514,700
RI Unemployment Rate	2.9%	4.5%
US Unemployment Rate	3.7%	4.4%
RI Labor Force	574,157	September 2025

According to Rhode Island Department of Labor and Training – Labor Market Information Division, the total civilian labor force (seasonally adjusted) for Rhode Island in September2025 was 589,837 of whom 563,560 were employed, and 26,277 were unemployed, resulting in an unemployment rate of 4.5% percent. However, the Unemployment Rate does not always describe the full employment picture in a state. For example; under the traditional definition of unemployment, (individuals in the labor force without a job, who are available for and actively seeking work) – the average unemployment rate for the four quarters ending September 2025 was 4.5%. However, under the broadest measure of unemployment (known as the U-6), which includes (traditionally defined) unemployed persons, as well as discouraged workers, marginally attached workers and those working part-time for economic reasons, yields an unemployment rate of 8.4% for the same period; 3.9% percentage points higher than the rate calculated using the traditional definition, with most of the increase (+2.9 percentage points) associated with the involuntary part-time worker.

Rhode Island has made a number of reforms and innovations in recent years to reach and serve the involuntary part-time worker. Our approach to Dislocated Worker eligibility, developed with input from our regional USDOL office, includes individuals that were previously dislocated from higher wage employment but currently work in lower wage positions to maintain income. In 2023, the state raised the 'economic self-sufficiency' standard to provide occupational training to more individuals that are employed in positions paying below a living wage. During the 2024 plan period, the state will continue to focus on reaching low-income working Rhode Islanders eager to build greater economic security and sustainability for themselves and their families.

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Furthermore, unemployment levels in Rhode Island vary substantially based on geographic and demographic factors, as well as an individuals' educational attainment. For example; in 2024, unemployment in Rhode Island was 3.9% for people with an associate's degree and less than 2.1% for an adult with a bachelor's degree or higher. Unemployment rates for high school graduates was 7.8% and for those with less than a high school education it was 4.0%. Average earnings continue to be higher for those with higher levels of education. Similarly, while individuals with a high school degree or less make up 37% of the state population (per the most recently American Community Survey data), they comprise 44% of all Insured Unemployed as of October 2025.

Unemployment also varies dramatically by race and ethnicity. For example, while the 2024 average unemployment for white Rhode Islanders was 4.3%; it was 3.5% and 5.7% for black and Hispanic Rhode Islanders, respectively. There are fluctuations in the unemployment rate by city and town as well. Municipalities in the state's urban core comprise approximately two-thirds of the non-white population of our state and, as of September 2025, most have unemployment exceeding the statewide average – with rates of 4.9% (Woonsocket), 4.8% (Central Falls), 4.6% (Providence) and 4.4% (Pawtucket).

According to the America Community Survey one-year average, in 2024 Rhode Island's poverty rate was 12.2% - tied for nineteenth highest in the country. However once again there are significant variations among race and ethnicity. While poverty rates for White and Asian Rhode Islanders were 8.4% and 9.0%, respectively; poverty rates were 18.4% for Black/African American Rhode Islands, 26.6% for Hispanic/Latino Rhode Islanders (of any race), and 27.2% for Rhode Islanders of Some Other Race. Differences are also observed among Median Household Income as illustrated in the chart below:

Race/Ethnicity	**Median Household Income, 1- Year Average, American Community Survey (2024)**
Total [Statewide Average]	$83,504
Asian	$98,933
White	$93,590
Two or More Races	$65,011
Some Other Race	$58,949
Black / African American	$57,759
Hispanic / Latino (of any race)	$55,948
American Indian / Alaskan Native	$40,526
Native Hawaiian / Pacific Islander	n/a

In November 2025, a total of 8,504 individuals were receiving TANF assistance. These 8,504 individuals were served across 3,325 cases – 945 were child only cases, 2,380 were single/two parent cases. Of the 8,504 individuals; 5,932 were under the age of 18, and 2,572 were above the age of 18.

28% of age appropriate TANF recipients had less than a high school degree, 44% had a high school degree or equivalent, 27% had an Associates Degree or some College, and 1% had a Bachelor's Degree or higher (Note: TANF Education Data is self-declared).

Unemployment rates and workforce participation rates for populations with barriers to employment also differ from the overall state averages, in some cases significantly. The rates for youth, veterans, long-term unemployed, and individuals with disabilities are described below.

Youth Unemployment: The youth unemployment rate (ages 16 to 19) remains above the statewide average but is down considerably from recent years. Over the twelve-month average for 2024, the youth unemployment rate stood at 12.2%, higher than the statewide average for the same period, 4.5%, but lower than 14.1% in 2022 and 18.1% in 2018.

Veterans: The average unemployment rate for Rhode Island veterans in in 2024 was 4.8%, half of a percentage point higher than the statewide average for the non-veteran population (4.3%). Employment services for recently separated veterans play a critical role in the successful transition from military to civilian employment. The state's workforce development network provides specialized services that are available only for eligible veterans, such as individualized job search assistance and case management for veterans with a service-connected disability or other barriers to employment, vocational and work-based training, as well as job fairs and hiring events specifically for veterans.

Returning veterans are often unaware of the range of services and benefits they earned through their service or are unable to navigate the often complex web of agencies, programs, and providers that administer such benefits. The Rhode Island Office of Veteran's Affairs (http://www.vets.ri.gov/) offers navigation and consultation services for veterans from all recent combat eras to guide them to the services they need. The workforce development network worked in close consultation with the OVA to make sure veterans are fully aware of the career services available to them, and their priority for receiving such services.

Individuals with Disabilities: According to American Community Survey 2024 data; of the 140,368 Rhode Islanders aged 16+ who reported having a disability, 21.5 percent had incomes below the poverty line; as compared to 9.6% of Rhode Islanders who did not report having a disability. For the total population aged 18-64, the 2024 statewide average for Labor Force Participation 81.5%, as compared to 55.7% for individuals with any form of disability. Similarly, the 2024 statewide unemployment rate for the total population aged 18-64 was 5.1%, but that rises to 8.7% for individuals with any form of disability. The Rhode Island workforce development network is firmly committed to providing high quality services for individuals with disabilities to help them compete for jobs and fully participate in workforce.

English-Language Learners : One of the fastest-growing segments of the Rhode Island labor force continues to be adult English language learners. According to 2024 US Census data, nearly one quarter (23.6%) of Rhode Islanders spoke a language other than English at home, and 15.7% of the total state population was foreign born (an increase from 13% in 2020). Cultural and linguistic barriers present a unique set of challenges above and beyond those can be alleviated through support services and resources. English language acquisition services are primarily offered through the state's AEFLA programming.

Long-term Unemployed: In October 2025, 35.1% (2,821 of 8,037) of Rhode Islanders collecting unemployment insurance were categorized as long-term unemployed, defined as collecting unemployment benefits for more than fourteen weeks. The long-term unemployed often face social and emotional challenges related to the duration of their unemployment, beyond the financial and economic challenges traditional associated with unemployment. These

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deficiencies require intensive "wraparound" services to address these issues effectively, while rapidly moving individuals to paid work experience and reemployment. Rhode Island has piloted a number of programs focused on this specific population.

TANF Population: Of the 2,572 unique adults who participated in Rhode Island Works over the course of the twelve-month period July 2024 through June 2025; there were 598 individuals with job placements (some with multiple over 12 months). This represents 23% of the adult TANF participation for the fiscal/program year.

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

Industry

According to the RIDLT Labor Market Information's 2032 industry Outlook Report Rhode Island employment is expected to increase by more than 32,000 jobs during the 2022-2032 projection period (https://dlt.ri.gov/labor-market-information/data-center/2032-industry-occupationalprojections). Employment by 2032 is projected to reach 564,230- an increase of 32,943 (6.2%) jobs from the 2022 employment level. Nationally employment is projected to increase by 2.8%. The largest increases on a percentage basis are seen in the Utilities sector (17.5%), followed by the Transportation & Warehousing (15.5%) and Arts, Entertainment, and Recreation (13.4%) sectors. Conversely, a few sectors, such as Mining, Quarrying, and Oil and Gas Extraction (-1.7%) and Finance and Insurance (-0.1%), are projected to experience slight declines. The data indicates a robust recovery and expansion in key industries, contributing to the overall economic growth of the state.

Health Care & Social Assistance will increase by the largest total number of jobs (8,214) during the 2022-2032 projection period. Construction remains a key priority for the state and will continue to represent a sizable portion of the labor market by 2032. The Construction sector is projected to grow at 9.3% during the 2022 -2032 projection period. Total jobs in the construction reached a low of 15,400 in February 2011 but now projects to employ 22,955 by 2032.

Longitudinal Employer-Household Dynamics data shows that the percentage of younger age construction workers in Rhode Island is shrinking, while the percentage of older construction workers appears to be on the rise. Between 2005 and 2025, the 55+ age group experienced an increase in the percentage of construction workers, with this age group representing 27.3% of the construction workforce in 2025, up from 13.0% in 2005. The five younger age groups of 14-18, 19-24, 25-34, 35-44 and 45-54, all reported a decrease in the percentage of construction workers. The percentage of construction workers in age group 35-44 reported the largest decrease among these five age groups. This age group represented 22.6% of the construction workforce in 2025, which was down from 31.1% in 2005.

Manufacturing also represents a source of high demand jobs that pay a good wage and are a priority for the workforce system. By 2032, Manufacturing will be the sixth larger sector of employment in the state, employing 41,120 Rhode Islanders, and increase of 948 (2.4%) from 2022. Similar to Construction, the percentage of manufacturing workers in Rhode Island's oldest age group rose between 2005 and 2025. The 55+ age group increased by a large margin, representing 33.4% of the manufacturing workforce in 2025, up from only 21.0% of the manufacturing workforce in 2005. The age group below the 55+ group, age group 45-54 experienced a sizable decrease in the percentage of manufacturing workers, falling from 29.6% in 2005 to 19.8% in 2025. Two younger age groups of 19-24 and 25-34 did report a marginal increase in the number of manufacturing workers in 2025 than in 2005. The age group of 19-24

represented 5.8% of the manufacturing workforce in 2005 which rose to 7.3% in 2025, while the 25-34 age group rose from 16.1% to 18.5 percent during this period.

Population

According to the American Community Survey, as of 2024; Rhode Island is the forty-fourth (44th) most populous state in the country; (1,112,308 total population); with the second (2nd) highest population density (1,075.9 residents per square mile). Demographically, Rhode Island has the twelfth(12th) highest share of foreign-born population (15.7%) and is the twenty-sixth(26th) most racially/ethnical diverse (66.1% white non-Hispanic population).

Rhode Island's increasing diversity, and the educational achievement gap between populations, is an important factor influencing the labor market. In 2024, the share of the state population identifying as 'white non-Hispanic' was 66.1%, down from 68.7% in 2020, and 76.4% in 2010. The share of state's population identifying as Black or African American was 5.6% in 2024, down slightly from 5.7% in 2020 and 5.7% in 2010. Some of the state's largest growth has been in its Hispanic or Latino population which represented 18.8% of the state's population in 2024, as compared to 16.6% in 2020 and 12.4% in 2010.

	2024 ACS	**2020 Census**	**2010 Census**	**2024 Percent**	**2020 Percent**	**2010 Percent**
Rhode Island	**1,112,308**	**1,097,379**	**1,052,567**	**100.0%**	**100.0%**	**100.0%**
Race (any Ethnicity):						
White Alone	762,360	782,920	856,869	68.5%	71.3%	81.4%
Black or African American Alone	61,764	62,168	60,189	5.6%	5.7%	5.7%
American Indian & Alaska Native Alone	6,760	7,385	6,058	0.6%	0.7%	0.6%
Asian Alone	41,755	38,961	30,457	3.8%	3.6%	2.9%
Native Hawaiian & Other Pacific Islander Alone	583	536	554	0.1%	0.0%	0.1%
Some Other Race Alone	95,036	103,615	63,653	8.5%	9.4%	6.0%
Two or More Races	144,050	101,794	34,787	13.0%	9.3%	3.3%
Ethnicity (any Race):						
Hispanic or Latino	208,976	182,101	130,655	18.8%	16.6%	12.4%
Not Hispanic or Latino	903,332	915,278	921,912	81.2%	83.4%	87.6%
White Alone, not Hispanic or Latino	735,570	754,050	803,685	66.1%	68.7%	76.4%

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American Community Survey data illustrates a stark contrast in educational attainment between these demographics. As illustrated in the chart below; 39.0% of all working age Rhode Islanders have a Bachelor's Degree or Higher; a rate that rises to 49.5% and 43.6%, respectively, for Asian and White Rhode Islanders; but decreases to 15.0% and 11.6% for Some Other Race and American Indian/Alaska Native Rhode Islanders. The percent of Black Rhode Islanders with a Bachelor's Degree or Higher is also below the statewide average at 33.2%. Hispanic/Latino residents with a Bachelor's Degree or higher is 16.4%.

Race/Ethnicity	**Bachelor's Degree or Higher, Aged 25+** **2024 American Community Survey 1-Year Estimates**
Total (Statewide Average)	39.0%
Asian	49.5%
White Alone	43.6%
Black / African American	33.2%
Two or More Races	24.1%
Hispanic / Latino (any Race)	16.4%
Some Other Race	15.0%
American Indian / Alaskan Native	11.6%
Native Hawaiian / Pacific Islander	n/a

Disparities also appear when reviewing the number of working age Rhode Islanders with less than a High School degree. The rate of White Rhode Islanders with less than a high school degree (6.3%) is less than the statewide average of 9.6%. Asian and Black/African American Rhode Islanders have rates only slightly above the statewide average, each at 10.0 and 11.2%. However, Hispanic/Latino (22.2%), American Indian/Alaska Native (23.9%) and Some Other Race (26.9%) significantly exceed the statewide average.

Race/Ethnicity	**Less than High School Diploma, Aged 25+** **2024 American Community Survey 1-Year Estimates**
Total (Statewide Average)	9.6%
White Alone	6.3%
Asian	10.0%
Black / African American	11.2%
Two or More Races	18.2%

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Hispanic / Latino (any Race)	22.2%
American Indian / Alaskan Native	23.9%
Some Other Race	26.9%
Native Hawaiian / Pacific Islander	n/a

With over 1/3 of the state's PK-12 population Hispanic (29.9%) or black (7.1%) and 14.8% of all PK-12 students coming from low-income families; the ability to sustain a competitive state workforce is in question. Rhode Island will need enough workers to replace the retiring Baby Boomer generation, as well as fill additional growth in high- and middle-skill jobs. In order to remain competitive, Rhode Island must prepare all of its citizens for the new economy.

A key factor that will continue to impact and influence the state's labor market is the rapid aging of the state's Rhode Island's workforce population. When it comes to working age citizens, in 2024 Rhode Islanders aged 15-59 constituted 58.5% of Rhode Island's population; down from 59.1% in 2020 and 62.6% in 2010. Persons aged 60 and older made up 26.6% of the state's population in 2024, up from 25.4% in 2020 and 20.1% in 2010. Children 14 years of younger represent 14.8% of the state's population in 2024, down from 15.5% in 2020 and 17.3% in 2010. The continued aging of the state's population, and related shrinking of the working age population, is a critical factor influencing the labor market for the foreseeable future.

A final critical trend in the state's labor market is Rhode Island's growing immigrant population. In the year 2010, the percentage of foreign-born residents within the state population was 12.8%. In 2020 it rose further increased to 14.0%. By 2024, 15.7% of the state population was foreign-born. This increase has a significant consequence for the state's labor market, as well as the structure and organization of the state workforce development system.

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

The education level of Rhode Island's current working-age population is somewhat bifurcated, with a lack of middle skilled talent. According to the American Community Survey; as of 2024, Rhode Island has the fourteenth (14th) highest percentage of its population with a Bachelors Degree or higher (39.0% RI as compared to 36.8% US average), but the state has the thirty-fourth (34th) highest percentage of its population with a High School or higher (90.4% RI, 89.9% US average). This divergence portends to create a shortage of labor supply for Rhode Island businesses.

Educational Attainment, Aged 25+	**Statewide Average, 2024 American Community Survey 1-Year Estimates**
Less than High School	9.6%
High School Degree or Equivalent	27.4%
Some College	16.0%
Associates Degree	8.0%
Bachelors Degree or Higher	39.0%

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Educational attainment is closely associated with high workforce participation and higher earnings. An analysis by the state Labor Market Information office in 2024, found that labor force participation for Rhode Islanders with less than a High School Degree was nearly fifteen percent lower than the statewide average; while labor force participation for individuals with a bachelor's degree or higher was 6.8 points higher than the statewide average. The analysis produced similar results when analyzing median annual earnings; with individuals with less than a High School Degree averaging $35,409 in earnings, as compared to $69,496 for those with a bachelor's degree and $90,945 for those with a Graduate or Professional Degree. A summary of that analysis is provided below.

	Workforce Participation Rate, Average 2024	**Median Earnings, Average 2024**
Statewide Average	83.1%	$57,276
Less than High School	68.3%	$35,409
High School Degree or Equivalent	76.7%	$42,251
Some College or Associates	84.1%	$50,264
Bachelors Degree or Higher	89.9%	$69,496

Irrespective of degree attainment, Rhode Island's economic strategy found that the state has lagged in providing specific skills and focusing on areas of discipline most associated with success in the 21st century economy - this may result in a shortage of labor supply for Rhode Island businesses and is particularly acute in computer programming and coding jobs, which have seen thousands of openings each year in Rhode Island. The number of occupations requiring Science, Technology, Engineering, the Arts and Mathematics (STEAM) degrees is also growing in the state, but Rhode Island produces the lowest or almost lowest number of STEAM degrees among its benchmark states and in the region.

Concerning the education and skill level of the TANF population; as of November 2025, 28% of age appropriate TANF recipients had less than a high school degree, 44% had a high school degree or equivalent, 27% had an Associates Degree or some College, and 1% had a Bachelor's Degree or higher (Note: TANF Education Data is self-declared). While not a reflection of education or skill; it is worth analyzing which industry sectors TANF job placements are occurring to see what sort of work experience these individuals are acquiring. An analysis of July 2025 – June 2025 TANF placements are below:

Customer Service Industry: 240
Healthcare: 160
Non-Profit: 51
Education: 45
Transportation: 23
Manual Labor: 21

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Staffing Agencies: 17
Government: 12
Security: 7
Childcare: 5
Banking: 4
Insurance: 3
Skilled Labor: 2
Other - 8

C. COMPARISON OF ECONOMIC AND WORKFORCE ANALYTICAL CONCLUSION. DESCRIBE AREAS OF OPPORTUNITY FOR MEETING HIRING, EDUCATION, AND SKILLS NEEDS IDENTIFIED IN THE ECONOMY COMPARED TO THE ASSETS AVAILABLE IN THE LABOR FORCE IN THE STATE.

Rhode Island compared the state's centers of economic growth and projected demand against the state's current and projected workforce. After completing this analysis; the state concluded that there is substantial opportunity, and unmet need, within "middle-skills" jobs – careers that require more education and training than a high school diploma but less than a four-year college degree. A lack of a properly trained 'middle skill' workforce is hindering the ability of Rhode Island businesses to compete. Similarly, a lack of relevant skills is hurting job seekers' (particularly those with barriers to employment) ability to be more productive and therefore to earn more and improve living standards. Focusing the workforce development system on 'middle skilled jobs' provides a number of value propositions to the state. Middle skill jobs:

- Create high value for businesses by addressing a common 'pain point';
- Are not adequately met by the current bifurcated education/workforce system;
- Are persistently hard to fill, and thus make trained and prepared candidates attractive hires;
- (Often) Provide an adequate initial wage, along with a pathway to increasing lifetime career value for many workers;
- Are trainable and attainable with right amount of education, services, and supports.

Rhode Island's workforce development system has the assets and resources to make this focus successful. Industry sector partnerships are able to quickly identify evolving industry needs and have been trained in turning those observed needs into actionable solutions. As described elsewhere in this plan, WIOA partners are committed to more proactively reviewing and refreshing training and career services to keep up with this need. At the same time, the partners can better align services to make sure life supports and assistance are as broad and responsive as possible to help job seekers (particularly those with barriers) persist and succeed.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs

of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required [6] and optional one-stop delivery system partners.[7]

[6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

The State's Workforce Development Activities

Rhode Island's workforce development activities are coordinated through the following state agencies: the Rhode Island Department of Labor and Training (DLT), the Rhode Island Department of Education (RIDE), and the Rhode Island Department of Human Services (DHS). These agencies are responsible for all the core and non-core programs included in the combined state plan.

State Agency WIOA Program Responsibility

Agency	**Core Program**	**Non-Core Program**
DLT	Adult (Title I); Dislocated Worker (Title I); Youth (Title I); Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)	Trade Adjustment Assistance for Workers Program (Chapter 2, Title II Trade Act); Jobs for Veterans State Grants (Title 38, Chapter 41); Migrant and Seasonal Farmworker Program (Title I); Senior Community Service Employment Program (Title V Older Americans Act)

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Agency	Core Program	Non-Core Program
RIDE	Adult Education and Family Literacy (WIOA Title II)	Carl D. Perkins Career and Technical Education
DHS	Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.); Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)	

The State Workforce Development Board (Rhode Island Governor's Workforce Board (GWB)) is the governing body charged with oversight of the statewide workforce development system including oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. The GWB ensures that the state workforce activities are aligned with the efforts of economic development, education, human services, and business stakeholders at the local and state level. This collaboration among public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Rhode Islanders.

WIOA is administered at the local level across two Local Workforce Development Areas - the Providence-Cranston workforce area, governed by the Providence/Cranston Workforce Development Board, and the remaining thirty-seven (37) cities and towns which make up the Greater Rhode Island workforce area, which has been overseen by the state workforce board since 2019 through authority granted by the US Secretary of Labor. These boards offer strategic direction for workforce activities at the municipal level, while also providing local guidance for implementation of workforce programs. The partnerships and atmosphere of collaboration guided by state agencies and the GWB extend to the local areas to create a fully integrated workforce system of not only core and non-core federal program partners, but also state and privately funded programming, resulting in a system that provides impactful services and activities throughout the state.

Rhode Island's American Job Centers are the physical hub of much of the state's workforce activities. There are presently three job centers spread geographically across the state. These centers are buttressed by a comprehensive suite of digital tools and platforms that help ensure statewide virtual access to career services.

The job centers are overseen at the state level by the Department of Labor and Training and are managed locally by each of the local area boards. Local boards are comprised of local businesses, labor, partner agencies, and other key stakeholders to create a varied and functional group. The boards, in alignment with the States' vision, provide front line strategic implementation for state-wide initiatives in addition to any programming that is unique to their region. Local boards are tasked with procuring a one-stop operator for the daily operation of their perspective center(s) in accordance with WIOA 121(d). These boards carry out workforce activities by partnering locally though Memorandums of Understanding (MOU) to implement core, non-core, and other partner programs.

Collaboration of Activities

Communication is vital to the efficient provision of workforce services statewide. Such communication starts with the GWB which has representation from DLT, RIDE, DHS, Rhode Island's postsecondary education system, as well as the Rhode Island Department of Commerce.

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Communication is further enhanced by the collaborative efforts of the Interagency Coordination Workgroup. This workgroup is comprised of Senior Manager-level staff within each Department represented on the Board – positioned between frontline program delivery and Cabinet/director level policy making - that work together on:

- Policy development, review, and feedback
- Performance data sharing and submission
- Troubleshooting and cooperative problem solving
- Technical Assistance and best practices
- Strategic review and resources alignment; and
- System reform and innovation

The GWB maintains a portion of its website dedicated to policymaking, planning, and resource sharing through the workforce development network (https://gwb.ri.gov/policy-and-planning). The website lists all board policies and guidance, presentations and related collateral, and state plans, and is viewable by all workforce stakeholders and partners, including businesses, workforce professionals, government, and others. This resource allows for all stakeholders within the workforce development system to readily access information and resources regarding the state WIOA network in one location.

The state also recently launched an ongoing virtual technical assistance (TA) series to provide a more holistic understanding of the WIOA law, its regulations, and its requirements. Remembering all of the different requirements, expectations, rules, and steps under WIOA can be a complex undertaking. The state's goal is to help frontline staff, and management, navigate all these requirements and provide the most effective possible service to customers. The TA series covers some of the more complex elements of WIOA, as well as state-specific priorities and initiatives, and best practices in serving clients. Each presentation, with Questions and Answers, is recorded and posted to a state website to serve as a knowledge library and reference for staff on an ongoing basis. The series began in PY2022 with two webinars; one covering Maintaining Effective Case Notes and a second on the various ways to Determining Youth Low Income Status. In PY2023 a webinar on recording and reporting Measurable Skills Gain was also held.

Program Overviews

Core and Non-Core WIOA Programs

Adult, Dislocated Worker and Youth: Title I of WIOA is the vehicle through which Rhode Island provides job search, education, and training activities for individuals seeking to gain or improve their employment prospects. Title I also funds the One-Stop delivery system. Activities funded through Title I provide job search, education, and training activities for individuals seeking to gain or improve their employment prospects. Services include: Basic career services, Individualized career services and Training services.

Wagner Peyser: Wagner Peyser is the major funding source for the one-stop system. The WP act of 1933 established a nationwide system of employment offices known as Employment Service. The Employment Service provides employment-related labor exchange services including but not limited to job search assistance, job referral and placement assistance for job seekers, reemployment services to unemployment insurance claimants, and recruitment services to employers with job openings. Services are delivered in one of three modes including

self-service, facilitated self-help services and staff-assisted service delivery approaches. Veterans receive priority referral to jobs and training as well as special employment services and assistance. The system provides specialized attention and service to individuals with disabilities, migrant and seasonal farm-workers, ex-offenders, youth, minorities and older workers.

Trade Act (TAA): Provides special benefits under the Trade Adjustment Assistance (TAA) program to those who were laid off or had hours reduced because their employer was adversely affected by increased imports from other countries. These benefits include paid training for a new job, financial help in making a job search in other areas, or relocation to an area where jobs are more plentiful. Those who qualify may be entitled to weekly TRA after their unemployment compensation is exhausted. The termination provision under Section 285(a) of the Trade Act of 1974, as amended, went into effect on July 1, 2022 and as such, the program operated in a phase out termination status in PY 2022. Rhode Island has reduced outreach and awareness for the TAA program, but still provides services and supports to eligible workers.

Foreign Labor Exchange and Migrant Workers (MSFW): The foreign labor certification process allows employers to hire foreign workers, who are temporarily authorized by the U.S. Citizenship and Immigration Service to live and work in the United States on a temporary basis. A qualifying business must demonstrate its inability to fill the position with a qualified citizen at prevailing wages.

Senior Community Services Employment Program (SCSEP): The Senior Community Service Employment Program (SCSEP) is a service and work-based program for low-income individuals aged 55 and older. DLT administers the program which includes recruitment and outreach, eligibility screening, enrollment assessment, Individual Employment Plans, follow-up, work site placement, monitoring and enrollee recertification. Through SCSEP, enrollees are placed at Host Agency sites for up to 30 hours per week and are compensated with wages commensurate with their occupation. Host Agency sites include faith-based organizations, senior centers, community action programs and community-based organizations. These agencies prepare and train participants for future unsubsidized employment. The program is a bridge leading to unsubsidized employment and works to reintegrate participants into the workforce. Eligible SCSEP applicants must reside in Rhode Island, be unemployed at the time of application and be a member of a family with an income not more than 125 percent of federal poverty guidelines. Priority is given to applicants over the age of 65, veterans or eligible spouses of veterans, have low literacy skills, limited English proficiency or are formerly incarcerated, along with other characteristic categories.

JVSG: JVSG funds are provided to states to fund associated staff, including Local Veteran Employment Representative (LVER) and Disabled Veteran Outreach Program Specialist (DVOP) staff who are fully integrated in each American Job Center (AJC). Our integration strategy includes a streamline referral process to all partner programs such as WIOA and other combined state plan partners. Furthermore, DVOP specialists provide intensive services and facilitate placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor. DVOP Specialists refer eligible veterans and eligible persons to all partner programs as determined in their comprehensive assessment. Additionally, DVOP Specialists receive referrals from other state partner programs such as; WIOA Title 1B for those eligible veterans and eligible persons who have been determined to have one or more Significant Barriers to Employment (SBE). In addition, LVER staff performs duties which are related to outreach to the employer community and facilitation within the

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state's employment service delivery system. LVERs will be assigned duties that promote to employers, employer associations, and business groups on the advantages of hiring veterans. LVERs are also responsible for facilitating employment, training, and placement services furnished to veterans in the State.

Reemployment and Eligibility Assessment Program (RESEA): The State has conducted the Reemployment Services and Eligibility Assessment (RESEA) program (previously REA) since 2005 and continues to do so. Currently under the program, all UCX claimants and selected UI are directed to report to the American Job Centers /One Stop Centers for mandatory participation in RESEA. The program focuses on providing participants with an overview of and access to the services available at the One-Stop Centers as well as through the state's Virtual One-Stop (EmployRI), a detailed review of the claimant's responsibilities while collecting UI, and assistance accessing the resources necessary to lessen time on unemployment and to return to work as quickly as possible.

Adult Education and Family Literacy (RIDE): The Rhode Island Department of Elementary & Secondary Education (RIDE) funds eligible providers to implement adult education and literacy activities - including GED, workforce training, and English for Speakers of Other Languages (ESOL) - that support Rhode Island adults in gaining skills and credentials for college and career, engaged citizenship, and family and community leadership.

Adult Education has positive impacts on multiple levels: it not only mitigates educational and economic barriers for the adults who participate in programming - it also improves outcomes for learners' children and families, and bolsters the well-being of the larger community.

RIDE is committed to enhancing data-driven accountability, and strengthening collaboration within the Title II provider network and with other WIOA programs. These priorities help drive progress on the state's goal of building prosperity by ensuring that all Rhode Islanders have access to quality education aligned with industry demands, as described in RI 2030: Charting a Course for the Future of the Ocean State.

Rhode Islanders who receive Title II services come from a variety of backgrounds, with wide-ranging goals and needs. More than half of participants are new Americans, immigrants and refugees who are improving their English language skills for their roles as workers and family members and for civic participation. Within this group, a wide range of educational attainment is represented, from those who have had limited or no formal education, to those with postsecondary degrees from their countries of origin.

Within the state's Adult Basic Education population, the majority of learners' skills assessed at program entry place them below secondary level, though the subpopulation with skills at the Adult Secondary Educational level has increased in recent years. Providers are committed to serving adults with barriers to employment, and some provide services designed around the needs of specific subpopulations, including unhoused Rhode Islanders, justice-involved individuals, TANF recipients, and unemployed or dislocated workers.

In the Ocean State, adult education providers are located in community-based organizations, public school districts, public postsecondary institutions, and public libraries. They offer a variety of services to meet the needs of the learners served by the system. To complement the core academic skills instruction, workforce preparation, and occupational skills training services, providers also offer work-based learning opportunities, case management, career coaching, and other wraparound services that support learners' successful completion and transition to employment, training, or postsecondary education. The pandemic showed that digital literacy is essential to full engagement in the workforce and in civic life, and providers

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are working on integrating digital skills instruction throughout all Title II programming. Additionally, Integrated Education and Training (IET) - delivery of adult education and literacy activities concurrently and contextually with workforce preparation and training activities for a specific occupation or occupational cluster - has been prioritized as a critical strategy to expand access to recognized postsecondary credentials for Rhode Islanders with foundational skills gaps.

Title II funds are not sufficient to establish and operate a comprehensive adult education system; collaboration with other government and community-based programs is key to ensuring comprehensive and integrated services for adult learners. Rhode Island's providers are committed to working together to strengthen collaboration within the network of adult education providers and with other WIOA core programs in the state.

Vocational Rehabilitation (ORS): The Vocational Rehabilitation Program (VR) is the federal government's largest and most successful employment program for individuals with disabilities. The Office of Rehabilitative Services is Rhode Island's administrator of the VR program and assists Rhode Islanders with disabilities to select, prepare for, obtain, advance in, and maintain competitive integrated employment.

Few other programs offer a holistic approach that advances empowerment, informed choice as well as a full range of services and supports that individuals with disabilities need to fully participate in education, training, and employment. The program helps individuals with disabilities to obtain an integrated competitive employment outcome at or above minimum wage. Vocational Rehabilitation Counselors tailor services to the individualized needs of the person with a disability. Services may include: evaluation and assessment, vocational counseling and guidance, training, assistive technology, job development and placement, including services that support individuals with disabilities to obtain and keep jobs. The objective of the program is to assist individuals with disabilities to become successfully employed in a job that matches the individual's skills, abilities, and interests.

- First priority will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability if a mental or physical impairment exists that seriously limits four or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.
- Second priority will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits at least one functional capacity area in terms of an employment outcome and whose rehabilitation requires multiple services over an extended period of time.
- Third priority will be given to other eligible consumers who have a disability that seriously limits their capacity in terms of an employment outcome and requires two or more services over an extended period of time: Six months or more.

RIWORKS (DHS-DLT): Rhode Island Works is Rhode Island's cash assistance program. The program provides cash assistance and employment support services to enable parents with children to support their families. Rhode Island Works (RIGL 40-5.2-5) replaced the Family Independence Program in 2008.Rhode Island Works is funded through the federal Temporary Assistance to Needy Families (TANF) program. As a condition of eligibility, recipients must enter into an employment plan developed in coordination with the Department of Human Services (DHS) and other contracted vendors. For most parents, the employment plan begins

with an assessment for job readiness. Single parents must work or participate in a work plan for either 30 hours per week, or 20 hours if the household includes a child under age six. In two-parent families, one parent must work or participate in their work plan for 35 hours per week; if the family uses a childcare subsidy, both parents must work a combined total of 55 hours per week. Receipt of cash benefits under Rhode Island Works is subject to time limits. A family can receive assistance for no more than 60 months, whether or not consecutive, in any 60-month period prior to requesting hardship.

The goal of the Rhode Island Works Program (RI Works) is to help very low-income families meet their basic needs by providing cash assistance and work supports, including employment services, SNAP benefits, health insurance, and subsidized child care. Children and families qualify for cash assistance based on their income, resources, and the number of people in their families. RI Works cash assistance recipients must participate in an employment plan unless they meet specific criteria for an exemption. The employment plan considers the parent's skills, education, and family responsibilities as well as local employment opportunities and creates a program of action to help the parent meet his or her employment goals. Parents are informed about opportunities to seek additional education or training to improve their employability prospects. RI Works provides a safety net for some children whose parents are unable to work due to a disability and can function as an unemployment system for parents who do not have sufficient earnings or work experience to qualify for unemployment benefits. RI Works currently provides time-limited supplementary cash assistance to very low-income working families.

Carl D. Perkins Career and Technical Education (RIDE): Carl D. Perkins Vocational and Technical Education Act is dedicated to increasing learner access to high-quality Career Technical Education (CTE) programs of study. With a focus on systems alignment and program improvement, Perkins is critical to ensuring that programs are prepared to meet the ever-changing needs of learners and employers. As the eligible state agency and recipient of the Perkins funds, RIDE supports numerous career preparation programs that are in alignment with the Governor's Workforce Board priority industries, including architecture and construction; bioscience; business and finance; defense; design; information technology; education; healthcare; hospitality,; manufacturing; marine trades; and transportation, distribution, and logistics. CTE is part of PrepareRI, a statewide initiative to build industry-aligned career pathways for all Rhode Island youth, which includes providing work-based learning opportunities. The goal is to improve youth career readiness, while simultaneously closing the employment gap in the state. Federally-mandated secondary student program outcomes include math, reading/language arts and technical skill attainment, and program completion, graduation, and placement in postsecondary education/training, work and/or the military. Postsecondary and adult student program outcomes include technical skill attainment; program retention, industry recognized credential and degree earning (as appropriate); and placement in advanced education/training, work and/or the military.

Job Corps: Rhode Island has as one Job Corps location in Exeter, Rhode Island. Job Corps is a federally-funded program under WIOA that provides free education and training to young adults (16-24 year olds). Eligible youth are able to earn a high school diploma or high school equivalency diploma and receive life, soft, and occupation skills training. Job Corps regularly participates in local youth job and career fairs. The state continues to build relationships between the job centers, youth service providers, and Job Corps.

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Associate Programs – Partner Agencies

Alongside federally funded workforce programming, core partner agencies manage and administer a range of state and/or hybrid funded programs. Many of these programs are overseen by the State Workforce Development Board and are strategically aligned and integrated with core and non-core WIOA programs and providers. The goal is a seamless and unified workforce network that leverages state, federal, and hybrid investments to meet employer demand and create pathways to employment for Rhode Islanders.

Industry Sector and Community-Based Workforce Partnerships – Real Jobs RI (DLT): Real Jobs RI is the state's workforce development initiative that ensures workforce solutions are driven and developed by industry and community needs. Real Jobs RI connects employers with industry intermediaries such as a trade association, nonprofit, or university, who acts as a convener, bringing together companies with similar workforce challenges to create innovative and impactful solutions. The program also supports partnerships between and among public, private, and nonprofit agencies that focus on serving populations with barriers to employment (ex. veterans, homeless, former offenders, and the long-term unemployed) or regions of the state with above average concentrations of unemployment. Solutions include but are not limited to: recruitment and training of new hires, re-skilling of incumbent workers, and other hiring activities.

Youth-Focused Workforce Partnerships – Real Skills for Youth (DLT): The Real Skills for Youth program funds strategic partnerships among schools, youth-serving organizations, industry, and others to develop and implement high-quality paid work-based learning activities and college and career readiness programming for youth. Real Skills for Youth aims to enhance and scale work-based learning and career exploration opportunities for youth by supporting partnerships between industry and education.

Incumbent Worker Training Grants (DLT): Employers often need to train and re-train their current workers to remain competitive. When workers lack necessary skills; an employer's ability to expand and grow may be compromised. The Incumbent Worker Training Grant Program addresses this issue. The Program provides grant funding for continuing education, training, and upskilling of incumbent employees at existing Rhode Island employers. The program provides matching reimbursement grants of up to 75% to employers that pay for preapproved, direct, training-related costs.

Subsidized Temporary Work Experiences – Work Immersion (DLT): For recent high school or college graduates, it can be difficult to build such experience from scratch once they enter the job market. While for out-of-work job seekers; lengthy periods of unemployment and gaps in their work history may cause an employer to hesitate in hiring. Work Immersion is designed to boost the employment prospects of new and returning workers while opening new and diverse hiring channels for employers by offering up to 75% wage subsidy to any RI business that provides a temporary paid work experience to RI-based students or unemployed adults.

Apprenticeship Development (DLT): Apprenticeship is a tried-and-true training model. The ability to 'learn and earn' through apprenticeship is mutually beneficial to employer and employee. Non-Trade Apprenticeship Expansion Grants provide development funds to organizations throughout the state to create new and innovative apprenticeship models outside of the traditional trades. Additionally, the Non-Trade Apprenticeship Incentive Program offers an incentive of $1,000 per non-trade apprentice provided the apprentice is registered with the State Apprenticeship Office and has completed their required probationary period.

PrepareRI (DLT and RIDE): The PrepareRI Destination 2030 Plan ensures all Rhode Island students are college and career ready by graduation. PrepareRI aims to close the gap between what students learn in school and what they need for high-demand jobs, and to ensure that historically underserved student populations have expanded access to quality career preparation opportunities in priority sector industries – through scaling out activities such as career exploration and work-based learning opportunities.

PrepareRI Internship Program: The PrepareRI High School Summer Internship Program places Rhode Island high school juniors in paid summer internships with the state's top employers in a range of industries. PrepareRI Internships benefit both students and industry. For students, the internships prepare youth with the skills they need to pursue meaningful, fulfilling futures through professional skills training, on-the-job experience, and connections to adult mentors who can help them achieve their career goals. For employers, the internships help diversify their workforce and build a strong pipeline of young, skilled workers who can keep RI's future economy vibrant and strong.

Associate Programs – Other Agencies

Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH): BHDDH partners with licensed Behavioral Health Organizations (BHO), which focus on mental health and/or substance abuse disorders, and Developmental Disabilities Organizations to provide supportive employment services to clients. Community based organizations (CBO) network with local businesses to develop relationships and build a referral/job pool.

- Developmental Disability Organizations (DDO): Individuals eligible for services through the Division of Developmental Disabilities are assessed and authorized a level of services and are able to choose from 34 licensed developmental disability organizations to provide these services or individuals may choose to "Self-Direct" services and hire employees to work directly for them to provide services. Supported Employment Services are included in an array of 24 services, specifically the services include job development, job coaching and job retention, as well as vocational assessments and training.
- Community Mental Health Center (CMHO) Employment Supports: Activities to support employment for Severely Mentally Ill (SMI) clients of the Community Mental Health Organizations include a variety of client-specific supports to prepare them for work, including coaching their job search efforts and supporting job retention by helping individuals to overcome the barriers presented by the their illness. Services are delivered either by certified Supported Employment Specialists or by Certified Community Support (CSP) Case Managers. Although specific outcomes are not required as a condition for funding, and access to Supported Employment Services is just one of the variables determining whether CSP clients get and keep employment, the goal of the service is to increase the number of clients in competitive, gainful employment.

Department of Children, Youth and Families (DCYF): RI DCYF was established by the RI Legislature in 1980 by merging children's programs previously administered by four different state agencies. The director of DCYF is also a member of the RI Children's Cabinet, which addresses cross-departmental issues relating to children's needs and services. Rhode Island is one of a small group of states that integrates the three major public responsibilities for troubled children, youth and families in one agency: Child Welfare, Children's Behavioral Health and Juvenile Corrections. DCYF provides a series of educational and training programs to

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adjudicated youth at the Thomas C. Slater Training School. Educational services include special education, regular education, ABE, training and post-secondary classes.

Department of Corrections (DOC): The Education Services Unit within the Department of Corrections, in partnership with RIDE and DLT, administers programming ranging from Adult Basic Education, English as a Second Language, Special Education, Inmate Literacy Programs, GED classes and testing, post-secondary programs, and occupational/vocational training programs.

Strengths and Weaknesses of Workforce Development Activities.

Strengths

There are a number of strengths across Rhode Island's workforce system. Perhaps the most prominent is the state's successful transition toward a business and industry driven model. Much of this transition has been aided by the state's "Real Jobs RI" industry sector partnership initiative which brings employer knowledge and expertise to the table in a way that can transform and improve the workforce system now and into the future. The program connects employers with intermediaries such as a trade association, nonprofit, or university, who then acts as a facilitator between the state and the industry - bringing together smaller companies that have similar workforce challenges to create innovative and quick solutions. Practical solutions include but are not limited to: recruitment and training of new hires, re-skilling of incumbent workers, and activities focused on the future workforce such as youth career readiness programming. Importantly, these partnerships also function as sophisticated, real-time, workforce intelligence aggregators that work directly with the state workforce system to disseminate actionable information, detail emerging workforce trends, articulate skill requirements, and design solutions to meet them. The effort places industry needs as the 'center of gravity' around which the disparate parts of the workforce network can align and coordinate, transforming the workforce network over time toward a responsive and effective source of talent. Through initiatives including sector partnerships, career pathway development, data analysis, system collaboration, and work and learn programming, the workforce system has fully embraced the key principles of WIOA.

A second strength, perhaps owing to Rhode Island's small size, is the degree of integration between the job placement and workforce development operations and the life and social support system. Since 2020, all programs have increased the focus and availability of work supports in a manner that benefits job seekers with barriers to employment. The state has made deliberate efforts to ensure case managers and frontline staff across all core and noncore programs are aware of the formal and informal supports in their local area that help promote participant success.

A third strength is provider experience. Across multiple provider-operated programs such as Title I Youth and Title II AEFLA, Rhode Island's provider network includes entities who have received WIOA funding for multiple grant cycles, with extensive experience delivering services and developing deep ties to the communities they serve. Providers are committed to ensuring program accessibility and offering programming that is responsive to the needs of constituents. This level of experience helps build trust and a willingness to innovate new service models; it also encourages more honest and open dialogue between recipients and their funders regarding what is working and what is not.

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Other strengths include:

- Rhode Island has taken a number of actions to promote board member engagement and knowledge of the WIOA service network and provides new member orientations and a WIOA 'help/reference desk' to ensure board members are empowered and prepared to meet their responsibilities under the law;
- Considerable expansion and promotion of Registered Apprenticeship as a training and placement model;
- A substantial increase in the systems data and performance analysis capacity, as described elsewhere in the plan; and
- A focus on career coaching excellence, with continued technical assistance and training not only on technical job-related functions but larger labor market dynamics and topics such as the effective use of social media, the impacts and opportunities of artificial intelligence, and other cutting-edge topics.

Weaknesses

In addition to the above strengths, the Rhode Island workforce system acknowledges certain areas of weakness that require our attention and effort to address. Some of these weaknesses are program specific, others are universal across all core WIOA programs.

Program-specific weaknesses include:

Adult, Dislocated Worker, and Youth

- While digital tools and virtual services have expanded the reach of Title I services, service density and location remains a challenge.
- Digital tools themselves risk creating new and unintended barriers for populations that lack digital literacy.
- Both internal (Adult and Dislocated Worker) and external (Youth) career service staff continues to face high turnover. Resulting in a loss of institutional knowledge and capacity.

Adult Education and Family Literacy

- Addressing the range of adult learner needs, including those of Internationally Trained Professionals.
- Capacity limitations and employee turnover within the provider network.

Vocational Rehabilitation

A legacy challenge for the Vocational Rehabilitation program is overcoming misconceptions and biases amongst employers regarding the employment of individuals with disabilities.

Cross-Program

In addition to program-specific weaknesses; the are weaknesses that cut across all programs which require joint solutions and collaboration:

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- All WIOA Programs continue to suffer from a lack of awareness and engagement with the overall market and community. While some progress has been made, additional work is needed.
- All programs have yet to braid program funds at scale. However, there are localized examples of effective braiding of funds across myriad programs, and in this environment of reduced federal resources the imperative to scale promising models is very high.
- As services continue to transition away from "bricks" and toward "clicks", all programs are challenged to ensure we do not create artificial barriers to participants with low levels of digital competency.

State Workforce Development Capacity.

Department of Labor and Training

Title I: Youth Program - In PY 2024 (July 1, 2024 - June 30, 2025) WIOA Title I-B served 507 participants in the Youth Program, down slightly from 592 in PY 2023. The Title I Youth program continues to utilize multiple providers throughout the state and has solid geographic representation.

Title I: Adult and Dislocated Worker Programs - In PY 2024, over 600 participants were served through the WIOA Title I-B program, with 292 receiving staff-assisted services in the Adult Program and 349 in the Dislocated Worker program, slightly down from total WIOA Title I-B clients in PY 2023

Title III: Wagner-Peyser Employment Services - In PY 2024, the Wagner-Peyser Employment Service served 5,322 participants, up from PY 2023, and about level with pre-pandemic service levels (PY 2018).

Department of Elementary and Secondary Education

Title II: Adult Education and Family Literacy: Rhode Island Department of Elementary and Secondary Education (RIDE), the State Eligible Agency for adult education, awards federal and state adult education funding through a competitive request for proposals (RFP) process which establishes multiyear contracts with local providers of demonstrated effectiveness. The most recent RFP was held in spring 2022. 19 local providers were awarded five-year grants in that competition. The next competition for RI adult education funding will be held in spring 2027.

The Ocean State's network of adult education providers delivers high quality adult education services at 50 locations across the state, covering both of Rhode Island's local workforce areas. Distance instruction is also available to maximize access to services. The local providers include 14 community-based organizations, two school districts, the state's community college, the state's four-year college, and a public library. In Program Year (PY) 2024-2025, the most recent complete reporting period, the system served around 6,315 participants. Enrollment has exceeded pre-pandemic enrollment each of the past two PY, signaling sustained capacity for the system to serve more individuals seeking services..

Office of Rehabilitative Services through the Department of Human Services

Title IV: Vocational Rehabilitation - The VR program can be accessed at four locations across the state and employs approximately 40 counselors and 11 program support staff. Services are provided statewide to clients through a contracted service delivery system. The VR program provided services to over 3,600 individuals. These individuals have been determined to have a

significant disability and are eligible and able to receive services under an Order of Selection. ORS currently has all OOS categories open and is not operating with a waitlist for services.

B. STATE STRATEGIC VISION AND GOALS

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

1. VISION

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

2. GOALS

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

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

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

3. PERFORMANCE GOALS

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

4. ASSESSMENT

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

1. Vision

The Governor's Workforce Board of Rhode Island envisions an industry-driven economy that delivers a strong and talented labor force to employers to power their growth, and allows individuals, no matter their present economic circumstance, to receive the resources and supports necessary to propel them into high-wage jobs and improve the economic condition of themselves and their families.

2. Goals

To support the above strategic workforce vision, Rhode Island has identified the following four goals for preparing an educated and skilled workforce, including youth and individuals with barriers to employment and other populations along with meeting the skilled workforce needs of employers.

GOAL 1: Continue to utilize demand-driven, sector-based strategies to develop pipelines of skilled workers that meet employer workforce needs and support the state's economic development priorities

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GOAL 2: Advance career pathway strategies to provide education, training, employment and support services for current and future workers, particularly those with barriers to employment and/or economic mobility (including TANF recipients),

GOAL 3: Align policy and leverage existing structures and resources so that government is networked and coordinated to achieve efficiencies and effectiveness throughout the workforce system.

GOAL 4: Use data to inform policy-making decisions, guide investments and evaluate performance to maximize return on investments.

Specific strategies and action items for each of these goals are outlined in the response to (c) State Strategy.

3. Performance Goals

Included in appendices.

4. Assessment

Tracking and assessment of these goals will be accomplished through multiple approaches. The State Workforce Development Board, which includes representation of all WIOA core partners and other key stakeholders, meets regularly throughout the year with an agenda that is tied to the state vision and the goals. These meetings include updates for key strategic initiatives and projects, updates from core partners and other stakeholders, performance reports, and identification of board-led initiatives to further improve performance. Following recent investments in resources and staff capacity, the Department of Labor and Training (the designated State Workforce Agency) can now receive core partner performance data which is assessed alongside state and local Title I targets and shared with the Board upon request. Gaps in performance are addressed at the state and local levels. State-level teams provide technical assistance to local boards on complex performance issues. Core program partners share performance reports and special analyses of performance are conducted and shared across programs.

Assessment of overall effectiveness is considered by the state workforce investment board when preparing for the Combined WIOA Plan (and two-year modification) as well as a statutorily required state-level workforce development plan that is typically off-cycle from the WIOA planning effort, and thus offers the opportunity for reflection, review, and adjustment. Regular interagency meetings of the WIOA core partner programs focus on plan implementation and successful strategies for continuous improvement. These meetings include leadership and subject matter experts from the Department of Labor and Training, the Department of Education, the Office of Rehabilitation Services, the Department of Human Services, and others.

The State Workforce Development Board also engages with independent stakeholder groups who meet regularly to share information and provide input for the plan and the overall strategic direction.

C. STATE STRATEGY

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

1. DESCRIBE THE STRATEGIES THE STATE WILL IMPLEMENT, INCLUDING INDUSTRY OR SECTOR PARTNERSHIPS RELATED TO IN-DEMAND INDUSTRY SECTORS AND OCCUPATIONS AND CAREER PATHWAYS, AS REQUIRED BY WIOA SECTION 101(D)(3)(B), (D). "CAREER PATHWAY" IS DEFINED AT WIOA SECTION 3(7) AND INCLUDES REGISTERED APPRENTICESHIP. "IN-DEMAND INDUSTRY SECTOR OR OCCUPATION" IS DEFINED AT WIOA SECTION 3(23)

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE TO THE STATE TO ACHIEVE FULLY INTEGRATED CUSTOMER SERVICES CONSISTENT WITH THE STRATEGIC VISION AND GOALS DESCRIBED ABOVE. ALSO DESCRIBE STRATEGIES TO STRENGTHEN WORKFORCE DEVELOPMENT ACTIVITIES IN REGARD TO WEAKNESSES IDENTIFIED IN SECTION II(A)(2)

- **Strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways**

Sector Strategies

Rhode Island's industry-led sector partnerships continue to be a proven strategy for growing regional economies and addressing industry specific workforce challenges. As part of the nationally recognized Real Jobs RI program, these partnerships are led by business, focused on industry identified priorities, supported by public partners, focused on long term success and sustainability, and are required to achieve meaningful and measurable results. The partnerships funded through Real Jobs RI continue to frame the state's economic and workforce development efforts, organizing and investing in key industries that are vital to our regional economy, including:

- Agriculture
- Commercial Fishing
- Commercial Shell Fishing
- Construction
- Defense & Cybersecurity
- Design
- Energy
- Finance
- Healthcare
- Hospitality
- Information Technology
- Manufacturing
- Marine Trades
- Medical Technology

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- Social Enterprise
- Transportation and Logistics

These sector partnerships engage with a variety of partners throughout the workforce development, education, and economic development continuum and thus form the backbone of the state's industry sector strategy. In recent years, sector partners have helped inform and revise community college curriculum, creating new industry-informed courses and programs at the state's four-year institutes of higher education. They've also worked within the developmental disabilities service network on integrated job training programs, worked with local high schools on experiential learning opportunities, and helped design innovative approaches to addressing community challenges regarding childcare, transportation, and recidivism.

The current plan term will focus on linking a greater share the WIOA service network (and resources) with these industry-driven partnerships. To this point, much of the funding for these activities has been braided state and state-level federal (Title I set-aside and discretionary grant) dollars. Now that partnerships have reached a level of maturity, and their training activities have become more refined; Rhode Island will work to connect WIOA Title I-IV programming and associate programs such as TANF to these partnerships. For example, in 2023, the State Workforce Development Board, acting in its role as Local Board for one of the state's local workforce development areas, began laying the groundwork for utilizing Real Jobs RI industry sector partnerships for occupation training using contracts consistent with 20 CFR 680.320. Such contracts would reflect the principles of consumer choice and would help fill in talent gaps unmet by the ETPL. Importantly, Real Jobs RI sector partnerships have proven adept at creating training programs for 'middle demand' jobs that pay a family sustaining wage. Lastly, the Real Jobs RI industry sector partnerships represent a 'brain trust' of sorts regarding the evolving talent needs of employers. These industry intermediaries serve as real time intelligence gatherers and are available to all WIOA core and associate programs to help advise and recommend regarding industry demand, curriculum, credentials, and other important matters.

Career Pathways

A key goal of Rhode Island's industry sector strategy is to aggregate industry demand and provide a mechanism through which these needs are clearly articulated to the workforce development network and others. This goal aims to help industries develop 'statements of need' that translate into activities that meet those needs such as recruitments, education, training, etc. A client-centered career pathway strategy compliments this effort by coordinating the services and resources necessary to connect individuals to the opportunities presented as a result of the work of the sector intermediaries.

Rhode Island's career pathway strategy looks to identify the unique skills and assets within all Rhode Islanders, help those who are job-ready to connect to high wage, high demand training and employment opportunities, and prepare and support those who are not yet ready to take advantage of these opportunities to become so.

A key element and expectation of Rhode Island's industry sector partnerships is that the lead entity will act as an intermediary between employers and workforce development partners. This creates a feedback loop wherein industries can communicate their needs and requirements to community and workforce partners; while community and workforce partners can communicate their needs, as well as any unnecessary barriers to entry that employers may have intentionally or unintentionally created, to the industry.

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This strategy views the state's role in helping an individual achieve economic stability and employment as a staged approach that must first meet the individuals' most basic needs before proceeding toward more employment-related outcomes. Failure to adequately address a job seeker's need for housing, for example, seriously jeopardizes that individual's ability to secure and retain employment, even if the program is initially successful in achieving a job placement. For that reason, this sequence of client need starts with assessing the individuals' most fundamental barriers and, if necessary, connecting them with human service and family stabilization assistance (such as mental health/substance abuse counseling, housing assistance, child care, transportation, SNAP, and other social assistance); as well as preliminary career services that will help transition them toward the next steps in meeting career goals, such as basic skills assessments, career guidance and counseling, and career services such as resume writing, interview skills and other general services.

The 2024-2027 plan term will include a specific focus on increasing referrals and co-enrollment between TANF and WIOA Title I programming. The Department of Human Services administers the Temporary Assistance for Needy Families (TANF) Program and Rhode Island Works (RI Works) is the state's TANF program. Education, training and job placement services are provided to RI Works parents with the goal of helping prepare for, find, and keep a job. Job retention and wage enhancement services are provided to individuals transitioning from RI Works.

RI Works services are planned for and provided through contracted partners as well community partners that provide family stability services such as mental health and substance use disorder services. Coordinated service delivery planning, for both workforce and family stability-focused resources, are conducted through local planning meetings.

With the goal of transitioning families from RI Works to employment or increased income, TANF and Title I case management staff will utilize a strength-based engagement and case management approach; while RI Works staff specifically works with the entire family in meeting their basic needs and become self-supporting. This approach respects and empowers families by recognizing they are capable, have strengths, and have resources that can help them take control of their lives. Benefit delivery is integrated with self-sufficiency enhancing services. The outcome of engagement and case management is increased family accountability and success for individual families in reaching and sustaining their goals. Engagement and case management is a cross-program team effort.

RI Works supports families transitioning to work by continuing to provide services after the case is terminated for over income. The support services, which include minimal cash, child care, transportation and continued assistance from other programs is meant to help stabilize families during the transition.

Mitigating hardship and helping achieve economic and family stabilization sets the participant up for success as they transition to work readiness and technical skill building. From adult basic education, and contextualized ESOL, to occupational training leading to an industry-recognized credential; the guidance and supports that helped address the individual's identified barriers continue as they jointly progress toward their employment goals. Throughout this sequence of education and training, individuals will be provided opportunities to build and enhance their digital literacy and skills.

For youth in particular, the goal is to prepare them for success in college and/or career through meaningful career exposure and exploration of potential career paths and their on-ramps, skill-

building with an emphasis on essential and professional skills and supported work-based learning experiences that allow participants to apply learning in a real-world setting.

Lastly, with a foundation of support and the acquired skills and knowledge gained through education and training; the workforce system aides the individual in acquiring work experiences and, finally, employment. The 2024 plan term includes a focus on expanding Work-Based Learning opportunities, including On-the-Job training, registered apprenticeship, and other 'earn and learn' models. Rhode Island recognizes that Registered Apprenticeship is a proven and highly effective training model that the workforce system can provide to its customers. Local Boards will be expected to consider apprenticeship and pre-apprenticeship as a career pathway for job seekers and as a job-driven strategy for employers and industries. Local plans will be asked to address the inclusion of apprenticeship as an integral part of the work-based learning options that WIOA customers may access. Rhode Island is proud to be an early adopter and leading state in expanding the use of Registered Apprenticeship and will continue to promote the model as an effective avenue to employment, particularly for job seekers with barriers.

Employment is an important outcome milestone, but it is not the end of the story as the workforce network continues to aid the individual in retaining employment and achieving economic self-sufficiency. Through formal (Title I Follow-Up Services) and informal (Community Partner engagement) channels; the workforce development network will continue to support the participant, offering services such as benefit counseling and financial literacy, while promoting further education and training to help the individual earn more and move up in a career pathway.

It is important to recognize that this supports model is fluid. Meeting client needs is not something that is sequential; and it is more accurate to view these levels as continuously overlapping each other. Doing so not only recognizes the reality of limited state resources and time; but also reflects the nature of the individual, for whom basic needs and career service needs are often simultaneous.

The goal of the Rhode Island career pathway strategy is to create a client-centered process that can be used by all entities that may contribute to the individual's career and educational development. When a client comes to an American Job Center for services, they should be welcomed and appreciated and should find atmosphere that inspires confidence and motivates. They should also be able to move seamlessly through the frontline staff that represent separate agencies as if they are one single entity and not multiple entities working through collocation. Since no one agency has the ability to meet every need of any given client it is crucial that systems flow smoothly into each other between programs. The flexibility of WIOA and the nature of combined planning allows us to create a career pathway strategy that is facilitated and operated by all participating agencies, intermediaries, and frontline staff.

Automation and Artificial Intelligence

Artificial intelligence (AI) experienced a leap in advancement with the advent of generative AI. According to the Future of Job Reports 2025 from the World Economic Forum, technological advancements are projects to displace up to 92 million jobs worldwide over the next five years while creating an estimated 170 million new roles. Four years later AI is the fastest-adopted consumer technology in history. Now, we are seeing that same accelerated adoption across industries as businesses race to adopt. We are also starting to see the impact on workforce. AI and automation have the potential to drive significant productivity gains and economic growth,

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but the talent pipeline is fragmenting as entry-level roles are at risk while new opportunities concentrate in training and refining AI systems with domain experts.

Rhode Island's Governor commissioned the AI Task Force through Executive Order 24-06 on February 29th, 2024, charging this task force with studying how artificial intelligence could be responsibly adopted across government, education, business, and community. The AI Task Force released Rhode Island AI Action Plan on January 28, 2026, outlining how Rhode Island will position itself to benefit from AI while mitigating disruption. The Rhode Island Department of Labor and Training worked closely with the AI Task Force in forming the workforce components of the plan. The plan cites Rhode Island's strengths in our education ecosystem and workforce readiness, from utilizing our educational institutions to bridge the skills gap, investing in workforce readiness, and leveraging established research institutions.

The plan calls for specific workforce investments from expanding AI accreditation and micro-credentialing programs that give workers industry-recognized pathways into emerging roles. It mentions certifying registered apprenticeships in AI, accelerating adoption by creating incentives and support structures for businesses to invest in AI training. While, promoting public awareness of AI opportunities through proactive communication and community engagement.

Yet, as proactive as the state may be in embracing the opportunities brought about by AI; it must also be prepared to quickly and effectively respond to potential challenges and disruptions. Rhode Island's Governor's Workforce Board (GWB) convened its Labor Market Information team and partnered with graduate researchers from Brown University to examine the potential occupational exposure of the state's workforce to artificial intelligence. Using occupation-level AI exposure scoring methodologies from Felten, Edward, Manav Raj, and Robert Seamans report *How Will Language Modelers Like ChatGPT Affect Occupations and Industries* and aligning those findings with Rhode Island's employment and wage data, the study identified occupational groups with high exposure scores and high employment in Rhode Island. This analysis provides an early warning system, allowing workforce leaders to monitor high-exposure occupations that represent a significant share of the state's employment and to engage employers about anticipated adoption timelines.

Rhode Island recognizes that the disruptions from AI will be more likely to impact those already economically disadvantaged, or those with non-traditional educational pathways. To respond to this shift, Rhode Island's approach to serving those displaced by automation and AI follows principles of quick and efficient service delivery, comprehensive supports, maximizing eligibility, and focusing on reemployment in suitable new work opportunities. Our large network of industry partners helps the state keep abreast of changes and shifts in demand and identify opportunities for skills transferability. As technological disruption is felt in one industry, partners in adjoining industries can help identify appropriate new opportunities for impacted workers. The WIOA network will then assist those workers with identifying skill gaps and accessing and completing the training required for reemployment. Training for affected workers should lead to employment in a high demand occupation, supported by labor market information.

Lastly, this state plan recognizes that many skills that will be in demand in the coming decades, as well as a good deal of the available jobs themselves, do not exist today. Driverless car engineer, telemedicine practitioner, app developer, and social media manager are just a few examples of in-demand high paying jobs that were in short, or nonexistent, supply just 15 years ago. While some occupations and industries may be impacted significantly by automation; new opportunities may appear elsewhere that we cannot predict nor anticipate today. To position

the workforce development system to embrace and take advantage of such opportunities; the state needs to promote life-long learning and skills diversity. WIOA partners also have to make certain that occupational training offerings, definitions of credentials, and the ranks of our industry partnerships do not atrophy and are regularly and consistently reviewed, revised, and refreshed to keep up with the evolving labor market.

- **Strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State**

Rhode Island has committed to four standing committees of the State Workforce Development Board aligned to each of the five broad goals identified in this plan. These committees include: (1) Executive Committee, (2) Strategic Investments Committee, (3) Adult Career Pathways Advisory Committee, and the (4) Youth Career Pathways Advisory Committee. These committees are focused on increasing alignment among the core and partner programs to achieve a fully integrated One-Stop system that delivers high quality, human centered, customer service to job seekers and employers in Rhode Island. The composition and agendas of these Committees reflects the target populations WIOA seeks to serve and the core and partner programs that seeks to serve them. The interests of Veterans (JVSG), adult learners and low-income families (AELFA, TANF), individuals with disabilities (VR), and more are represented in the Adult Career Pathways group. The interests of opportunity youth and others are represented at the Youth Career Pathways group.

Rhode Island routinely convenes interagency meetings to ensure all partner agencies and programs are coordinating their efforts and identifying any duplicative efforts, so as to make the system as efficient as possible. Agenda items focus on aligning employer and job seeker outreach, promoting (wherever possible) uniform service-related terms and definitions, integrating systems and processes, and promoting a universal standard of quality. The interagency convening provides a forum to share best practices and was instrumental in developing the goals set forth in this plan.

In addition, the strategies described below are flexible and designed to allow the workforce network to nimbly respond to opportunities or challenges within the economy and labor market as they arise. The strategies are designed to help realize the goals outlined above and reflect the dual priority of meeting the talent needs of Rhode Island employers and industries while building pathways to family-sustaining employment for all Rhode Islanders, particularly those with barriers to employment and recipients of public assistance.

GOAL 1: Continue to utilize demand-driven, sector-based strategies to develop pipelines of skilled workers that meet employer workforce needs and support the state's economic development priorities.

Strategy 1.1 - Continue to invest and support growing industry and sector partnerships , with a focus on manufacturing, shipbuilding, and defense, among others..
Strategy 1.2 - Work with state and local boards on integrating Title I and Title IV training and career services funds into sector partnership activities, and providing access to employer-driven activities to Adult and Dislocated Worker clients, Youth clients, and Vocational Rehabilitation clients.
Strategy 1.3 – Increase information sharing and communication between business outreach arms within all partner programs, and the state economic development agency, so that all business-facing staff across the workforce development system is knowledgeable of the services and employer resources available among from all partner programs.

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Strategy 1.4: Explore an employer outreach and information campaign regarding the opportunities and manageable challenges of hiring and retaining populations with barriers to employment
Strategy 1.5 – Remain engaged in ongoing statewide efforts to promote competency-based hiring to maximize opportunities for untapped talent to succeed in the labor force.

GOAL 2: Advance career pathway strategies to provide education, training, employment and support services for current and future workers, particularly those with barriers to employment and/or economic mobility.
Strategy 2.1 - Building on the progress made during the previous plan period, identify additional opportunities for uniform statewide definitions and consistent standards of quality across the workforce development network.
Strategy 2.2 – Contextualize adult education programs for workforce demands, including AI literacy and skill development, and connect participants to post-secondary/industry credential and/or employment.
Strategy 2.3 - Conduct analysis of statewide Career and Technical Education (CTE) programs, youth work experiences, and other work-based learning programs to ensure alignment with the state's largest and/or growing industries.
Strategy 2.4 - Implement continuous (and, whenever possible, joint) professional development and customer service training for staff from all partner programs to elevate internal expertise and professionalism and to build a growing and shared knowledge base across programs
Strategy 2.5 – At the program administrative level; conduct regular information exchanges regarding existing/new training, education, and career service resources within each core and partner WIOA program.
Strategy 2.6 – Expand Registered Apprenticeship programs and participation, including on-ramps to apprenticeships through pre-apprenticeships, CTE alignment, and work-based learning.

GOAL 3: Align policy and leverage existing structures and resources so that government is networked and coordinated to achieve efficiencies and effectiveness throughout the workforce system.

Strategy 3.1 – Require each local workforce area to demonstrate success in community engagement and outreach including, but not limited to, partnering with community-based organizations, community leaders, and others to increase the awareness and availability of services beyond the One Stop location and within the community.
Strategy 3.2 – Work with relevant state agency partners to provide clear and uniform guidance regarding the impact of service-related income and post-placement earnings on public assistance programs. Increase the level of interagency communication regarding the impact of employment and earnings on eligibility and benefit levels, in an effort to avoid the "benefits cliff.".
Strategy 3.3 – Complete a comprehensive analysis of each core and partner programs' service-related terms and definitions to see where there is uniformity, diversion, and opportunities for greater alignment.

GOAL 4: Use data to inform policy-making decisions, guide investments and evaluate performance to maximize return on investments.

Strategy 4.1 – Wherever possible, transition program and performance reports into user-friendly online dashboards for the public to access, including leveraging of AI data tools..
Strategy 4.2 - Encourage cross-agency/cross-program performance review and analysis for all

WIOA programs at the state and local board level
Strategy 4.3 - Adopt system-wide outcome measures for service levels within communities of need.
Strategy 4.4 - Explore additional ways to capture the Return on Investment (ROI) of the workforce system, including wage increases and attainment of credentials of value to employers, in order to promote the value of the system and all programs within it.

III. OPERATIONAL PLANNING ELEMENTS

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

A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include–

1. STATE BOARD FUNCTIONS

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

The Governor's Workforce Board of Rhode Island ("GWB" – the state workforce development board) is formally established under RI General Law 42-102 as the state's primary policy-making body on workforce development matters. In that this role, the GWB oversees and coordinates both federal workforce development policy (through implementation of the Workforce Investment and Opportunity Act (WIOA)) and state workforce development policy (through allocation of the Job Development Fund (JDF)). The Board is comprised of business, workforce, and government representatives from throughout the state who represent key industries and programs instrumental to the success of the public workforce development network. The GWB is administratively housed within the Rhode Island Department of Labor and Training and serves as a coalition of the state departments of Education, Postsecondary Education, Labor and Training, Rehabilitative/Human Services, and Commerce, with the balance of the board made up of public representatives consistent with the requirements of WIOA. All members are appointed by the Governor.

In addition to providing strategic direction and coordination to the entire statewide workforce development network, the Board is statutorily responsible for assisting the governor and the general assembly in:

- Developing the state WIOA Plan;
- Actively promoting and coordinating private-sector involvement in the workforce development system through the development of partnerships among state agencies, the business community, and the board;
- Ensuring that the current and projected workforce needs of Rhode Island employers inform and advise Rhode Island's education and workforce-development system;
- Providing oversight of local workforce development boards;

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- Developing a statewide system of activities that are funded under WIOA or carried out through the one-stop delivery system, including:
    - Assuring coordination and nonduplication among the programs and activities carried out by one-stop partners;
    - Issuing state policies and guidance;
    - Reviewing local workforce development plans;
    - Designating local workforce development areas in accordance with federal law;
    - Developing allocation formulas for the distribution of funds for adult employment-and-training activities, youth activities to local areas, and creating and expanding job and career opportunities for individuals with intellectual, developmental, or other significant disabilities;
    - Developing comprehensive, state-performance measures as prescribed by federal law, including state-adjusted levels of performance, to assess the effectiveness of the workforce development activities in the state;
    - Preparing the annual report to the Secretary of Labor;
    - Developing the statewide Labor Market Information system;
    - Preparing applications for discretionary grants;
    - Addressing any other matters requiring input from the board under the provisions of WIOA.

Pursuant to waiver authority granted by the US Secretary of Labor in his letter dated September 30, 2019 and subsequently renewed in letters dated September 16, 2020 and June 7, 2022, and May 30, 2024; the State Workforce Development Board also serves as the Local Workforce Development Board for the Greater Rhode Island area.

The full GWB meets no less than 6 times a year (and as needed), while its committees are typically active bimonthly. The board's work is coordinated across the following committees – Executive Committee, Strategic Investments and Evaluation Committee, Youth Career Pathways Advisory Committee, Adult Career Pathways Advisory Committee, and the Local Area Advisory Committee (created as a condition of the local governance waiver referenced above). The committees play a critical role under WIOA with the Executive Committee playing the principal lead and hub of coordination. Each Committee, in turn, may bring together sub-committees and/or task groups made up of local and state partners working together on specific strategies. A list of all board members can be found on the GWB web site. (www.gwb.ri.gov).

The GWB is supported by an executive director and associated staff that are involved in day-to-day implementation of key initiatives. This staff is augmented by the staff of the State Workforce Agency (Department of Labor and Training) that provides local monitoring, subrecipient monitoring, performance analysis and submission, assistance with policy and plan development, and other responsibilities at the direction of the Board. On an ongoing basis, staff members help to operationalize the required functions of the state board. Information and items requiring board input or approval are brought to the GWB at regular meetings for action and to the Executive Committee as appropriate. Information about the Board, including its by-laws, is made available to the public through the GWB's web site (www.gwb.ri.gov) and,

consistent with federal sunshine rules and state open meetings laws, notice of meetings are posted to the secretary of State's website (www.sos.ri.gov)

2. IMPLEMENTATION OF STATE STRATEGY

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

A. CORE PROGRAM ACTIVITIES TO IMPLEMENT THE STATE'S STRATEGY

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

To realize the previously discussed goals and associated strategies; Rhode Island's core programs will utilize the activities described below, including the alignment of partner programs. Most of these activities are addressed further in the program-specific requirements for Combined State Plan partner programs sections.

Since the programs under the four titles of WIOA are administered by different and autonomous state agencies, alignment of purpose and activities is essential to the success of this state plan. The following actions will support the ideas of universal service, supported pathways to employment, and demand-driven decision-making embodied in the state goals.

Integrated Service Delivery

Through strategic co-location, comprehensive cross-training, and frequent information sharing and knowledge transfer, Rhode Island will strive to offer expedient and effective assistance through a "no wrong door" approach. Customers can access workforce services through virtual means as well as through in-person offerings at our three American Job Centers. Our core program partners are co-located at all comprehensive One-Stops to ensure services are aligned to serve customer needs. Two of the state's three career centers recently completed a remodel and relocation resulting in new state-of-the-art facilities to reflect the principles of customer centered design and universal access.

Service delivery integration is not limited across programs but also includes integration within the communities we serve. Rhode Island will continuously review the offerings and services available at our career centers and work with our local board partners to evolve and adapt those offerings to the changing needs of the community. Small details such as community bulletins, local art, and communal sitting areas help convey a sense of ownership and comfort within the communities served and demonstrates that these centers belong to the people of Rhode Island and exist to meet their needs.

Rhode Island will also continue to pilot the community-affiliate American Job Center model comprised of smaller job centers housed in trusted community organizations located within underserved communities throughout the state. These affiliate Job Centers help increase the recognition and level of access to the workforce system, providing career services in a venue and environment that customers are familiar with, while providing an introduction and onramp to other services and programs within the workforce development system.

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Integrated service delivery also requires that each segment of the workforce network be fluent and familiar with the services and capabilities of the others. Therefore, Rhode Island will continue to develop collaborative training toolkits and implement cross-agency training to ensure that all of the resources of the system can be funneled appropriately to customers. The expertise of specific partners will be utilized, such as having adult education and family literacy programs provide training on assessment delivery to workforce center staff and using ORS's expertise to provide disability awareness and etiquette training to core and combined partner staff.

A key priority for the state in the 2024 plan period is ensuring that each partner program is knowledgeable of the impact (or lack of impact) that income earned during program participation (such as a stipend or paid work experience) and income earned from employment may have on individuals receiving public assistance supports. Aiding TANF, SNAP, and other recipients of public benefits is a high priority under this 2024 state plan; and state leaders have heard from both client advocates and the service provider community that there is a wide, and potentially damaging, lack of knowledge regarding human service eligibility conditions and the 'benefits cliff' among state workforce staff. In response to this feedback, the State Workforce Development Board intends to work with relevant state agency partners to:

(1) provide definitive and uniform guidance regarding the impact of service-related income (i.e. participant stipends, incentives) and employment earnings on all public assistance programs, and

(2) increase the level of real-time interagency communication regarding the impact of employment and earnings on individual's client eligibility and benefit levels, and

(3) provide support services during the WIOA follow-up year (assuming approval of our waiver request).

Common Screening

Core and partner WIOA programs commit to sharing, comparing and contrasting screening tools currently being used in the field in order to prepare a best-in-class common systemwide screening and barrier assessment tool. Such a tool will ensure that all participant needs and risk factors are accounted for across all partner programs. The development and use of the tool will also help advance the 'service fluency' activity described above.

Affirmative Referrals

While Rhode Island has promoted interservice referrals, the structure and formality of those referrals have varied across the state and across time. After a referral is made, workforce development staff must make sure customers are received by the appropriate service partner and obtain the job placement services they seek. This positive handoff and return is called affirmative referral. Rhode Island's workforce system will work with our local area partners in implementing this outcome-focused approach to customer service. Partner agencies will utilize appropriate tracking mechanisms to ensure that customers move smoothly and fruitfully through the workforce development system until they achieve their desired result. This effective and efficient customer service is the central goal that aligns all workforce partners.

Service Innovation and Collaboration

A frequent concern raised regarding the public workforce network is that of client accessibility. These concerns range from ensuring the hours of operation of career centers met the needs of clients to offering services in more geographic areas using technology and other methods. The

state has made substantial progress in bringing the full suite of workforce development programs and services into a virtual environment; then augmenting those services with cutting edge web-based career and communications tools. This build-out of web and virtual services will only continue in this plan period.

Because some program funding is participant based, our core and partner programs have historically struggled to leverage funding in a meaningful way since pooling funds has not been an option. Recognizing these past failings, Rhode Island seeks to develop real-time braiding practices that capitalize on pursuing the shared goals of separate programs and developing customized funding plans for each participant in a jointly supported activity. As Rhode Island implements the strategies described in this plan, the ability to braid funding in real-time to address the unique needs of clients and employers becomes a critical function of all partner programs.

Rhode Island will also promote better collaboration and information sharing regarding discretionary grant opportunities and activities. In addition to formula resources, each WIOA partner program is often presented with additional funding opportunities that may be advantageous to participants in other WIOA programs. Sharing information about these grants, whether pre-award in pursuit of potential application partners, or post-award to increase awareness and access to grant-funded services across programs, requires relatively low effort but can provide considerable mutual benefit to programs and their participants. For this reason, WIOA plan partner leadership will be required to regularly update one another on discretionary grants pursued or received and discuss opportunities for collaboration.

Collaborative Business Outreach

Each core and partner program has agreed to appoint no fewer than one staff person from among their business service/outreach staff to an interagency workgroup that has been conducting regularly scheduled information exchanges and check-ins. These information exchanges will be designed to make sure all business outreach staff were knowledgeable of each other's programs, services, and recent outreach efforts as well as any upcoming employer events. The plan provides the forum to enable organic collaboration based on opportunities and the professional judgment of each program's business service team.

Service Linkages for Youth

The state plan continues to emphasize and focus on aligning the Youth WIOA program with the state's overall youth vision and service network. The Youth WIOA program is now more intentionally connected to state youth workforce investments and the K-12 system under a unified theory of action which provides a seamless experience for youth participants. The state prioritizes career exploration, high-quality work-based learning and promotes a uniform definition of WIOA 'work experience' to match the Governor's Workforce Board's work-based learning guidance and emphasize work readiness and growth in essential skills as a key component of successful youth programming, including Youth WIOA.

Second, the state promotes seamless co-enrollment for age-appropriate youth in both the Title I Adult and Youth program. Youth that are between the ages of 18-24 (Out of School) and 18-21 (In School and Low Income) that are eligible for both the WIOA Adult and WIOA Youth programs benefit by accessing the best of both programs (for example, intensive counseling and emotional supports from Youth; access to a great variety of occupational training programs from Adult). The state provides the policy and guidance innovations needed to promote co-enrollment and will encourage it whenever it is in the best interest of the participant.

Lastly, the state prioritizes more direct collaboration with area high schools to increase the awareness of available WIOA services for youth nearing graduation who are not college- or military-bound.

Integration with Plan Partner Programs: TANF

The Rhode Island Department of Human Services, Office of Family and Adult Services administers the Temporary Assistance for Needy Families (TANF) Program. The RI Works Program (RIW) is the state's TANF program which provides employment and training.

Through RI Works, education, training and job placement services are provided to single-parent and two-parent families with the goal of helping prepare for, find and keep a job. Job retention and wage enhancement services are provided to individuals receiving RI Works and transitioning from RI Works to self-supporting employment. Additionally, RI Works provides support services such as transportation, childcare, clothing, food assistance and an array of supports to help RI Works participants seek, find and retain employment and training.

RI Works services are provided through contracted partners (predominantly Comprehensive Community Action Program and Equus Workforce Solutions) as well as other community partners that provide family stability services such as mental health, financial literacy, specialized populations, and substance use disorder services.

To provide RI Works services to working participants to help them transition from dependance on assistance to increased earnings, DHS staff uses a strength-based engagement and case management approach that works holistically to serve the entire family. The intent of engagement and case management is to help families move forward based on their needs and become self-supporting. DHS respects and empowers families by recognizing they are capable, have strengths, and have resources that can help them take control of their lives. Benefit delivery is integrated with self-sufficiency enhancing services. The outcome of engagement and case management is increased family accountability and success for individual families in reaching and sustaining their goals.

RI Works collaborates with WIOA Core partner programming in a number of ways. Title II Adult Education programs target youth and parents who need basic education, GED, and job skills in order to compete in the Rhode Island job market. Title I Adult programming offers job search and occupational training that compliments and, in some instances, augments the services and supports received through RI Works.

RI Works is also party to the afore-mentioned interagency meetings that are designed to ensure all partner agencies and programs are coordinating their efforts and identifying any duplicative efforts, so as to make the system as efficient as possible. Agenda items focus on aligning employer and job seeker outreach, promoting (wherever possible) uniform service-related terms and definitions, integrating systems and processes, and promoting a universal standard of quality. The interagency convening provides a forum to share best practices and was instrumental in developing the goals set forth in this plan.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

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

As part of its state-level statutorily mandated responsibilities; the State Workforce Development Board (SWDB) is charged with setting "goals and objectives for serving the state's existing and emerging workforce utilizing all state and federal workforce-development programs." This responsibility includes, and is in addition to, the Board's oversight over WIOA and offers a platform for aligning WIOA programs with non-WIOA education and workforce programming.

Placing this responsibility with the State Workforce Development Board offers the opportunity for alignment among WIOA Core and Partner programs as well as programs outside of the WIOA plan. All core and partner programs are represented at the State Board. Adult (Title I), Dislocated Worker (Title I), Youth (Title I), Wagner-Peyser (Title III), Trade Adjustment Assistance, Jobs for Veterans State Grants (JVSG), Migrant and Seasonal Farmworker Program, and the Senior Community Service Employment Program are represented by the Department of Labor and Training; Adult Education and Family Literacy (Title II) and Perkins Career and Technical Education are represented by the Department of Education; and Temporary Assistance for Needy Families (TANF) and Vocational Rehabilitation (Title IV) are represented by the Department of Human Services. Appointees representing these programs have primary decision-making responsibility and are often Cabinet-level directors who help promote alignment in spending and resource allocation and high-level strategy. This is buttressed by the work of the Interagency workgroup, which is comprised of management-level staff from all core and partner programs that can focus on alignment within more technical and administrative matters.

The positioning, structure, and charge of the State Workforce Development Board offers opportunity for alignment with programs and activities outside of the WIOA plan as well. Perhaps the most impactful area of alignment stems from the SWDB statutory oversight over the Job Development Fund - a state level account funded by a portion of the state Unemployment Insurance account that is intended to improve the preparedness and competitiveness of the state workforce. The Board aligns these state programs alongside WIOA programming in a number of ways. For example, state funds can help build and install new resources and assets within the workforce network that can then be utilized on an ongoing basis by federal programs. Through our industry sector partnerships described below, the state (among other investments) funds curriculum design and equipment purchases for training in new and growing industries. The 'piloting' of such training (and the initial associated risks) is borne by the state investment until the model becomes refined and proven to the point the program is offered placement on the WIOA Eligible Training Provider list. Similarly, the state funded Non-Trade Apprenticeship Expansion Grants provide development funds to organizations throughout the state to create new and innovative apprenticeship models outside of the traditional trades. Once developed, these Apprenticeship programs can also pursue placement on the ETPL, and/or partner with core and partner WIOA programs on recruitment opportunities.

State funded workforce programs help fill in 'the gaps' of the federal workforce system. The state 'work immersion' wage subsidy program reimburses employers for providing temporary work experiences to job seekers that do not require the intensive training aspect of a WIOA OJT – the program is also available for youth job seekers and places another effective tool in the toolbox of WIOA Youth service providers. The state 'incumbent worker training grant' program offers flexible matching funds to employers for training their current employees – the presence of this state program negates the need for a WIOA-funded incumbent worker training program, leaving more of those funds to serve the un- and under-employed. Approximately $3,500,000 in

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Job Development Funds is co-deployed alongside the state's AEFLA allocation to enhance and augment the state's adult education system in a manner that is seamless to the customer.

The organizing principle behind these partnerships is that employers know best what their industry needs, and that agencies that work on a daily basis with clients with barriers to employment know best the unique, often overlooked, challenges their populations face. These programs place this expertise as a center of gravity around which often siloed state programs can organize. For example, AEFLA-funded providers, TANF providers, JVSG, or Title I may be presented the opportunity to refer interested participants to an employer-designed training cohort funded through the state sector partnership program. The afore-mentioned state 'work immersion' program may be attached at the conclusion of training as an enticement for employers to hire completers. In this example, three federal-funded and two state-funded workforce programs are aligned and coordinated in a manner that benefits employers, providers, and most importantly, participants.

Rhode Island's status as the geographically smallest state in the United States offers additional opportunities for alignment. With a comparatively small service footprint, there is substantial overlap among the vendors/service providers utilized by WIOA core and partner programs. These organizations provide a good deal of cross-program alignment themselves across multiple funding streams. WIOA Partner Agencies are actively working with entities to provide cross platform services to make sure customer needs are being met. The agencies also rely on these vendors to serve as service alignment 'laboratories' and inform program administrators when opportunities for, or barriers to, alignment are discovered.

One last vehicle for aligning the activities of this plan with outside non-WIOA workforce, education, and human services is offered by the statutorily required Unified Workforce Expenditure and Program Report (UEP), a compendium of all workforce development programs in the state (WIOA or otherwise). This report is prepared annually and profiles spending and service patterns for any program, state or federally funded, that is intended to prepare Rhode Islanders for employment. The report has evolved to include programs from approximately ten different state agencies, divisions, and higher education institutions. While historically intended as an oversight and transparency document; the report also provides a systems map of the range of state and federal workforce investments in the state and offers a platform for strategic alignment and collaboration.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

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

Rhode Island strives to provide consistently high-quality service to customers across the state through technical assistance, clearly defined roles and responsibilities, and training for staff. Reviewing orientation programs, flow processes, and forms ensures consistency statewide and supports service alignment across programs. Trained and informed staff are critical to providing comprehensive, high-quality service.

WIOA partner agencies will continue to provide services to individuals with barriers to employment and locally outreach to them, as funds permit, to ensure that they are aware of services and of their priority for those services. Perhaps more importantly, Rhode Island is

continuing to expand coordination between state agencies who already serve individuals with barriers to employment, thus allowing easier identification and access to these populations. Expanded coordination with programs serving disabled (Vocational Rehabilitation), low-income (TANF), current and former foster youth (the state Department of Children, Youth, and Families) and justice-involved (Corrections) are just a few examples. Upon discovery that an individual belongs to a specific priority category, priority of service will be explained to that individual.

Local plans are required to identify how workforce partners and programs in each local workforce area will align and implement the vision and goals of the state workforce development board and requirements of the WIOA. Each Local Area is further charged with demonstrating success in community engagement and outreach including, but not limited to, partnering with community-based organizations, identifying community leaders/champions, and working with their area school districts to increase the awareness and availability of services beyond the AJC location and within the community. This includes the continued expansion of strategic co-location of WIOA services within culturally competent organizations with trust and positive reputation within the state's increasingly diverse communities.

Trained, knowledgeable and responsive staff is another critical element to providing comprehensive, high-quality service. An expanded curriculum of training, technical courses, and workshops will help to enhance the knowledge, skills and the professional development of workforce professionals in the state's American Job Centers.

Rhode Island has placed a special emphasis on participant mental and social-emotional health. Economic struggles and unemployment are closely associated with mental crises including depression and substance use disorder. The target populations served by WIOA as especially vulnerable. Alongside our collective focus on employment and economic security, WIOA core and partner programs want to make sure customers can efficiently access the mental and emotional supports they need through active linkages and connections with mental health and substance abuse treatment providers. Rhode Island's American Job Centers now include collateral and information regarding the 988 Suicide & Crisis Lifeline which is strategically placed in visible areas. In addition, the State Workforce Agency is collaborating with the state Department of Health on mental health identification and crisis management training for frontline Job Center staff to help them assist participants in a safe and appropriate manner.

All core and partner programs commit to aligning resources and providing the most comprehensive range of supportive services to customers, particularly those with barriers to employment. While many of these supportive services can be provided directly by the core programs, local boards are encouraged to secure other services through partner programs and community organizations based on local needs. At present, each partner program endeavors to provide necessary supportive services as seamlessly as possible.

During the 2020-2024 plan period, Rhode Island; Title I Adult, Dislocated Worker, and Youth program made expansion of supportive services a high priority. Using lessons learned from the Covid-19 pandemic including the pronounced role and oversized impact that support services had on participant completion and employment, the state board sought to expand the scope, availability, and flexibility of support services under WIOA. Through voluntary collaboration with both local workforce development areas, the state raised local caps/limits on support services and expanded the range of covered services and costs to include, but not be limited to: heating and utilities assistance (if determined necessary for continued participation in WIOA programming), Background Checks (BCI) as required; Child or Dependent Care Assistance; Clothing and Hygiene assistance; Emergency Food Assistance (if determined necessary for

continued participation in WIOA programming); Emergency Housing Assistance (if determined necessary for continued participation in WIOA programming); Healthcare or Medical Assistance; Legal Aid Services as required; Technology such as reasonable assistance with internet or computing equipment as required; and Tools, Equipment and Uniforms. Offering a wide net of support services was crucial to the success of many of the state's employment and training initiatives during the pandemic; providing a responsive and customized approach to barrier mitigation that was widely praised by participants and employers, while maintaining fiscal accountability and integrity.

Case management in Title II adult basic education programs connects adult learners with other supports, including resources to address basic needs insecurity and other barriers to enrollment and persistence in adult basic education programming, as well as services to support transition to employment and/or postsecondary education and training.

In providing Title IV Vocational Rehabilitation programming, ORS works with local, community rehabilitation providers on a fee for service basis to ensure that extended services are available to individuals with the most significant disabilities who require supported employment.

TANF has a range of programs and activities for supportive services that help parents address the specific barriers preventing them from gaining long term employment. Supportive Services are key to developing employment plans with long terms goals for each of the TANF families. Such supports are separated into cash assistance or programs like childcare, SNAP, bus passes and transportation allowances. A second group of more intensive supports focus on challenges such as housing needs, financial literacy, substance abuse, help for those experiencing domestic violence, and mental health and physical health services.

As described elsewhere in the plan, Rhode Island has placed a high priority on serving low-income individuals, particularly participants receiving public benefits. Since 2020, Rhode Island has improved its coordination efforts between TANF and WIOA through increased communication, promotion of cross-program knowledge, and cross-training among frontline staff. These trainings enhance the ability of each program to address the customer needs and questions that may cross program lines. This process reduces the passing of customers between programs for answers to basic questions. State Title I staff actively work with TANF, SNAP, and other public assistance staff on preparing a shared knowledge base concerning the 'benefits cliff'. The State Board has placed a high priority on serving participants receiving public benefits and seeks to develop a universal understanding among staff, and participants, around the impact of employment and earnings on eligibility and benefit levels of public assistance programs. The DHS has developed a Post Employment Benefit to assist families exiting TANF due to employment. It is a small cash grant to help with items such as transportation, work clothes, etc. to help transition to the work force. The benefit is limited to 12 months as the family adjusts to new patterns, responsibilities and costs. The purpose is to stabilize the family during the 6-month new employment peak recidivism period.

Moving forward; Rhode Island will promote even greater service coordination for TANF participants and other low-income individuals by building on the colocation within the state's American Job Centers through intentional and strategic colocation of staff within communities that have historically been underserved and continuing the ongoing trainings and information sharing between agencies. In this way the state will meet the WIOA client base in locations where they are comfortable and have the trust of the community. By stepping out of the traditional brick and mortar models, we will create a more direct pathway of services while allowing clients the opportunity to learn about the full spectrum of state services.

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As described in subsection (A); a key priority in the 2024 plan period to promote the coordination, alignment, and efficient provision of services to individuals; is implementing an affirmative referral system between and among WIOA core and partner programs. In such a 'close loop' system; staff across all programs are able to screen the participant's individual needs, identify the appropriate resource from among partner programs, ensure that the participant is in agreement regarding the referral, make the referral, ensure that that receipt happens, and have some form of response back to show that the engagement occurred and whether there is the opportunity for further collaboration.

In pursuit of this affirmative referral system, all core and partner programs commit to developing a comprehensive active contact list across programs that would include service and resource definitions; as well as a designated 'point person' with each program so that partners can refer to a name and not a program. This would not necessarily be the staff directly receiving the referral but would be an identified accountable party to help confirm, and report, a successful referral. The partners are also exploring 'low hanging fruit' that can be enabled by the fact all state agencies share the same information technology office (Division of Enterprise Technology Strategy and Services). This can include creating shared virtual workspaces on Microsoft Teams and secure document sharing such as through Sharepoint and OneDrive to enable great collaboration and information sharing.

Core and partner program staff continue to work to build collaborative partnerships and relationships. Such efforts are designed to identify ways to braid and leverage resources, reduce duplication of services, and ensure qualified professionals offer appropriate services.

Wagner-Peyser (WP) – The Wagner Peyser Program provides basic career services to all individuals seeking them.

While some job seekers may only need self-service, others may need basic career services, including reviewing job postings, labor market information, labor exchange services, or information about other services. Other job seekers may need services that are more comprehensive and tailored to their individual career needs. These services may include comprehensive skills assessments, career planning, and the development of an individual employment plan that outlines the needs and goals of successful employment.

In the current tight labor market, Rhode Island finds that participants who begin with Wagner-Peyser services are often less job-ready than those in traditional labor markets and are also less ready to enter more individualized intensive training services of Title 1B. Service integration with other WIOA partners is critical to ensure that the Wagner-Peyser participants who need additional assistance receive the supports necessary to prepare them for more individualized intensive services. Wagner-Peyser plays a key role as the connective tissue for many WIOA programs. Wagner Peyser also assures that participants are kept up to date on the ever-evolving labor market and are aware of employment trends. The co-enrollment of Title IB and RESEA participants in Wagner-Peyser provides a unifying scaffolding of information and services that support a more successful transition into unsubsidized employment.

Vocational Rehabilitation (VR) – The VR program provides individualized and customized services and support to individuals with disabilities. While VR staff is especially well prepared to serve this population; Rhode Island's American Job Centers will continue to coordinate services between all programs. As appropriate, VR and WIOA services complement one another.

As mentioned elsewhere, joint professional development is a key priority for the state during the 2024 plan period. For the VR program specifically, this will include educating other program staff on the services available through the VR program and the most effective means of serving

and supporting individuals with disabilities, which results in appropriate referrals and enhanced outcomes.

Title II Adult Education– The Adult Education Program is administered by the Department of Education and has a good working relationship among internal and external partners.

Local American Job Centers will be charged with strengthening their relationships with the Adult Education providers throughout the state. The goal is to have seamless referral relationships between and among all the state providers, providing the citizens of Rhode Island with better access to all programs.

Job Corps – Rhode Island has one Job Corps Center located in Exeter, RI. Job Corps is a federally-funded program under WIOA that provides free education and training to young adults (16–24-year-olds). Eligible youth are able to earn a high school diploma or high school equivalency diploma and receive life-, soft-, and occupational-skills training.

Rhode Island seeks to strengthen the relationship between the state Job Centers and Job Corps. The state seeks to have Job Corps representatives visit local Career Centers on a regular basis and provide outreach that includes program information to increase the knowledge and familiarity of Job Corps among frontline WIOA staff.

Veterans – Rhode Island will continue its strong tradition of promoting training, hiring, and retention of veterans while ensuring that veterans receive priority of service in all required funded programs. Continuing to develop close working relationships with workforce system partners will help to ensure veterans are represented to employers and as qualified and valuable employees who bring a unique set of skills to the workplace.

Jobs for Veterans State Grant – The Jobs for Veterans State Grant (JVSG) establishes a focus on serving eligible transitioning service members, eligible veterans, and eligible spouses by providing employment services and resources to obtain meaningful careers. Priority of Service is required for veterans and eligible spouses for all employment and training programs funded by the Department of Labor. Priority of Service examples include receiving priority on referrals to job opportunities, testing, counseling, and other services, including training programs.

JVSG staff provide individualized career and training-related services to eligible veterans and persons with significant barriers to employment and assist employers in filling their workforce development needs with job-ready veterans. In order to receive employment services from a DVOP, the individual must meet the eligibility requirements. DVOPs may serve eligible veterans and eligible spouses attesting to one (or more) significant barriers to employment, as identified through federal guidance.

JVSG staff are fully integrated members of the American Job Center (AJC) team and actively participate in all AJC activities so their clients can take full advantage of all available employment and training services. Professional development sessions regarding WIOA partner programs, Rapid Response, Reemployment Services and Eligibility Assessment (RESEA), and Registered Apprenticeship are critical to expanding the services of the JVSG team. Their participation in these partner staff meetings broadens their knowledge of programs and resources, thus improving their capacity to effectively serve their client base.

Senior Community Service Employment Program (SCSEP) –

The Senior Community Service Employment Program (SCSEP) is a community service and work based training program for older workers. SCSEP is authorized by the Older Americans Act and is administered by the RI Department of Labor and Training.

The purpose of the SCSEP program is to train older workers by providing useful part-time community service training assignments. Participants that are eligible must be 55 years old or older and must meet certain income guidelines. Older workers are placed into Host Agencies where they will receive subsidized work-based training (at no cost to the host agency) averaging 20 hours a week. They are paid a competitive wage based on the position and their past skills. The subsidized wages are paid through grant funds. This training will provide the necessary skills to help the individual re-enter the workforce. Host Agencies also have the option to retain the individuals for either full or part-time employment after the completion of their community service training assignment. It's a great way for an agency to try out an employee.

A Host Agency is a community-based organization (501(c)(3)) or government entity that provides part-time training and supervision for one or more SCSEP participants. Placing older individuals in community service positions provided by Host Agencies strengthens the ability of the individuals to become self-sufficient, provides much-needed support to organizations, and strengthens the communities that are serviced by such organizations.

The SCSEP program works together and leverages resources with many organizations to provide training and supportive services for the participants. Many of these entities include host training sites, educational organizations to support participants where English is a second language, veteran representatives, vocational rehabilitation activities, and social service agencies. In addition, RI SCSEP coordinates with many agencies to help participants in need of services such as subsidized housing or temporary shelters; no-cost medical and prescription programs; Catholic Charities; energy assistance; food stamps; Supplemental Security Income; reduced fares on transportation; the RI Food Bank; church-provided food and clothing; and nutrition programs provided through the Older Americans Act. For participants who will exit SCSEP without a job, they will continue working with an American Job Center WIOA Title I job coach until they obtain employment. They will continue to have the opportunity to access supportive services as needed and be referred to other local agencies to assist them until they can obtain employment. In the past year Rhode Island increased its Host Agency opportunities, particularly focusing on other public entities, and Community Based Organizations (CBO) in the state. New Host Agencies include the Secretary of State, Public Libraries, Food Banks, Lifespan Health Care Center, and more.

RI SCSEP will remain a close liaison with the State's American Job Centers (AJC) to monitor job market trends and opportunities. Working relationships will be maintained with the One-Stops partners including Disability Specialists from the Office of Rehabilitative Services (ORS) and Veteran Representatives. Assessments on Job market information including the Occupation and Industry Projections information will be measured when making training decisions. The AJCs will continue to be consulted as they provide daily support in the transition of SCSEP participants to jobs. SCSEP participants are also kept informed of other training and employment opportunities throughout the state.

Migrant and Seasonal Farm Workers (MSFW) – The Rhode Island Department of Labor and Training as the State Workforce Agency (SWA) provides MSFW services through the statewide network of workforce centers to ensure that migrants and seasonal farmworkers receive the full range of employment, training, and educational services.

The SWA actively partners with Nation Farmworker Jobs Program-grantee, New England Farm Workers Council (NEFWC) to provide MSFW-tailored services to qualifying individuals in order that they might attain greater economic stability, retain agricultural jobs, or find alternate work of interest outside of agriculture.

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American Job Center (ACJ) staff provide career and job services to NEFWC-referred clients. MSFWs receive personalized assistance in navigating Rhode Island's online labor exchange system either in-person or via comprehensive virtual services. EmployRI spiders available job openings in agricultural and non-agricultural employment. Historically, there have not been significant numbers of agricultural job opportunities in Rhode Island. However, the ARS is a national resource and a tool that is offered to local MSFWs.

Other services offered to referred clients through the ACJ network or the Outreach Worker include employment and training or supportive services. WIOA Title IB funding may provide a pathway for MSFWs to transition to higher-wage jobs and permanent year-round employment in both agricultural and non-agricultural industries.

Temporary Assistance for Needy Families (TANF) – The Rhode Island Department of Human Services administers the state's Temporary Assistance for Needy Families (TANF) Program, known as RI Works. TANF is a partner program under this combined WIOA Plan.

As part of the state's plan to coordinate and align services to individuals; the TANF program will share information with other WIOA programs regarding eligibility, earnings, and benefits; particularly to dispel myths and misconceptions about the impact of earnings and employment on benefit eligibility. The goal is for all relevant participant-facing staff across all programs to develop a foundational understanding of TANF and other social assistance programs in a manner that promotes economic independence and asset-building.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

Employer services is one of the most important areas where alignment is vital to program success. With so many client-focused programs, driven by siloed performance targets; there is little inherent opportunity for a coordinated employer engagement strategy. As a result, employers may develop a strong relationship with one program and not gain access to other resources that may be of additional use to them. Conversely, the employer may experience the opposite challenge of 'government fatigue,' wherein the employer is approached by too many programs looking to assist them. In a state the size of Rhode Island government fatigue can happen quickly if a coordinated employer engagement strategy is not in place.

Title I Adult, Dislocated Worker, and Youth programming, as well as other partner programs administered by the Department of Labor and Training including TAA, SCSEP, and JVSG, have a history of coordinated services for employers due to their organizational linkages to the Employer Services staff at the Department and, by extension, the Department of Commerce. These linkages have been strengthened over the past few years to maximize the benefits of a demand-driven system to these programs, while increasing the potential referral and recruitment pool for the Employer Services staff to satisfy demand.

Rhode Island's Title II program is a key partner in upskilling the state's workforce. RI Department of Education (RIDE) has increased its focus on meeting the needs of the workforce by encouraging local providers to develop services responsive to employer demand and to align programming with opportunities for transitions to workforce and postsecondary. RIDE

recognizes that adult education services should be "responsive to both each individual student's needs while also ultimately positioning them for jobs that meet employers' demands." Accordingly, RIDE incentivizes partnerships between adult education providers, postsecondary institutions, and industry/business partners, as well as the implementation of Integrated Education and Training (IET) models to ensure adults receive the skills and credentials needed for available, in-demand jobs.

The Office of Rehabilitation Services, administrator of the state's Title IV Vocational Rehabilitation program, strives to streamline and improve the employment experience by connecting employers with a designated liaison staff member responsible for coordinating program support, including pre-screened individual recruitment and onboarding to ensure placement and retention success. ORS has also promoted successful employer-led training and education models such as Project Search, along with other employer-informed and industry-driven solutions to meet individual needs.

While the above efforts are effective in addressing the needs of employers, all programs stive to develop enough consistent employer connections to generate continuous employment opportunities for their clients. Driven by the need to meet their own programmatic and performance goals, and, more importantly, a desire to best serve their client, programs may view employed engagement as a 'competition' with partner program. The idea that employer services is a 'zero sum game' where one program's success must come at another's programs failure can lead to a duplicative and disjointed approach that fails to benefit job seeker and employer alike.

Per state statute, the Rhode Island Executive Office of Commerce is responsible for setting and communicating the economic development strategy for the state. This office is required by Rhode Island state law to coordinate with the Governor's Workforce Board and the state workforce development system, and the Secretary of Commerce statutorily serves as the Vice-Chair of the State Workforce Development Board. The Commerce Department is positioned as the first point of contact for Rhode Island-based businesses interested in learning more about assistance and available programs. The WIOA plan partners will leverage this reputation and recognition by each appointing one or more business service staffers to liaise with the Department of Commerce and share information about their employer benefit programs. The goal is to position the state Department of Commerce as 'hub and spoke' for workforce services, connecting need with opportunity across the range of WIOA programs. Brining the Department of Commerce 'into the game' alongside the current business outreach and engagement efforts can considerably expand the breadth and depth of the WIOA system's reach. Rhode Island began regular cross-agency information sharing sessions among all WIOA core and partner programs with employer-facing staff and these meetings will continue through the remainder of the plan period. The state anticipates that the Department of Commerce will join these meetings in the near future.

This 'vertical' integration with the state Department of Commerce will be accompanied by 'horizontal' integration among the core and partner WIOA programs. As described in subsection (A), each program has agreed to appoint no fewer than one staff person from among their business service/outreach staff to an interagency workgroup that will conduct regularly scheduled information exchanges and check-ins. These information exchanges will be designed to make sure all business outreach staff were knowledgeable of each other's programs, services, and recent outreach efforts as well as any upcoming employer events. The plan would not mandate collaboration but rather provide the forum to enable organic collaboration based on opportunities and the professional judgment of each program's business service team.

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Rhode Island's plan for coordinating, aligning and improving the provision of services to employers also includes elevating the role of the state-funded Industry Sector partnerships under the Real Jobs RI program. These partnerships are primarily funded and administered by the Department of Labor and Training. As mentioned earlier, a key priority for the Department in the coming plan period is to better integrate the work of these partnerships into the Title I program, including the utilization of contract-based training utilizing industry-developed curriculum. The 2024 plan period also envisions opening the partnerships up to other WIOA partner programs seeking to solicit industry intelligence and employer feedback to help better inform program design. Partnerships can also communicate employer or industry specific hiring opportunities to the WIOA partners and potentially collaborate on bespoke training and hiring projects.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS AND OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

Per state statute, both the Commissioner of (Elementary and Secondary) Education and a representative of a Public Institution of Higher Education (presently the Commissioner of Postsecondary Education) are members of the State Workforce Development Board. In addition to overseeing PreK-12 education in the state, the state Department of Education (led by the Commissioner of Education) is also the administrative entity for the WIOA Title II Adult Education and Family Literacy program and Perkins Career and Technical Education. Having these two individuals present on the state board helps ensure that the priorities and goals of the state workforce development system are communicated to PreK-12 partners, community colleges, CTE programs, community-based training and adult education providers, and four-year institutions. It also provides an avenue for the needs, concerns, and opportunities of those entities to be communicated to the board and WIOA partner programs.

A key priority for Rhode Island's Title I workforce development system has been to significantly expand the quality and quantity of programs available on the state Eligible Training Provider List (ETPL). Previously, the state took a more passive approach to maintaining the ETPL; processing applications as they were submitted, but not actively building awareness of the ETPL among training providers. During the last two program years, the State Workforce Agency prepared a "road show" recruitment presentation explaining the benefits and opportunities of placement on the ETPL with a focus on providers in growing industries with documented strong performance, as identified by the state Labor Market Information office. The effort resulted in over twenty new providers submitting applications for placement on the ETPL (compared to the current ETPL roster of 24 unique providers – not including Registered Apprenticeship Programs). Submitted programs are in growing industries, including healthcare, manufacturing, and a few programs specializing in Artificial Intelligence, which aligns with the Administration and the US Department of Labor's priorities. With Individual Training Accounts remaining the primary avenue to occupational training, expanding the ETPL will offer more and better choices to job seekers looking to skill or reskill.

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Also consistent with Administration and the US Department of Labor's priorities; the state has introduced minimum performance standards for the ETPL. Beginning with Program Year 2025; any ETPL provider that is up for continuing eligibility review will be expected to meet minimum employer, earnings, and completion standards as set by the State Workforce Development Board in Workforce Innovation Notice: 06-02. Failure on any metric will result in corrective action in the first year; failure on any two metrics in two consecutive years will result in removal from the ETPL. Such measures ensure prudent use of taxpayer money and help promote stronger outcomes for participants. Rhode Island is able to leverage other federal, state, and local investments within the educational institutions to enhance overall access to workforce development programs. As mentioned previously, in addition to its WIOA responsibilities, the State Workforce Development Board also oversees allocation of the Job Development Fund (JDF) – a state level account intended to improve the preparedness and competitiveness of the state workforce. The Board aligns JDF investments alongside WIOA with the vision of a single unified workforce development system. In Program Year 2024 (Fiscal Year 2025), the Board allocated over $14.2 million in state Job Development Funds. Much of these state funds were allocated to educational institutions directly, or indirectly through the state's industry sector partnership program, Real Jobs RI. Real Jobs RI funds a diverse range of industry-driven workforce solutions, which include developing training and/or academic curriculum at institutions of higher education and piloting innovative training programs. Programs that are developed (and proven) with state JDF funds can apply to be on the ETPL where a flow of job seeker participants, and potential ongoing revenue stream, becomes possible.

State Job Development Funds also augment the Youth WIOA system by funding the Prepare RI initiative - a statewide youth career readiness effort that funds high quality internship opportunities and work-based learning experiences, primarily for in-school youth, but also for out-of-school youth with opportunities to braid WIOA funds. Prepare RI also funds a statewide Workforce Based Learning Navigator - a centralized entity serves as a facilitator for employers, schools, and providers to develop youth work experiences and work-based learning opportunities, streamline and coordinate processes, and eliminate duplication and confusion. This state investment in youth career readiness is leveraged against WIOA Youth investments in K-12 education in a manner that benefits and elevates both systems.

Rhode Island also leverages considerable state funds to increase the rigor, reach, and capacity of adult education programs. In Program Year 2024 (Fiscal Year 2025), the state leveraged $3.5 million in afore-mentioned Job Development Funds as well as $2.4 million in state General Revenue ($5.9 million in total state funds) against its $2.38 million in federal Title II Adult Education funds, $700,000 in federal TANF funds, as well as smaller amounts from other non-federal sources. Adult education funds are competed through an RFP process and grantees include community-based nonprofits, public postsecondary institutions, and a public library. The Department of Education strategically braids these state and federal resources in a way that promotes enhanced access, comprehensive services, and pathways to postsecondary education and employment.

Lastly, perhaps the largest single state level investment in increasing educational access was the launch of the Rhode Island Promise Scholarship. The Rhode Island Promise is a "last-dollar scholarship" that fills in the gap between other aid, like Pell grants, and the actual costs of tuition and mandatory fees at the state's community college. There are no extra forms to fill out for this scholarship, only the FAFSA form that is required for federal student aid programs like Pell. RI Promise funds are distributed directly to the Community College of Rhode Island and are applied to the student's bill for tuition and mandatory fees. RI Promise "fills the gap" between a

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student's financial aid package and the actual costs of college and will help set more Rhode Islanders on the path to postsecondary education. In addition to current funding streams, the State anticipates that Workforce Pell will be another mechanism to support workforce programing throughout the state.

F. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

Rhode Island is focused on improving access to recognized postsecondary credentials, including Registered Apprenticeships, certificates, and licenses that are portable and stackable. It is estimated that 72% of Rhode Island jobs by 2030 will require education beyond high school, but as of today only 53% of working-age adults in the state have completed a postsecondary credential.

The state Office of the Postsecondary Commissioner (which is represented on the state workforce development board and is a key partner in the workforce development network) manages and operates three workforce development centers in Rhode Island. These cross-agency facilities, with the public and private colleges and universities; state agencies; business and industry; and not-for profit agencies all offering services and operations (including an affiliate American Job Center in one of the three locations). The coursework ranges from GED studies offered by local CBOs to master's level engineering courses from the public research university; short-term training in shipbuilding trades to certificate-level nursing and first aid programs. Regardless of the level, all of the offerings are an effort to make postsecondary degrees and credentials available to persons seeking to attain them for their careers.

Rhode Island Department of Education (RIDE) has prioritized Integrated Education and Training (IET) as a key strategy to expand access to recognized postsecondary credentials for Rhode Islanders with foundational skills gaps. Known locally as RI-BEST, IET is an evidence-based approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster aligned with RI's priority industry sectors. This integrated approach supports educational and career advancement for adults who might otherwise have difficulty transitioning to college or getting jobs that are part of a career pathway. High quality IET programming results in more diverse, qualified recruitment pipelines for in-demand jobs.

RIDE has built a strong foundation of IET guidance for local providers, thanks in part to participation in OCTAE's IET Design Camp and the IET Design Toolkit. For example, in the most recent Title II funding competition, RIDE made IET Technical Assistance resources available to all potential applicants in order to build understanding of the model and support strong IET proposals. In PY 2024-2025, RIDE funded ten local providers to deliver 30 IET programs, serving 836 participants. 90.61% of IET participants demonstrated a Measurable Skill Gain (MSG), compared to the 51.90% MSG rate among the state's Title II participants overall. Additionally, RI IET participants consistently achieve employment rates around 70% two and four quarters after program exit, evidence of the effectiveness of the approach.

A key asset in increasing the diversity and availability of industry-recognized credentials in Rhode Island is the state's industry sector partnership program, Real Jobs RI. Lead by employers and industry representatives themselves, these partnerships identify, refine, and, in some instances, create industry recognized credentials that reflect the skills employers need. Clients

that receive training through the Real Jobs RI programs often earn an industry recognized credential at the conclusion of training, helping increase the total number of working age Rhode Islanders with a credential. Once programming concludes, the industry-informed revisions to curriculum and credential design remain, benefiting future students, regardless of program or funding stream. The state is currently developing the policies and processes that will govern program eligibility and access to Workforce Pell funding. Given the statutory requirement that programs articulate to credit, the state anticipates this initiative will serve as a vehicle to better align workforce training with employer needs while creating clearer educational pathways for individuals seeking continued advancement.

A critical component to Rhode Island's credentialing effort will be the continued expansion of registered apprenticeship. Apprenticeship is a proven workforce training strategy to develop new talent in highly skilled occupations and combines paid on-the-job learning with related technical instruction in the classroom. Registered Apprenticeships are high-quality work-based learning and post-secondary education models that meet national standards for registration and often results in an industry and/or post-secondary credential. Alongside the investment of federal Apprenticeship Expansion funds (ASE, SAEEI, and recently State Apprenticeship Expansion Formula and Competitive Funds), Rhode Island has taken a number of strategic steps in recent years to promote the expansion of apprenticeship, including offering state-level employer incentives for apprenticeship and making financial resources and technical assistance available to increase the number of apprenticeship programs available. Rhode Island has been strategically focused on installing Registered Apprenticeship as a recognized and utilized workforce solution within the American Job Center system. Through strategic partnerships with the State Apprenticeship Council and industry/labor intermediaries, information regarding ETPL/WIOA funding is regularly distributed to sponsor employers. American Job Center managers and designated Apprenticeship-ambassadors participate in a series of discussions focusing on the structure of the Registered Apprenticeship Program, their placement on the ETPL, and supportive services operations and procedures. As of the writing of this report, thirty-eight (38) RAPs are registered on ETPL.

G. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

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

Per state statute, the state Secretary of Commerce serves as Vice-Chair of the State Workforce Development Board. The Secretary of Commerce oversees the Rhode Island Executive Office of Commerce which is responsible for setting and communicating the economic development strategy for the state. The inclusion of the Secretary of Commerce in such an influential position on the state workforce board helps ensure that policies, priorities and decisions regarding the state's workforce development system reflect the economic development priorities of the state. For example, the workforce development network's priority industry sectors described previously were selected, in large part, based on the state's economic development priorities. This positioning also allows workforce development decision makers to tap into the expertise and perceptive of the state economic development staff. Conversely, as member of the state workforce board, the Secretary of Commerce is well versed in the service and programs available and is provided a forum to bring workforce issues to this body on an ongoing basis.

B. STATE OPERATING SYSTEMS AND POLICIES

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

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE MANAGEMENT SYSTEMS, JOB BANKS, ETC.).

A key component of the combined plan is the ability to collect, maintain and update the critical information needed by all partners. Without timely, accurate, relevant, and accessible information, there can be no increased integration or efficiency in operation. Rhode Island 's workforce development network is supported by multiple operating systems:

EmployRI (Adult, Dislocated Worker & Youth, RI Department of Labor and Training)

EmployRI is Rhode Island's statewide Virtual One-Stop and workforce management information system that incorporates customer self-service, labor market information (LMI), and labor exchange services. Procured from Geographic Solutions, Inc. and implemented in May of 2009, the operating system serves as a comprehensive online workforce development platform designed for jobseekers, employers, students, training providers, workforce professionals, and analysts. The system is available at no charge to customers 24 hours a day, 7 days a week.

Labor Exchange Platform: The EmployRI system allows job posting and job order management by employers directly and spiders job postings from multiple job boards (state and private), government sites, corporate websites, social media sites, and the National Labor Exchange to create an accessible job bank within the platform. Employers can create and post job orders, write job descriptions, and conduct talent searches. Jobseekers can target their search by preferred employer, job location, source, date and/or required skills. The system also offers additional features for jobseekers and students such as résumé creation wizards (Resume Builder) and scheduled, automated job search tools (Virtual Recruiter), as well as lists of eligible training providers and programs. To customize their search within the system, jobseekers can also enter occupational and personal skills as well as information on desired careers to further customize their search within the system.

Labor Market Information: EmployRI provides labor market information services to various groups including, but not limited to, jobseekers, employers, and research analysts and has the functionality of a comprehensive LMI web site including the display and manipulation of data; occupation, industry, and economic data analysis; integrated job search capabilities, O*NET data review; skills assessment; and linkage to education providers and programs. The labor market information module contains state and national data and allows jobseekers to research potential careers, and the required training and/or experience needed to excel in them.

Case Management: EmployRI is the primary case management system for multiple workforce development programs, including Wagner-Peyser (Labor Exchange), Workforce Innovation and Opportunity Act Adult, Dislocated Worker, and Youth (WIOA), Trade Adjustment Assistance (TAA), Jobs for Veterans State Grants, Reemployment Services and Eligibility Assessment (RESEA) and National Dislocated Worker Grants. Additionally, the state has purchased an enhancement to EmployRI that allows the workforce network to utilize the system for case management of additional grants and programs. The platform captures provided services and case notes, tracks progress, gathers all data elements required for state and federal compliance, stores source documentation and tracks performance outcomes. The system also provides predictive performance reports based on staff entered data as well as the quarterly and annual WIOA reports and Wagner-Peyser reports which also incorporate wage record data. The

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predictive reports allow local workforce boards to determine performance and implement corrective action in a timely manner without having to wait for wage record data.

Integrated Management Information System: As an integrated internet-based management information system (MIS), EmployRI includes common intake, case management, and data tracking components to meet the data collection and reporting requirements of, and provide a single interface for, WIOA, Wagner-Peyser, TAA, Jobs for Veterans State Grants (JVSG), Rapid Response activities, Employer Engagement and Business Services, the Migrant and Seasonal Farmworkers program (MSFW), among other reportable services. The system provides Local Workforce Development Boards with the tools needed to deliver WIOA services through an income growth model, integrating workforce information, transferable skill sets, and career paths into the case management system. With data from other WIOA and One Stop partners, EmployRI's system provides seamless information sharing and data exchange in addition to increased customer service; this connectivity forms the basis for the development of interagency data exchange.

With configurable activity reports and dashboards, the EmployRI tool assists state decision-makers and serves as a foundation for labor market-relevant, data-driven planning activities amongst workforce system stakeholders, including Local Workforce Development Boards and other state agency funded One-Stop partners and local entities. Utilizing this data, Rhode Island continues to evaluate how our systems are functioning, provide timely technical assistance, and assists local boards in making programmatic and funding decisions.

Microsoft Bookings, Virtual Appointment Center (WIOA, RI Department of Labor and Training)

In response to the growing need for virtual services following the pandemic, in 2021 Rhode Island launched a proprietary web service known as Back to Work RI. While the web service included a number of innovative tools and assets; we found customers generally only used the portal to schedule and attend virtual appointments with DLT job coaches. In 2025 the Department began the process of decommissioning the Back to Work RI service in favor of a simplified registration process hosted through Microsoft Bookings. Early feedback indicates that customers appreciate the ease-of-use and integration with other Microsoft suite products like MS Teams and MS Outlook. The Department is proceeding cautiously to make sure the product meets our needs but we remain confident the change will improve the customer experience and ease access to WIOA and other services.

LACES Management Information System (Adult Education & Family Literacy Act, RI Department of Education)

Rhode Island uses LACES (Literacy, Adult, and Community Education System) as its adult education management information system (MIS). Rhode Island Department of Education (RIDE) procured the MIS from LiteracyPro Systems in spring 2020, at which point the agency carried out migration of historical data from the state's previous MIS (Comprehensive Adult Literacy Information System, or CALIS), and implemented LACES in fall 2020.

LACES is fully compliant with National Reporting System (NRS) and Office of Career, Technical, and Adult Education (OCTAE) requirements. The system has been built around federal reporting requirements, and is updated regularly to incorporate any federal changes, including required fields and automatic population of cohorts.

LACES allows RIDE staff the ability to track data for all Rhode Island adult education programs at the state and local level, including participants, classes, and staff. Local grantees are able to

enter, edit, and view data in these same categories for their programs. The system collects all NRS-required data and generates required and optional NRS tables at the local and state levels. In addition to tracking federally reported measures such as skill gains, demographic information, and attendance hours, LACES functionality allows the state office the flexibility to disaggregate data in order to monitor outcomes for at the local and state levels, and for specific student subpopulations.

LACES supports the quarterly export of data used for employment outcomes matching with the Rhode Island Department of Labor and Training and the state longitudinal data system, as well as an annual export of data for postsecondary outcomes matching, carried out in partnership with the Rhode Island Office of the Postsecondary Commissioner. Matched outcome data is imported back into the system to populate tables for federal reporting.

InFormed (Vocational Rehabilitation, Office of Rehabilitative Services)

The state Office of Rehabilitative Services has had an Electronic Case File/MIS that is cloud based, proprietary and uniquely designed to meet the data collection requirements of Vocational Rehabilitation (VR) Programs. The product, Libera System 7 was updated to a new platform, InFormed in November 2023. The ECF/MIS program provides data security, reporting compliance, project management, case management, integrated authorization & billing, customer service and customization options. This new product was rolled out in just a few states and all are state VR agencies. The program is WIOA-compliant and the software is specific to State operated VR programs. It is an update to the older system which is used nationally by several other State VR Agencies. ORS feels that the new program will continue to facilitate the Agency's ability to meet and report on its Federal mandates and capture the data elements required by RSA/WIOA - all necessary to maintain Title I and Title VI funding for and function of Vocational Rehabilitation Programs that assist individuals with disabilities to obtain and maintain employment in integrated competitive work settings.

The Vocational Rehabilitation Program has staff co-located at each of the one stop sites and pays an annual rental fee for space, clerical and technology support. The VR program meets all of the data elements required for the RSA -911. VR has an electronic case file system that integrates all the required data elements, client specific services, financial authorizations and expenditures. The program captures all services authorized and provided to clients, plan development and employment outcomes. A client is not considered successfully employed until the client has been on the job for at least 90 days.

RIBridges (Temporary Assistance for Needy Families, Department of Human Services)

RIBridges, developed by Deloitte is a complex, integrated eligibility system that combines eight major programs, including Rhode Island Works (RI Works), RI's TANF program, and more than 15 sub-programs into a single global system. RIBridges is a self-service application system that provides secure access to Rhode Islands Department of Human Services benefit applications on the internet 24 hours per day, 7 days per week. Residents are able to electronically apply for benefits and/or report changes to RI Works. RIBridges electronically determines eligibility based on the data input. Customers can view their benefit status online, view correspondence, receive e-mail notifications if they choose, and upload documents.

RI residents can complete a RI Works application on RIBridges with the assistance of staff at the local field offices. Staff at the local field offices access the system to provide approvals, enter data, and review cases. RIBridges will create tasks for staff to complete processing of the application. Once interviews are completed, data is entered, and customer documentation is uploaded, benefits can be approved and authorized for disbursement. The system is also

accessed by managers and administrators to collect data and reports allowing them to effectively manage the program at the state level. These reports are used to compile information for federal reporting as well.

UI System Modernization

Rhode Island Unemployment Insurance program implemented the new, secure, cloud-based system, 'UI Online,' in 2022. This system allows claimants to apply online and track their claim as it processes. Claimants can receive reminders to certify for weekly payments, get alerts if they need to provide additional information, and securely update their payment method and other settings. It also has additional security features designed to stop fraudulent unemployment claims.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (FOR EXAMPLE. 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 AND ANY ADDITIONAL GUIDANCE FOR ONE-STOP PARTNER CONTRIBUTIONS.

The State Workforce Development Board (SWDB) reviews, updates, and issues policy on an ongoing basis to support the implementation of WIOA and the strategies outlined in this plan. Workforce Innovation Notices (WINs) are the formal process through which the SWDB sets statewide policies, guidance, and information for WIOA. Upon passage, these notices are delivered to the local workforce development boards as well as system partners and are made available on the Governor's Workforce Board website policies/reports webpage.

As of the writing of this plan, there are thirty-nine active state WIOA policies. These policies are categorized by topic area and summarized below:

Administration and Governance

- The process by which local workforce areas are identified and designated is described in the **Local Workforce Development Area Designation** policy.
- The responsibilities of the local workforce boards are outlined in the **Governance and Duties of Local Workforce Development Boards** policy.
- Who should be appointed to local boards and the process by which those appoints should be made is described in the **Establishment and Membership of Local Workforce Development Boards** policy.
- As described in the **Regional Planning Policy,** Rhode Island has designated each local area a planning region. Accordingly, regional plan is not required, and Local Boards must submit only a Local Plan to the Governor for approval.
- Timelines for the retention of certain programmatic and financial records, as required under the WIOA law, are described in the **Records Retention** policy.

The One-Stop (America's Job Center) Delivery System

- Requirements for how the One Stop delivery system should be structured are described in the **Establishment of the One Stop Delivery System** policy**.**

- The process by which local areas should competitively procure the One Stop Operator is described in the **Competitive Procurement of One Stop Operator** policy**.**
- The elements that must negotiated between WIOA partner programs, Local Elected Officials and local workforce boards; as well as the process for said negotiation; is described in the **Local One Stop Partner MOU** policy.
- The process for local parties to arrive at a shared funding arrangement, or request state intervention, for career center infrastructure costs, is described in the **Local/State Mechanism for One Stop Infrastructure Funding** policy.
- The process by which local boards certify One Stop Centers for service access and quality is described in the **One Stop Certification Standards** policy.

Program Funding and Grants Management

- The **WIOA Funding Transfer Policy** describes the process by which local boards can shift dollars between Adult and Dislocated Worker funding streams.
- The **Sub-recipient vs Contractor Designation** policy describes how the state will delineate between contractors or subrecipients.
- The annual distribution of WIOA funds to the local areas is addressed through the **WIOA Funding Allocations** policy which is revised and newly issued every year.
- Eligibility and priority for many WIOA programs is based on participant income levels, which are updated annually consistent with the **Lower Living Income Standard & Self Sufficiency** policy.

Nondiscrimination, Equal Opportunity, and Customer Experience

- Should a participant believe they were subject to discrimination, local boards are required to have and make available a process through which participants can raise their concern and pursue remedy as required in the **State Discrimination Complaint Processing** policy.
- If a participant has a complaint regarding customer service, local boards are required to have and make available a process through which participants can raise their concern and pursue remedy as required in the **State Program Complaint Processing** policy.

Adult and Dislocated Worker Programs

- The **WIOA Adult – Definition** policy memorializes the federal definition of an Adult participant under WIOA.
- The state's priority for services within the Adult program is described in the **WIOA Adult – Priority of Service** policy.
- The state's definition of 'basic skills deficient', and the means of documenting basic skills deficiency, is outlined in the **Basic Skills Deficient – Definition** policy.
- The **WIOA Dislocated Worker – Definition** policy describes the state definition of a dislocated worker. Rhode Island's definition of a "Dislocated Worker" was clarified to better fit the economic realities of the state. The policy expands the scope of that definition to help more Rhode Islanders while decreasing the administrative burden of determining and documenting eligibility.

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- The documents that participants must provide to establish eligibility under WIOA are described in the **Eligibility and Performance Documentation** policy.
- The process by which eligible participants meet United States selective service requirements is described in the **Selective Service Requirement** policy.
- The range of career services to be provided by local areas are described in the **Provision of Career Services** policy.
- The scope of support services that may be provided by local areas, including the state's preference for a broad and comprehensive approach to such services, is communicated in the **Provision of Support Services** policy.
- Rapid Response services to be provided in the event of a plant closure and/or mass layoff event are described in the **Rapid Response Services** policy.
- The range of services and resources local areas must make available to employers is outlined in the **Business Services** policy.

Training Programs and Allowable Training Models

- The utilization of both On-the-Job Training (OJT) and Individual Training Accounts (ITA) are outlined in the **Provision of Training Services** policy.
- How a provider applies for initial and continuing eligibility as an eligible training provider is described in the **Eligible Training Provider Policy.** The state recently revised the Eligible Training Provider Policy to streamline the application process for providers and place a heavier emphasis on performance outcomes for continuing eligibility.
- The ability of local areas to offer incumbent worker training to upskill currently employed workers is described in the **Provision of Incumbent Worker Training Services** policy.
- The process by which local areas may fund custom training cohorts prepared for one or more unique employers is described in the **Provision of Customized Training Services** policy.
- The requirements for local areas to authorize training provided by a specific provider on a contractual-basis is described in the **Provision of Contract-Based Training Services** policy. Expanding the use of flexible and responsive contract-based training is a key priority for the state board.
- How local areas can most effectively leverage innovative Registered Apprenticeship models under WIOA is escribed in the **Apprenticeship under WIOA Policy**.

Youth Programs

- The requirements for providing services for youth, including the required fourteen elements and the process by which such services may be procured, is described in the **Provision of Youth Services** policy.
- Rhode Island's definition of youth requiring "additional assistance to complete an educational program or to secure and hold employment" is described in the **Youth Requiring Additional Assistance – Definition** policy.

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- The authority of local areas to provide reasonable incentive cash payments to encourage youth to persist and achieve certain program milestones, is described in the **Youth Incentive Payments** policy.
- The state's expectations for quality and rigor of paid and unpaid work experiences in communicated in the **Youth Work Experience Guidance policy.**

Performance Accountability and Reporting

- WIOA performance accountability indicators to assess the effectiveness of WIOA-funded programming are described in the **Performance Accountability Policy**.
- Requirements for state and local monitoring and oversight responsibilities is provided in the **Monitoring Policy.**
- The definition of a credential for WIOA reporting purposes is described in the **Credentials Definition Policy.**

The State's guidelines one-stop partner programs' contributions to a one-stop delivery system are provided in the 'Local and State Mechanisms for Funding One-Stop Career Center Infrastructure Costs' policy. That policy was developed to fulfill the WIOA requirement that the Governor issue guidance to state and local partners for negotiating cost-sharing (including determining equitable and stable methods for all required partners to contribute to funding infrastructure costs in accordance with WIOA Section 121(h)(1)(B)), service access, service delivery, and other matters essential to the establishment of effective local workforce development services under WIOA (§678.705).

The policy explains that all one-stop partner programs must contribute to the infrastructure costs of comprehensive American Job Centers based on their proportionate use of the one-stop delivery system and relative benefit received. In affiliate Job Centers, only the one-stop partners participating in the affiliate Job Center must contribute to the infrastructure costs for that Job Center. When two or more entities receive funding to carry out a required program in the local area, each entity must contribute to infrastructure costs, including costs at an affiliate Job Center.

The policy defines the term "infrastructure funding," used with respect to a Job Center, as the non-personnel costs that are necessary for the general operation of the Job Center. Each local area is authorized to determine what costs are included when negotiating infrastructure cost contributions. The policy describes line items that may fall into this category, including rent, maintenance, utilities, equipment, technology, supplies, and common identifier costs (costs for signage, outreach, and other identification for the one-stop center)

The policy mandates that state partners must negotiate the extent of infrastructure costs as well as their respective contribution to them. In-kind contributions are allowable; however, partners must agree that the in-kind contribution is required in the Job Center and is an acceptable form of cost contribution among the partners.

Local WDBs and all WIOA-required one-stop partners must enter into good-faith negotiations to determine each provision in the MOU, including:

- Completion of the MOU regarding the structure and integration of the one-stop delivery system in the local area;
- Costs necessary to support the infrastructure of the one-stop delivery system in the local area;

- Costs necessary to support the delivery of shared services in the local area; and
- The cost allocation methodology or methodologies by which shared costs will be split between partners to reflect proportionate use and relative benefit.

The policy lists acceptable cost allocation methodologies for partners to consider which include:

- Square footage;
- Full-time equivalent employee count (FTE);
- Seat/cubicle occupancy;
- Customer count; and
- Customized/Manual allocations based on local negotiations.

The policy requires that local MOUs must include a process by which projected/budgeted costs are reconciled against actual costs incurred on a regular basis (ex. monthly or quarterly). The MOU must include a reconciliation schedule, identify who will be responsible for the reconciliation, and include a process by which partners can dispute the reconciliation.

Under the policy, Local WDBs, CEOs, and/or partners may request assistance with the negotiation process from the Department of Labor and Training. If the partners and the local area are unable to come to agreement on a local infrastructure funding mechanism; they must notify the SWDB. All documents utilized by the local area in the negotiations process, including any budgets or allocation methodologies that have been agreed upon, should be submitted to the state board. The state board will then impose the State infrastructure funding mechanism, which is also outlined in the policy. The policy includes an appeals process for decisions made using the State infrastructure funding mechanism.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

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

Rhode Island's core and non-core WIOA programs are primarily administered by three state agencies: the Department of Labor and Training (DLT), the Department of Education (RIDE), and the Department of Human Services (DHS). Each entity has administrative responsibility for one or more programs contained in this plan.

Organizational charts for each agency administering Core and Non-Core Programs included in the plan are provided below:

- Department of Human Services- Office of Rehabilitation Services: https://dlt.ri.gov/sites/g/files/xkgbur571/files/2026-02/DHS%20ORS%20org%20chart%202026.pdf
- Department of Human Services – Temporary Assistance for Needy Families: https://dlt.ri.gov/sites/g/files/xkgbur571/files/2026-02/DHSTANF_OrgChart_2026.pdf
- Department of Labor and Training: https://dlt.ri.gov/sites/g/files/xkgbur571/files/2026-02/DLT%20Org%20Chart%20Feb%2726%20-%20External.pdf

- Department of Education: https://dlt.ri.gov/sites/g/files/xkgbur571/files/2026-02/RIDE%20WIOA%20Org%20Chart%202026.pdf
- All Agencies: https://dlt.ri.gov/sites/g/files/xkgbur571/files/2026-02/combined.pdf

Below is a list of each of the programs included in this Combined Plan and the state agency that has administrative responsibility for each program.

Agency	Core Program	Non-Core Program
DLT	Adult (Title I); Dislocated Worker (Title I); Youth (Title I); Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)	Trade Adjustment Assistance for Workers Program (Chapter 2, Title II Trade Act); Jobs for Veterans State Grants (Title 38, Chapter 41); Migrant and Seasonal Farmworker Program (Title I); Senior Community Service Employment Program (Title V Older Americans Act)
RIDE	Adult Education and Family Literacy (WIOA Title II)	Carl D. Perkins Career and Technical Education
DHS	Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.); Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)	

The organizational structure the state workforce development network begins with the Governor's office. The Governor has dictated the responsibilities of each WIOA core partner agencies as required by state and federal law.

Workforce investments and strategic decision making are overseen at the state level by the State Workforce Development Board (the Governor's Workforce Board of Rhode Island); and at the local level by two local boards (note, pursuant to waiver authority granted by the US Secretary of Labor, the state board also serves as a local board for one of the state's two local workforce development areas).

The afore-mentioned Department of Labor and Training serves as Rhode Island's State Workforce Agency (SWA). The Workforce Development Services (WDS) division of the Department administers most statewide activities required under WIOA include maintenance of the Eligible Training Provider List, overseeing the statewide One Stop System, compiling and completing required performance reports, and a range of other duties. The Integrity and Compliance division is a separate unit from the WDS and conducts fiscal and programmatic monitoring. An Organization Chart for these divisions within the Department of Labor and Training is provided here: https://dlt.ri.gov/sites/g/files/xkgbur571/files/2026-02/DLT%20Org%20Chart%20Feb%2726%20-%20External.pdf

B. STATE BOARD

Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State

Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.

All board members are given a thorough orientation of their roles and responsibilities, including the Governor's Strategic Vision for the workforce development system. This orientation is provided at the beginning of their appointment as well as annually. The Board meets no less than eight times per year. During these meetings the Board is updated on key performance metrics and program outcomes, discusses high-level strategic priorities for the workforce system, deliberates policy, reviews budgetary matters, and considers activities and recommendations from one of the Board's committees. There are currently five committees of the Board that inform the execution of WIOA:

Executive Committee: Supports the implementation of WIOA by discussing and deliberating policy, planning, and strategic priorities for the WIOA system. Identifies opportunities for improvement, reviews resource and technology needs of WIOA partners, and oversees outreach and awareness efforts.

Strategic Investments and Evaluation Committee: Captures system-level performance data to drive decision-making and budgetary priorities. Reviews the statewide WIOA allocation formula and WIOA program performance.

Youth Career Pathways Advisory Committee: Develops recommendations to enhance integrated programming and career pathways for youth; provides general oversight on the development and implementation of the WIOA State Plan youth goals.

Adult Career Pathways Advisory Committee: Supports the integration of statewide workforce-related resources, programs, and initiatives to enhance career and economic outcomes for adult job seeker customers.

Local Area Advisory Committee (created as a condition of the local governance waiver described previously): Informs on all strategic, policy, and budgetary matters concerning the Greater Rhode Island local workforce development area.

The committee structure supports both staff and board members in completing tasks and effectively carrying out all required functions under WIOA. When necessary actions must take place that do not align well with scheduled full Board meetings, authority is formally delegated to the Executive Committee.

The Board is comprised of twenty-three (23) members, appointed by the Governor with the Advice and Consent of the State Senate:

Governor Daniel J. McKee

BUSINESS MEMBERS (12)

Xaykham Khamsyvoravong, PFM Financial Advisors [GWB Board Chair]

Mike Grey, Sodexo Food Service

James Ferrara, Bristol County Savings Bank

Jennifer Ortiz, Executive Cuts

Steve Kitchin, New England Institute of Technology

Sean Morrone, General Dynamics Electric Boat

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Kristen Adamo, Providence Warwick CVP

Marc Amato, Innova-Logic LLC

William Schmiedeknecht, Lifespan

Heather Singleton, RI Hospitality Association

Tracy Wiley, Bally's Corporation

(Pending position to be filled)

GOVERNMENT REPRESENTATIVES (5)

Stefan Pryor, Rhode Island Commerce Corporation [GWB Board Vice Chair]

Matthew Weldon, Department of Labor and Training [Adult; Dislocated Worker; Youth; Wagner-Peyser; Trade Adjustment Assistance for Workers Program; Jobs for Veterans State Grants; Migrant and Seasonal Farmworker Program; Senior Community Service Employment Program]

Shannon Gilkey, Postsecondary Education Commissioner

Angelica Infante-Green, Department of Elementary and Secondary Education [Adult Education and Family Literacy; Carl D. Perkins Career and Technical Education]

Joseph Murphy, Department of Human Services [Vocational Rehabilitation]

WORKFORCE REPRESENTATIVES (6)

<u>Organized Labor</u>

Erica Hammond, RI AFL-CIO

Paul Alvarez, UA Local 51

Paul MacDonald, Providence Central Federated Council

Robin Coia, New England Laborers Labor-Management Coop. Trust

<u>Community</u>

Mario Bueno, Progreso Latino

Darrell Waldron, Rhode Island Indian Council

4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP PROGRAM PARTNERS

A. ASSESSMENT OF CORE AND ONE-STOP PROGRAM PARTNER PROGRAMS.

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

Rhode Island's WIOA administrative agencies (Department of Labor and Training, Department of Education, Office of Rehabilitation Services) will use the primary indicators of performance specified in section 116(b) of WIOA and contained in State Performance Reports to assess the performance of the six core programs. Each program's actual performance will be assessed in

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relation to the State adjusted levels of performance and revised State adjusted levels of performance. Rhode Island does not presently have additional indicators of performance, however as elaborated within the performance accountability section of the state plan, the state continues to explore and develop additional program measures to compliment those required by WIOA.

Performance assessment will utilize quarterly wage records to determine program quality and effectiveness with respect to outcomes including employment rates and median earnings for participants with a social security number that exited from one or more of the six core programs. Rhode Island will also assess the average cost of those participants who received career and training services, respectively, during the most recent program year, while considering relevant economic conditions and characteristics of participants.

The State Workforce Development Board will use the Local Area Performance Report broken down by local area for the WIOA Adult, Dislocated Worker, and Youth programs to determine each local area's performance on the primary indicators with respect to local performance targets and will provide on-going evaluation of core program activities in order to promote continuous improvement. To better ensure local workforce development areas are aligned with the WIOA combined state plan, Rhode Island has offset the local planning cycle by one year. For example, after approval of the State WIOA Plan by June 2024; submission of local area WIOA plans were due by December 31, 2024, with final approval and effective date of July 2025. Doing so ensures local alignment with statewide strategy, and the local contextualization of performance standards.

Partner programs will be assessed based on their statutorily required performance metrics and reporting requirements. Partner programs will be asked to make such reports available upon request to the State Workforce Development Board and will also be assessed based on meeting commitments outlined in MOUs. Along with these reviews, the State Board may review performance on specific matters such as services to individuals with barriers, customer satisfaction, program flexibility and alignment, and others. Rhode Island has two additional vehicles through which assessment and public accountability of One Stop Partner programs can occur. The State Board - Adult Career Pathways Advisory Committee is positioned to lead in oversight, coordination, and direction of WIOA partners. This Committee reviews partner program performance and responsiveness in a public forum and make recommendations to partner agencies and the full board when appropriate. The Interagency Workgroup - a multi-agency workgroup comprised of sub-cabinet level decision-makers from all core and partner programs, as well the State Workforce Development Board is able to discuss performance and program delivery in a collaborative fashion and offers the opportunity for group problem-solving when necessary

B. PREVIOUS ASSESSMENT RESULTS

For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

Rhode Island's 2024 Plan states that core WIOA programs will be assessed using the primary indicators of performance specified in section 116(b). Partner WIOA programs will be assessed based on their statutorily required performance metrics and reporting requirements. Local

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areas will be assessed based on the primary indicators of performance for WIOA Adult, Dislocated Worker, and Youth programs within their respective local areas.

As of the writing of this plan, the most recent twelve-month period for which a comprehensive assessment could be completed was Program Year 2023 (July 1, 2023 – June 30, 2024). This review was completed in 2025 and is represented in the chart below:

Adult	**PY 2023 Actual**	**PY2023 Performance to (Adjusted) Target**
Employment 2nd Quarter After Exit	86.70%	91.70%
Employment 4th Quarter After Exit	78.30%	87.50%
Median Earnings 2nd Quarter After Exit	$9,226	92.10%
Credential Attainment Rate	60.00%	96.00%*
Measurable Skill Gains	65.00%	138.30%*
Dislocated Worker	**PY 2023 Actual**	**PY2023 Performance to (Adjusted) Target**
Employment 2nd Quarter After Exit	78.80%	89.10%
Employment 4th Quarter After Exit	87.50%	96.30%
Median Earnings 2nd Quarter After Exit	$10,114	112.00%
Credential Attainment Rate	75.00%	97.40%*
Measurable Skill Gains	49.80%	114.48%*
Youth	**PY 2023 Actual**	**PY2023 Performance to (Adjusted) Target**
Employment 2nd Quarter After Exit	72.90%	89.30%
Employment 4th Quarter After Exit	72.20%	86.00%
Median Earnings 2nd Quarter After Exit	$3,805	108.20%
Credential Attainment Rate	65.10%	120.70%
Measurable Skill Gains	53.90%	131.46%*

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Wagner-Peyser	**PY 2023 Actual**	**PY2023 Performance to (Adjusted) Target**
Employment 2nd Quarter After Exit	67.80%	98.10%
Employment 4th Quarter After Exit	71.10%	101.40%
Median Earnings 2nd Quarter After Exit	$8,717	95.30%
Credential Attainment Rate	N/A	N/A
Measurable Skill Gains	N/A	N/A
Adult Education	**PY 2021 Actual**	**PY2021 Performance to (Adjusted) Target**
Employment 2nd Quarter After Exit	30.87%	89.48%*
Employment 4th Quarter After Exit	30.85%	81.18%*
Median Earnings 2nd Quarter After Exit	$7,028	143.46%*
Credential Attainment Rate	16.79%	93.28%*
Measurable Skill Gains	54.35%	135.88%*
Vocational Rehabilitation	**PY 2023 Actual**	**PY2023 Performance to (Adjusted) Target**
Employment 2nd Quarter After Exit	49.70%	80.30%
Employment 4th Quarter After Exit	44.40%	80.40%
Median Earnings 2nd Quarter After Exit	$3,372	82.60%
Credential Attainment Rate	32.10%	68.9%
Measurable Skill Gains	28.80%	66.40%*
*= Performance is unadjusted		

Rhode Island is pleased with statewide WIOA performance for PY2023, having met or exceeded multiple employment and earnings performance indicators across Adult, Dislocated Worker, Youth, and Wagner-Peyser programs. As anticipated, performance on employment and earnings metrics has improved and recovered from the Covid-19 pandemic and the associated economic challenges and disruptions. Rhode Island is especially proud that these performance marks

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were achieved alongside a devoted focus on reaching traditionally underserved populations throughout the program year.

No single metric fell below the 50% performance threshold for single individual indicator; however, Rhode Island underperformed against its negotiated goals for Dislocated Worker 2nd Quarter employment (94.94% of target); Adult 4th Quarter employment (97.88% of target) as well as Adult and Dislocated Worker Credential Attainment (96.00% and 97.40%, respectively).

Rhode Island will continue to monitor 2nd and 4th quarter employment rates to ensure they meet negotiated goals. Additional staff capacity and training may help provide the support and guidance participants need to obtain employment.

The state will also provide continuing technical assistance regarding how to identify, track and report credential attainment. Technical assistance provided in response to the state's PY2022 performance report appears to have borne fruit. In PY2022, Rhode Island underperformed against its negotiated goals for Youth Measurable Skill Gains (91.85% of target). In August 2023 the state delivered a technical assistance training to Title I staff throughout the state (Youth provider staff included) to improve the tracking and reporting of Measure Skill Gains and the result is that Youth Measurable Skill Gains are now at 131.46% of target for PY2023. The state has also seen improvement in Adult and Dislocated Worker Credential Attainment, rising from 85.25% to 96.00% of target and from 93.59% to 97.40 of target, respectively, from PY2022 to PY2023.

The state will continue to prioritize staff training, technical assistance, and support to meet the employment and education goals of our participants; and the WIOA performance goals set for our state.

Partner WIOA programs were asked to submit their statutorily required performance results and reports as part of the performance assessment effort. If and where performance deficiencies are observed, the partners were asked to indicate what corrective actions they intended to take. To allow for comparison and contract, TANF was asked to provide performance data for the same timeframe as the WIOA core programs (July 2023 - June 2024). During that period TANF secured 502 Job Placements; 511 Participants were earning at least $4,000 in the 5th quarter after program entry; the average wage for job placements was $17.17; and 117 individuals acquired an Industry Certification and/or Educational Degree. In response to these results, TANF explained that timeframe included job retentions which may have been impacted by the pandemic and that the program expects higher rates of retention in subsequent quarters; similar to the analysis for Title I and III above. Furthermore, the TANF program state that the Rhode Island minimum wage has increased since this time period and TANF expects later quarters to show higher average wages.

Lastly, the state's two Local Workforce Development Areas were assessed based on the primary indicators of performance for WIOA Adult, Dislocated Worker, and Youth programs within their respective local areas; as well as their progress in achieving the state's vision and goals, as outlined in the State Plan. The Providence/Cranston local area and Greater Rhode Island local area were determined to have performed successfully on all Title I indicator scores.

Both local areas were also assessed on the degree to which their local plans, and their activities, helped to achieve the vision and goals outlined in the State Plan. The state found multiple examples of the local areas increasing outreach to underserved populations, streamlining service delivery, promoting workforce resources to industry and small business, and innovating policies to improve and expand the capacity of the local area.

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C. EVALUATION

Describe how the State will conduct evaluations and research projects of activities carried out in the State under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA (WIOA Section 116(e)).

Rhode Island recognized in early 2022 that it lacked the capacity to conduct regulation evaluations of WIOA core programs. In August 2022, the Rhode Island Department of Labor and Training (RIDLT) lead a coalition of partner WIOA state agencies in applying to the 2022-2023 Evaluation Peer Learning Cohort (EvalPLC) hosted by the United States Department of Labor in the hopes that the initiative would offer a shared space where the state could identify collective evaluation needs and wants, receive guidance and support from experienced facilitators on how to overcome barriers to collaboration, and begin the development of an action plan for joint data analysis and performance evaluation. The Rhode Island team was comprised of ten individuals from each of the four core WIOA programs, plus TANF; as well as an observer representative from the SNAP Employment and Training program. Each WIOA program appointed one program and one data/evaluation staff person to the effort.

The state partners' participation in the EvalPLC was of great value and has considerably enhanced our capacity for conducting WIOA Section 116(e)-compliant evaluations. The result was a multiagency memorandum of understanding that authorizes cross program evaluations designed by the various WIOA administrative agencies. The structure of such evaluations is shared with state and local boards for their review and input; and completed evaluations, with associated findings and results, are shared with state and local boards.

As State Workforce Agency and administrative agent for the State Workforce Development Board, the Department of Labor and Training will serve as lead for conducting WIOA evaluations. The evaluations will be overseen by the Department's PhD-level Director of Data and Performance, in concert with designated staff from each involved program.

In Fall 2023 the state began its first cross-program evaluation - a study of the geographic location of the WIOA service locations and their associated outreach and recruitment networks, as compared to state's communities and subcommunities of greatest economic need. The design and scope of this evaluation was consistent with the state WIOA Plan and the Governor's priority of ensuring equitable access and a specific focus on serving traditionally underserved communities. A copy of the evaluation will be made available to the regional USDOL-ETA team upon completion.

The evaluation helped inform the development of this state plan and will continue to inform the board's strategic decision making. As the state completes additional WIOA evaluations; those assessments and any resulting actions, such as policy changes or adjustment in strategy, will be shared with partner federal agencies at the appropriate time.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

A. FOR TITLE I PROGRAMS

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Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

I. YOUTH ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 128(B)(2) OR (B)(3)

Youth funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii) and memorialized in the state's annual allocation policy. The three data factors utilized by the State for calculation of the formula are:

- 33 1/3 percent of WIOA Youth funds are allocated on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each Local Workforce Development Area as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in the State;
- 33 1/3 percent of WIOA Youth funds are allocated on the basis of the relative excess number of unemployed individuals in each Local Workforce Development Area as compared to the total excess number of unemployed individuals in all Workforce Investment Area in the State; and
- 33 1/3 percent of WIOA Youth funds are allocated on the basis of the relative number of economically disadvantaged youth within each Local Workforce Development Area as compared to the total number of economically disadvantaged youth in the State.

II. ADULT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) OR (B)(3)

Adult funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii) and memorialized in the state's annual allocation policy. The three data factors utilized by the State for calculation of the formula are:

- 33 1/3 percent of WIOA Adult funds are allocated on the basis of the relative number of unemployed individuals residing in areas of substantial unemployment in each Workforce Investment Area as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in the State
- 33 1/3 percent of WIOA Adult funds are allocated on the basis of the relative excess number of unemployed individuals who reside in each Workforce Investment Area as compared to the total excess number of unemployed individuals in the State; and
- 33 1/3 percent of WIOA Adult funds are allocated on the basis of the relative number of economically disadvantaged adults within each Workforce Investment Area as compared to the total number of economically disadvantaged adults in the State.

A hold harmless provision (establishing a 90% minimum of previous two fiscal years funding) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.

III. DISLOCATED WORKER EMPLOYMENT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) AND BASED ON DATA AND WEIGHTS ASSIGNED

Dislocated Worker funds are allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii).

- Unemployment data;
- Unemployment concentrations;

- Plant closings and mass layoff data;
- Declining industries data;
- Farmer-rancher economic hardship data; and
- Long-term unemployment data

Because Rhode Island lacks sufficient data for the Farmer/Ranch Economic Hardship factor; no weight has been assigned to that category. The state then assigns the following weights to the remaining factors:

- Insured unemployment data 18%
- Unemployment Concentrations 18%
- Plant closings and mass layoff data 23%
- Declining industries data 18%
- Long-term unemployment data 23%

A hold harmless provision (establishing a 90% minimum of the previous two-year average share of the state allotment) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.

B. FOR TITLE II

I. DESCRIBE THE METHODS AND FACTORS THE ELIGIBLE AGENCY WILL USE TO DISTRIBUTE TITLE II FUNDS.

Rhode Island Department of Elementary and Secondary Education (RIDE), the State Eligible Agency for adult education, awards federal and state adult education funding in compliance with 34 CFR part 463, Subpart C, through a competitive request for proposals (RFP) process which establishes multi-year contracts with eligible providers that have demonstrated past effectiveness in providing adult education and literacy services. Eligible providers 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.

Consistent with WIOA Final Rules Subpart C, 463.24, an applicant must demonstrate past effectiveness by providing performance data on its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the state's application for funds. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transitions to postsecondary education and training.

Eligible providers may apply as a consortium with other eligible entities to consolidate and leverage resources. If eligible entities apply as a consortium, each consortium member must submit demonstrated effectiveness data and meet the definition of demonstrated effectiveness requirements.

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There are two ways in which an eligible provider may meet the requirements for demonstrating effectiveness:

1. An applicant that is a current RIDE Adult Education grantee must provide performance data from the state-administered adult education Management Information System (MIS) to demonstrate past effectiveness.

2. An applicant that is not a current RIDE Adult Education grantee must provide performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals, particularly eligible individuals who have low levels of literacy in the content domains of reading, writing, mathematics, English language acquisition, including evidence of its success in achieving outcomes related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

Eligible providers may propose some or all of the following allowable activities; providers may also propose these services concurrently:

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

In awarding grants or contracts, RIDE considers the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in local workforce development plans, and would serve individuals in the community identified in such plans as most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
3. The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy, and the degree to which those improvements contribute to meeting the state–adjusted levels of performance for the primary indicators of performance described in WIOA section 116;
4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108 of the ACT, as well as activities and services of the core partners;
5. Whether the eligible provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;

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6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, One-Stop/American Job Centers, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, in the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance; and

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE submits an application to RIDE containing such information and assurances as RIDE may require, including:

1. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

2. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;

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3. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;
4. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
5. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
7. Any information that addresses the 13 considerations described under section 231(e), as applicable.

As required by WIOA section 107 (d)(11)(B)(i), RIDE partners with the state's two Local Workforce Development Boards (LWDBs) to review each Title II grant proposal for alignment with the Local Workforce Plan. The LWDBs provide recommendations to promote greater alignment with the Local Plan. Applicants may be required to modify their service delivery proposal to be more consistent with the plan as a condition of funding.

In addition to federal considerations and requirements, the state has prioritized other factors in distribution of Title II funds, based on characteristics of the state's established adult learner population and emerging needs. Other factors taken into account include: ensuring geographical distribution of activities to support statewide access, and ensuring alignment between providers' enrollment capacity and census data about potential local demand. The changing demographics of the state's population, as reflected in census data, is another factor in determining distribution of Title II funds. English language acquisition activities continue to be a priority for the state, as English language learners consistently make up more than half of all adult education learners in Rhode Island. In the first funding competition post-pandemic, the state prioritized high-quality Integrated Education and Training (IET) pathways for college and career, making IET Technical Assistance resources available to all potential applicants. Another post-pandemic priority is ensuring program accessibility, including providers' readiness to continue offering services in multiple modalities (in-person, distance, and blended) in order to extend learning beyond the classroom and provide flexibility to meet the needs of adult learners.

II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS 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.

Application processes for adult education funds are uniform to ensure a standardized approach to the review of proposals and awarding of funds. Funding competitions are widely advertised by the Department of Education, including on social media. All current providers and other potential applicants that request information prior to the announcement receive information on the same day as the public notice of the competition. The same application and review procedures are used for all eligible providers to ensure that all applicants have direct and equitable access to apply and compete for Title II grants and contracts, including WIOA Sections 225 (Corrections), 231 (Grants) and 243 (IEL/Civics).

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The state requires that all grants and contracts are competed in the same manner, using the same processes and templates, to ensure direct and equitable access. All information related to this and all grants and contracts is posted on the state Department of Education website and provided to those in contact with the state agency. Additionally, the Department has used technology to support information-sharing. A bidders' conference and an online form allow opportunities to ask questions about the funding opportunity; responses to questions received are made available on the Department's website. Because expansion of high-quality Integrated Education and Training (IET) programs is a priority for Rhode Island, the Department made Technical Assistance (TA) related to design and implementation of IET programs available to all potential applicants, with a public-facing webinar. Recordings of the bidders' conference, TA webinar, and related resources, were posted to the RFP section of the RIDE adult education webpage for viewing on demand.

C. VOCATIONAL REHABILITATION PROGRAM

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

Rhode Island has only one designated state unit for VR services that encompasses all populations and activities.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

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

Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

I. DESCRIBE THE STATE'S PLANS TO MAKE THE MANAGEMENT INFORMATION SYSTEMS FOR THE CORE PROGRAMS INTEROPERABLE TO MAXIMIZE THE EFFICIENT EXCHANGE OF COMMON DATA ELEMENTS TO SUPPORT ASSESSMENT AND EVALUATION

WIOA Core Programs are administered across several state agencies each with separate case management and performance data systems. While unifying these information management systems has remained elusive; Rhode Island is working to maximize the efficient exchange of common data elements to support assessment and evaluation. Rhode Island recognized in early 2022 that it lacked the capacity to conduct regulation evaluations of WIOA core programs. In August 2022, all partner agencies administering core WIOA programs submitted a joint application to the 2022-2023 Evaluation Peer Learning Cohort (EvalPLC) hosted by the United States Department of Labor. The Rhode Island team was comprised of ten individuals from each of the four core WIOA programs, plus TANF; as well as an observer representative from the SNAP Employment and Training program. Each WIOA program appointed one program and one data/evaluation staff person to the effort.

The state partners' participation in the EvalPLC was of great value and has considerably enhanced our capacity for conducting WIOA Section 116(e)-compliant evaluations. The result was a new baseline analysis using GIS, which was a method not previously used to evaluate integrated data on agency service delivery. More importantly, the project resulted in a new legal infrastructure authorizing cross program evaluations designed by the various WIOA administrative agencies. As State Workforce Agency and administrative agent for the State Workforce Development Board, the Department of Labor and Training will serve as lead for conducting these evaluations which will be overseen by the Department's PhD-level Director of Data and Performance. This work has offered a considerable boost to the state's ability to exchange common data elements and complete evaluations. Any evaluations completed will be shared with appropriate parties, including the USDOL when applicable.

Some direct interoperability is presently occurring between certain core and partner WIOA programs. WIOA Adult, Dislocated Worker and Youth data systems are already integrated with Wagner-Peyser with the Rhode Island Department of Labor and Training (DLT). DLT utilizes an Management Information System (MIS) developed by Geographic Solutions Inc. (GeoSol) that integrates reporting and case management for these core programs as well as Trade Adjustment Assistance for Workers, Jobs for Veterans State Grant and other ETA programs including Registered Apprenticeship. Adult Education and Vocational Rehabilitation are located at the Departments of Education and Human Services respectively have their own systems of reporting.

II. DESCRIBE THE STATE'S PLANS TO INTEGRATE DATA SYSTEMS TO FACILITATE STREAMLINED INTAKE AND SERVICE DELIVERY TO TRACK PARTICIPATION ACROSS ALL PROGRAMS INCLUDED IN THIS PLAN

Four of Rhode Island's six core WIOA programs (and seven of the twelve total programs party to this combined plan) are presently integrated into one intake and client management system. WIOA Adult, Dislocated Worker, Youth, and Wagner-Peyser - as well as Trade Adjustment Assistance for Workers, Jobs for Veterans State Grant, the Senior Community Service Employment Program, and other ETA programs (including Registered Apprenticeship) are administered by the Department of Labor and Training and managed in the same data system. Currently, the Department of Education (Title II) and the Office of Rehabilitation Services (Title IV) utilize their own client management systems, as does partner program Temporary Assistance to Needy Families (TANF). Unemployment Insurance and Perkins Career and Technical Education operate independently as well.

While a single multi-agency intake and client management system for all six core (and all twelve core and partner) programs remains elusive; the three state agencies that oversee core and partner WIOA programs have collaborated on other measures to help streamline intake and service delivery including more frequent data sharing and regular interagency meetings at the administrator level to troubleshoot issues and promote further integration.

For TANF (RI Works), the Department of Human Services uses two state systems. One, RIBridges, is an integrated eligibility data system for 17 DHS programs, including RI Works, the Supplemental Nutrition Assistance Program, Medicaid, and the Child Care Assistance Program. Vendors do not have access to RIBridges. Rather, to communicate participant information, such as attendance in required activities, to the Department, RI Works vendors enter data into a separate shared data system called "EARR" (Employment Activity Referral and Response) system. Vendors also receive information about referred participants through EARR. Both DHS ECAs and vendor staff enter data into their own systems as well as EARR.

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DHS has worked with the vendors to create dashboards of important participant information. To ensure the dashboards present accurate data from vendors, DHS requires the vendors to submit monthly data in a warehouse completed with over 60 data points about each of their RI Works parents. DHS then uses those data elements to monitor RI Works and participant outcomes as part of the Active Contract Management approach. Using the vendor-reported data, DHS generates reports and dashboards and uses those to review vendor performance and track program trends over time. To ensure data quality, DHS cross-checks the information it receives in monthly reports with the EARR data that vendors enter.

In the past few years, Rhode Island has made measurable progress in promoting the secure sharing of client information across these systems. In 2019 a pilot interface was implemented to establish a coordinated information sharing of SNAP and TANF eligibility with DLT programmatic eligibility. Through this interface, eligibility is fed directly into the state programmatic MIS. The state utilizes the Work Opportunity Tax Credit interface to combine SNAP and TANF eligibility requirements with WIOA eligibility and assesses the shared data on a weekly cadence. This supports a streamlined consistency of services and takes the burden off of the client to show duplicative forms of proof of need.

There are additional opportunities for integrating backend functions such as grant administration and oversight. Rhode Island is in the process of launching a new statewide Grant Management System (GMS). State agencies are gradually transitioning to this new system, but full installation will occur during the 2024-2027 plan period. Eventually all federal (and state) funded grant programs will shift to the GMS, streamlining and unifying the award, management, and monitoring process, and dramatically simplifying the subrecipient experience.

III. EXPLAIN HOW THE STATE BOARD WILL ASSIST THE GOVERNOR IN ALIGNING TECHNOLOGY AND DATA SYSTEMS ACROSS REQUIRED ONE-STOP PARTNER PROGRAMS (INCLUDING DESIGN AND IMPLEMENTATION OF COMMON INTAKE, DATA COLLECTION, ETC.) AND HOW SUCH ALIGNMENT WILL IMPROVE SERVICE DELIVERY TO INDIVIDUALS, INCLUDING UNEMPLOYED INDIVIDUALS

The Data and Performance staff of the State Workforce Development Board is party to a number of statewide data governance and oversight bodies convened by the office of the Governor. The work of the State Workforce Development Board in promoting data uniformity and secure data sharing has been viewed as model to help other agencies adopt similar practices. The State Workforce Development Board has helped informed the development of template data sharing agreements along and responsibly advocates, when necessary, for policy changes as needed to establish data sharing agreements.

Perhaps the most impactful update concerning the state board's efforts with the Governor in aligning technology and data collection was the codification of the state's Longitudinal Data Systems into law. In June 2023, the Rhode Island Longitudinal Data Systems Act (R.I. Gen Law Chapter 42-165) was signed into law by Governor Dan McKee. The Act officially established the Rhode Island Longitudinal Data System (RILDS) within Office of the Postsecondary Commissioner (OPC) and appointed a governing board composed of the Director of the Department of Administration (DOA), the Director of the Office of Management and Budget (OMB), the Chief Digital Officer, the Commissioner of Postsecondary Education (OPC), and the Executive Director of the RILDS Center; along with leaderships from the three agencies that oversee WIOA core and partner programming; the Commissioner of Department of Education (RIDE), the Director of Labor and Training (DLT), and the Secretary of the Executive Office of Health and Human Services (EOHHS) The Act also allocated funding for 3.0 new full-time equivalent (FTE) positions at RILDS using general revenue, with the purpose of assisting in

state-directed policy research. Amendments to the Act in 2025 expanded its scope by incorporating data managed by the state's Executive Office of Health and Human Services, enabling greater cross-linking as well as access to additional Medicaid grant funding to support this work. The state is currently procuring a vendor to build out a Secure Data Research Enclave where state decisionmakers can access linked data without any movement from source systems. Such platforms are the next evolution of integrating administrative data for program evaluation and analysis.

Prior to this change there was a chance that the RILDS might degrade or dissolve entirely without a secure source of funding, a governance body with representation at the highest levels of state leadership, and an administrative 'home.' The system now provides a clear governance structure where agency directors meet quarterly to set system priorities and review integrated data requests. Administrative data are shared with the RILDS at established intervals so timely interagency data is available when needed. With the RILDS established in statute as the state's primary data collection and analysis vehicle for education and workforce matters; the WIOA system can benefit from much more efficient evaluation, analysis, and actionable data sharing. Rather than a limited, ad-hoc query of one or more data sets, all WIOA partner programs are connected, or should soon be connected, the RILDS and can submit and request custom queries and analysis which can help improve/improve performance and service delivery. The agencies administering WIOA programming have already begun discussions on how this asset can be utilized to improve service. For example, the partners have had informal inquiries whether any specific combination or services, or sequence of services, could be shown to have a statistically significant impact on outcomes. Recent projects by the RILDS, such as an assessment of the education pathways that lead to higher wages among Rhode Island foster youth, pave the way for projects that could identify how WIOA programs can support such pathways. It may be worth noting that the RILDS is of particular utility in a geographically small state like Rhode Island. While in larger states there may be multiple levels of separation between the LDS and local WIOA decision-makers and practitioners; in Rhode Island there are direct and near-direct connections between the work of the LDS and the WIOA system. For example, state agency leadership governing the RILDS also directly oversee WIOA programming; these parties see the needs that the system can highlight and can relay the changes back in real time.

While the RILDS offers 'backend' connectivity and alignment; the WIOA core and partner programs will continue to explore opportunities for frontend alignment of data systems. During the previous plan period, the State Workforce Agency led an effort to review all partner intake/application forms and identify overlap and commonalities. While there are no current plans for a common intake system or data collection system, the WIOA core and partner programs all collaborate with the state Division of Enterprise Technology Strategy and Services (ETSS) and the state's Office of Digital Excellence on ways to improve public service and align technology. All partner programs are also working closely with the state Department of Administration on the rollout of the afore-mentioned statewide Grant Management System (GMS). Through the leadership of the Governor's office; state agencies are gradually transitioning to this new system for the award, fiscal management, performance management and monitoring of federal grants. While there is no immediate benefit to individual participants through this effort; the overall system (and the subrecipients and providers that are often the front line of that system) will benefit considerably from a more uniform, predictable, and streamlined process.

IV. DESCRIBE THE STATE'S DATA SYSTEMS AND PROCEDURES TO PRODUCE THE REPORTS REQUIRED UNDER SECTION 116, PERFORMANCE ACCOUNTABILITY SYSTEM. (WIOA SECTION 116(D)(2)).

Previously, reporting for the WIOA Annual State Performance Report involved the Department of Labor and Training securely obtaining electronic files for each State agencies responsible for the respective core programs. Individual records in each of these electronic program files were matched against the state Unemployment Insurance database. If a participant's earnings and employment record was not included in the state database; that information was then queried against the national Wage Record Interchange System (WRIS). Earnings and Employment status data was then securely returned back to the sending agency for reporting purposes. Beginning with the transition to the new State Wage Interchange. System (SWIS) and continuing to current day; the Department of Education and the Office of Rehabilitation Services have respectively been designated as Performance Accountability and Customer Information Agencies (PACIAs) and are responsible for querying their own interstate wage records. All core programs and providers request and collect data at client intake and input into their respective information management systems.

The Department of Labor and Training is currently responsible for reporting wages, entered employment rates, and employment retention rates for individuals who exit in the Wagner-Peyser, Adult, Dislocated Worker, Youth, and Trade Adjustment Assistance programs. The Department is also responsible for collecting data and generating the Eligible Training Provider Performance Report required under WIOA. Once the waiver providing an exemption from data collecting for Eligible Training Provider (ETP) Performance reporting expired; the Department conducted an education and technical assistance series for all active ETPs on why all student data was required, what it would be used for, and how to securely submit this data through the Title I Management Information System.

The Department of Education is responsible for preparing the performance accountability reports required under section 116 for Title II. All AEFLA providers are required to enter data into Title II's Management Information System (MIS) at minimum on a monthly basis. Apart from data collected at the local level, state office staff carry out earnings and employment status data matching for those participants who provide a Social Security Number (SSN). Local providers conduct outcome surveys with participants who do not provide a SSN and manually enter outcomes into the MIS. Additionally, the Department of Education works with the State Longitudinal Data System (SLDS) to match earning and employment outcomes using non-SSN fields. Data matching for postsecondary enrollment and credentialing outcomes is carried out annually, in partnership with the Office of the Postsecondary Commissioner. The state's Title II MIS produces all the reports required under section 116, based on the information entered into the system.

The Office of Rehabilitation Services (ORS) is responsible for utilizing its case management system to record and report WIOA participants' wages, employment rates, and employment retention for individuals with disabilities who received ORS services. Additionally, ORS utilizes MIS to collect all other reporting data required by WIOA. The ORS maintains a Data Sharing Agreement with the Department of Labor and Training (DLT) to enable matching of individual records to the State Unemployment Insurance database. Earnings and employment data is then securely returned to the agency. With the transition to the new State Wage Interchange System (SWIS), and ORS being designated as a Performance Accountability and Customer Information Agency (PACIA), if a participant's earnings and employment record was not included in the state database, that information is then queried against the national Wage Record Interchange System (WRIS). Earnings and Employment status data is then securely returned to ORS for reporting purposes.

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Lastly, the State Workforce Development Board helps to aggregate employer service data and information from all three agencies before calculating statewide Employer Penetration Rate. Similar analysis is conducted on the client earnings and employment information to determine Employer Retention. The Department of Labor and Training remains the lead agency in developing the Effectiveness in Serving Employers Report.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

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

Rhode Island has made considerable progress in building out its statewide longitudinal data system (https://rilds.org/). RILDS now integrates K-16 public education data, human service data, public workforce system data, child welfare data, and employment and earnings data, as well as smaller data sets. The State Workforce Development Board was closely involved in the launch and continued growth of the LDS and seeks to include follow-up capability regarding completion of education and attainment of degrees by use of higher education data. As mentioned previously, the LDS is now codified in state law and has a designated state funding stream.

Consistent with the USDOL and Presidential Administration's focus on utilizing earnings data to better demonstrate return on investment; Rhode Island is reviewing options for additional state level metrics beyond the core WIOA performance measures. One such measure would extend the earnings query one quarter prior to participant exit; and two quarters beyond the current WIOA mandated 4th quarter after exit. The resulting data would provide a fuller picture of the impact of services on individual employment and earnings based on the individuals' economic circumstances. The metrics are not yet in place but will be under review and consideration throughout the plan period.

C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

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

Rhode Island has utilized Unemployment Insurance (UI) wage records for many years for performance accountability and for labor market information. Currently, wage records are used to calculate performance measures for Title I, Title II, Title III and Title IV programs as prescribed in WIOA.

The Rhode Island Department of Labor and Training is the state Unemployment Insurance agency and also administers Title I programming. UI wage record data is provided to Title I through data match and transfer between those two divisions. Wage records are utilized to verify participant data for Title I core performance measures as well as internal analysis of ETPL training institutions, programmatic priorities, and strategic planning.

The Rhode Island Department of Education is a designated Performance Accountability and Customer Information Agency under the State Wage Interchange System (SWIS) Data Sharing Agreement and administers Title II programming. UI wage records are used to verify participant employment data two quarters and four quarter after exit and while calculating median wage earnings.

The Rhode Island Department of Labor and Training also administers Title III Wagner-Peyser programming and uses UI wage records for core performance and internal analysis.

The Office of Rehabilitation Services (ORS) within the Department of Human Services is a designated Performance Accountability and Customer Information Agency under the State Wage Interchange System (SWIS) Data Sharing Agreement and administers Title IV programming. UI wage records are used to verify participant employment data two quarters and four quarter after exit and while calculating median wage earnings.

D. PRIVACY SAFEGUARDS

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

The State of Rhode Island takes its responsibility to protect the privacy of individuals and their personally identifiable information (PII) very seriously. Case managements systems, data transfer protocols, and sensitive document handling procedures administered by the Department of Education, Department of Labor and Training, and the Department of Human Services all comply with internal state data security and privacy requirements and include all requisite safeguards to comply with state and federal law.

EmployRI, the State's Virtual America's Job Center (AJC) and Case Management Information System, provides the highest level of confidentiality where required and conforms to federal law Sec. 205 [42 U.S.C.] (c) (C) (vii). The Virtual AJC system supports the security standards recommended for State Employment Security Agencies by the Information Technology Support Center, College Park, Maryland. The system supports username and password access. The username determines the access level and whether a user may access certain services and confidential data. If a user does not have privileges to view certain data, these fields will not be shown.

To secure Virtual AJC internet communications, a Secure Sockets Layer (SSL) encrypts a session between the server and the Web user. SSL is a highly reliable program layer for managing the security of message transmissions in a network. The programming for maintaining data confidentiality is contained in a program layer between an application such as Virtual AJC and the Internet's TCP/IP layers. The "sockets" part of the term refers to the socket methods of passing data back and forth between a client and a server program in a network or between program layers in the same computer. SSL uses the public-and-private key encryption system for RSA. This Internet authentication system uses an algorithm that also includes the use of a digital certificate. The following data is always encrypted when is accessed by a Virtual AJC:

- Social Security Number
- Federal Employer Identifier Number
- Wage Records
- Individual benefits and public assistance Information
- User ID and Password

The controls in the Virtual AJC Administration Site and the SSL method for security give the Virtual One-stop the means to protect confidential information and restrict access to that data. The state's Virtual AJC has been successful with these methods of security.

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7. PRIORITY OF SERVICE FOR VETERANS.

A. DESCRIBE HOW THE STATE WILL IMPLEMENT THE PRIORITY OF SERVICE PROVISIONS FOR COVERED PERSONS IN ACCORDANCE WITH THE REQUIREMENTS OF THE JOBS FOR VETERANS ACT, CODIFIED AT SECTION 4215 OF 38 U.S.C., WHICH APPLIES TO ALL EMPLOYMENT AND TRAINING PROGRAMS FUNDED IN WHOLE OR IN PART BY THE DEPARTMENT OF LABOR.

B. DESCRIBE HOW THE STATE WILL MONITOR PRIORITY OF SERVICE PROVISIONS FOR VETERANS.

C. DESCRIBE THE TRIAGE AND REFERRAL PROCESS FOR ELIGIBLE VETERANS AND OTHER POPULATIONS DETERMINED ELIGIBLE TO RECEIVE SERVICES FROM THE JOBS FOR VETERANS STATE GRANTS (JVSG) PROGRAM'S DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALIST/CONSOLIDATED POSITION.

As required by 38 U.S.C 4215 (b) and 20 CFR part 1001 and 1010, Rhode Island ensures that all eligible veterans and covered persons receive priority access for all career service opportunities for which they qualify within the employment service delivery system and any sub-grantee funded in whole or in-part by the United States Department of Labor.

Key Definitions:

Covered Person – the regulations adopt and apply this statutory term, which includes veterans and eligible spouses.

Veteran – the regulations specify that the definition for veteran specified at 38 U.S.C. 101(2) applies across all qualified job training programs for the purpose of priority of service. The definition includes two key criteria:

- Service in the active military, naval, or air service
- Discharge under conditions other than dishonorable

Eligible Spouse – means a spouse of any of the following:

- A spouse of any veteran who died of a service- connected disability;
- A 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 a hostile force; or
    - Forcibly detained or interned in the line of duty by a foreign government or power.
- A spouse of any veteran who has a total disability resulting from a service- connected disability, as evaluated by the Department of Veterans Affairs; or
- A spouse of any veteran who died while a disability was in existence.

Rhode Island's local Workforce Development Boards (LWDBs) will ensure their local plans provide clear strategies and policies for providing Covered Persons with priority for the highest

quality of service at every phase of services offered. Policies shall be implemented to ensure eligible veterans and eligible spouses are aware of:

- Their entitlement to priority of service
- The full array of programs and services available to them
- Any applicable eligibility requirements for those programs and/or services

Priority of Service to Covered Persons means when customers self-attest they are a veteran or an eligible spouse, they are given precedence over eligible non-covered persons for the receipt of employment, training and placement services provided under new or existing qualified job training programs. If a customer self-attests, they must meet eligibility for POS under 38 USC Section 4215. Veterans or eligible spouses shall receive access to the service or resources before noncovered persons. If the service or resource is limited, the veteran or Covered Person receives access to the service or resource instead of or before the non-covered person. For example, this could mean:

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

At the point of entry all covered persons are given an opportunity to be screened by American Job Center (AJC) staff member using the "Veteran Intake Form" available at all AJC fronts desks, on Teams, and ERI Docs folders. When an eligible veteran or eligible person has indicated that they have one or more qualified Employment Barriers (EBs) as outlined in Veteran Program Letter (VPL) No. 05-24, then a referral is made to a Disabled Veteran Outreach Specialist (DVOP) or a Consolidated Position (CP), where applicable, for individualized career services. The AJC staff member will enter a "Principal Veteran Initial Screen/Referral to DVOP: 102/135 Code" (107/135 for RESEA) case note and activity codes in the MIS. In an event that a DVOP or CP is unavailable the covered person is afforded the opportunity to be seen by next available AJC staff member. The veteran may choose to wait to be seen by the DVOP, but if they choose not to the covered person will be served by the next available AJC staff member to ensure timely access to services. In addition, the covered person's information is referred to the AJC managers who are responsible for ensuring he or she will be outreached by a DVOP, or CP where appropriate, for individualized career services by the next available DVOP. If a covered person does not have the documentation verifying his or her eligibility for priority of service at a point of service, he or she is afforded access on priority basis to all services provided by program staff (including an intensive service) while awaiting verification.

The state's MIS also includes content that explains priority of service, as well as provides covered persons the opportunity to self-identify as a veteran or eligible spouse through virtual self-service registration. Questions are embedded at initial enrollment that will also act as the screening tool to identify a Qualified Employment Barriers (BEs), identify potential eligibility for JVSG-funded individualized career services and other appropriate referrals, and establish interest in receiving DVOP services via question: "Are you interested in receiving one-on-one career planning or help finding employment from a staff member?" as outlined in Veteran Program Letters (VPL) No. 05-24. When a covered person has indicated potential eligibility for JVSG-funded services, the MIS will generate a notification that will be sent to the Veterans Program Manager and/or the closest geographically located AJC to be outreached by a DVOP or CP where appropriate.

The Veteran Service Coordinator will assist AJC managers in the verification process of covered persons by providing expertise in veteran documents and priority of service training. In such cases where a covered person is unable to produce supporting documents at point of enrollment, they will be able to gain access to training funds as a non-covered person until supportive documentation is verified. During this time, DVOP specialists or CP where authorized, and/or AJC staff members will continue to render individualized career services to the veteran or eligible person per self-attestation as first indicated at point of entry. In addition, DVOP specialists, CP where authorized, and AJC staff will assist covered persons with resources to recover these documents, while continuing to provide services.

Rhode Island also promotes outreach and recruitment of veterans for career services and programming. To that end, Veteran Service Coordinator, DVOPs, CPs where authorized, and AJC staff will collaborate with regional veterans' service organizations, as well as the state's office of veterans affairs (http://www.vets.ri.gov/) to raise awareness and familiarity of available WIOA programming, as well as veterans' priority of service.

Training on priority of service regulations, veteran referral processes and guidance on the "Veteran Intake Form" will be provided on no less than an annual basis by the Veterans Program Manager or assigned Veteran Representative when authorized, as well as by American Job Center managers and other appropriate partners. Initial oversight of priority of services to covered persons at point of entry will be monitored by the ETA 9002F quarterly report. Oversight also includes review of intake practices, staff training, case file documentation, and corrective action when necessary. In addition, the ETA 9002F report will indicate the percentages and total number of covered persons receiving staff-assisted services during the entry period; this report will be review and monitored for compliance. Ongoing monitoring to ensure that Priority of Service for Covered Persons is successfully implemented statewide is responsibility of the Department of Labor and Training as well as LWDB leadership.

The JVSG staff, the State Office of Veterans Affairs, and the monitoring staff within the Department of Labor and Training, are available to provide technical assistance when requested or needed. Monitoring activities generally include on-site visits, interviews with staff, and regular reviews of local plans and (if available) LWDB policies related specifically to "Priority of Service for Covered Persons." Furthermore, the JVSG staff will identify issues and resolutions to Priority of Service as they arise.

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

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

Rhode Island is committed to making all services, facilities, and information accessible for individuals with disabilities. This applies to all programs, activities, services provided by or made available to potential employees, volunteers, contractors, service providers, licensees, clients, and potential clients within the Local Career Centers.

To reinforce this commitment, all recipients and service providers are required to provide written assurance in their agreements, grants, and contracts that they are committed to and will comply with the requirements of the WIOA Section 188, the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, and with 29 CFR Part 32 and Part 38.

The State-level Equal Opportunity Officer acts as the agency's ADA Coordinator to oversee ADA efforts, as required. When applicable, recipients must have established policies and procedures addressing reasonable accommodations, auxiliary aids and services, effective communication; and site selection assuring accessibility. These recipients must also conduct self-evaluations which include corrective action plans, when necessary, that are developed to ensure compliance with obligations not to discriminate on the basis of disability and to provide reasonable accommodations. In addition, when the State enters into contractual agreements with WIOA recipients, compliance with program-specific laws and regulations are specified as standard boilerplate language. This same language further specifies that sub-recipients are required to comply as well. Ongoing training and monitoring ensure that partner programs continue to meet their requirements not to discriminate. In the written contracts Terms and Conditions require all contractors meet the requirements of the ADA.

In 2025, monitoring of the state's American Job Centers was completed. No significant violations were noted, and some recommendations were made to improve signage. To date, there have been three complaints of discrimination filed against the Local Career Centers, all of which were thoroughly investigated by the Local and/or State Equal Opportunity Officers. Two complaints have been resolved, and one is pending.

The State-level EO Officer performs site visits to ensure a facility remains in compliance unless compliance issues require more frequent visits. The ADA Checklist for Readily Achievable Barrier Removal may be utilized as a field evaluation. Site reviews for accessibility to individuals with disabilities include wheelchair accessible entrances, signs indicating the nearest accessible entrance, designated restrooms, TTY-TDD or Relay Services. Additionally, the state recommends that all LWDAs conduct an annual facility self-assessment using the ADA Checklist for Readily Achievable Barrier Removal and inform the State-level EO officer of any potential deficiencies.

Provide programmatic accessibility for persons with disabilities.

Entities within the local American Job Centers, including operators and partners, must comply with Section 188 of WIOA, if applicable, and applicable provisions of ADA regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities.

The LWDAs are committed to complying with the requirements of WIOA Section 188 and the ADA to maximize access to services for people with disabilities. Entities within Local Career Centers are required to comply with WIOA Section 188 and the ADA by implementing policies, procedures, protocols and practices for programmatic accessibility of facilities, programs and services. The Local Career Centers will comply with the ADA by promoting inclusion, choice, and accessibility.

The state One Stop Certification Policy, Workforce Innovation Notice 02-05, lists the following criteria to be utilized when determining Programmatic and Physical Accessibility:

- Reasonable accommodations are available for individuals with disabilities and services are delivered in the most integrated setting appropriate.

- Electronic materials are 508 compliant.
- Assistive technology is available.
- Translation/interpretation services are available when needed.
- Programmatic assessment is performed/updated annually.
- Center is physically accessible for individuals with disabilities and the assessment is performed/updated annually.

The policy provides local areas the flexibility to add additional criteria at their discretion. The policy also recognizes the state board responsibility to ensure all one stop centers are assessed annually for physical and programmatic accessibility, in accordance with section 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990. To prevent duplication of efforts, certification criteria under this policy also includes annual assessment requirements. The One Stop Operator and the leadership of the career centers are instructed to coordinate accessibility assessments with the State-level EO Officer and other entities to physically and/or programmatically inspect the on centers. One Stop centers cannot become fully certified until they are in compliance; however, they may be provisionally certified while working towards compliance as required by law.

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE ENGLISH LANGUAGE LEARNERS

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

Rhode Island is focused on continuing to improve accessibility of the One-Stop System for English Language learners. That State's One-Stop Centers provide assistive tools and informative posters in visible locations that indicate language proficiency assistance is available and free of charge. Staff at the One-Stops have been trained on LEP procedures and instructed to recognize individuals with LEP and disseminate appropriate information as needed.

- Language Identification Card: This process provides a Menu of Languages (over 150) that customers can identify and select their language of origin. The staff member has the ability to contact an interpreter immediately by telephone and start the translation process to begin services and help set up future appointments.
- Translation Services: Workforce Development programs have a list of available vendors to perform Interpretation and Translation services for individuals identified as Limited English Proficient Customers. Interpretation services for appointments and programs are available within 24 hours of the customer's request.
- Accessible Operating Systems: Rhode Island recently upgraded technology at two of the states three One-Stop centers. These computers are available to the general public and are equipped with assistive technology as well as language technology. Designated computers are installed with operating systems entirely in Spanish and Portuguese. The Back to Work RI site where clients may make virtual appointments with One Stop staff offers full translation in twelve languages to ensure client accessibility.

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- Internal Bi-lingual Staff: All Comprehensive One-Stop locations have Bilingual staff on hand for immediate assistance. Across the workforce network, the state is focused on increasing the number of bi-lingual and/or promoting and expanding partnerships with appropriate community-based organizations to improve the lingual and cultural competency of the workforce network.
- EmployRI Spanish Module: The state's Virtual One Stop (EmployRI) is also available in Spanish for the benefit of the department's Limited English Proficient customers.
- Vital Document Translation: in PY2023 all vital documents required for awareness of and enrollment in the programs of the One Stop system were translated into Spanish. Outreach documents detailing requirements of programs are sent in both languages and contact information for alternat language options is clearly delineated.

Through appropriate combination of resources detailed above, individuals with LEP can receive services upon meeting with a Department of Labor and Training Job Coach and be provided with information and the ability to enroll in programs they are eligible for. In addition, each Local Area will be charged with demonstrating success in community engagement and outreach to increase the awareness and availability of services beyond the One-Stop location and within the community.

- Office of Community Engagement: The Department of Labor and Training's Office of Community Engagement (OCE) leads the Department of Labor and Training's commitment and strategy to be a diverse, equitable, and inclusive organization, in serving the public. Through the Community Engagement Partners initiative, the office collaborates with community-based organizations to advise the Department of Labor and Training on culturally- and linguistically appropriate programming.
- Community Outreach and Cultural Competency: Each Local Area places emphasis on partnering with culturally competent organizations with trust and positive reputation within the state's increasingly diverse communities, particularly English Language Learners.

Leveraging existing community assets, improved training, and technology, Rhode Island looks forward to continuing to enhance and simplify access to the One-Stop Delivery System for Individuals who are English Language Learners.

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

Strategic planning occurred between all partners in the Combined State Plan:

- Workforce Innovation and Opportunity Act (WIOA) Title I;
- Adult Education and Family Literacy Title II'
- Wagner-Peyser (W-P) Employment Services Title III;
- Vocational Rehabilitation (VR) Title IV;
- Carl D. Perkins Career and Technical Education (Perkins) Act;
- Jobs for Veterans State Grant (JVSG);

- Trade Adjustment Assistance for Workers programs;
- Unemployment Insurance
- Senior Community Service Employment Program (SCSEP); and
- Temporary Assistance for Needy Families (TANF) program;

Representatives from these programs worked in close collaboration, along with the State Workforce Development Board and the Governor's Office, through a series of meetings and discussions to determine and outline the vision, goals, strategies, and action items. Collectively they formed the state plan coordination team.

These meetings ran from May 2023 through December 2023 for the 2024 WIOA State Plan, and then again in November 2025 through April 2026 for the WIOA State Plan Modification. Starting with the vision for workforce established by the Governor and described in the State Plan, the coordination team discussed initiatives, programs, and other innovative practices that fit within the workforce vision.

The team jointly designed the strategic planning process and helped to develop the public and stakeholder input process that was undertaken across all partner programs. Focus groups and surveys were conducted to identify the strengths and weaknesses and opportunities for the system. This feedback was synthesized by the coordination team to develop the strategies outlined throughout the plan. Combined plan partners reviewed draft versions of the goals and strategies and worked together on the development of Operational Planning sections. Each program has had the opportunity to review and comment on these sections of the plan prior to publication for public comment. All initiatives established in this plan are not done in a vacuum, but rather a partnership of agencies working together to improve Rhode Island’s workforce development system.

These partner agencies have worked on previous strategic endeavors and will continue to work together to carry out the strategies and achieve the goals outlined in this Combined State Plan.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that:

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 rep- resents, 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	Yes

The State Plan must include	Include
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;	
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes

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The State Plan must include	Include
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 eligible populations to DVOP services, when appropriate.	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

A. IDENTIFY THE REGIONS AND THE LOCAL WORKFORCE DEVELOPMENT AREAS DESIGNATED IN THE STATE

In consultation with the State Workforce Board and chief local elected officials, the Governor has designated each local workforce development area described below a planning region. Accordingly, a regional plan is not required, and Local Boards submit only a Local Plan to the Governor for approval. The Board may revisit this policy in future; however, the Governor will retain final authority over the identification of regions.

Rhode Island has designated two local workforce development areas with the state:

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- Providence/Cranston Workforce Development Area comprised of Providence and Cranston.
- Greater Rhode Island Development Workforce Area comprised of Barrington, Bristol, Burrillville, Central Falls, Charlestown, Coventry, Cumberland, East Greenwich, East Providence, Exeter, Foster, Glocester, Hopkinton, Jamestown, Johnston, Lincoln, Little Compton, Middletown, Narragansett, New Shoreham, Newport, North Kingstown, North Providence, North Smithfield, Pawtucket, Portsmouth, Richmond, Scituate, Smithfield, South Kingstown, Tiverton, Warren, Warwick, West Greenwich, West Warwick, Westerly, and Woonsocket

B. DESCRIBE THE PROCESS AND POLICY 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

Rhode Island's Local Workforce Development Area Designation policy (Workforce Innovation Notice 01-01) is consistent with WIOA section 106(b). The policy requires the State Workforce Development Board, in consultation with Local Boards and chief local elected officials, to review all requests for local workforce development area designation using procedures outlined in the policy, and to make a recommendation to the Governor regarding the designation of such areas. In reviewing new designation requests, the State Board shall evaluate the extent that requested 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 provisions of WIOA, including whether the areas have the appropriate education and training providers, such as institutions of higher education and career and technical education schools.

The policy describes the criteria by which a Governor must designate a local workforce development area under Initial Designation as well as Subsequent and new Designation. The process for designating local workforce development areas are outlined below:

Initial Designation: For the first two full program year following the date of enactment of WIOA and clarified through the WIOA Final Rule to mean Program Years 2016 and 2017 (July 1, 2016-June 30, 2018), any area that was designated as a local area for the purposes of the Workforce Investment Act of 1998 for the 2-year period preceding the date of enactment of WIOA received initial designation provided they performed successfully, and sustained fiscal integrity (see below). The State's two local Workforce Development Boards both submitted requests for initial designation in November of 2015. A review of their submitted documentation of fiscal and programmatic records indicates that all of the above conditions had been met.

Subsequent Designation: After the period of Initial Designation, the Governor approves subsequent designations as a local workforce development area, if such area:

- performed successfully;

- sustained fiscal integrity; and
- in the case of a local area in a planning region, meets the requirements of planning regions outlined in WIOA [note: Pursuant to state Regional Planning Policy [WIN 01-04]; each local area is designated a planning region; and is thus only required to submit a local WIOA plan]

Consistent with 20 CFR 679.250, local areas are considered to have requested continued or subsequent designation unless the local area and chief elected official notifies the State indicating that they no longer seek designation. Therefore, local areas are not required to submit requests for designation. The Department of Labor and Training reviews the criteria for subsequent designation for local areas considered to request such designation. The Department shares the result of this review with the Governor who approves subsequent designation of any local workforce development area(s) which met the criteria for subsequent designation. The Department then notify the chief elected official(s) within 30 calendar days after the review indicating approval or denial of subsequent designation.

New Designation: The process outlined below is to be followed by a unit or units of local government seeking new designation of local workforce development areas under the WIOA:

Step 1. The local government unit(s) seeking designation of a local workforce development area(s) must coordinate and consult with the chief local elected officials of the local areas and existing local workforce development boards.

Step 2. If a decision is made by the local government unit(s), in coordination with the chief local elected officials, to seek designation under the WIOA, the local government units must undertake a formal public comment period and provide documentation of the results of the formal public comment period with the designation request to partners, including existing local workforce investment boards. The formal comment period must allow for comments by businesses, labor organizations, institutions of higher education, community-based organizations, and the public at-large.

Step 3. The request for designation of a local workforce development area under the WIOA must be submitted to the State Workforce Development Board and must include the following information:

- How the proposed local workforce development area is aligned with labor market areas including information on growth industries and occupations in the local labor market.
- How the proposed local workforce development area is aligned with a regional economic development area within the state of Rhode Island.
- How the proposed local workforce development area can effectively administer activities under WIOA with available federal and non-federal resources, including a description of area education and training providers, a description of how the available resources will be made available for training activities, and a description of the percentage of overall resources administered by the local area that will be dedicated to training activities.

Step 4. After submission of the designation request, the State Workforce Development Board will review the request and provide a recommendation for the Governor. As required by WIOA, the Governor will use the consultation of the Board and consult with chief local elected officials prior to designating local workforce development areas in the state. The Governor may rely on the submissions from the requestor(s) as meeting the requirement for consultation with chief

local elected officials, including the public records of meetings and any recorded votes or resolutions regarding the designation request.

Step 5. Pursuant to WIOA section 106(b), the Governor may designate local workforce development areas in Rhode Island for two-year periods, as appropriate.

For the purpose of determining subsequent local workforce development area designation:

- The term ‘‘performed successfully” means the local workforce development area met or exceeded the adjusted levels of performance for primary indicators of performance for the last two consecutive years for which data are available, and that the local area has not failed the same measure for the last two consecutive program years.
- The term “Sustained Fiscal Integrity” for all program years means the Secretary of the United States Department of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misexpended funds due to willful disregard of the requirements of the provision involved, gross negligence or failure to comply with accepted standards of administration for the two-year period preceding the determination.

At the request of the Governor, the state Department of Labor and Training evaluated labor market structure and distribution, designated economic development areas, distribution of educational and training resources, location of population centers, workforce commuting patterns, labor force conditions, and geographic boundaries. That evaluation concluded that land use and economic planning, public administration and services, economic activity, and commuting patterns were already addressed and reflected in the designation of the state’s two local workforce development areas.

Following that evaluation, the State Workforce Development Board consulted with partner WIOA programs, local workforce boards, and Chief Elected Officials. Following that consultation, the Board recommended to the Governor that each local area (the Providence-Cranston LWDA and the Greater Rhode Island LWDA) be designated a planning region. The Governor endorsed this designation and the states’ approach to regional designation was codified in the Board’s Regional Planning Policy [WIN 01-04]. Accordingly, a regional plan is not required, and Local Boards are only obligated to submit a Local Plan to the Governor.

C. PROVIDE THE APPEALS PROCESS AND POLICY REFERRED TO IN SECTION 106(B)(5) OF WIOA RELATING TO DESIGNATION OF LOCAL AREAS

Rhode Island’s Local Workforce Development Area Designation policy (Workforce Innovation Notice 01-01 includes an appeal process for local areas denied designation. If the State denies designation of a local area, the chief elected official(s) may appeal the decision through the following appeals process:

1. Within 14 days from the date of receipt of the notice of denial, the chief elected official(s) may file an appeal to the State Board by submitting in writing all of the following information:
    a. a statement that the chief elected official(s) is appealing the denial of designation;
    b. the reason(s) why the local area should be designated;
    c. signature of the chief elected official(s).

2. The appeal shall be submitted in writing.

3. The State Board will provide the parties with the opportunity for a hearing, review the appeal, and make a ruling on the appeal within 60 days after the submission of the appeal.

The State Board shall notify the chief elected official(s) in writing, of its decision on whether or not to approve designation of an area as a local area. In the event the State Board denies the appeal or fails to issue a decision within 60 days of the date the appeal is submitted, the chief elected official(s) may further appeal the State Board's decision or lack thereof to the U.S. Department of Labor (USDOL). Pursuant to 20 CFR 683.640, appeals made to USDOL, must be filed no later than 30 days after receipt of written notification of the denial from the State. The appeal must be submitted by certified mail, with return receipt requested, to the following address:

Secretary, U.S. Department of Labor
200 Constitution Ave. N.W.
Washington, D.C. 20210
Attention: ASET

The appellant must establish in its appeal to USDOL that the appellant was not accorded procedural rights under this appeal process, or that it meets the requirements for designation. The appellant must provide a copy of the appeal to the State Board at the same time that the appellant sends the appeal to USDOL.

D. PROVIDE THE APPEALS PROCESS AND POLICY REFERRED TO IN SECTION 121(H)(2)(E) OF WIOA RELATING TO DETERMINATIONS FOR INFRASTRUCTURE FUNDING

Consistent with section 121(h)(2)(E) of WIOA; the state's One Stop Infrastructure Funding policy (Workforce Innovation Notice 02-04) includes a process by which partners may appeal the determination of state infrastructure funding contributions on the basis that such determination is inconsistent with this policy or with any part of section 121(h) of WIOA. The appeals process is as follows:

1. Within 21 calendar days from the date of receipt of the notice of state infrastructure funding determination, the partner(s) may file an appeal to the State in writing that clearly describes the reason(s) the partner is disputing the required contribution amount calculated under the state infrastructure funding mechanism.

2. The State will review the request for appeal.

3. The State will notify the partner of its actions in writing within 30 calendar days upon receipt of the appeal.

2. STATEWIDE ACTIVITIES

A. PROVIDE STATE POLICIES OR GUIDANCE FOR THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM AND FOR USE OF STATE FUNDS FOR WORKFORCE INVESTMENT ACTIVITIES

Rhode Island's State Workforce Development Board has established a public website that contains all policy and guidance issuances (termed 'Workforce Innovation Notices' or 'WINs') for the workforce development system, which address both the programmatic and administrative requirements for utilization of state funds for workforce development activities. All policies can be accessed at: https://gwb.ri.gov/policies-reports-plans/wioa-state-and-local-

policies. All state WINs are cataloged in a State 'Policy Manual.' As of the writing of this plan, forty (40) individuals WINs have been issued organized across either (8) topic areas:

1. Administration and Governance
2. The One-Stop (America's Job Center) Delivery System
3. Program Funding and Grants Management
4. Nondiscrimination, Equal Opportunity, and Customer Experience
5. Adult and Dislocated Worker Programs
6. Training Programs and Allowable Training Models
7. Youth Programs
8. Performance Accountability and Reporting

Rhode Island is up to date on all required WIOA policies and has issued a number of discretionary policies as well. The policy development process involves the participation of key state and local partners that provide critical input regarding content of the policies. Policies are deliberated and drafted in the Executive committee before they are brought before the full State Board for additional deliberation and consideration. Policy modifications can be made as additional guidance is received from federal departments or specific needs are identified by one-stop system providers and partners.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING FOR MANDATORY AND DISCRETIONARY ACTIVITIES, INCLUDING HOW THE STATE WILL CONDUCT EVALUATIONS OF TITLE I ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES.

The Rhode Island Department of Labor and Training is the designated State Workforce Agency and utilizes Governor's set aside funds to carry out required statewide employment and training activities. These activities include, but are not limited to:

Rapid Response: The provision of Rapid Response activities is described in the following section.

Administration of the Eligible Training Provider List: The Department of Labor and Training administers the statewide Eligible Training Provider list (ETPL). The Department is responsible for oversight of each training provider and programs as well as maintenance of the list itself. All new or continuing training providers are required to submit specific documentation regarding the provider and each proposed training program. A rating team is compiled to rate each program before the program is made available to clients. Training programs must be for in-demand industry sector and occupations. Each program is compared against Labor Market information, in-demand industries and occupation. Current ETPL providers are offered the opportunity to present to AJC staff and Youth WIOA staff to provider greater detail regarding their programs. This offers WIOA staff a chance to gain insight into the participant experience and ask questions of the providers, thus encouraging better knowledge and support for ITA/ETPL clients.

Monitoring and Oversight of WIOA Title I Programs: The Office of Planning, Integrity, and Compliance (OPIC) within the Department of Labor and Training is responsible for programmatic, fiscal, and administrative monitoring of WIOA Title I Programs as well as other associate programs and federal grants. Such monitoring is conducted on an ongoing basis throughout the program year, and on an annual basis if otherwise not conducted throughout the

year. In addition to program compliance reviews; OPIC ensures that the use, management, and investment of funds for workforce development activities is consistent with WIOA laws, DOL-ETA regulations, Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (known as the OMB Super Circular and 2 CFR Part 200), and state and Department of Labor and Training policies. Monitoring duties include reviews of local governance, data element validation, local area OMB compliance, and other responsibilities.

Information Sharing and Technical Assistance: The Office of Planning, Integrity, and Compliance (OPIC) also provides technical assistance, guidance/clarification, and information sharing for WIOA partners and the local areas. Technical assistance is offered in the form of onsite presentations and troubleshooting - provided at the program's request or at OPIC's discretion. OPIC also conducts quarterly webinars on a variety of WIOA-related topics, including proper case management, the tracking and reporting of Credentials, the tracking and reporting of Measurable Skill Gains, and other matters. Completed webinars are saved to the OPIC website and form an ongoing (and growing) knowledge library that program and local area staff can utilize as a reference. OPIC also identifies local, regional, and national best practices, and other information, regarding service innovation and outreach for populations with barriers to employment and distributes them throughout the workforce development network. Lastly, OPIC conducts a required annual Governance Training for state and local board members, introducing and/or reminding them of their responsibilities under WIOA.

Evaluations: The Office of Data and Performance within the Department of Labor and Training is responsible for evaluation and analysis of all Department-administered workforce programs including Title I Adult, Dislocated Worker, and Youth activities. The Office is led by a PhD-level Director of Data and Performance who has authority to conduct evaluations at their discretion, provided they are consistent with the goals, priorities, and focus of the Board. Evaluations are also conducted at the Board's request and direction. The Data and Performance Office has access to WIOA MIS systems and reports and conducts evaluations in concert with Title I program management.

The Department of Labor and Training also utilizes Governor's set aside funds to carry out a number of discretionary statewide employment and training activities. These activities include, but are not limited to:

Sector Partnership Development: The Department of Labor and Training continues to support demand-driven workforce development strategies such as the Real Jobs RI industry partnership program, consistent with the terms of WIOA section 134 (a)(3)(A)(i). A portion of Governor's set-aside funds helps to grow the capacity of these workforce intermediaries and support the implementation of a comprehensive sector-based strategy. Staff supported, in part, by set-aside funds work with industry sector partners on growing their knowledge and capacity, engaging employer partners within their industry, designing and developing industry-driven workforce solutions, networking with workforce and education partners, and troubleshooting performance issues.

Pilot Programming: A portion of Governor's set-aside funds also assists with piloting innovative service programs designed to assist populations with barriers to employment. The goal is to pilot such programs with relatively flexible set-aside funds to prove concept before attaching the newly developed programs to the traditional workforce system. For example, Rhode Island had a Trade Adjustment Assistance petition filed and approved for a 2021-2022 business closure; but the eligibility window was limited by the terms of Training and Employment Guidance Letter (TEGL) No. 13-21 which closed TAA eligibility as of June 30, 2022.

A number of individuals were as equally impacted and economically harmed by the closure and would have received all of the available TAA services (including occupational training and trade readjustment payments) but for the program closure and cut-off date; in response Rhode Island piloted an innovative program whereby limited TAA-like services were provided to these individuals using Governor's Set Aside Funds. Doing so helped an additional dozen individuals recover from the dislocation event.

C. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS.

Rhode Island's Rapid Response policy is described in Workforce Innovation Notice 05-09 in the State WIOA Policy Manual (https://gwb.ri.gov/policy-and-planning).

Rhode Island's Rapid Response Program is administered by the Rhode Island Department of Labor and Training's Workforce Development Services Division. Rapid Response proactively responds to layoffs and plant closings by quickly coordinating services and providing immediate aid to companies and their affected workers. The Rapid Response Unit works with employers and employee representative(s) to maximize public and private resources quickly and to minimize disruption associated with job loss. Rapid Response staff members conduct on-site or virtual services, when possible, to disseminate information on accessing unemployment insurance benefits, Job Center re-employment services, and state and federally funded training opportunities. The topics presented at Rapid Response events regularly include:

- American Job Center resources;
- Title I adult and dislocated worker program services;
- Unemployment Insurance benefits;
- Trade Adjustment Assistance (if Trade certified);
- employment services;
- labor market information;
- financial counseling programs;
- resume and interview guidance;
- Veterans program assistance;
- local health and human services programs; and
- health insurance options.

Other on-site or virtual services include job fairs and customized re-employment workshops, such as resumé development and interviewing strategies. Email distribution lists of Dislocated Workers are formed to provide immediate information and reemployment opportunities to these individuals. Additionally, mailings are sent out to notify those without computer access. Rapid Response activities can also be scheduled utilizing the Job Centers.

Layoff aversion and business retention strategies are practiced as part of the scope of work for Rapid Response as a function of the Workforce Development Services Division. The Business Service Representatives continually work on relationship building with the employer

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community to support them throughout all business cycles. Workshare has been a very popular and often used program by businesses experiencing a downturn in business. Joint visits to employers by the RI Department of Labor and Training and other economic resources entities, such as the RI Commerce and Small Business Development Corporations, are conducted regularly initiated by outreach as a result of employer requests.

D. DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES.

The most important aspect to providing an effective response during a disaster event is fast and broad-based coordination with local and national partners. Local partners in Rhode Island include municipalities, town organizations like the Rhode Island League of Cities and Towns, and State agencies. The State agencies involved in natural disaster relief efforts are notably the Rhode Island Emergency Management Agency, which is the lead State agency for statewide disaster response activities, the Office of the Governor, the Department of Transportation, and the Executive Office of Health and Human Services. National partners include the National Guard and Federal Emergency Management Agency (FEMA), and the USDOL-ETA through the provision of National Dislocated Worker Grants (DWGs).

In the event of a natural disaster, the Rapid Response team will coordinate with these partners to determine the needs of those affected and the resources available. When responding to a natural disaster, the state would follow the WIOA dislocated worker and DWG guidelines. Disaster DWG funds are sought to provide funding to create temporary employment opportunities to assist with clean-up, recovery, and other humanitarian efforts in one of three situations. First, when an area impacted by disaster is declared eligible for public assistance by FEMA; second, when another federal agency with jurisdiction recognizes the disaster as one of national significance that could result in a potentially large loss of employment; and third, when a substantial number of individuals, defined as 50 or more, relocate to another area from a disaster area. The Rhode Island Department of Labor and Training is the agency eligible to apply for a Disaster DWG in Rhode Island, because it is designated to receive Dislocated Worker formula funds. In addition, the Department of Labor and Training is the fiscal agent responsible for the appropriate allocation of funding to the affected areas. As such, the Rapid Response Team carries out its disaster response within the parameters of the Disaster DWG guidelines and in coordination with state and national entities.

E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE 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 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 AND HOW THE STATE WILL ENSURE THE PROVISION OF APPROPRIATE CAREER SERVICE TO WORKERS IN THE GROUPS IDENTIFIED IN THE PETITION (TAA SEC. 221(A)(2)(A)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND

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APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

As the administrator of Trade Adjustment Assistance Act services, the Rhode Island Department of Labor and Training's Workforce Development Services (WDS) division has ensured services are rendered quickly address the needs of trade-affected workers. As part of the early intervention program, Rapid Response, Workforce Development Services staff gather information from the employer and employees to determine whether Trade Adjustment Assistance may be applicable. Prior to the termination provision under Section 285(a) of the Trade Act of 1974 which went into effect on July 1, 2022, the Department would file a petition on behalf of the trade-affected workers to request an eligibility verification from USDOL followed by a certification or denial. In cases where Rapid Response was not presently working with the employer or employee upon notification that a petition has been filed, WDS would notify the Rapid Response team so that outreach efforts to that employer or impacted employee could commence.

When a federal TAA petition certification was granted, the Department would notify workers in writing of the federal certification of the TAA petition and inform the workers of the services to which they are entitled. Early intervention and Rapid Response services would then be provided in a manner consistent with state Rapid Response policy (WIN 18-06)).

The Department also organizes public informational presentations on the workforce services available to workers, and the ability of the Job Center staff to assist them with reemployment. The Department will inform impacted workers of these presentations by directly contacting workers by letter, email, or phone, by issuing press releases, outreaching to industry and union organizations and posting notices on the DLT website. The Department works to ensure that TAA workers are informed of and receive every service available, including co-enrollment in the

WIOA dislocated worker and other programs. These services include case management through the provision of basic and individualized career services through WIOA. The focus is on skill-assessment and retraining workers who need further skills in order to obtain employment in emerging, in-demand occupations.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

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

Rhode Island utilizes a variety of work-based training models for adults and dislocated workers. Use of these training models is determined based on the best method to meet the needs of the participants as well as employers.

The state remains a strong advocate for **on-the-job training (OJT)**. Through OJT activities, participants can obtain the skill sets necessary to fill the jobs that are available and that are being created in this economy. OJT provides an incentive to employers to hire individuals and invest in their skill development, and trainees can earn a wage as they learn. This is particularly beneficial to low-income job seekers who may not be able to interrupt their income while participating in classroom-based training. Employers are typically reimbursed 50% of the hourly rate of an OJT trainee. However, pursuant to waiver authority granted by the Secretary of the US Department of Labor; from August 2021 through June 2026 (unless otherwise extended);

local areas had the option of increasing the rate of reimbursement to employers based on their size (subject to reimbursement maximums):

- For employers with 50 or fewer employees: up to ninety percent (90%) on-the-job training employer reimbursement
- For employers with 51-250 employees: up to seventy-five percent (75%) on-the-job training employer reimbursement
- For employers with 250 employees+: up to fifty percent (50%) on-the-job training employer reimbursement

State Workforce Innovation Notice 06-03 **Incumbent Worker Training (IWT)** Guidelines was issued March 2021 to provide guidance on the requirements for local areas to conduct IWT including the amount of local Adult and Dislocated Worker funds that may be used for IWT, the factors for determining use of funding for incumbent worker training, the employer cost-share requirements, and clarification around the requirement that employees must have no less than a 6-month established history with the employer (along with the exemption when a majority of employees being trained meet the 6-month employment requirement). As part of the larger statewide workforce development, Rhode Island offers a state-funded IWT grant program which historically made a WIOA-funded iteration of IWT redundant.; At this time neither local area offers WIOA-funded ITW, opting instead to focus training investments primarily on job seekers and the unemployed; however the boards retain the ability to provide IWT under WIOA if they determine it is in the local area's best interest.

Work Experience (WEX) activities continue to play a vital role in state youth program offerings, providing enrolled youth an up-close look into the world of employment. Rhode Island considers work experiences "an essential component of a student's career pathway, building on their classroom knowledge with practical experience in the workplace and interaction with industry and community professionals." Paid and unpaid work experiences are one of the 14 program elements for the WIOA youth program. State Workforce Innovation Notice 07-04 provides guidance and clarification regarding the provision of Work Experiences for WIOA Youth consistent with the state's vision for work-based learning. The policy describes which expenditures are counted toward the 20% youth work experience requirement, the types of work experiences available, the allowability (with justification) of virtual work experiences, considerations for high quality WEX program design, and other items.

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

Rhode Island remains a leading state in the effort to expand new and innovative apprenticeship models. The state has applied for, and received, multiple Apprenticeship grants from the USDOL over the past five years including an Apprenticeship State Expansion (ASE) grant, a State Apprenticeship Expansion, Equity and Innovation (SAEEI) grant, a State Apprenticeship Expansion Formula (SAEF) grant and, most recently, a State Apprenticeship Expansion Competitive (SAEF – Competitive) grant. These funds are deployed alongside state and other resources to increase the number and diversity of Registered Apprenticeship Programs (RAPs).

Rhode Island has created an apprenticeship intermediary, Apprenticeship RI to provide technical assistance to any sponsor seeking to register a program. Rhode Island also provides

direct development funding to employer and other organizations through the state-funded Non-Trade Apprenticeship Development Grant program. This grant program provides up to $25,000 to cover costs such as curriculum development, supplies, consultants, meetings, and other expenses associated with developing apprenticeships in high-growth, high-demand fields. Lastly, the state's Apprenticeship Incentive program offers $1,000 per registered non-trade apprentice (up to five within a 12-month period), payable after the apprentice has completed the probationary period. The payment provides direct resources to help offset the cost of sponsoring an apprentice and is designed to encourage and promote Registered Apprenticeship as an effective workforce solution for employers.

As the state increases the variety of RAPs; a key priority of the 2024 WIOA plan, remains the integration and realization of Registered Apprenticeship as a training model within WIOA. Rhode Island's primary focus is at the 'grassroots' level and ensuring that apprenticeship is fully present and activated in our WIOA American Job Centers. The State Workforce Agency spoke to frontline WIOA staff directly to learn their first impressions of apprenticeship; did they have any questions, both personally or professionally, about apprenticeship, or any concerns or misconceptions? Having received that feedback; the state sought to address those concerns and answer those questions with the goal of building confidence and familiarity with registered apprenticeship among the staff, dissolving any misconceptions, and overcoming any hesitancies. The result was an initial technical assistance series provided to staff; followed by desk guides and other 'leave behind' documents to provide ongoing assistance. Those documents cover:

- Registered Apprenticeship on Eligible Training Provider List (ETPL)
- The differences between Registered Apprenticeship vs Traditional Training
- Effective Use of ITA and OJT for Register Apprenticeship
- FAQ And Common Terms
- A Funding Matrix of various streams that can be leveraged for Registered Apprenticeship

The state also made content knowledgeable staff available to serve as a 'help desk' and provides continuous technical assistance. American Job Center managers and designated Apprenticeship-ambassadors participate in a series of discussions focusing on the structure of the Registered Apprenticeship Program, their placement on the ETPL, and supportive services operations and procedures. As of the writing of this report, thirty-eight (38) RAPs are registered on ETPL.

This focus on Registered Apprenticeship is a ground-up, not top-down, effort. Rhode Island specifically and intensely focused on frontline staff when rolling out Registered Apprenticeship within the America Job Center system; providing repeated training, technical assistance, and "help desk/office hours" resources to help ensure that job coaches and counselors understood the unique features of Registered Apprenticeship (as compared to the training models they were historically familiar with); and how to maximize WIOA resources when connecting customers with Registered Apprenticeship Programs. This approach was a key factor in the successful adoption of Registered Apprenticeship within the state workforce system, breaking down misconceptions and misunderstandings that could otherwise hinder that process. We expect to build on this progress in the coming years. Under the state Eligible Training Provider List policy, Registered Apprenticeship program sponsors are automatically eligible for placement on the state-approved ETPL and are not subject to the same application and performance information requirements as other providers, in part because they have already gone through the vetting process to become a Registered Apprenticeship program.

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Rhode Island recognizes that Registered Apprenticeships are an important component of training and employment services that the workforce system can provide to its customers. Local service providers will be expected to consider apprenticeship and pre-apprenticeship as a career pathway for job seekers and as a job-driven strategy for employers and industries. Local plans will be asked to address the inclusion of apprenticeship as an integral part of the work-based learning options that WIOA customers may access. Lastly, the state will continue to provide training, technical assistance and access to USDOL's apprenticeship resources to encourage and foster the use of existing programs.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

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

The State of Rhode Island maintains procedures for determining training provider initial and continued eligibility, including Registered Apprenticeship programs through Workforce Innovation Notice 06-02.

WIN 06-02 provides eligibility criteria for providers of training, as well as the procedures for implementing the Eligible Training Provider List (ETPL) requirements under WIOA. This policy is applicable to providers of occupational skills training services for Adults, Dislocated Workers, and other populations as defined by WIOA Title I. The policy applies to training programs provided by the Eligible Training Provider and Individual Training Account Services supported by WIOA Title I funds. Registered Apprenticeship programs are also addressed in the policy.

Initial Program Eligibility:

As the designated State Workforce Agency, the Department of Labor and Training (DLT) has the responsibility for receiving, reviewing, and approving training providers and their programs. The Department also ensures that data elements related to initial application, continued eligibility and performance information regarding approved providers and programs are entered into the supported MIS system.

DLT maintains the infrastructure to support the state ETPL, including publishing provider information related to cost and performance outcomes, and make it publicly accessible in a user-friendly way to the consumers, other members of the public, and other workforce stakeholders.

There are four categories of providers who may apply for consideration to be included on the state eligible training provider list:

1. Institutions of higher education that provide a program which leads to a recognized postsecondary credential.

2. Entities that carry out programs registered under the National Apprenticeship Act 29 U.S.C.50 et seq.)

3. Other public or private providers of a program of training services, which may include m community-based organizations, joint labor-management organizations and eligible providers of adult education and literacy activities under Title II if such activities are provided in combination with occupational skills training

4. LWDBs, if they meet the conditions of WIOA sec. 107(g)(1).

Category 2 (Registered Apprenticeship Programs) will be granted automatic approval, if requested, following confirmation by the State Apprenticeship Office that the sponsoring employer and apprenticeship related instruction have been recognized by the state and are active and in good standing. WIN 06-02 describes the eligibility criteria and procedures specific to Registered Apprenticeship programs.

Continued Provider Eligibility:

Per WIN 06-02; an initial eligibility determination will allow a training provider onto the ETPL for the one (first) year. Subsequent eligibility determinations will allow a training provider to stay on the ETPL for a subsequent two years. An eligibility review must be conducted at least once every two years from the first subsequent eligibility review. To simplify the subsequent provider eligibility determination process; the Department of Labor and Training may limit the required documents to only those items that have been changed, altered, or modified since the last/previous eligibility determination.

In addition to the performance measures described in the section below, eligibility review will consider:

- The need to ensure access to training services throughout the State, including in rural areas, and through the use of technology: Training providers will provide the geographic location where a training program will be conducted. Training Providers offering distance, online, web-based and/or virtual learning models are subject to the requirements described in 'Conditions for Online/Virtual Training Programs.'

- Information reported to State agencies with respect to Federal and State programs involving training services (other than the program carried out under this subtitle), including one-stop partner programs**:** As described in the 'Roles and Responsibilities' section, training providers are expected to submit accurate and timely performance data and cost information for both initial eligibility and subsequent eligibility**.**

- The degree to which the training programs of such providers relate to in-demand industry sectors and occupations in the State: A training program must be for occupations in in-demand industry sectors as identified by the state, region, or Local Board. In-demand or priority industry sector information must be verified with the State Board and/or Local Board.

- The requirements for State licensing of providers of training services, and the licensing status of providers of training services if applicable: Training Providers must be licensed by the appropriate Rhode Island and/or federal licensing authority, as required both by Rhode Island and Federal law as described in 'Requirements: Qualifications.'

- Ways in which the criteria can encourage, to the extent practicable, the providers to use industry-recognized certificates or certifications; and

- The ability of the providers to offer programs that lead to recognized postsecondary credentials: Training providers will describe any industry-recognized certificates, certifications, or credentials that will result from a training program. If a program does not result in an industry-recognized certificates, certifications, or credentials, the provider will be expected to explain why the program will nonetheless benefit the career and employment goals of training participants, despite the absence of such certificate, certification, or credential.

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- The quality of a program of training services, including a program of training services that leads to a recognized postsecondary credential: Program quality will be determined by a program's ability to meet performance thresholds set in paragraph 'i' 'Performance Accountability and Outcomes' and whether the program results in an industry-recognized credential (or the provider has adequately explained why the program will nonetheless benefit the career and employment goals of training participants, despite the absence of such certificate).

- The ability of the providers to provide training services to individuals who are employed and individuals with barriers to employment: Training providers will be provided the opportunity to describe their ability to provide training services to individuals who are employed and individuals with barriers to employment as described in Workforce Innovation Notice 05-02. The ability to provide training services to individuals who are employed will be considered a positive additional factor when considering eligibility for the ETPL.

- Such other factors as the Governor determines are appropriate to ensure-- (i) the accountability of the providers; (ii) that the one-stop centers in the State will ensure that such providers meet the needs of local employers and participants; (iii) the informed choice of participants among training services providers; and (iv) that the collection of information required to demonstrate compliance with the criteria is not unduly burdensome or costly to providers**:** The Department will endeavor to make the initial and continued eligibility process as efficient as possible so as to promote and encourage quality training programs to apply. The Department will provide ongoing technical assistance to providers to assist them in meeting the information collection and reporting requirements of this policy. The Department will make provider performance, cost, quality, and other information available to participants so as to promote informed choice

A recognized Registered Apprenticeship program may remain on the ETPL as long as it remains registered and recognized by the State Apprenticeship Office.

Performance:

Training providers (except sponsors of registered apprenticeship programs) must provide the most recent available and verifiable performance data on all course participants. At a minimum, outcome data must be from performance for the most recent twelve (12) month period. Training providers must give sufficient explanation if performance data are not available (for example, a course not previously offered).

The following information will be collected, and reviews for each program of study provided by an eligible training provider, *regardless of whether any WIOA-funded Participants were enrolled in training programs or services at the time*:

1. The levels of performance achieved for all individuals engaging in the program of study (or the equivalent), specifically:

    a. The percentage of individuals who are in unsubsidized employment during the second quarter after exit from the program.

    b. The percentage of individuals who are in unsubsidized employment during the fourth quarter after exit from the program.

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c. The median earning of individuals who are in unsubsidized employment during the second quarter after exit from the program.

d. The percentage of individuals who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent, during participation in or within one (1) year after exit from the program.

2. The total number of individuals exiting from the program of study (or the equivalent)

Beginning July 1, 2024, performance in a given program of study will be required to meet minimums performance thresholds established by the state board in order to meet continued eligibility criteria.

Registered Apprenticeship Program:

WIN 06-02 also provides the process for adding Registered Apprenticeship programs to the state eligible training provider list. The Registered Apprenticeship process and supporting documents reflect the automatic eligibility of all approved Registered Apprenticeship programs.

Registered Apprenticeship program sponsors will be invited by the Department of Labor and Training to be included on the state's ETPL. If electing to do so and the State Apprenticeship Office recognizes the program and reports it in good standing, it is automatically included on the list and will remain as long as the program is registered or until the program sponsor notifies the State that it no longer wants to be included on the list.

RA Sponsors who are interested in being on the ETPL shall provide the following information to DLT:

- Occupations included in the RA program
- The name and address of the RA program sponsor
- The name and address of related technical instruction provider and location of instruction if different from the sponsor address
- The method and length of instruction; and,
- The number of active apprentices

Following the receipt of a completed application, DLT will verify that the program sponsor is active and in good standing. Continued eligibility for Registered Apprenticeships is automatic unless the sponsor of the program no longer wants to be included on the list or the sponsored program is deregistered with the state. Registered Apprenticeship programs are not subject to the state performance requirements.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR FOR THE ADULT PRIORITY OF SERVICE REQUIREMENT IN WIOA SECTION 134 (C)(3)(E) THAT REQUIRES AMERICAN JOB CENTER STAFF, WHEN USING WIOA ADULT PROGRAM FUNDS TO PROVIDE INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES, TO GIVE PRIORITY OF SERVICE TO RECIPIENTS OF PUBLIC ASSISTANCE, LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT (INCLUDING ENGLISH LANGUAGE LEARNERS).

Rhode Island's Priority of Service policy is described in Workforce Innovation Notice 05-02 and is consistent with the requirements of WIOA section 134 (c)(3)(E). The state assists local areas in the implementation of this policy by providing biennial technical assistance sessions describing the federal requirement, the state's implementation of the requirement, and

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suggested methods for meeting the requirement. This technical assistance focuses on continuous improvement and implementation to ensure local areas understand the priority of service requirements under WIOA and have an effective strategy to comply. Local areas are required to issue their own priority of service policy; and, in their local WIOA plans, are required to describe the guidance they will provide to One Stop partners, and the One Stop Operator, to ensure that priority of service requirements is met. Local boards are also required to identify the priority populations they will specifically focus their outreach efforts on.

Rhode Island utilizes existing monitoring functions which include conducting onsite reviews, desk audits of participant data, and requiring corrective actions if priority is not met. Further, the state collaborates closely with combined program partners to ensure those receiving public assistance are referred to available programs and services. The State Workforce Agency works with each Local Area on their required community engagement and outreach strategies including, but not limited to, partnering with community-based organizations, identifying community leaders/champions, and working with area school districts to increase the awareness and availability of services within low-income communities. Local areas are expected to account for the language needs in such communities and translate messaging and materials whenever it is deemed appropriate to ensure outreach to English language learners.

Per TEGL 7-20, the USDOL expects that at least 75% of a state's participants receiving individualized career and training services in the Adult program are from at least one of the identified priority groups. From a recent low of 72.7% in Program Year 2020, Rhode Island's adult priority of service share rose to 83.8% in Program year 2023 and 89.0% in Program Year 2024, according to Quarterly Report Analysis results. These figures comfortably exceed the USDOL target.

5. DESCRIBE THE STATE'S CRITERIA REGARDING LOCAL AREA TRANSFER OF FUNDS BETWEEN THE ADULT AND DISLOCATED WORKER PROGRAMS

Rhode Island's Title I Transfer policy ((Workforce Innovation Notice 03-01) allows Local Workforce Development Boards to transfer up to 100% of the base Adult and Dislocated Worker allocations of the current year between programs. Youth funds may not be transferred.

Transfer requests must be signed by the Local Board Chair and Executive Director and submitted to the State Workforce Development Board. The requests must include:

(1) The reason for the transfer request, including current service level information,

(2) Assurances that services for Adults and Dislocated Workers will be maintained, and

(3) a listing of other Local Area funding available to serve Adult and Dislocated Worker populations (for example: NDWG, other federal or state funding, other special grant funding).

Once the request has been received by the Board, it will be reviewed within five business days to determine approval or denial of the request. The Board may request additional information from Local Boards before rendering a decision.

6. DESCRIBE THE STATE'S POLICY ON WIOA AND TAA CO-ENROLLMENT AND WHETHER AND HOW OFTEN THIS POLICY IS DISSEMINATED TO THE LOCAL WORKFORCE DEVELOPMENT BOARDS AND REQUIRED ONE-STOP PARTNERS. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.325, 20 CFR 618.824(A)(3)(I).

Rhode Island's Trade Adjustment Assistance (TAA) program is administered by the Rhode Island Department of Labor and Training's Workforce Development Services (WDS) Division. As

the program winds down the state has reduced outreach and awareness activities but still recognized the importance of service integration to better serve clients. 20 CFR 618.325 mandates co-enrollment of TAA participants with the WIOA Dislocated Worker (DW) program; therefore Rhode Island ensures that trade-affected workers eligible for WIOA's Dislocated Worker program are co-enrolled accordingly. Policy, generally, on the Trade Adjustment Assistance program requirements are embedded in associated state program policies, including the Rapid Response Process under WIOA (WIN 05-09), Apprenticeship Under WIOA (WIN 06-06), and the Local Workforce Development Board policy for Greater Rhode Island on Provision of On-the-Job Training Services (L06-03); the administering unit specifically houses the TAA Co-Enrollment with WIOA operational policy. WIOA DW eligibility criteria is defined in the Dislocated Worker Eligibility Determination Policy (WIN 05-03) based on WIOA Section 3(15). As such, all TAA participants who are eligible for the WIOA's DW program must be co-enrolled (if eligible and service is not declined).

Each of these policies highlights the importance of ensuring that TAA impacted participants are ensured access to co-enrollment. Despite the recent decision to sunset TAA, the state continues to apply these policies to those currently receiving TAA services and ensures that those workers under currently approved petitions are being identified and offered services.

7. DESCRIBE THE STATE'S FORMAL STRATEGY TO ENSURE THAT WIOA AND TAA CO-ENROLLED PARTICIPANTS RECEIVE NECESSARY FUNDED BENEFITS AND SERVICES. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.816(C)

As the WIOA Title I administrator, the Department is well-positioned to ensure the alignment and coordination of funds and activities between WIOA Adult and Dislocated programs, and the statewide Rapid Response activities. This is due to the administration of the Rapid Response outreach events, including job fairs or hiring events, by the same Department responsible for administering the WIOA Adult and Dislocated programs. The Department is consequently able to leverage WIOA Title I program resource in response to a layoff or facility closure. This dual-program role enables the Department to combine Dislocated Worker activities with TAA activities for trade-affected workers, helping to avoid duplication of services and ensure that appropriate career services are provided. While recognizing the sunset provisions of the TAA program; the state nonetheless strives to ensure impacted TAA-eligible workers receive the full range of services they are still entitled to.

8. DESCRIBE THE STATE'S PROCESS FOR FAMILIARIZING ONE-STOP STAFF WITH THE TAA PROGRAM. 20 CFR 618.804(J), 20 CFR 618.305

To ensure WIOA and TAA co-enrolled participants receive necessary services, the TAA program is managed by coordinator-level staff for oversight and deployment; this ensures service delivery is consistent with TAA guidance and regulations. With a shared management information system for the TAA program and WIOA Title I and III programs, the TAA coordinator can monitor case management efforts, co-enrollment and expenditures seamlessly. Job Coach staff in the administering unit, also responsible for WIOA Title I and III service delivery, are on-boarded with an overview of TAA and cross-trained on TAA-specific process and procedure, allowable activities, along with differences and similarities to WIOA and ways to maximize supports, so employment and case management services and training assistance can be effectively provided. Rhode Island schedules trainings and routine check-ins as needed to coordinate services effectively; accordingly, one-stop service providers have a solid understanding of the TAA program, WIOA DW program and other partner programs. As this manager is also responsible for the TAA Data Integrity and Performance Reporting, the one stop staff are given real time feedback on any case management and recording issues that may

arise. Rhode Island will be continuing to staff the TAA team at current levels until all currently approved petitions are expired.

C. YOUTH PROGRAM REQUIREMENTS.

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA.[11] FURTHER, INCLUDE A DESCRIPTION OF HOW THE STATE ASSISTS LOCAL AREAS IN DETERMINING WHETHER TO CONTRACT FOR SERVICES OR TO PROVIDE SOME OR ALL OF THE PROGRAM ELEMENTS DIRECTLY.

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

State Workforce Innovation Notice 07-01 describes the criteria that local boards must use when awarding grants or contracts for WIOA youth activities. The criteria include, but are not limited to:

1. The financial stability of the service provider;
2. Experience in successfully providing services to disconnected youth and youth with barriers to employment, including youth with disabilities;
3. Demonstrated success in serving youth, specifically youth with barriers and OSY;
4. Length of time the youth service provider has been in business;
5. Available network of business and community partners; and
6. Ability to meet the performance accountability measures based on the performance indicators for youth programs.

In addition to the state criteria, local boards must make sure that prospective awardees are able to provide, or refer to, all 14 elements as defined in Youth WIOA

Meeting performance accountability measures will be part of the contract between the local boards and the awardee. Regular reporting and monitoring will keep the local boards informed of the performance of the awardee and any awardee not performing will receive technical assistance to improve performance. Local boards are responsible for ensuring that all sub-recipients and contractors are monitored for quality of services and achievement of performance standards.

The State Board provides initial and ongoing technical assistance to local boards in determining whether to contract for services or to provide some or all of the program elements directly. Local boards are provided a comprehensive review of the fourteen required youth elements and encouraged to review and assess their internal capacity to provide such services directly and the associated costs. Local Boards are further advised that if the board elects to provide youth services directly while performing other roles such as fiscal agent or One Stop Operator, the Local Board must have appropriate firewalls in place between the staff providing services, the staff responsible for oversight and monitoring of services, and the Local Board. The

firewalls must conform to Title 20 CFR Section 679.430 for demonstrating internal controls and preventing conflicts of interest.

2. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH. DESCRIBE PROMISING PRACTICES OR PARTNERSHIP MODELS THAT LOCAL AREAS ARE IMPLEMENTING AND THE STATE'S ROLE IN SUPPORTING AND SCALING THOSE MODELS WITHIN THE STATE FOR BOTH IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.

Rhode Island supports equitable outcomes for both in-school and out-of-school youth through an integrated workforce system in which the state operates as both the State Workforce Agency and the local workforce development board. This unified structure enables the state to align policy development, program design, funding decisions, and service delivery in a coordinated manner, reducing fragmentation and promoting consistent expectations, equity strategies, and outcomes for youth statewide.

In this dual role, Rhode Island provides direct guidance, technical assistance, and performance oversight to youth service providers while also convening cross-agency partners to address the needs of youth with barriers to employment. The state prioritizes equitable access to paid work-based learning, sector-aligned career pathways, and employer engagement opportunities, recognizing these strategies as critical to improving outcomes for both in-school and out-of-school youth.

A key mechanism for advancing equitable youth outcomes is the state's role in designing and administering statewide youth initiatives that align education and workforce systems. Rhode Island's Real Skills for Youth program, for example, serves as an important platform for engaging young people in career exploration and paid work-based learning experiences while also supporting local providers' recruitment into WIOA Youth services. Through partnerships with schools, community-based organizations, and employers, Real Skills for Youth expands access to early career exposure and employment opportunities for a diverse population of youth and helps create intentional pathways into WIOA programming for both in-school and out-of-school participants.

These efforts are further reinforced by PrepareRI: Destination 2030, the state's long-term education and workforce strategy. Destination 2030 provides a shared framework for aligning secondary education, postsecondary pathways, and workforce development around career readiness, credential attainment, and equitable access to opportunity. By embedding expectations for work-based learning, employer engagement, and career-connected learning into the broader education and workforce ecosystem, Destination 2030 strengthens the infrastructure that supports WIOA Youth service delivery and informs strategies for serving both in-school and out-of-school youth.

Rhode Island also supports promising partnership models that address the needs of youth with significant barriers to employment, including system-involved youth. The state continues to work closely with local partners and agencies such as the Department of Children, Youth, and Families and the Rhode Island Family Court to improve coordination of employment and training services for foster youth participating in the Voluntary Extension of Care program. Through this collaboration, the state has provided guidance on eligibility, co-enrollment, and service alignment to ensure youth can access the full range of WIOA services for which they are eligible. The state has also clarified that co-enrollment in WIOA Youth and Adult programs,

when appropriate, is encouraged and does not negatively impact program performance, helping to remove barriers to equitable service delivery.

Beyond supporting individual initiatives, Rhode Island uses its statewide oversight role to identify effective practices and scale them across the workforce system. Through ongoing monitoring, data analysis, technical assistance, and shared learning, the state evaluates implementation, elevates successful partnership models, and disseminates promising practices that can be replicated statewide. This approach allows Rhode Island to continuously strengthen service quality, promote consistency across service delivery, and improve equitable outcomes for in-school and out-of-school youth.

Collectively, these efforts have strengthened access to paid work-based learning, improved alignment across education and workforce systems, and increased the state's ability to engage and serve youth with barriers to employment in pathways that support credential attainment, continued education, and entry into unsubsidized employment.

3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

Rhode Island supports innovative youth workforce investment models through an integrated workforce system in which the state operates as both the State Workforce Agency and the local workforce development board. This unified structure enables alignment across policy, funding, program design, and service delivery, allowing youth workforce activities to be implemented consistently while meeting the needs of both in-school and out-of-school youth.

In this dual role, the state provides guidance, technical assistance, and performance oversight to youth service providers, emphasizing flexible and participant-centered delivery of the 14 program elements described in WIOA section 129(c)(2). Rhode Island encourages providers to bundle multiple program elements within cohesive career pathways rather than delivering stand-alone services, allowing elements to be offered concurrently and, when appropriate, through partnerships and referrals to ensure comprehensive access without duplication.

Work experience is prioritized as the cornerstone of youth service delivery and serves as the primary mechanism through which many WIOA Youth program elements are delivered. The state emphasizes paid work-based learning as a core equity strategy, embedding internships, transitional jobs, and other paid experiences within broader career pathways and supporting them with career counseling, leadership development, and supportive services aligned to long-term education and employment goals.

Rhode Island's approach is reinforced through alignment with the state's Career and Technical Education system and broader education and workforce strategies. Coordination with partners such as the Rhode Island Department of Education and the Office of the Postsecondary Commissioner ensures youth workforce programming is connected to industry-recognized career pathways spanning secondary education, postsecondary training, and employment. WIOA Youth services enhance these pathways by supporting paid placements, supportive services, and transitions beyond high school.

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Pre-apprenticeship and registered apprenticeship are incorporated intentionally within this career pathways framework. Pre-apprenticeship opportunities build foundational skills and prepare youth for next steps, while registered apprenticeship is prioritized in sectors where employer demand and participant readiness align.

Through statewide oversight, clarification of system flexibilities such as co-enrollment, and continuous improvement, Rhode Island supports the replication of effective practices across the workforce system. This approach prioritizes work experience within career pathways and ensures in-school and out-of-school youth have access to innovative workforce services that support credential attainment, continued education, and entry into unsubsidized employment.

4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR "REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(B)(III)(VIII) AND FOR "REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII). IF THE STATE DOES NOT HAVE A POLICY, DESCRIBE HOW THE STATE WILL ENSURE THAT LOCAL AREAS WILL HAVE A POLICY FOR THESE CRITERIA.

In 2018 the state workforce development board, in concert with local boards, community advocates, and youth providers, developed an additional assistance policy (Workforce Innovation Notice 07-02) that recognizes two 'types' of barriers a youth can face which requires additional assistance to overcome: Education and Employment barriers. Education barriers include factors such as chronic absenteeism, below average academic performance, falling behind on graduation expectations, or financial/transportation challenges interfering with attendance.

Employment barriers include never holding a job (older youth), repeated failure to secure employment within a 60-day period, loss of employment in the last 30-day period, and family history of chronic unemployment or reliance on public assistance.

	Additional Assistance - Educational Barriers
ISY	• Has missed 18 or more days of school in the most recent academic year (secondary only)
ISY	• In school (secondary or postsecondary) with a GPA of less than 2.0.
OSY	• Has left educational program because of transportation or financial situation (secondary only)
ISY & OSY	• One or more grade levels below age-appropriate level
	Additional Assistance - Employment Barriers
ISY & OSY	• Has never held a job
ISY & OSY	• Has had two or more employment interviews without being hired in past 60 days

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	Additional Assistance - Educational Barriers
ISY & OSY	• Has lost employment placement in past 30 days
ISY & OSY	• Has a family history of chronic unemployment, including long-term public assistance.

D. SINGLE-AREA STATE REQUIREMENTS

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

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

Element not applicable to Rhode Island.

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

Element not applicable to Rhode Island.

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

Element not applicable to Rhode Island.

6. 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.

Element not applicable to Rhode Island.

7. 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.

Element not applicable to Rhode Island.

8. 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.

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Element not applicable to Rhode Island.

E. WAIVER REQUESTS (OPTIONAL)

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

1. 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;

2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;

3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;

4. 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.

5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER; AND

6. DESCRIBES THE PROCESSES USED TO:

A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;

B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;

C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;

D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.

E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.

7. THE MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

1. **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**;

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The State of Rhode Island seeks continuation of the waiver from the requirements outlined at Sec. 107 of the Workforce Innovation and Opportunity Act, relating to the roles and responsibilities of a local board.

Prior to the Secretary's initial September 2019 waiver approval, Rhode Island had two Local Workforce Development Areas under the Workforce Innovation and Opportunity Act (WIOA): The Providence/Cranston Local Workforce Development Area (LWDA) (made up of two cities) and the Greater Rhode Island LWDA (made up of thirty-seven (37) cities and towns). WIOA requires Chief Local Elected Officials to administer WIOA Title I funds and appoint Local Workforce Development Board members. In Rhode Island, as far back as the Jobs Training Partnership Act, the Governor performed the functions of the Chief Local Elected Official for the Greater Rhode Island (GRI) LWDA. This meant the Governor was appointing both the State Workforce Development Board (SWDB) and the GRI LWDB.

After authorization of WIOA, the Governor continued to serve as the Chief Elected Official for the GRI LWDB. However, during a compliance monitoring review conducted in February 2018, United States Department of Labor (USDOL) regional staff identified that the Governor acting in this capacity was inconsistent with WIOA requirements because the Governor is not a Local elected official and, thus, cannot appoint the local board. Regional staff advised finding a local elected official(s) to assume the role of Chief Local Elected Official for the area or submit a waiver requesting that the SWDB act as, and carry out roles and responsibilities of, the GRI LWDB. It is important to note that the local area belonging to this board comprises 95% of the municipalities within the state.

In response to the regional office's directive, the Governor engaged the RI League of Cities and Towns to address the issue. The DLT Director, at the direction of the Governor, met with the League twice to explain the change in law and answer questions regarding the ramifications of that change. The DLT then asked local officials if they wanted to appoint the board and they ultimately decided they wanted to relinquish that responsibility to the state and therefore wanted the state to produce a waiver request. These considerations were documented in a letter addressed to the Director dated April 23, 2019. The main theme of those comments involved the need for more efficient management of the local board and more effective use of funds. The decision of the local officials was the primary compelling reason for the proposed governance structure. The waiver request was initially approved in September 2019. It was subsequently reauthorized in September 2020, again in June 2022, and again in May 2024.

The May 2024 reauthorization included the following conditions:

- That the state demonstrate progress in addressing concerns identified in the 2018 compliance monitoring review, particularly in regard to fiscal controls and firewalls;
- That the state include local input into its activities. As proposed in the State's waiver request, the state board must maintain a subcommittee to reflect the geographic diversity of the State and its local elected officials; and
- Allocate funding to the local area for which the state board is carrying out local board functions.

In response to condition one; on March 29, 2021, the state provided USDOL regional staff a copy of the document entitled "Firewalls and Internal Controls Re: State and Local Board Responsibilities." This document memorialized the internal controls that all staff adhere to when fulfilling State and Local Workforce Board responsibilities in order that business will be conducted in a manner that will prevent actual, potential, or questionable conflicts of interest

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and will provide clear separation of duties. The Board's administrative and fiscal agent, the Department of Labor and Training, continues to conduct the responsibilities and functions of both boards consistent with Uniform Guidance and in compliance with the established firewalls and internal controls. Administrative and fiscal procedures were shared with, and reviewed by, USDOL-ETA staff during a PY2022 Consolidated Compliance Review. Any issues or deficiencies with those procedures were addressed and resolved through corrective action.

In response to condition two; the Board initially worked with the League of Cities and Towns to establish a Local Area Advisory Committee (LAAC) for the State Board, comprised of business, labor, and community leaders from throughout the Greater Rhode Island workforce area. This Subcommittee has continuously met throughout PY2021-PY2024, and presently - and helps ensure local area 'voice' and representation in key WIOA-related matters including policymaking, service data and demographic analysis, modification of the local WIOA plan, overseeing rehabilitation and upgrading of the local area American Job Centers, and other matters. While the ultimate responsibility for these functions remains with the board; the LAAC insures the needs, perspective, and opinions of the local area is hear.

In response to condition three; the state board allocates funds to both local areas annually through the annual "Allocations for Adult, Youth, and Dislocated Programs" policy (Workforce Innovation Notice 03-03). The development of the weights and allocation formulas, as well as the annual calculation and funding allocation, are done in specific manner such to ensure they are free from any real or perceived conflicts or biases toward one local area over another.

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

The Rhode Island Department of Labor and Training conducted a review of potential statutory and regulatory barriers and does not anticipate any challenges in this area. In addition, this waiver would not change the allocation of resources as there will be no change to the designation of Local Workforce Development Areas. Allocations made to the Providence/Cranston local area would remain unchanged as the Providence/Cranston local board would remain active and continue to be appointed by the two mayors.

State law R.I.G.L §42-102 provides the Governor's Workforce Board authority to "establish statewide policies, definitions, objectives, goals, and guidelines for the coordination of all employment-and-training programs and related services and programs within the state." This statute applies to all such programs administered by the Department of Labor and Training, which includes WIOA Title 1B. This statute, and its related subsections, provides the state policy necessary to assume the roles of the local workforce board.

As mentioned above, to ensure local stakeholder interests are represented and engaged; the Governor's Workforce Board has formed a subcommittee called the Local Area Advisory Committee, which reflects the geographic diversity of the greater Rhode Island area. This body is in addition to the current composition of the Board itself which includes representation from the greater Rhode Island area and already provides a degree of synergy between the role of the SWDB and the GRI LWDB. Existing SWDB committees already address many of the local board roles and the Local Area Advisory Committee is positioned to handle any additional roles.

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

The primary goal and outcome related to this waiver request are to comply with the provisions of WIOA.

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Ancillary outcomes expected from this waiver include increased efficiency within the Department of Labor and Training, reduced overhead costs, and a maximizing of funds available for direct services for individuals and businesses. Pandemic-related disruptions made it difficult to quantify and document the efficiencies that have resulted from the board governance waiver. However, as Rhode Island enters the fourth year of the waiver, the state estimates that the waiver and its associated administrative efficiencies have resulted in a reduction of no fewer than two FTEs, reducing overhead and freeing up more resources for direct participant services.

A second outcome of this waiver greater synergy between WIOA investments and the sizable commitment of state funds to workforce development. Per state statute, the State Workforce Development Board oversees WIOA investments and activities in the state and is also responsible for allocating the Job Development Fund – a state level workforce development account that augments the federal investments of WIOA. Involving the board in the direct oversight and administration of the local area offers opportunities to integrate state-funded programming into the local area American Job Centers and helps identify gaps and areas where state funds can compliment and assist federal programming.

4. **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.**

This waiver directly responds to the issues raised in the USDOL compliance monitoring review conducted in February 2018, which identified that the Governor appointing membership to the LWDA is inconsistent with WIOA requirements because the Governor is not a Local elected official and, thus, cannot appoint the local board.

5. **Describes the individuals affected by the waiver; and**

We believe that all employer and job-seeker customers benefit from this waiver and the transition toward a more unified statewide workforce system. WIOA partner programs benefit from a more straightforward planning and program development. AJC staff and other partners benefit from increased resources for direct programming and training as well as increased opportunities for system improvements and investments in technical assistance.

6. **Describes the processes used to:**
    a. **Monitor the progress in implementing the waiver;**
    b. **Provide notice to any local board affected by the waiver;**
    c. **Provide any local board affected by the waiver an opportunity to comment on the request;**
    d. **Ensure meaningful public comment, including comment by business and organized labor, on the waiver.**
    e. **Collect and report information about waiver outcomes in the State's WIOA Annual Report.**

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The State Workforce Development Board will continuously monitor the implementation and impact of this waiver. The Office of Planning, Integrity, and Compliance (OPIC) within the Department of Labor and Training is responsible for this monitoring. OPIC includes dedicated staff who do not have a role in the implementation or operations processes. Consistent with the terms of the waiver, the state revised its statewide monitoring policy to ensure that local monitoring decisions were free from any actual, potential, or perceived conflicts of interest. In CY2022, OPIC conducted a comprehensive fiscal monitoring of the Providence/Cranston workforce development area. A similar review of the Greater Rhode Island workforce development area is planned for the near future and will include a review of the aforementioned firewalls and internal controls to ensure continued adherence.

In addition to formal monitoring functions, the department also engages in regular internal performance reviews. These reviews cover progress on key implementation issues involving workforce development programs and Unemployment Insurance. The continued implementation of the waiver and the related data necessary to evaluate outcomes would be collected by the department's performance data team and presented at these meetings. Each local board role and project relating to the waiver would be converted into deliverable and the progress of each deliverable would be evaluated.

The initial waiver request was announced to the public and posted to the State Workforce Development Board's website for four weeks for public comment and review. Furthermore, Rhode Island Department of Labor and Training hosted three (3) public hearings across the LWDA to encourage public comment and notified stakeholders and advocates of these scheduled events, as well as the process for submitting written comments.

A copy of this renewal request has been shared with the Chair and Executive Director of the Providence-Cranston Local Workforce Development Board as well as the Chair and executive Director of the State Board, acting as Local Board for the Greater Rhode Island area. Should the waiver be renewed, notice will be disseminated to both boards as well as other impacted partners as necessary.

As part of the 2026 WIOA State Plan Modification submission, this waiver request will be posted to the State Workforce Development Board's website for comment and review by the general public and will be accompanied by public notice.

7. **The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.**

As described above, the waiver has functioned without issue since its initial authorization in 2019. The members of the Local Area Advisory Committee meet regularly and are engaged in decision-making effecting the Greater Rhode Island local area; firewalls and internal controls are working as intended with board and staff taking reasonable precautions against real or perceived biases. The waiver has resulted in some administrative efficiencies as estimated; with a reduction of no fewer than two FTEs, reducing overhead and freeing up more resources for direct participant services.

Statutory and/or Regulatory Requirement to be Waived – Allowing use of supportive services for participants within 12 months of exit for employment retention (new request)

1. **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;

Rhode Island is seeking a waiver from WIOA Section 134(d)(2) and 20 CFR 680.910 to allow use of supportive services for participants within 12 months of exit for employment retention. WIOA allows provision of supportive services to enable participants to successfully participate in career or training services; however for Adult and Dislocated Worker program participants, it does not authorize their use during the 12-month period post exit. This waiver can assist Adult and Dislocated Worker program participants who successfully obtain employment to have access to short-term supportive services that can ease the transition period to a new job.

2. **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 nor local statutory or regulatory barriers to implementing the requested waiver.

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

WIOA allows provision of supportive services to enable participants to successfully participate in career or training services; however for Adult and Dislocated Worker program participants, it does not authorize their use during the 12-month period post exit. This waiver will assist newly employed Adult and Dislocated Worker program participants to have access to short-term supportive services that can ease the transition period to a new job, particularly if that new job causes a participant to lose public benefits due to income thresholds. Often we see participants declining better-paid jobs due to the expected losses in public assistance benefits (i.e. the "benefits cliff"). This waiver will address benefit cliffs and temporarily replace lost benefits as the exited participant earns higher wages through employment. Such supportive services may include transportation, temporary living costs, grocery/gas cards, or childcare expenses while the individual adjusts to his or her new employment and public assistance situation.

4. **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.**

By allowing supportive services for WIOA participants post-exit, the US Department of Labor seeks to ease the transition period to a new job. This waiver is designed to address benefit cliffs and temporarily replace lost benefits as the exited participant secures higher earnings through employment. This waiver will improve job and career results as participants are able to train for and obtain better-paying jobs without the worry of a challenging transition period as they earn higher wages and potentially lose public benefits. This will lead to a higher-income, more self-sustainable population that can enjoy the dignity of work and pull themselves and their families out of poverty, and a more stable workforce for employers.

5. **Describes the individuals affected by the waiver; and**

WIOA adult and dislocated worker participants will benefit from this waiver, particularly participants transitioning off social assistance benefits. Employers will also benefit from a more stable workforce as participants can keep their better-paying jobs while transitioning off social assistance.

6. **Describes the processes used to:**

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

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

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

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

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

Annual WIOA programmatic reviews will include an evaluation of how this and all waivers are impacting local programs and performance. Rhode Island can effectively monitor the impact of the waiver through our existing client management system. Funds used for supportive services would be tracked, easily identifiable, and linked to the specific participant.

A copy of this waiver request has been shared with the Chair and Executive Director of the Providence-Cranston Local Workforce Development Board as well as the Chair and executive Director of the State Board, acting as Local Board for the Greater Rhode Island area. Should the waiver be renewed, notice will be disseminated to both boards as well as other impacted partners as necessary.

As part of the 2026 WIOA State Plan Modification submission, this waiver request will be posted to the State Workforce Development Board's website for comment and review by the general public and will be accompanied by public notice.

Any information gathered from the waiver will inform new or changes to policy as well as provide best practices. Outcomes of the waiver will be reported in the WIOA Annual Report. This strategy ensures that the goals described above, as well as those outlined in the State's Combined Plan are consistent with established objectives of the WIOA and federal and state regulations.

7. **The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.**

This is a new waiver request for which no previous outcome data is available. However, Rhode Island is prepared to provide any other information that may be requested.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the	Yes

The State Plan must include	Include
delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	
2. The State has implemented a policy to ensure local areas have a process in place for referring eligible veterans with employment barriers 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;	Yes
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 by formula, and no local area shall "receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years" [(WIOA Section 133(b)(2)(A)(ii)];	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for	Yes

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The State Plan must include	Include
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;	
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

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE STAFF

1. DESCRIBE THE STATE'S STAFFING MODEL FOR THE PROVISION OF LABOR EXCHANGE SERVICES USING STATE MERIT STAFF. STATES COVERED BY 20 CFR 652.215(B) (COLORADO, MASSACHUSETTS, AND MICHIGAN) MUST DESCRIBE THE STAFFING MODEL THE STATE WILL USE TO PROVIDE LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, INCLUDING OUTREACH TO MSFWS.

To provide labor exchange services under the Wagner-Peyser Act efficiently and effectively, Rhode Island will continue to utilize State merit staff for service deployment. The Workforce Development Services division within the Department of Labor and Training (serving as the State Workforce Agency), is responsible for these employees and will ensure all services are provided as outlined under the Workforce Innovation and Opportunity Act.

2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

Professional development activities for Employment Service staff will focus on several key areas:

- Labor Exchange: The Workforce Development Services division within the Rhode Island Department of Labor and Training continually reviews and evaluates the skills and related training necessary to conduct job seeker and employer services, such as workshops, one-on-one counseling, public presentations, and provision of exceptional

client service. Professional development time is set aside for staff to access programs that enhance and support their growth and ensure staff have the tools to offer efficient, client-centered services. Office hours are offered every Friday morning for staff that have any technical questions or troubleshooting concerns relate to the state job board.

- Labor Market Information (LMI): RIDLT WDS provides in-house training on the use of labor market information to allow staff to better assist clients in understanding in-demand jobs, labor market projections, and how to identify the skills that are in demand by employers. Labor Market Information training also helps staff assist clients in identifying salary demands and industry trends. Staff gain knowledge of high demand sectors, growing companies, and common skill and education requirements to better prepare clients for job interviews and salary negotiations. The State has invested in tools and protocols to help in this effort, e.g. the RIDLT Labor Market Information unit provides monthly 'Stat Track' updates and agency-wide bulletins designed to keep staff informed on regional economic trends, employment by industry, RIDLT activities as well as other various economic data.

- Effective Use of Tools: Job Center Staff are trained on utilization of EmployRI (Rhode Island's Virtual One-Stop platform) including instruction on how to better assist job seekers in job search methods, use of skills assessment, job matching protocol as well as the access and use of labor market information. Staff are further trained to identify and highlight skills and experience in resumés in response to demand-driven job descriptions, to leverage state and online resources in a job search process, and to build awareness of professional skill development opportunities available for their clients. Recently, staff has received regular training on safe and effective use of artificial intelligence tools such as resume and cover letter builders, utilizing chat bots for mock interviews, engineering resumes for Applicant Tracking System (ATS) friendlessness, and other important tools and processes.

- Business and Demand-Driven Technologies: Staff professional development includes continuous online and classroom training on the business and employer-facing portion of EmployRI. Employment Service staff are trained to assist employers in posting jobs, conducting resumé searches, and maximizing their recruitment strategies. Staff are trained to disseminate employer needs to clients in a timely manner to meet employer demands. The latest tools and techniques are provided to staff to enhance employer engagement and better direct employers to candidates and job seekers to quality jobs.

- Technology: RI DLT WDS provides professional development to staff regarding upgrades in IT resources, so staff are up-to-date on the most effective use of the latest technologies. This includes classroom training in the latest version of Microsoft Office, continual webinars and classroom training on effective use of the EmployRI system, use of labor market information tools, and use of virtual and teleconferencing tools. All staff in the Job Centers have also been trained on the use of Adaptive Technology (AT) and communication methods for individuals with disabilities. Adaptive Technology training includes use of various AT tools including TTY, Captel, Zoom Text, Magnifier, Pocket Talkers, Jaws and Magic. When the COVID-19 pandemic impacted the ability to provide in-person services, Rhode Island made remote/virtual services available statewide. All Job Center staff are trained on how to effectively provide remote career services in a virtual environment. Remote services help address some of the most common access barriers to Job Center services such as transportation and childcare. In addition, for the

virtual meeting environment allows job seekers to practice the virtual component of the job search, which allows them to better meet the demands of today's digital world.

In addition to deploying virtual/remote services; Rhode Island has modernized technology training to reflect today's job market. While topics like interviewing skills and resume writing remain critically important, job seekers increasingly mention concepts such as artificial intelligence, remote work and decentralization as areas they wish to learn more about. For this reason, WIOA Title I and III training and technical assistance have evolved to include these contemporary topics. Virtual and in-person workshops and seminars will soon integrate these topics, and customer handouts and collateral covering the topics will be disseminated.

- Social Media & Electronic Communication: Employment Service staff are trained to assist job seekers in professional and electronic communication skills including an understanding of appropriate email etiquette, applying to jobs through on-line applications, use of employment-focused social media including LinkedIn, and preparing for virtual interviews. Staff share the latest information with job seekers on how to cultivate a professional online presence. The State remains committed to providing modern professional development and training to all staff within the Rhode Island Workforce Development System.
- Integrity/Ethics: Employment Service staff participate in integrity trainings on standards of conduct, privacy awareness, safeguarding sensitive information, appropriate use of state systems and resources, ethics, system security considerations and appropriate policy. The State is committed to integrity and compliance for related regulations, policies, and procedures..

3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

Rhode Island seeks to ensure that workforce professionals across the core partners are knowledgeable and up to date on Unemployment Insurance (UI) eligibility issues and understand the referral process to UI staff. The State Workforce Development Board requires that local areas describe how they will "strengthen linkages between the one-stop delivery system and unemployment insurance programs" as part of their local 4-year WIOA Plans.

The RI Department of Labor and Training (RI DLT) oversees or is contracted to manage most of Workforce Development programs including Unemployment Insurance (UI), Title I of the Workforce Innovation and Opportunity Act (WIOA), and the Wagner Peyser/Employment Services funded through the U.S. Department of Labor (USDOL). RI DLT continuously works to improve internal and external communication and integration through among these programs and has identified liaisons in each division that assist in training and development of all Job Center staff.

The Department provides training to all Job Center staff regarding the identification of potential UI eligibility barriers. Career Center staff have been trained to recognize UI eligibility barriers and make referrals, if necessary, to UI staff for adjudication. When Job Center staff become aware of potential UI eligibility issues that are outside of the RESEA process, the Adjudication Division is notified immediately of an eligibility issue.

All UI information, changes, and updates are provided to Employment Service staff, which, in turn, enables Employment Service staff to provide UI program information to claimants. UI Call Center staff are able to refer and educate claimants on the workforce development system to assist UI claimants with their job search activities. With online portal enhancements, such as the front-facing UI Online portal, clients are easily able to access the scheduling platforms remotely, and both Employment Service staff and UI staff are trained on protocol to ensure ease of referral and seamless access.

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

Each of the state's three (3) American Job Center locations have computers available in a public resource area for individuals during business hours that may be used to file unemployment compensation claims. Through the States' Unemployment Insurance Online portal (UIO), claimants can not only file their initial claims, but also access their payment history, file an appeal, check adjudication status, certify for payment, check the balance of their UI credits, and print necessary verification forms for Department of Human Services assistance programs, as well as tax documents. One Stop merit staff are assigned to assist clients with questions and in navigating and completing the online UI claim process. Each one-stop center has bilingual (Spanish/English) employment service team members who are available to assist Spanish clientele with their claim submission.

The State ensures that on-site assistance is made available at Job Centers to give meaningful assistance to individuals who are filing UI claims. American Job Centers also have dedicated computers and telephone lines that are available and accessible to any client that needs assistance filing a UI claim. Job Center staff work directly with Rapid Response teams to provide services to employers and workers in mass layoff situations and to disseminate claims filing information.

In addition to direct staff assistance, posters are visible that provide potential claimants with information on how to file UI claims in the resource rooms. Additional documents that provide assistance to claimants are also available in the resource rooms and are available in languages other than English.

Effective services will be provided to Veterans who file for benefits under the Unemployment Compensation for Ex-Service members (UCX). UCX claimants are included in the weekly selection of RESEA required claimants. The State has implemented a collaborative effort between UI Programs and WDS services to better ensure the State's Veteran's population has a smooth transition from the military to civilian life. This will insure that UCX claimants have better exposure to jobs and reemployment services and fully leverage existing resources.

Job Center staff are trained to provide information and meaningful assistance to all individuals filing UI Claims. In addition, staff are trained to recognize individuals who lack computer skills and proactively offer one-on-one assistance in filing UI claims. Staff are also trained to recognize individuals with Limited English Proficiency (LEP) and individuals with disabilities and assist them in filing UI claims through the use of assistive tools and technology for LEP and individuals with disabilities. The remote scheduling platform allows individuals with LEP to make direct appointments with multi-lingual Job Center staff. Job Centers have procedures in place to assist clients having difficulty or needing immediate assistance for UI issues.

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C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

The Reemployment Services and Eligibility Assessment (RESEA) program identifies UI claimants for mandatory participation in RESEA. RESEA appointments are available virtually or in-person at one of our three American Job Centers. The Unemployment Insurance Online (UIO) platform includes a notification to RESEA selected claimants each week when certifying their claim, making sure they are aware of the requirement to participate in the RESEA program as well as instructions on how to schedule an appointment with Job Center staff.

RESEA focuses on providing participants an introduction and access to the services available at the state's physical Job Centers and virtual/remote services. Participants also receive a detailed review of their responsibilities while collecting UI, and assistance accessing the resources necessary to lessen the time on unemployment and to return to work. As the program mandates, each participant receives one one-on-one sessions with a Job Center staff member in addition to participation in enhanced reemployment services. Over the course of the one-on-one meeting:

- UI Eligibility Reviews are conducted,
- staff reviews the claimant's work search responsibilities,
- staff provides detailed labor market information,
- staff assists with job matching, if requested by the participant,
- staff assists with developing an individual reemployment plan,
- staff reviews a job skills assessment, if requested by the participant,
- staff reviews claimant's resumé,
- staff conducts a mock interview,
- staff assists claimant in registering with and accessing the Virtual Job Center, if requested by the participant,
- staff schedules each claimant for additional reemployment services including workshops and/or training as appropriate,
- and staff makes referrals to UI adjudication as appropriate.

Since 2014, the state has required claimants (except those meeting specific exemption criteria) to post their resumé in the state's Virtual One Stop online platform (EmployRI) by the 6th consecutive week of collecting UI benefits. To comply, claimants are required to be registered on EmployRI and utilize the system to generate, or specifically upload, a resumé. Posting a resumé on EmployRI allows employers to conduct talent searches of UI claimants and allows claimants access to additional features including skills assessments, LMI, an automated job search tool (Virtual Recruiter), and other job search and reemployment resources. Claimants are also advised through the UI call center and website messaging as well as printed media that they may take advantage of services provided at the state's American Job Centers

The state has a number of other programs designed to assist UI claimants and other unemployed individuals. All unemployed individuals are eligible to receive all Wagner-Peyser services and most other services offered by our partners, including job matching, training and education opportunities, on the job training, and registered apprenticeship programs. The

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Trade Adjustment Assistance (TAA) program is a federal program established under the Trade Act of 1974. The TAA Program provides aid to workers who lose their jobs or whose hours of work and wages are reduced as a result of increased imports. Although the TAA program is sunsetting nationally, the state continues to work with individuals impacted by previously approved Trade petitions, and continues to work with the impacted employers to connect those individuals not already served. Rapid Response teams communicate with the TAA team to share information regarding future Trade petitions if reauthorization is enacted. The Jobs for Veterans State Grant (JVSG) provides funds to the state to serve eligible veterans, as defined in 38 U.S.C. 4101(4) and 4211(4),3 and other eligible spouses as defined in 38 U.S.C. 4101(5),4 and to perform outreach to employers. Reemployment services are available to all UI claimants through all of state's comprehensive or affiliate One-Stop Centers. Instructions about how to apply for UI benefits are also available through the DLT's website, with links to online application for UI benefits, as well as instructions for how to get registered as a job seeker in the system.

D. DESCRIBE HOW THE STATE WILL USE WAGNER-PEYSER FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN WAGNER-PEYSER 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;

After filing a claim, UI claimants are advised of work search requirements and other pertinent information regarding their claim. Communication is provided to claimants of the services available in the state's Job Center offices and invites them to visit the office for job search assistance and reemployment services, as well as the Virtual Career Center for virtual meetings and services. Claimants are required to post their resumé on EmployRI and use of that system triggers the claimant's WP enrollment, after which their active enrollment and existence of a resumé allows the opportunity to conduct job matching and referrals to positions for the claimants. Additionally, claimants that are selected for RESEA are mandated to meet with the Job Center staff for reemployment services and are informed of additional services the Job Centers can provide, which they can access under Wagner-Peyser. If the client needs additional reemployment support beyond the initial RESEA, these appointments are funded and provided through co-enrollment practices with WIOA partner programs, promoting alignment and integration of services over the course of the participant's engagement with the workforce system. Other activities performed align to this referral process. After completion of the RESEA program, claimants who have not yet returned to work are encouraged to continue their interaction with the Job Center system, both in-person and virtually which continues their participation in WP supported activities and/or partner programs.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

Rhode Island UI claimants are required to register with the state's employment service. To assist claimants in complying with this requirement, the state has set up an automated process by which claimants who do not already have an existing registration (account) with the state's Virtual One-Stop platform (EmployRI) are pre-registered thereby allowing them to login and complete only the portions of the registration information not previously provided on their UI claim. Claimants are advised after filing a claim how to access their EmployRI account.

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

Claimants selected for RESEA are required to participate in the program which includes eligibility reviews by Job Center staff as well as mock interviews, job referrals (as appropriate), and mandatory individualized reemployment services designed to assist claimants in utilizing the Job Center and virtual services, for finding employment. RESEA serves a significant portion of the UI claim load each week including all UCX claimants.

Non-RESEA claimants who enter the Job Centers for services, such as Trade Adjustment Assistance and WIOA participants meet with staff make referrals to UI adjudication as appropriate. Additionally, any claimant who interacts with Job Center staff and discloses a potential work test compliance or other eligibility issue are referred to UI adjudication as appropriate.

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

Claimants can receive Wagner-Payer services through both self-service and staff-assisted interaction within the American Job Centers and the associated EmployRI system. Through staff-assisted interaction, claimants are offered services that include job search assistance, career counseling, skills assessment, skills gap analysis, resumé writing assistance, and interviewing skills workshops. Claimants who are deemed, through provision of these services, to show interest and aptitude towards a specific field that would require training are subsequently provided opportunities for training and education. If the individual meets the appropriate minimum pre-requisite requirements set forth for a particular training program, they are then referred to associated programs under WIOA for determination of eligibility for WIOA-funded training and education programs. Application assistance for these WIOA-funded programs is then provided to the Claimant by their assigned Job Coach. The State assures customer choice by offering a range of training options, and by making outcome and performance information on all training programs available to customers.

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.

Seasonal and migrant farmworkers (MSFWs) face needs which are unique to their profession as well needs common to most employees. In Rhode Island, based on past and projected agricultural and farmworker activity, those needs may include career counseling, skills assessment and enhancement, job search assistance, job training referral, worker protection education, complaint resolution, advocacy, and/or supportive services.

Access to employment assistance or training in multiple languages can be important to reach diverse worker populations. For H-2A guest workers, additional needs include transparent

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recruitment practices, housing provision, and community integration. RIDLT is dedicated to providing MSFWs with equitable services that are qualitatively equivalent and quantitatively proportionate to the services provided to all other job seekers, and to encourage their participation in any program or service where they may find benefit.

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

According to the USDA's 2022 Census of Agriculture, the most recent census available at the time of this writing, RI's top agricultural asset—by a wide margin—is its greenhouse and nursery industry, accounting for more than 55% of agricultural production in the state and reporting over $51 million in sales. This includes sod, ornamental trees and shrubs, floriculture, and other non-consumable products. Vegetables such as sweet corn and potatoes rank second for value of crops in the "Ocean State." Aquaculture (primarily hard clams, mussels, and oysters) is the largest livestock sector in RI agriculture, ranking third overall in market value and capturing 7.8% of revenue. Fourth and fifth in market value are cow's milk, and orchard fruits like apples, peaches, and blueberries. Rural areas support small-scale farms, such as grapes for local wineries, cultivated Christmas trees, and "backyard" egg producers. Animal agriculture includes cattle, hogs, and chickens. The total market value of RI's agricultural products was reported by the 2022 Census to total over $92 million, a 60% increase over the 2017 Census. Nearly 77% of sales are attributed to crops/plants.

Nearly 90 oyster farms, three trout farms, and six kelp farms were identified under aquaculture. with Eastern oysters—a popular restaurant staple—accounting for about 98% of RI's aquaculture production. With reported sales over $8 million in 2025, RI has pursued a steady growth in the aquaculture industry—ballooning from just 54 acres in 2002 to 384 acres in 2025.

RI's top five labor-intensive crops are orchard fruits, greenhouse/nursery, dairying, aquaculture, and corn. Other labor-intensive crops include vegetables, strawberries, and blueberries. May has been identified as the month of "heaviest worker activity" based on local conditions and is therefore the most effective period for RIDLT to provide full-time outreach to MSFWs. The growing season spans from late March to the end of October, with greenhouse/nursery and fruit/vegetables crops driving spring–summer labor needs, cool-season turfgrass remaining steady across the warmer months, and apples and shellfish harvesting increasing in the fall.

The bulk of farms are located in Providence County. Washington County boasts more agricultural land (35%), with Providence (28.7%) close behind. There are 1,054 farms reported in the 2022 Census, with an average farm size of 56 acres. Rhode Island is a diminutive state and roughly 43% of farms in the State are smaller than 9 acres, with an additional 36% of farms sited on parcels between 10-49 acres. Two percent of farms reported a pledge to organic practices.

Two noteworthy trends this Census period were that RI reported the highest percentage of new and beginning farmers in the US and was one of only three states reporting an increase in total

farms. Since the prior Census in 2017, about a dozen new farms opened in Rhode Island, and farmland increased by 4% to just over 59,000 acres in 2022. Expansion was mostly attributed to the repurposing of woodland in Washington County. Despite an increase in total agricultural land, the amount of harvested cropland decreased by over 4,400 acres from 2002 to 2022 over the same period. Farm acreage decreased in Kent, Newport, and Providence counties.

New England produces about 10% of the food it consumes. In RI, that percentage is cut in half. Rhode Island's growers are heavily invested in inedible products, with greenhouses/nurseries/floriculture accounting for over 21% of agricultural produces in 2022. With 59,076 acres categorized as agricultural land in RI, woodland is the largest category with nearly double the acreage of cropland. On harvested cropland, forage and other animal feed accounted for 49%, with vegetables, fruits, and berries nearing 20%. The 2022 Census of Agriculture has estimated a larger amount of land in agriculture than the USDA's Major Land Uses series because it includes all woodland owned by a farm. Cropland, pastureland, and farmstead acreage have generally decreased nationwide, while woodland estimates tend to be variable.

Almost ninety-five percent of area farms are identified as family owned. Unsurprisingly, nearly two thirds of growers have reported that they do not seek outside workers, a narrative reinforced by anecdotal data from the MSFW Outreach Worker (OW) and her manager. This is evidenced by RI's small known agricultural labor force, a universe abridged further by Federal MSFW definitions.

For employers who do hire agricultural workers, when the OW performed on-site visits in 2025, employers reported persistent labor shortages, often resulting in "skeleton crew" conditions. Rhode Island generally has limited domestic farm labor pools. Relatively low unemployment rates over the span of this report coupled with average farmworker wages reported to fall beneath a "living wage" per the U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics, MIT, Living Wage Calculator have typically resulted in local job market conditions that do not readily favor fulfilment of vacancies. The RI Food Council's 2025 Fact Book reported, "Although wages for most occupations have increased in recent years and are above Rhode Island's minimum wage, it is also the case that most food system jobs received some of the lowest wages of any jobs in Rhode Island."

The USDA's Economic Research Service reports that "one of the clearest indicators of the scarcity of farm labor is the fact that the number of H-2A positions requested and approved has increased nearly 20% [nationwide] since 2020, with a more than sevenfold growth over the past 19 years." Likewise, RI's use of H-2A labor has grown exponentially over the past five years, increasing roughly 18% year over year. Over half of RI's H-2A farmers have shared with the State Monitor Advocate (SMA) that they could not remain in business were it not for the Office of Foreign Labor Certification's (OFLC) program. It is worth noting that 2025 proposed changes to calculation of the Adverse Effect Wage Rate (AEWR)—the lowest hourly wage rate that must be offered to H-2A workers—tentatively dropped the baseline beneath RI's minimum wage, conceivably resulting in a 19% reduction in H-2A wages from 2025 to 2026. A lower, more "affordable" AEWR may encourage additional farmers to participate in the H-2A program, but the economic responsibility to provide housing for their H-2A workers and pay for their domestic and international transportation remains.

Compared to other states, "Rhode Island has the smallest total of land dedicated to agriculture—roughly 9% of land area—and the second lowest agricultural sales, reporting $86.6 million in sales in 2025. The RI Food Policy Council reported, "A consequence of Rhode Island's relatively small land base, coupled with intense development pressure, is that it has the most expensive

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farmland in the country: $22,000 per acre. From 1945 to 2022, farmland as a percentage of Rhode Island's total land area decreased from 40% (264,734 acres) to 8.9% (59,076 acres)."

EcoRI.org reported, "As older farmers age out of demanding work and sell or lease their property to developers, the high cost of what [land] remains makes farming especially challenging. Rhode Island's transition to suburbanization has cost the State 80% of its farmland since 1945, and the resulting lack of access to affordable farmland threatens the State's agricultural sector, according to the RI Department of Environmental Management (DEM)."

The publication continued to outline economic factors facing farmers, reporting general frustration with RI's commercial environment, quoting one local organic pork, beef and chicken farmer, "The primary hurdle that Rhode Island farmers face is that most consumers aren't willing to pay enough for food to actually support farmers to make a full-time living without off-farm jobs." He wished it were possible for the government to "demand sourcing food locally at a fair price to the farmer." A kelp and oyster farmer and her husband, both working full-time in non-agricultural jobs were cited in the environmental news outlet as "believ[ing] the state is doing a 'wonderful' job supporting local food, but she said both Rhode Island and the farmers, producers, and harvesters here could better share their resources and expertise." In 2025, RI saw an increase agrotourism, with farmers offering goat yoga and food-truck nights to boost revenue.

In 2025, RI's Commerce Department reported over 80 farmers' markets statewide, including seasonal standbys, smaller year-round "winter farmers' markets," and pop-up events. Local producers received a boost with a 2024 award of over $270,000 of USDA//DEM Specialty Crop Block Grants to expand market access for locally grown food and nursery crops and enable consumers to contribute directly to—and develop relationships with—area farms. The RIDEM continues to promote agribusiness with their "Get Fresh, Buy Local!" RI Grown program, which easily identifies local products for consumers and wholesale buyers through an interactive map, steady promotion on social channels, and a marketing toolkit for growers. DEM offers a number of other services and programs to support the agricultural community including farmland protection and leasing, grant programs including the Local Agricultural and Seafood Act, and farmland tax relief through the Farm, Forest and Open Space program, among others.

Income eligible seniors receive food boxes under the USDA's/DEM's Senior Farmers Market Nutrition program and receive Electronic Benefit Transfer (EBT) cards to purchase RI-grown food at farmers' markets, a boon to 6,600 participating seniors and averaging $2,742 in sales per participating farmer in 2025. Both the Special Supplemental Nutrition Program (SNAP) and the Women, Infants, and Children (WIC) Program have a similar benefit card program for an average of 68,000 households, representing roughly 16% of Rhode Islanders, and totaling over $1,300,000 in SNAP/EBT sales at farmers' markets from 2015-2022. The non-profit Farm Fresh RI offers "Bonus Bucks" tokens on-site at farmers' markets—effectively doubling the spending power of SNAP/WIC recipients by providing a 100% match on the purchase of fresh fruits and vegetables. This remarkable program has three benefits: boosting the purchasing power of participants, providing an incentive for consumers to seek out and spend at local farmers' markets, and benefiting the growers who retail their produce there. EBTs can also be used to subscribe to Community Supportive Agriculture (CSA), a prepaid subscription to a farm's produce for the season.

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

The State's Labor Exchange instrument—EmployRI—tallies "Migrant Farm Worker" and "Seasonal Farm Worker" separately in reporting. Both are regularly reviewed by RIDLT and individuals who meet the definition of MSFW are offered appropriate services by an American Job Center (AJC) Job Coach, while participants who do not qualify can have their EmployRI account corrected. Any MSFW identified in the field by the OW can receive a presentation on the services available at the local one-stop centers, information on the Employment Service (ES) and Employment-related Law Complaint System, guidance on other available MSFW services, and a summary of farmworker rights including anti-retaliation, anti-discrimination, workplace safety, and the terms and conditions related to their employment. RIDLT provides MSFWs with equitable services that are qualitatively equivalent and quantitatively proportionate to the services provided to all other job seekers.

The approximate number of MSFWs in Rhode Island during peak season is estimated to be nearly 25, ebbing to less than five during low season. Estimates are aggregated with EmployRI data, anecdotal information gleaned during Outreach visits, NFJP-grantee input, and feedback from other agricultural organizations. RIDLT is not aware of any domestic migrant workers; all area MSFWs are believed to fall under the category of seasonal workers. While the Census of Agriculture reports a total of "hired farm labor," Appendix B in the National Agricultural Statistics Service (NASS) includes paid family members and year-round farm employees in that figure, so while the tally does include MSFWs, is not a one-for-one count. RIDLT contacted NASS in preparing this Plan.

In 2025, three RI farms placed "criteria" clearance orders with RIDLT to participate in the H-2A program, which allows foreign-born workers to perform seasonal labor for a period of up to 10 months. In 2025, there were twelve H-2A guest workers, an increase of 20% over the previous year. Every H-2A worker in RI calls Jamaica home, all are fluent in English, and some also speak Jamaican Patois.

An OFLC representative at a 2024 Regional SWA Training stated, "Over 30% of agriculture workers in the program surveyed by OFLC wish to leave agriculture work." RIDLT is prepared to assist those who wish to transition out of lower-paid seasonal and/or manual roles in agriculture.

As outlined Section VI.e.1, the ES needs of farmworkers may include job coaching, training, job search assistance and/or referral, worker rights' education, complaint resolution, advocacy, and/or supportive service referral. Access to employment assistance or training in multiple languages can benefit diverse worker populations. For H-2A guest workers, additional needs include transparent recruitment practices, housing provision, and community integration. RIDLT regularly reviews the services and protections offered to MSFWs, both at the ACJs and through Outreach, in a continual effort to improve the delivery of service.

4. OUTREACH ACTIVITIES

Historically, Rhode Island has encountered low MSFW numbers yet is committed to identifying individuals who are not reached through normal intake activities. This includes increasing Outreach during "peak season" to full-time service. The OW and RIDLT management are trained

on MSFW service provision, field checks, H-2A housing inspections, the ES Complaint System (including the processing of apparent violations), and core services available through the AJCs. Activities are detailed in the following Sections VI.e.4.A-E.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES

Outreach attempts identify MSFWs at their working, living, or gathering areas in PY24 totaled 417, of which 366 were on-site and in-person. During the low season, the OW also visited community-based organizations, health clinics, laundromats, churches, grocery stores, and food pantries to attempt to locate MSFWs, leave behind marketing materials where MSFWs may congregate, and promote cooperative working relationships between RIDLT and groups that serve MSFW populations.

The Spanish-English bilingual OW can deliver a presentation on the core ES available—whether in-person at the AJCs or virtually guidance on the ES Complaint System, referral to available MSFW services, Wage and Hour Division (WHD) safety resources, and a summary of farmworker rights including Agricultural Employment Under the Fair Labor Standards Act (FLSA) and the Migrant and Seasonal Agricultural Worker Protection Act (MSPA). Where appropriate, the OW will leave printed materials behind as well as her contact information and is prepared to supply resources digitally or via the postal service. The SMA is ready to offer the SWA TA, employer education, and MSFW guidance.

RIDLT fosters a collaborative atmosphere between State agencies, nonprofits, and the farming community. Continued coordination is critical to nurturing a flourishing agricultural sector. The State will continue to work cooperatively to improve existing employment and training programs to emphasize quality service and client satisfaction.

In accordance with 20 CFR 653.107, the OW conducts full-time outreach to MSFWs across the State during the "period of highest MSFW activity" or 'peak,' identified in this plan as the month of May, and part-time outreach during low season in an effort to contact a majority of MSFWs in the State annually. Staffing levels align with the estimated number of farmworkers and anticipated farmworker activity as indicated in this Plan. Peak season was successfully modified in the last submitted Plan, and as a result, the OW reported fewer closed or vacant farms, however identifying individuals who meet MSFW criteria still remains a challenge. The OW conducts Outreach in each service area of the State and is expected to spend a majority of her time in the field.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF.

The State Monitor Advocate (SMA) is a resource both for merit staff in the American Job Centers and at the administrative center, providing ad hoc and programmed technical assistance, printed resources and tools, best practice recommendations, and regulatory compliance. She has onboarded multiple OWs, managers, and administrators. The SMA regularly reviews regulatory guidance and recommends course correction whenever identified, such as during routine review of daily MSFW Outreach Logs. The SMA, the Outreach Worker, and her office manager meet at least quarterly to review operating procedures and discuss potential improvements to service provision.

The OW is a fully trained ES Job Coach within the AJC. Job Coaches are instructed on all available ES and referral practices, including the ES Complaint System. Before PY25, NFJP-service referrals were available to RI's MSFW population. Partnership with the New England Farmworkers Council is detailed below in Sections VI.e.4.E.

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At the time of this writing, the OW sits on RIDLT's Equal Opportunity Advisory Committee (EOAC).

A cloud-based resource library of staff training materials and educational client collateral, inaugurated during the last Plan period, is consistently augmented. Subject-appropriate materials are forwarded to relevant audiences.

C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES

The Rhode Island Department of Labor and Training conducts training sessions and provides information to enhance the awareness of outreach representatives. The Outreach Worker undergoes individualized training, supplemented with continuous technical assistance throughout the program year. They also engage in various webinars organized by the U.S. Department of Labor and attend meetings t to stay informed about agricultural activities across the state. Ongoing training is specifically tailored for MSFW Outreach staff, aiming to elevate awareness across core programs, including VET, JVSG, OFLC, WP/ES, and Rapid Response.

The Workforce Development Services (WDS) division continues to partner with the Unemployment Insurance (UI) division to provide awareness on the Unemployment Insurance Program. Both UI and WDS are within the RI Department of Labor and Training, making cross training and information sharing easier. Staff are trained to provide general assistance and information to customers who have questions about filing an unemployment insurance claim. Questions regarding individual claims, appeals, or those that require specific UI expertise are referred to UI staff for responses.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

The RIDLT trains merit staff members in Federal regulations related to MSFW services and provides outreach-specific professional development activities to the OW using online training modules, invitations to external webinars, and video resources from "WorkforceGPS," USDOL's platform that supports the development of efficient and effective employment programs.

In PY24, standard case review of EmployRI participants prompted an apparent violation to be filed on behalf of an MSFW. This led to a cross-functional professional development opportunity for ES staff on the potential misclassification of a cash-paid employee, potentially in violation of RI's 2024 "Payment of Wages Act" (RIGL § 28-14-1). Ultimately, Local or Federal enforcement was impeded by a lack of actionable information from the MSFW.

Also in PY24, RIDLT instituted division-wide "Title III WIOA training for ES Programing" to deeply educate Job Coaches—including the OW—on W-P provision and documentation, and to standardize procedures across the Workforce Development Services (WDS) division. This in-depth instruction, coupled with vendor-coordinated Management Information System (MIS) refinements in 2024, were implemented to better capture data relative to service provision. Continuing education is predicted for this Plan period.

Self-paced state-wide Performance Development curricula is available to all State merit staff on-demand. The RI Learning Center offers training videos and written tutorials on topics that would prove valuable in serving both job seekers and employers, such as "Having Difficult Conversations" and "Effective Public Speaking," and "Why Trust Matters."

The OW is a fully qualified AJC Job Coach and has been cross trained on Title I and III services. WIOA Job Coaches undergo professional development on a regular and frequent basis, understanding available ES and resources, and are positioned to effectively provide high-quality service and referral to any MSFW seeking work.

In this Plan period, informal but deliberate coordination between neighboring Region 1 OWs is anticipated in an effort to share best practices, field experience, and peer support in what can be a lonely station. Planning is expected to be initiated by the SMA in PY25 and modeled after her own monthly R1 SMA calls and regular conversations with national SMA groups.

Procedural improvements to MSFW outreach are planned for 2026 and are expected to include pre-arranged visits to local resource providers and workplaces.

The RIDLT Employer Engagement Team's Business Service Specialists (BSSes) are committed to serving every Rhode Island employer and can promote appropriate supports to agricultural employers, including known tax credit and grant programs. The OW refers agricultural employers to BSS merit staff during on-site visits, as appropriate.

The SMA regularly includes relevant SWA staff, including the OW and her manager, in local, regional, and national training opportunities on farmworker rights, employment law, trafficking, sexual discrimination, and safe working conditions. Partnering with the Monitor Advocate System, WHD, Employment and Training Administration (ETA), Occupational Safety and Health Administration (OSHA), and legal advisors not only builds skill acquisition but also can develop interpersonal relationships for personnel offered "a seat at the table."

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

Rhode Island fosters a collaborative atmosphere between State agencies, nonprofits, and the farming community. A four-year Memorandum of Understanding (MOU) and two-year Data Sharing Agreement (DSA) was established between the SMA, RIDLT, and the NFJP-grantee New England Farmworkers Council (NEFWC), effective July 1, 2024. In September 2024, DOL announced plans to distribute Hawaii's, Massachusetts', New Hampshire's, Rhode Island's, and Oklahoma's funding proportionally to all other states. Rhode Island did not receive a grant allotment for NFJP funding for PY25 per TEGL 13-24. At the time of this writing, RI has no NFJP partner.

The SMA serves as a point of contact for active collaboration with the RI Department of Environmental Management- Agricultural Division (RIDEM), the U.S. Department of Agriculture (USDA) and their local Farm Service Agency (FSA), the RI Farm Bureau, the Wage and Hour Division's CORPS (Community Outreach Resource Planning Specialists), and the National Monitor Advocate's office (NMA).

In 2025, the OW contacts other state departments and grassroots organizations to promote AJC services available to RI's MSFWs, including referrals to training, supportive services, and career services.

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

Describe the State agency's proposed strategies for:

A. PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

I. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS

II. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES

RIDLT provides a full range of employment and training services to RI's agricultural community. Services are available through the one-stop delivery system in-person, virtually, or through outreach efforts. Merit staff provide one-on-one and group services, and where needed, can walk participants through remote-access processes, thereby improving digital literacy. Assistance for Limited English Proficient (LEP) customers services are available, and all AJCs in the State are staffed with English-Spanish bilingual merit personnel.

AJC Job Coaches provide ES to MSFWs, and the OW assists MSFWs who cannot or do not wish to visit their local AJC. MSFW-eligibility is determined, and as appropriate, reportable individuals and participants are apprised of and/or registered for available core or intensive programs. Comprehensive ES are provided in a manner that is equal in quantity and quality to any services provided to non-MSFWs such as career guidance, development of individual employment plans (IEPs), skill assessment, EmployRI Labor Exchange assistance, job search assistance, training referral, complaint handling, labor market information, supportive service referral, and information on community resources and partner organizations that serve the MSFW community such as mental health support for those in agriculture. If an individual requires services that are beyond the scope of ES such as occupational training, and if they are eligible, they may then be co-enrolled in select programming such as WIOA Title I Adult, Youth, or Dislocated Workers, and other programs.

AJC resource areas provide a comfortable and convenient space in which to take advantage of a range of tools. The AJC computers include operating systems in multiple languages. Internet access, job boards, printers, telephones, and faxes are available to conduct job searches free of charge, with or without staff assistance as desired. Clients interested in gaining new job skills or verifying their existing skills can access online training modules or on-site classes. Individualized career services include comprehensive assessments, individual or group counseling, and workshops such as résumé writing or AI orientation.

In accordance with equity ratio indicators and minimum service level indicators, RIDLT will ensure that Job Center staff are trained in the proper identification and documentation of MSFWs, as well education on possible barriers to employment that MSFWs may confront. The SMA will continue on-site monitoring of the AJCs to ensure regulatory compliance and offer TA as needed.

The final objective of RIDLT's career guidance, training, and supportive services is to assist individuals who wish to obtain or retain stable employment leading to economic self-sufficiency and, for workers who wish to move from lower-paid seasonal and/or manual roles in agriculture, to assist in the acquisition of skills that may lead to higher paying employment. MSFWs have access to these ES in a way that meets their unique needs.

RIDLT is committed to assisting agricultural employers with their labor needs by promoting vacancies on the Agricultural Recruitment System (ARS) within their no-fee Labor Exchange

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EmployRI, processing job clearance orders, and referring domestic intrastate and interstate applicants.

AJC Job Coaches can recruit and refer qualified applicants to available employment opportunities and the RIDLT's Employer Engagement Team work directly with employers to promote growth and workforce retention, craft and post job orders, and provide labor market information, prevailing wage data, or funding opportunities for training. Upon request, the Department may host virtual or on-site recruitment events.

Agricultural employers are also educated on available tax credit and grant programs such as the Work Opportunity Tax Credit, the Job Growths Act, Commerce RI supports, and many more. The OW directs agricultural employers to the BSS team during their on-site outreach visits. TA on compliance with employment-related Federal and State regulation is available.

In this next plan period, RIDLT seeks to build upon its partnerships with public agencies and agricultural employer organizations, coordinating more regularly with the RIDEM's Division of Agriculture, the RI Farm Bureau, Farm Fresh RI, and the USDA FSA to better understand the agricultural sector in RI and potentially offer more agriculture-customized employer support.

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND STAKEHOLDERS

RIDLT will continue to market the Employment Service and Employment-related Law Complaint system, described at 20 CFR 658 Subpart E, to farmworkers and other farmworker advocacy groups through scheduled in-person outreach visits and promotional mailings. Additionally, posters are displayed at every AJC to inform any reader of the Complaint System. Relevant information and posters are also published on RIDLT's landing page, "Jobseeker Resources," and the employer "Fair Employment Practices" landing page.

The OW advises all entities with whom she interacts of the availability of the Complaint System and offers to accept and/or refer any complaints. RIDLT anticipates coordinating with their own Office of Community Engagement and State Equal Opportunity Officer to further promote the Complaint System externally.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

RIDLT will continue to market the ARS for U.S. workers among local agricultural employers through the WDS division and their AJC network.

RIDLT's Employer Engagement Team works directly with employers to recruit qualified domestic workers on a temporary or seasonal basis, process criteria (H-2A) and non-criteria clearance orders, and promoting vacancies on the Labor Exchange. AJC Job Coaches refer qualified domestic intrastate and interstate applicants, to available employment opportunities.

The OW refers employers to the Employer Engagement Team as appropriate, and the SMA also provides RIDLT with a list of agricultural employers who have been observed to post "help wanted" notices or who have shared their interest in assistance with recruitment.

In this next Plan period, RIDLT will leverage its social media presence on Facebook, Instagram and X (formerly Twitter) to raise awareness of the ARS and how RIDLT can assist attaining and retaining a viable workforce. Historically, ARS participation has been nominal due to employer experience with a shortage of applicants and reported dissatisfaction with work ethic among

domestic applicants. H-2A-related job vacancies are posted in the area of need, instructing interested job seekers to visit their nearest AJC for EmployRI orientation and/or referral.

6. OTHER REQUIREMENTS

A. COLLABORATION

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

RIDLT previously enjoyed a robust partnership with New England Farmworkers Council (NEFWC)—the area's NFJP-grantee—which included monthly meetings and a multi-year MOU) and DSA. In September 2024, DOL announced plans to redistribute NFJP funding for Hawaii, Massachusetts, New Hampshire, Rhode Island, and Oklahoma proportionally to all other states. Rhode Island did not receive a grant allotment for PY25 per TEGL 13-24. At the time of this writing, RI has no funded NFJP partner.

RI fosters a collaborative atmosphere between State agencies, nonprofits, and the farming community. As noted in Section VI.e.4.E., this includes regular communication with DEM's Agricultural Division, Farm Fresh RI, the USDA and their local FSA, the RI Farm Bureau, WHD's CORPS, and the NMA's office. Local nonprofit outreach includes Community Action Programs (CAPs), WIC clinics, Salvation Army campuses, community centers, health centers, and food banks. As noted in Section VI.e.4.D., procedural improvements to MSFW outreach are planned for 2026 and are expected to include pre-arranged visits to local resource providers and workplaces. RIDLT also works closely with the state-level Wage and Hour Division, and the SMA maintains contact with the Jamaican Ministry of Labour since all of Rhode Island's H-2A workers hail from Jamaica.

Since the last Plan's submission, RIDLT has opened new channels of communication to include RIDLT's Office of Community Engagement and the State Equal Opportunity Officer to further promote MSFW issues and services. The OW is a volunteer on RIDLT's Equal Opportunity Advisory Committee (EOAC), bringing her lived experience with MSFWs to the table.

In the coming plan period, RIDLT plans to investigate enhancing partnerships among local and regional agricultural agencies and employer organizations with a goal of better understanding the landscape of agricultural employment available in RI. This will include outreach to the state's Food Strategy Director within the state economic development agency. A broader knowledge of both successful practices, and new or entrenched challenges faced by MSFWs and their employers, could instruct strategy and possibly improve service delivery. RIDLT will be reaching out to Migrant and Seasonal Head Start (MSHS) to discuss services to MSFW's children where appropriate.

B. REVIEW AND PUBLIC COMMENT

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in

formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

In accordance with 20 CFR 653.107(d)(3), on January 13, 2026, the SMA emailed "interested parties" this draft of the PY24-27 Agricultural Outreach Plan Modification to "solicit information and suggestions." A deadline of February 12, 2026, was provided to allow "at least 45 calendar days […] to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 calendar days for review and comment."

An invitation to review and comment was sent to the following organizations:

1. RI Department of Environmental Management (RIDEM)-Agricultural Division,
2. RI Farm Bureau,
3. Farm Fresh RI,
4. RI Coastal Resources Management Council, and,
5. USDA Farm Service Agency (FSA).

At the time of this writing, RI has no NFJP partner from whom to solicit comment.

C. DATA ASSESSMENT

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

PERFORMANCE	FY21	FY22	FY23	FY24
Number of agricultural job orders received	3	4	6	6
Number of agricultural job orders filled	3	4	6	6
Number of H-2A interstate clearance job orders received	0	0	0	0
Number of H-2A interstate clearance job orders initiated	0	0	0	0
Number of non H-2A interstate clearance job orders received	0	0	0	0

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RIDLT provides MSFWs with equitable services that are qualitatively equivalent and quantitatively proportionate to the services provided to other W-P participants. Every identified MSFW has been offered personal attention yet each consistently decline any service provision.

The SMA uses on-demand EmployRI reports, quarterly Monitor Advocate Reports, monthly Outreach Summaries, and MSFW Daily Log records to assess data and monitor service provision. In compliance with the Wagner-Peyser Act Staffing Final Rule, RIDLT data collection and performance accountability measures include "reportable individuals" in addition to "participants," as defined at 20 CFR 651.10. Qualifying participants as MSFWs is a standard operating procedure of the W-P intake process, and during Re-Employment and Eligibility Assessment (RESEA) Program mandatory appointments, ES Job Coaches poll UI claimants for MSFW classification. Low MSFW totals likely reflect RI's demographics, which are informed by our small geographic area and an agricultural base predominantly composed of modest family farms.

RIDLT requires the AJC managers to regularly review both "Migrant Farm Worker" and "Seasonal Farm Worker" categories within the online Labor Exchange system. Each MSFW participant is contacted directly by a Job Coach, offered basic and individual career services, and advised of the ES Complaint System. MSFWs also receive secondary follow-up where indicated and are offered the full complement of Outreach services outlined at 20 CFR 653.107(b). Common issues which resulted in rectifying self-registered EmployRI accounts have been: insufficient work history; agricultural experience which falls outside the 12-month criteria; or customers incorrectly identifying themselves as MSFWs. RIDLT makes corrections as necessary on or before each quarter end, prior to ETA-5148 certification. With an MSFW universe often tallied by single digits, one incorrect MSFW classification might mean the difference between meeting or failing Equity Ratio Indicators (ERIs). An additional impact on ERIs is each MSFW's chronic refusal of service. All interactions are captured via Case Notes but are not referenced in the Performance Report for the Monitor Advocate System (the ERI tool).

RIDLT typically meets two of eight ERI percentages—Received Basic Career Services and Received Individual Career Services. In PY23, a single MSFWs indicated an interest in training and was referred to—and subsequently completed—a Microsoft Office software course. Both the SWA and SMA believe this tool does not fully capture RI DLT efforts and actions to provide ES to MSFWs.

In the performance chart above, all agricultural job orders posted with RIDLT were ultimately filled by H-2A visa holders. Limitations imposed on H-2A work authorization for W-P service receipt may also have a negative impact ERIs since the only ES to which they are entitled is the ES Complaint System, which is not an ERI category. Despite consistent year-round outreach efforts—and full-time outreach during peak season—RI's OW consistently reported difficulty locating MSFWs in the field from PY21 to PY24.

In 2025, TEGL 23-19 Change 3 provided clarifying language and revisions to data validation requirements, including new source documentation for PIRL 1618, which is calculated in the Minimum Service Level Indicators (MSLIs).

D. ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

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Over the period of the last AOP, a review of MSFW performance indicated that RIDLT provided the full range of employment and training services to RI's MSFW-specific agricultural community mandated by regulations at 20 CFR 652, 653, 655, and 658, and using definitions at 20 CFR 651. Wagner-Peyser ES was provided through the one-stop delivery system: in-person or virtually through AJCs, through the OW's targeted attempts to contact MSFWs not reached by normal AJC intake activities, or online through EmployRI. ES provision was guided by assessing farmworker and employer needs, identifying economic or other factors anticipated to impact agriculture, and coordinating with other organizations and service providers who assist the population. MSFWs were provided qualitatively equivalent and quantitatively proportionate services to improve their living and working conditions.

All interested MSFWs were offered resources to attain greater economic stability, whether through retention within agriculture, asserting their legal rights, or assistance in finding work of interest in a different field. Agricultural employers were supported in promoting and filling available vacancies and provided information on grant opportunities, proposed rulemaking, or regulatory compliance. Details on how these goals were achieved are elsewhere in this Plan.

State merit staff—including the OW, AJC Job Coaches, and management—were evaluated and provided TA whenever appropriate. With an eye towards continuous improvement, the SMA indicated satisfaction with the level and quality of RIDLT's efforts to reach stated MSFW objectives: ES provision, with as much or as little staff-intervention and follow-up as the MSFW desires, in whichever language the client prefers. RI's MSFWs are reasonably able to participate in ES, with preference given to their individual inclinations, needs, and skills.

In Rhode Island, most merit staff are unionized, which may impact scheduling assignments, remuneration, and vacancy posting. Service provision, operating procedures, and administrative processes are regularly evaluated by the SMA. Before the next Plan submission, monitoring of each AJC in the State will have been completed.

When performing outreach, in-person visits comprise the majority of the OW's efforts. In PY24, 417 attempts were made to identify MSFWs at their working, living, or gathering areas, of which 366 were on-site. Locations included area farms, agricultural businesses, libraries, markets, popular eateries, churches, food pantries, and community-based organizations. Agricultural producers visited by the OW included fruit/vegetable farms, tree farms, vineyards, aquaculture farms, livestock/poultry farms, and greenhouses. The OW made targeted attempts to service the aquaculture sector as called out in the previous Plan and discovered an as yet unexplored branch of agriculture in Little Rhody – kelp farming.

While the OW was able to speak with at least one person in two-third of her outreach attempts, all MSFWs interviewed on-site were H-2A workers. In PY24, the OW joined the SMA on her H-2A field visits, to advise visa-holders on the Complaint System. RI hosted 12 H-2A workers at three farms over the summer of 2025. This marks a 20% increase in H-2A workers over the prior PY. Two H-2A housing inspections were conducted by State merit staff—the third labor camp is over the border in a neighboring state.

A digital daily MSFW Outreach log, referenced in the previous Plan, was deployed towards the end of 2023 and successfully captures granular data used to improve outreach strategy.

RIDLT has begun researching best practices, both from neighboring states within the Region and the Federal Monitor Advocate System, in order to enhance successful identification of MSFWs in the field. The OW has consistently reported difficulty in finding MSFWs, despite steadfast in-person outreach efforts. In the next plan period, the OW is anticipated to connect with fellow OWs within Region 1 as part of her professional development: to build community,

share field experiences, and provide peer support. Planning is expected to be initiated by the SMA and modeled after her monthly R1 SMA calls and regular conversations with national SMA groups. Procedural improvements to MSFW Outreach are planned for 2026 and are expected to include scheduled site visits. Technological enhancements are also being explored, and any improvements will be incorporated, as identified. As called out in the previous Plan, in 2025, RI DLT sought to partner with Migrant and Seasonal Head Start (MSHS) to offer services to MSFW's children when possible.

As noted in Section VI.e.6.C., one area where the State consistently struggles to meet expectation is with Equity Ratio Indicators, and the reasons are outlined in that Section. RIDLT's administration and data team have been, and will continue to, work with the vendor who administers EmployRI—Geographic Solutions—to identify and implement refinements wherever possible. Staff have been regularly trained on MSFW identification and data capture, however, as noted earlier in this Plan, when participants decline service, it can have an outsized impact on ratio calculation.

In 2026, RI's minimum wage will rise to one dollar to $16 an hour, nominally protecting RI's H-2As from the Interim Final Rule's (RIN 1205-AC25) recission of the 2024 Improving Protections for Workers in Temporary Agricultural Employment in the United States. The Interim Final Rule included a recalculation of the AWER. which has the potential to reduce mandated H-2A wages in RI by 19% from 2025 to 2026. On 6/20/25, WHD suspended enforcement of all provisions introduced in the 2024 H-2A Final Rule. Local dependence on H-2A labor was noted in Section VI.e.2.

The SMA prepared RIDLT to meet the compliance date of the Wagner-Peyser Act Staffing Final Rule (88 FR 82658). She will continue to provide TA with an aim to continuously improve service delivery., with unhesitating support from RIDLT's administration.

RIDLT receives regular guidance on regulation and expectations surrounding the ES Complaint System. with the SMA reinforcing the vital importance of and protective safeguards offered when properly processing complaints and apparent violations. The OW will continue to promote the Complaint System in her visits across the state marketing AJC services.

One area discussed in the previous Plan period that did not bear fruit as expected was the USDA's Farm and Food Workers Relief Program (FFWR). It was hoped that the $600 one-time payment to qualified frontline workers employed during COVID-19 might reveal formerly unidentified MSFWs, but it provided no actionable intelligence to expand MSFW data, and the NFJP-partner tasked with disbursing payments for the FFWR grant awardee reported an underwhelming turnout in RI.

E. STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

Nicole Armstrong is Rhode Island's SMA. She been afforded the opportunity to review and provide input into this Agricultural Outreach Plan. The SMA will be kept informed of further plan developments.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

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The State Plan must include	Include
1. The State will provide labor exchange services under the Wagner-Peyser Act using State merit staff.	Yes
2. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
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;	Yes
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

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In January 2014, the Rhode Island Board of Education officially adopted the College and Career Readiness Standards (CCRS) as the state's standards for adult education. Because the CCRS are closely aligned with the Rhode Island Core Standards used in RI's K-12 system, their adoption supports alignment and continuity across the state's education pathways, including Adult Education and Family Literacy Act (AEFLA)-funded adult education programs. Over the decade since their adoption, local providers have aligned instructional materials and curricula with CCRS, while the state continues to prioritize professional development that strengthens educators' understanding and effective implementation of the standards in the classroom.

B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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

1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
2. Is for the purpose of educational and career advancement.

Special Rule. Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

In Rhode Island, Adult Education and Family Literacy Act (AEFLA) programming provides on-ramps to college and career pathways for residents with foundational skill gaps, increasing workforce participation and leveraging underutilized talent in the Ocean State. Rhode Island Department of Elementary and Secondary Education (RIDE), the State Eligible Agency for adult

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education, awards federal and state adult education funding through a competitive request for proposals (RFP) process which establishes multi-year contracts with eligible providers that have demonstrated past effectiveness in providing adult education and literacy services. Eligible providers 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.

Consistent with Workforce Innovation and Opportunity Act (WIOA) Final Rules Subpart C, 463.24, applicants must demonstrate past effectiveness by providing performance data on their record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the state's application for funds. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transitions to postsecondary education and training.

Eligible providers may apply as a consortium with other eligible entities to consolidate and leverage resources. If eligible entities apply as a consortium, each consortium member must submit demonstrated effectiveness data and meet the definition of demonstrated effectiveness requirements.

There are two ways in which an eligible provider may meet the requirements for demonstrating effectiveness:

1. An applicant that is a current RIDE Adult Education grantee must provide performance data from the state-administered adult education Management Information System (MIS) to demonstrate past effectiveness.
2. An applicant that is not a current RIDE Adult Education grantee must provide performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals, particularly eligible individuals who have low levels of literacy in the content domains of reading, writing, mathematics, English language acquisition, including evidence of its success in achieving outcomes related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

Eligible providers may propose some or all of the following allowable activities; providers may also propose these services concurrently:

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

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- Integrated Education and Training.

Application processes for adult education funds are uniform to ensure a standardized approach to the review of proposals and awarding of funds. Funding competitions are widely advertised by RIDE, including on social media. All current providers and other potential applicants that request information prior to the announcement receive information on the same day as the public notice of the competition. The same application and review procedures are used for all eligible providers to ensure that all applicants have direct and equitable access to apply and compete for Title II grants and contracts, including WIOA Sections 225 (Corrections), 231 (Grants) and 243 (Integrated English Literacy/Civics).

The state requires that all grants and contracts are competed in the same manner, using the same processes and templates, to ensure direct and equitable access. All information related to this and all grants and contracts is posted on the state Department of Education website and provided to those in contact with the state agency. RIDE uses technology to support information-sharing; for example, in the most recent competition, a virtual bidders' conference and an online form allowed opportunities to ask questions about the funding opportunity. Additionally, as expansion of high-quality IET programs is a priority for Rhode Island, RIDE made Technical Assistance (TA) related to design and implementation of IET programs available to all potential applicants with a public-facing webinar. Recordings of the bidders' conference and IET TA webinar, as well as answers to questions received in the online form, are posted to the RFP section of the RIDE adult education webpage for viewing on demand.

In awarding grants or contracts, RIDE considers the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in local workforce development plans, and would serve individuals in the community identified in such plans as most in need of Adult Education and Literacy activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy, and the degree to which those improvements contribute to meeting the state–adjusted levels of performance for the primary indicators of performance described in WIOA section 116;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108 of the ACT, as well as activities and services of the core partners;

5. Whether the eligible provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

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7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including through IET, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, One-Stop/American Job Centers, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, in the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance; and

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE submits an application to RIDE containing such information and assurances as RIDE may require, including:

1. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

2. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;

3. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

4. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;

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5. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;

6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and

7. Any information that addresses the 13 considerations described under section 231(e), as applicable.

As required by WIOA section 107 (d)(11)(B)(i), RIDE partners with the state's two Local Workforce Development Boards (LWDBs) to review each Title II grant proposal for alignment with the Local Workforce Plan. The LWDBs provide recommendations to promote greater alignment with the Local Plan. Applicants may be required to modify their service delivery proposal to be more consistent with the plan as a condition of funding.

In addition to federal considerations and requirements, the state has prioritized other factors in distribution of Title II funds, based on characteristics of the state's established adult learner population and emerging needs. English language acquisition activities continue to be a priority for the state, as English language learners consistently make up more than half of all adult education learners in Rhode Island. In the first funding competition post-pandemic, the state prioritized high-quality IET pathways aligned with high-demand industry sectors. Another priority is ensuring program accessibility, including providers' readiness to continue offering services in multiple modalities (in-person, distance, and blended) in order to extend learning beyond the classroom and provide flexibility to meet the needs of adult learners.

The most recent competitive RFP process for Rhode Island AEFLA funding was held in spring of 2022. A statewide network of 19 providers is funded for a five-year grant cycle through June 30, 2027. RIDE requires local providers funded through the multiyear RFP to reapply for funding on an annual basis with an abbreviated application process.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional

institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

As part of the open and competitive Request for Proposals (RFP) process held for Adult Education and Family Literacy Act (AEFLA) funding, Rhode Island Department of Education (RIDE) awards Section 222(a)(1) funds for provision of correctional education programs, including any of the program types identified in section 225 of Workforce Innovation and Opportunity Act (WIOA), with the goal of reducing recidivism. In RIDE's Spring 2022 RFP, Integrated Education and Training (IET) programming for currently incarcerated Rhode Islanders was a priority. RIDE uses no more than 20 percent of the 82.5 percent of the state grant that must be allotted to local programs for Section 225 activities. Each eligible provider using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Application processes for adult education funds are uniform to ensure a standardized approach to the review of proposals and awarding of funds. Funding competitions are widely advertised by RIDE, including on social media. All current providers and other potential applicants that request information prior to the announcement receive information on the same day as the public notice of the competition. The same application and review procedures are used for all eligible providers to ensure that all applicants have direct and equitable access to apply and compete for Title II grants and contracts, including WIOA Sections 225 (Corrections), 231 (Grants) and 243 (Integrated English Literacy/Civics).

The state requires that all grants and contracts are competed in the same manner, using the same processes and templates, to ensure direct and equitable access. All information related to this, and all grants and contracts is posted on the state Department of Education website and provided to those in contact with the state agency. Additionally, RIDE uses technology to support information-sharing. A virtual bidders' conference and an online form allow opportunities to ask questions about the funding opportunity; responses to questions received are made available on RIDE's website. Recordings of the bidders' conference and related resources are posted to the RFP section of the RIDE adult education webpage for viewing on demand.

In awarding grants or contracts under Section 225, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of Adult Education and Literacy activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;

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4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and services of the other one-stop partners;

5. Whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

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Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

1. A description of how funds awarded under this title will be spent consistent with the requirements of this title;
2. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
3. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;
4. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
5. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
7. Any information that addresses the 13 considerations described under section 231(e), as applicable.

In the most recent competitive RFP process held in spring of 2022, RIDE awarded AEFLA funds to Community College of Rhode Island (CCRI) to deliver programming for inmates at the state Adult Correctional Institution (ACI). CCRI, in partnership with Rhode Island Dept of Corrections (DOC), launched an IET program enrolling women in medium-security in the first phase of a Computer Numerical Control (CNC) Manufacturing program aligned with a program offered on the CCRI campus. Phase 1 of the program is offered onsite at the women's facility at the ACI and mirrors a program available at CCRI for the general public. Participants who successfully complete the program earn industry-recognized certifications and college credits, gain access to employment opportunities for work release and reentry, and have the option to continue into Phase 2 of the program at CCRI after their release. In addition to IET programming at the women's facility, CCRI provides a Financial and Digital Literacy for Reentry class in the men's minimum facility for inmates scheduled for release. The class combines foundational reading skills with workforce preparation. Like in the IET program, participants have the option to continue in a class meeting on the Providence CCRI campus post release. Class content includes digital literacy skills development and the development of an educational plan, to streamline the connection to postsecondary pathways at CCRI. These programs are funded for a five-year grant cycle through June 30, 2027. RIDE requires local providers funded through the multiyear RFP to reapply for funding on an annual basis with an abbreviated application process.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

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Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

Rhode Island leverages section 243 Integrated English Literacy and Civics Education (IELCE) funds to increase labor force participation among the growing population of multilingual Rhode Islanders, including professionals with degrees and credentials from other countries. The state's application for IELCE funds is competed along with section 225 and 231 funds as part of Rhode Island Department of Education's (RIDE's) open and competitive Request for Proposals (RFP) process for Adult Education and Family Literacy Act (AEFLA) funding. The application funds require eligible agencies to demonstrate the ability to work with partners to accomplish the purposes of IELCE, including evidence of established industry partnerships. In the spring 2022 RFP, applicants were not required to apply for section 231 in order to propose section 243-funded activities; applicants could respond to the RFP with a proposal for only section 243 activities. Applicants for section 243 funding were required to submit both the proposal components required from all applicants as well as an additional narrative response, budget proposal, and a proposal for at least one Integrated Education and Training (IET) program.

The thirteen considerations listed below and described in Workforce Innovation and Opportunity Act (WIOA) Title II § 231(E) are federal factors that are required to be used in evaluation of the RFP applications and determination of funding decisions.

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and services of the other one-stop partners;

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5. Whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, state, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

These considerations are integrated into the narrative portion of the RFP application. Eligible agencies must provide narrative detail on how they will meet the considerations, along with a

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supporting budget. Only those applications that include activities and budgets that meet the statutory requirements will be approved by the state agency.

Application processes for adult education funds are uniform to ensure a standardized approach to the review of proposals and awarding of funds. Funding competitions are widely advertised by RIDE, including on social media. All current providers and other potential applicants that request information prior to the announcement receive information on the same day as the public notice of the competition. The same application and review procedures are used for all eligible providers to ensure that all applicants have direct and equitable access to apply and compete for Title II grants and contracts, including WIOA Sections 225 (Corrections), 231 (Grants) and 243 (Integrated English Literacy/Civics).

The state requires that all grants and contracts are competed in the same manner, using the same processes and templates, to ensure direct and equitable access. All information related to this, and all grants and contracts is posted on RIDE's website and provided to those in contact with the state agency. Additionally, RIDE uses technology to support information-sharing. A virtual bidders' conference and an online form allow opportunities to ask questions about the funding opportunity; responses to questions received are made available on RIDE's website. Recordings of the bidders' conference and related resources are posted to the RFP section of the RIDE adult education webpage for viewing on demand.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

1. A description of how funds awarded under this title will be spent consistent with the requirements of this title;
2. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
3. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;
4. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
5. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
7. Any information that addresses the 13 considerations described under section 231(e), as applicable.

In the most recent competitive Request for Proposal (RFP) process held in spring of 2022, RIDE awarded section 243 funds to three local providers for the five-year grant period from July 1, 2022, to June 30, 2027.

IELCE programs integrate contextualized language instruction with occupational skills training, workforce preparation, and civics instruction. In Rhode Island, all IELCE-funded providers deliver services in conjunction with in-house IET activities funded under section 243.

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Depending on participants' skills and career goals, providers also refer IELCE participants to IET programs offered by other AEFLA providers, including programs not funded through section 243. Many pathways incorporate work-based learning experiences, and all include wraparound supports designed to help learners successfully complete their programs. The state's providers report that multilingual career coaching is a particularly effective strategy for supporting IELCE participants' progress towards their goals.

IELCE pathways in the Ocean State are designed to meet employer demand and align with high-demand industry sectors. The majority of IELCE-funded IET programs focus on occupations in the healthcare sector, which is among the sectors with the highest expected gains in employment in the state per 10-year projections by the Rhode Island Department of Labor and Training (DLT). Beyond IETs, section 243 funds also support bridge programs that combine contextualized English language instruction with career exploration and workforce readiness training, preparing learners for success in the workforce or subsequent occupational training. For example, an IELCE provider and the Rhode Island Welcome Back Center partner to offer a bridge program tailored to the ESOL needs of internationally trained healthcare professionals. Multi-year partnerships in the health care sector connect employer partners with a well-qualified candidate pool, building a culturally competent, multilingual workforce.

RI's IELCE programs are integrated with the state and local workforce development system because of strong cross-agency partnerships. As part of the PY 2022 AEFLA funding process, local Workforce Development Boards (WDBs) reviewed funding applications, providing feedback on alignment with local priorities. All three IELCE grantees also receive DLT funding and collaborate with their local WDBs, blending workforce development and AEFLA resources to create in-house IET pathways for English learners. Providers also work with local American Job Centers (AJCs) to offer career services tailored to the needs of individuals with limited English proficiency, including bilingual job clubs and job fairs.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

Funds made available under section 222(a)(2) for adult education and literacy activities are used for State Leadership activities to strengthen and improve Rhode Island's adult education system. Not more than 12.5 percent of grant funds are allocated to these activities under section 223. Rhode Island Department of Education (RIDE) is committed to supporting integration of Title II activities with other WIOA core programs and one-stop partners so that Rhode Islanders benefit from unified workforce services.

Core and partner programs work together to implement priority strategies from Rhode Island's Combined State Plan. Rhode Island's WIOA Interagency Workgroup is convened by Rhode Island Department of Labor and Training (DLT), with participation from the local WDBs, and WIOA core and partner programs, including RIDE, the Adult Education and Family Literacy Act (AEFLA) State Eligible Agency, whose staff salaries are partially paid with section 223 funds.

Partners meet on a monthly basis to discuss emerging issues and collaborate on initiatives that advance State Plan priorities. The Workgroup emphasizes approaches aligned with the state's identified strategies: ensuring access to education and job training programs for adults with barriers to employment; a focus on small business development; promoting digital access and digital literacy; and leveraging delivery of services in new modalities and settings to expand access in the community or through virtual platforms.

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Rhode Island's core and partner programs work together to ensure regular stakeholder engagement at the state level. The state Workforce Development Board (WDB) convenes the Adult Career Pathways Advisory Committee (APAC) every other month. This committee is a forum to engage a broad cross-section of adult education stakeholders, including providers, employer partners, community-based organizations, and representatives from the core partner agencies. Furthermore, adult education staff members supported with State Leadership funds also join representatives from other core programs in presenting at the monthly meetings of the Rhode Island Workforce Alliance. The Workforce Alliance is a community coalition on issues affecting low-income working Rhode Islanders. Membership includes local adult education providers, as well as stakeholders from other sectors and the community. The coalition has been a consistent source of feedback on state WIOA implementation activities. RIDE is committed to working with state partner agencies and with each local workforce development area to ensure continued alignment and coordination.

RIDE adult education staff collaborate with the state's American Job Center (AJC) partners to provide access to employment, education, and training services that are aligned with other services available in the local area. Coordination and integration of services, rather than duplication, is a priority in order to ensure more efficient service delivery.

There are two local workforce development areas within Rhode Island. RIDE has fully executed title II Memorandums of Understanding with each local WDB, defining the roles and responsibilities of each partner for the operation of the one-stops as required under WIOA. Title II funds fund an adult education seat at each of the state's comprehensive AJC offices. Furthermore, the state's one-stop partner agencies meet on a quarterly basis. The operator of RI's one-stop offices supports interagency alignment and information sharing by compiling and disseminating training, employment, and other opportunities from partner agencies. The information is sent out in a weekly email summary and updated information is posted in a shared folder online. Local adult education providers are members of the distribution list.

Each of the two local WDBs includes at least one local adult education provider as a member. As board members, these local providers are included in planning for WIOA implementation at the local level. The WDBs coordinate local program efforts to develop career pathways providing access to employment and training services for adults with barriers to employment, including adult education participants.

Additionally, one of RI's local providers is designated to serve as a system liaison with the state's AJC system. RIDE funds the provider to deliver adult education services onsite in RI's two comprehensive AJC offices, Providence/Cranston and West Warwick. Instructors staff classrooms within the offices to serve clients seeking adult education services and digital literacy skill development. Services are available in a traditional classroom format, as well as through one-on-one tutoring supported by technology. The tutoring provides adults with just-in-time technology-enabled services with support from local adult education staff. Thanks to the strong Title II presence at the AJC offices, clients receive targeted skills coaching that can make the difference in demonstrating eligibility for WIOA services.

Funding allocated to adult education by the state's General Assembly is building out Title II's partnership with the AJC system. This additional, system-level funding is supporting a pilot of regional Adult Education Information Centers through June 2026. The Centers are located at key locations statewide, including at both comprehensive AJC offices, expanding Title II's presence onsite. Center staff provide individualized career services to prospective learners: an orientation to adult education services, a comprehensive assessment of goals and barriers, warm referrals to supportive services as needed, as well as initiating the intake process prior to

connecting a learner with a local provider that can help them work towards their goals. Given that demand for Title II services consistently exceeds available seats, Information Centers are piloting strategies to engage waiting learners with light-touch services to build digital literacy skills and support asynchronous learning with vetted educational resources.

State office staff work with the state's local WDBs and the AJCs to determine training needed across partner organizations, and to connect local providers with opportunities to partner with the AJC system. RIDE adult education staff are active partners in supporting referrals between adult education providers, AJCs, core partners, and community-based organizations to increase access to employment and training opportunities for adult learners. RIDE personnel support local providers in establishing partnerships with the core and AJC partner programs.

At the local level, adult education providers are required to collaborate with workforce development programs and to align adult basic education programming with partners named in the state plan. RIDE's 2022 competitive RFP, which identified the current cohort of local AEFLA providers, required applicants to detail plans for collaboration with core partners, alignment of activities with LWDB priorities, and integration with the American Job Center (AJC) system. Local programs continue to revise intake, case management, and client referral and placement procedures to maintain efficient access to high-quality career services, education, and training supportive services for those with the greatest barriers to employment. Providers offer online registration and intake forms, case management, and services at a distance.

State Leadership funds support monthly meetings of local adult education program managers. The meetings are facilitated by state office staff, and participation is mandatory for RIDE adult education grantees. Meeting agendas include presentations to review WIOA statutory requirements and provide technical assistance (TA) related to the implementation of required activities. Updates and new guidance from the federal government are also shared during the monthly meetings. Funded local providers are required to report on their alignment with core and AJC partners on a quarterly basis, and in their annual funding renewal applications. This information is used to help guide the state office, inform planning for TA, and to support continuous quality improvement.

RIDE operates a high-quality statewide professional development (PD) program to improve instructional quality across the state's adult education system. Through a competitive request for proposals (RFP) process, RIDE selects a local AEFLA provider to lead the planning and delivery of PD for the statewide network of adult education providers over a multiyear grant cycle. The most recent RFP, conducted in 2022, awarded Providence Public Library funding to lead PD for adult education in Rhode Island for a five-year grant cycle.

RIDE promotes adoption of research-based instructional and programmatic practices from around the country to support local delivery of high-quality adult education and literacy services. The state is committed to a dual PD focus on both academic content and technology integration in order to ensure that all learners are equipped with the foundational skills essential for success in college, the workforce, and the wider community.

PD activities supported by State Leadership funds promote adoption of standards-based curriculum and evidence-based reading instruction - including STudent Achievement in Reading (STAR) standards, Teaching Skills that Matter (TSTM) and Standards in Action (SIA) - as well as expansion of quality Integrated Education and Training programming. Professional learning opportunities are grounded in adult learning principles and address the specific academic, workforce, and digital literacy needs of adults. Building local programs' capacity to deliver high-

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quality distance and blended instruction remains a priority, with an emphasis on integrating digital literacy skills across all content areas.

PD is designed to support all instructional staff, including volunteers, and is offered in multiple formats to ensure broad access. Through curated training, coaching, and alignment with state office TA priorities, the PD system promotes effective instructional practices and builds local capacity to deliver high-quality in-person, blended, and distance education.

Proven models from other states are key resources for supporting local program quality and continuous improvement. Dissemination of information about nationally recognized models and promising practices related to AEFLA-funded programs is at the center of the state's PD for adult education. Rhode Island has statewide memberships in New England Literacy Resource Center (NELRC), Coalition on Adult Basic Education (COABE), and National Association of State Directors of Adult Education (NASDAE), ensuring local practitioners' access to resources opportunities provided by these regional and national networks. In addition, local providers benefit from PD on proven, or promising, approaches to adult instruction within the state, as well as PD delivered by regionally and nationally recognized trainers. The state's PD calendar includes training on standards-based instruction, contextualized curriculum, administration of standardized assessments, professional learning communities, and instructional technologies. These opportunities are delivered through multiple modalities, including group trainings, online learning, and individualized coaching.

RIDE facilitates state-level role-based sharing opportunities, which serve as important forums for surfacing local issues and for peer support, including sharing of promising practices. Each local provider is required to designate a staff person as the Professional Learning Specialist. This role serves as a formal connection between PD efforts at the local and state levels. The Specialist assesses and communicates the PD needs at their local program, highlights local efforts at the system level, and - in turn - encourages participation in state PD opportunities at their local program. Professional Learning Communities for Local Program Managers and Professional Learning Specialists meet on a monthly basis. Building on the success of these synchronous meetings, RIDE has also launched a series of facilitated role-based Google Groups. These serve as asynchronous communities of practice to support sustained engagement with PD resources and foster sharing and adoption of promising practices.

State memberships in national and regional groups, state level sharing meetings, and the role-based sharing groups work together to cultivate connections among providers and efficient sharing of effective practices for AEFLA-funded activities. In addition to these opportunities for peer connection, RIDE's PD provider organizes workshops facilitated by local practitioners that highlight promising practices, and cultivate a sense of community within the field, featuring local instructor-leaders.

PD resources are carefully vetted to ensure they are grounded in rigorous research and evidence-based practices. The state's approach to supporting high-quality distance education illustrates this commitment. While expanding access through distance education is a priority, RIDE focuses not only on increasing the availability of distance services but also on ensuring the quality of virtual programming. As a result, the state has prioritized the dissemination of clear guidance and promising practices for building and implementing effective distance education opportunities.

For example, Rhode Island's Guidelines for Distance & Blended Learning is a key state resource that supports adult education providers in planning and implementing distance and blended services. Developed using relevant research, the handbook helps practitioners develop or

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strengthen their instructional practices by adapting the National Standards for Quality Online Teaching to the Rhode Island context. In addition, the state's participation in the Innovating Distance Education in Adult Learning (IDEAL) consortium connects the PD system with vetted resources, nationally recognized subject matter experts, and peer leaders. This partnership enables local trainers to more effectively support programs and provide guidance on best practices in blended and distance education.

Meetings with local leadership and staff are the backbone of TA provided by RIDE. Regular meetings serve as forums for RIDE to communicate role-specific information, as well as opportunities for state office staff to get a sense of shared challenges and emergent needs. Staff paid by section 223 Leadership funds facilitate monthly TA meetings with local program leadership. RIDE also provides TA for local staff in specific roles. RIDE staff facilitates a required monthly TA meeting on the state data system for local Data Managers. The state CASAS trainer facilitates quarterly meetings for local Assessment Specialists. In addition to regularly scheduled meetings, state office staff develop additional TA responsive to grantee questions and feedback.

As an example of TA provided on programmatic practices, RIDE holds quarterly meetings focused on assessment to ensure that policies and practices across local programs are consistent with publishers' guidelines and National Reporting System (NRS) requirements. Assessment Specialists from each local program are required to attend. Individualized TA is available to Specialists to provide support with topics and questions from the quarterly meeting agendas. RIDE has invested funding from the state General Assembly in local infrastructure to support a system-wide transition away from paper-based tests to computer-based testing. Adoption of computer-based testing has helped to standardize test administration, streamline the assessment process for learners and program staff, and build system capacity to administer tests remotely in case of closure of in-person services. RIDE is in conversation with other WIOA core and partner programs about opportunities to align assessment infrastructure across agencies.

NRS data entry and reporting is an ongoing TA priority. Based on findings from quarterly audits of local program data, it's apparent that local data users' uneven understanding of what is reported and how it is tracked in the data system results in underreporting of outcomes. TA on the state's adult education Management Information System and NRS data collection and reporting is offered monthly for local data managers and are supplemented by quarterly sessions with trainers from the data system vendor. Meeting topics include quality data collection standards, NRS data reporting, and data analysis to support program- and class-level progress towards meeting statewide federal targets.

Ensuring a research-informed approach to distance education for adult learners is an additional TA priority for Rhode Island. Local support is focused on use of technology and ensuring integration of digital literacy skill development in Title II services across content areas, while strengthening local practitioners' own digital literacy skills and understanding of quality distance education. Adult education providers are required to assess and build digital literacy for all learners as an essential workforce, employability, and life skill, and staff must demonstrate and document their own digital proficiency. Integrating technology into instruction and using it to improve efficiency and learner outcomes has long been a priority in Rhode Island: a local adult education provider has served as the statewide lead for technology-related PD and TA since 2017. Currently, the state PD team housed at Providence Public Library includes a Technology Integration Specialist who is responsible for supporting local programs

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and staff with their questions related to implementation of instructional technology and integration of digital literacy skills into AEFLA activities.

The State Eligible Agency is committed to continuing to support programs in the use of technology to increase the amount, quality and effectiveness of services for all learners. In 2023, RIDE invested over $1.3M in funding from the state General Assembly towards digital infrastructure improvements for local programs, including device and equipment to support delivery of distance and blended education. The state's PD provider has a specialist focused on developing PD responsive to grantees' technology-related needs and providing individualized support with tech-related issues. Additionally, RIDE makes state-level purchases of vetted educational software for use by local providers.

RIDE leverages technology to support communication and improve efficiency at the system level. Rhode Island's adult education system has a website (RIAdultEd.org) that hosts the state PD calendar and serves as a resource repository for local practitioners. Resources available on the site will be further developed in alignment with WIOA required activities, including tutor and volunteer-specific resources and state and national workforce preparation and career pathways resources. The website houses role-specific Google Groups, which facilitate peer sharing across programs and dissemination of information about promising practices and proven models. RIDE continues to promote the use of domain features such as the Google Groups and other communication tools to improve system efficiencies and propagate promising educational practices.

RIDE's unified enrollment platform, EnrollRI.org, has an adult education page designed to expand access to adult education services statewide. The page includes a directory of all RIDE-funded providers and services, intended to be easily navigable by prospective learners or referring partners. RIDE's adult education data system has been built out to include a public-facing student intake portal, which allows potential learners to browse available programming and indicate their interest in a program by submitting an abbreviated pre-registration form. Information submitted is integrated into local providers' view of the data system for follow up by local staff. Contact information for the Adult Education Information Centers is also featured on the webpage for people who are looking for additional help.

Related to the use of technology to improve system efficiencies, RIDE is piloting a Learning Management System (LMS) for adult education. During the initial phase of the pilot, the LMS is being used to organize PD materials for asynchronous access by local program staff. The LMS serves as a tool to support the dissemination of information on effective models and promising practices. By introducing the LMS as a platform for accessing PD materials, the pilot aims to build practitioners' familiarity and comfort with the system and to lay the groundwork for statewide LMS use in the delivery of Title II programming to learners.

Regular feedback from providers helps inform development of TA responsive to local needs. RIDE staff join the monthly meeting of the local program managers' Professional Learning Community. These meetings are an opportunity to get a sense of common challenges and emerging needs among local providers. Common questions or themes indicate potential areas for TA.

Rhode Island's State Leadership funds are used to support state staff who monitor and evaluate local programs. RIDE staff carry out quarterly desk audits of local program data, analyzing data from the state's adult education Management Information System (MIS). The analysis includes program enrollment, learner demographics, attendance hours, posttest rates, educational functioning level gains, measurable skill gains, employment outcomes, high school credentials,

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and transitions to postsecondary education or training. Programs whose outcome performance is not on track to achieve locally negotiated performance targets are flagged for follow up by state office staff. The state office – in collaboration with the local program's leadership – designs a corrective action plan to support program improvement. Additional details on the monitoring of local providers are included in the next section of this report.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

In Rhode Island, Section 223 funds support permissible State Leadership Activities, with a focus on learning from - and collaborating with - other states in order to improve the quality and outcomes of adult education and literacy activities in the Ocean State.

- Learning from and with other New England states, through continued membership in the regional literacy resource center, New England Literacy Resource Center (NELRC);
- Professional Development (PD) to build local programs' capacity to deliver quality distance education and effectively leverage instructional technology;
- Technical assistance to support implementation and expansion of effective Integrated Education and Training models;
- PD focused on meeting the needs of specific adult learner subpopulations (such as adults with learning disabilities or English language learners);
- Promoting adoption of curricula incorporating the essential components of reading and math instruction as such components relate to adult learners;
- Piloting of strategies for improving teacher quality and retention;
- And outreach to employers to promote workplace adult education and literacy activities.

F. ASSESSING QUALITY

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

State Leadership funds support the monitoring and evaluation of the quality and effectiveness of local Rhode Island programs' Adult Education and Family Literacy Act (AEFLA) activities. Rhode Island Department of Education (RIDE) is committed to building a culture of accountability with local adult education providers to ensure delivery of high-quality adult education services and accurate reporting of outcomes. State office staff continue to refine the Accountability Tool introduced in the first year of the current five-year grant cycle (PY 2022). The Tool is a shared spreadsheet of compliance and performance metrics that grantees update quarterly as part of the reporting process. Metrics on the sheet align with federally negotiated targets for Measurable Skill Gains (MSGs) and other federal performance indicators, as well as state targets for enrollment and post-testing rates. The Tool functions as a performance dashboard, providing a transparent framework for quarterly data reviews and biannual performance discussions between grantees and state office staff. The data on the Accountability Tool also provides a basis for risk assessment and targeted technical assistance (TA).

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State office staff conduct quarterly evaluations of local providers that include a review of Accountability Tool data, narrative report responses, and an update on programming planned for the remainder of the year. In the narrative, local providers report on effective practices, implementation challenges, and progress related to one-stop integration and employer partnerships. Local providers are required to submit National Reporting System (NRS) Tables 4, 4b, and 5 as part of the quarterly reporting process. In addition, RIDE conducts one-on-one virtual meetings with providers in the first and third quarters of the Program Year to review progress, reflect on lessons learned, and identify areas requiring monitoring or TA. Information gathered from the narrative helps state office staff to identify promising practices at the local level, which are highlighted in monthly grantee meetings or in peer-led PD sessions. In addition to grantees' quarterly reporting submission, RIDE holds one-on-one virtual meetings with each funded eligible provider during quarters one and three to review program implementation and outcomes year to date. These conversations are an opportunity to reflect on lessons learned and promising practices, and to identify areas potentially in need of additional monitoring or TA.

Consistent with its commitment to accountability, the state office prioritizes TA support related to data collection and reporting in the state Management Information System (MIS), LACES from LiteracyPro/Genius. State Office staff conduct quarterly audits of local National Reporting System for Adult Education (NRS) data and tables, and work with local staff as needed to address any anomalies identified. The adult education MIS provides the full array of NRS tables for adult education as well as customized reporting functions that both the state office and local program providers can run to check performance at the state level, program level, teacher level, and student level. These reports are used to identify areas of strengths and weaknesses. In addition to the WIOA Primary Indicators of Performance, data analyzed includes program enrollment, learner demographics, attendance hours, and posttest rates. This comprehensive monitoring and TA system is designed to ensure data accuracy and maintain high data quality, so that program outcomes are accurately reflected in the state's federally reportable data.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes

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The State Plan must include	Include
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

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301	Yes

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The State Plan must include	Include
through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

NOTICE TO ALL APPLICANTS

Section 427 of the GEPA (20 U.S.C. 1228a) applies to applicants for grant awards under this program. ALL APPLICANTS FOR NEW GRANT AWARDS MUST INCLUDE THE FOLLOWING INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS.

OMB Control No. 1894-0005 (Exp. 02/28/2026)

Notes:

1. Applicants are not required to have mission statements or policies that align with equity in order to submit an application.

2. Applicants may identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

3. Applicants may have already included some or all of this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) and page number(s) in their applications or State Plans that includes the information responsive to that question on this form or may restate that information on this form.

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1894-0005. Public reporting burden for this collection of information is estimated to average 3 hours 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. The obligation to respond to this collection is required to obtain or retain a benefit. If you have any comments concerning the accuracy of the time estimate or suggestions for improving this individual collection, send your comments to ICDocketMgr@ed.gov and reference OMB Control Number 1894-0005. All other comments or concerns regarding the status of your individual form may be addressed to either (a) the person listed in the FOR FURTHER INFORMATION CONTACT section in the competition Notice Inviting Applications, or (b) your assigned program officer.

1. SF424B - Assurances – Non-Construction Programs

(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

2. Grants.gov - Certification Regarding Lobbying

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(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)

(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

Rhode Island Department of Education (RIDE) does not require eligible providers to have mission statements or policies that align with equity in order to submit an application for Adult Education and Family Literacy Act (AEFLA) funds.

In accordance with Section 427 of the US Department of Education's General Provision Act (GEPA), applicants seeking a grant or contract for AEFLA funds identify barriers that may impede equitable access or participation in the proposed project or activity. Barriers commonly identified by applicants include: economic disadvantage, disability (diagnosed and undiagnosed), language, housing status, and reentry status.

Application processes for adult education funds are uniform to ensure a standardized approach to the review of proposals and awarding of funds. The state requires that all grants and contracts are competed in the same manner, using the same processes and templates, to ensure direct and equitable access. This is detailed in three sections of the Program-Specific Requirements for AEFLA Programs: Section b. Local Activities Adult Education and Literacy Activities (Section 203 of WIOA), Section c. Corrections Education and other Education of Institutionalized Individuals (WIOA section 102(b)(2)(D)(ii)(II)(bb)), and Section d. Integrated English Literacy and Civics Education Program (WIOA section 102(b)(2)(D)(ii)(II)(cc)).

PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

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Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1st term	12/2025
Parent Training and Information Center	Vice 1st term	1/2024
Client Assistance Program	Vice 1st term	1/2024
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1st term	8/2024
Community Rehabilitation Program Service Provider	1st term	1/2025
Business, Industry, and Labor	1st term	1/2025
Business, Industry, and Labor	Vacant	
Business, Industry, and Labor	Vacant	
Business, Industry, and Labor	Vacant	
Disability Advocacy Groups	2nd term	9/2025
Current or Former Applicants for, or Recipients of, VR services	2nd term	9/2025
Section 121 Project Directors in the State (as applicable)	3rd term	5/2025
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1st term	11/2025
State Workforce Development Board	1st term	11/2025
VR Agency Director (Ex Officio)	1st term	5/2025

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

Membership and Participation in the SRC

Impact of Virtual Meetings on Accessibility

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During Rhode Island's response to the COVID-19 pandemic, Executive Order 21-72 allowed public bodies governed by the Open Meetings Act to convene virtually. This change was especially beneficial for people with disabilities, enhancing access and enabling broader participation. However, since the expiration of Executive Order 21-72, meetings have returned to being held exclusively in person. This shift has raised concerns that the lack of virtual options discourages individuals with disabilities from joining or attending Council sessions, thereby diminishing their representation in government decisions that directly affect them.

Membership Trends Before and After the Pandemic

Prior to the pandemic and throughout the duration of Executive Order 21-72, the Council maintained robust membership, with nearly all seats filled except for two vacancies in the business, industry, and labor sectors. Recruitment and attendance were strong, supported by the use of telecommunication platforms like Zoom. When the pandemic subsided and the State removed the ability to hold remote meetings for voting members, membership declined sharply, dropping by more than half. The Council lost representatives from business, industry, and labor, as well as several members who were former clients of the Office of Rehabilitation Services (ORS) and employees from the Department of Education.

Efforts to Restore Virtual Participation

In recent years, the Council has collaborated with the Governor's Commission on Disabilities and other statewide organizations to reinstate virtual participation for voting members. Despite these efforts, the proposal remains stalled in State Legislature.

Challenges and Recruitment Strategies

Because many on the Council either have disabilities or care for vulnerable family members, concerns about COVID-19 continue to affect in-person attendance. To address declining numbers, the Council is pursuing new recruitment strategies, seeking guidance from the National Coalition of State Rehabilitation Councils and the Office of Rehabilitation Services. By combining in-person and virtual meeting formats, gradual progress is being made toward rebuilding membership.

Ongoing Council Activities

The Office of Rehabilitation Services (ORS) and the State Rehabilitation Council (SRC) hold regular meetings throughout the year, including multiple executive board sessions, full council meetings, an annual planning day, and other gatherings focused on best practices in vocational rehabilitation. ORS works closely with SRC to encourage participation from a wide variety of stakeholders, including employers, parents of individuals with disabilities, educators, students, and both current and former clients of vocational rehabilitation programs.

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

On behalf of the State Rehabilitation Council (SRC), we welcome the opportunity to submit comments and recommendations regarding the Vocational Rehabilitation portion of the Workforce Innovation and Opportunity Act (WIOA) for Program Years 2026 and 2027.

Our feedback is designed to further strengthen and enrich the State Plan for Vocational Rehabilitation Services, highlighting several promising areas where additional clarification, comprehensive data, and actionable recommendations can drive even greater positive change. We are excited about the opportunities to enhance employer engagement, optimize service delivery processes, and expand measurable outcomes, all of which have the potential to significantly boost the plan's overall effectiveness.

Additionally, we are pleased to offer constructive suggestions to address ongoing challenges, such as broadening outreach to underserved populations, formalizing and reinforcing 504 outreach efforts in partnerships, and fostering stronger collaboration with CILs. By expanding on these areas and sharing our perspectives, we hope to help build an even more robust, inclusive, and impactful vocational rehabilitation program that meets the diverse needs of stakeholders and leads to improved employment outcomes for all.

Comments and recommendations included:

(b) Comprehensive Statewide Needs Assessment (CSNA)

The SRC the following questions and recommendations regarding this section of the plan:

* **Comment** - Rhode Island's employment rate for individuals with disabilities was 36%, ranking between 30th and 33rd nationwide. This figure is lower than previous statewide assessments, suggesting a downward trend in employment among people with disabilities. The Council finds this downward trend concerning and would like to review this further with ORS this year.

* **Comment** - The Council requested that the agency provide services for job development, job clubs, vocational evaluations, etc., utilizing a wider range of CRP vendors to provide these services. The Council supports this approach, given that ORS staff noted that clients often had other barriers to employment (the fear of losing benefits, transportation, social aspects of work). CRPs like OSCIL, RIPIN, Voc Works, Goodwill Industries, AccessPoint RI, are in a unique position to be more actively involved and can address these other barriers with clients in addition to ORS provided services in-house.

* **Question** - Tribal Collaboration – Does the plan address partnerships with community agencies or programs aimed at serving underserved tribal populations?

* **Comment** - The Council recommends that ORS work with local tribal resources to provide cultural competence training for ORS counselors and SRC members.

* **Question** - Is there an improved method for tracking underserved populations?

* **Comment** - The Council suggests that ORS partner with Centers for Independent Living to outreach underserved communities. For example, OSCIL's established relationships with immigrant communities, deaf/hard of hearing adults, and individuals with limited English proficiency can help ORS increase access and reduce service disparities identified in the CSNA.

(c) Goals, Priorities, and Strategies

1. Support Innovation and Expansion Activities

* **Comment** - In April 2025, ORS implemented an agency-wide practice of meaningful engagement. The Council is pleased with this initiative and requests ongoing updates.

3. Changes to Hiring Requirements and Certificate Program

ORS has updated its job requirements and no longer mandates a Master's Degree specifically in Rehabilitation Counseling.

* Comment - The SRC strongly supports maintaining a Master's level requirement for Rehabilitation Counselors, recognizing the value it brings to quality service delivery. At the same time, we enthusiastically commend ORS for its proactive efforts to expand the talent pool. By creating a pathway for candidates without a master's degree to transition into the Rehabilitation Counselor role, ORS is demonstrating both innovation and responsiveness to workforce needs, which we wholeheartedly endorse.

The Council is grateful for the opportunity to provide input on these exciting initiatives and commends the dedication and collaboration that have led to these advancements. We applaud the commitment to filling all open positions, which will undoubtedly enhance service delivery and better support our consumers.

The SRC encourages the development of a program offering financial assistance to new hires, supporting them as they pursue the education and experience required for success as rehabilitation counselors. Furthermore, the Council recommends expanding current mentoring and practical experience programs at ORS, paired with meaningful incentives, to cultivate a robust pipeline of talented professionals. These efforts will help ensure that future Rehabilitation Counselors are well-prepared to meet the highest standards and continue advancing in their careers.

(B) Overcome Barriers to Accessing VR and Supported Employment Services.

GOAL 1: To increase awareness of ORS and its scope of services / Objective 1

* **Comment** - The Council commends ORS for its initiative in developing a community bulletin board webpage. However, we find the current format challenging to navigate and busy. Additionally, it appears that the ORS Facebook account has limited engagement. We recommend that ORS enhance its online presence through more timely, dynamic, and impactful outreach strategies. Establishing a dedicated YouTube channel for interactive sessions and integrating QR codes—linking to informative videos and resources—within ORS literature could improve accessibility and strengthen connections with the communities served by ORS. Furthermore, engaging with partner organizations such as the Sherlock Center, RIPIN, and OSCIL through regular postings of outreach activities and training sessions would benefit ORS customers. Lastly, we suggest hiring an intern or part-time staff member to support and maintain ORS's online presence.

* **Comment** - Collaboration with CILs: OSCIL recommends deeper coordination with Centers for Independent Living to ensure consistent messaging and streamline referrals for individuals needing both VR and IL services.

* **Comment** - Accessibility of outreach materials: Continued focus on plain language, culturally relevant communication, ASL access, and language accessibility is essential.

* **Comment** - Employer education: Continued expansion of disability awareness trainings aligns with IL philosophy and should explicitly incorporate community-based independent living competencies, not just employment readiness.

OBJECTIVE 3: *Develop, implement, and replicate the successful business partnerships already operating. ORS will:*

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* **Comment** - The Council has expressed concerns regarding the effectiveness of the Business Engagement Specialist Team (BEST) and emphasized the necessity for updated employer contacts, referencing issues identified with outdated information in this year's Consumer Statewide Satisfaction Survey.

The State Rehabilitation Council (SRC) has recommended reinstating our collaboration with the Business Engagement Specialist Team (BEST). To facilitate this objective, the SRC has approved the formation of an Employer Outreach Committee. The committee's primary focus will be to develop and execute a comprehensive on-boarding strategy aimed at recruiting new employer partners for ORS.

GOAL 2: ORS will overcome barriers to accessing VR and supported employment services through the following objectives / Objective 3

* **Comment** - Referrals for underserved communities: Strengthening partnerships with culturally specific and disability-led organizations would help identify individuals earlier and increase access.

Consumer choice and self-advocacy: VR programs could more explicitly integrate IL skills, self-determination, self-advocacy, and peer support to better address holistic employment barriers.

Coordination with IL services: Many individuals who access VR also require IL support (housing, transportation, AT exploration). Formalizing cross-referrals between ORS and CIL would support service continuity.

GOAL 3: To provide a flexible service delivery system that helps individuals to remove personal and other barriers they face to obtain and maintain industry-driven competitive integrated employment.

* **Comment** - Transportation remains a major barrier: The report acknowledges flexibility but does not reflect targeted strategies for transportation barriers, one of the highest consumer-reported obstacles to employment.

* **Comment** - Digital inclusion needs: Hybrid services require reliable technology and digital literacy. Collaboration with CILs could provide additional access and training, especially for consumers with limited resources.

* **Comment** -Supported Employment culture shift: OSCIL supports the emphasis on Employment First but encourages continued monitoring to ensure job placements truly meet industry-driven competitive integrated employment standards, not just rapid placement goals.

GOAL 4: ORS will monitor and track following performance measures quarterly via WIOA PY24 and PY25 RSA911 data submittals and timely compliance of case movement of applicants to eligibility and to IPE. ORS will also utilize Pre-ETS real time data collected through participation in a grant that measures the effectiveness of services delivered under Pre-ETS.

* **Comment** - ORS will shortly be finishing a grant-funded three-year pilot designed to measure the effectiveness of services delivered under Pre-Employment Transition Services (Pre-ETS).

Data Access and Timeline; An important consideration is whether ORS has gained access to the data regarding outcomes from the pilot.

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* **Comment** - If access has not yet been achieved, it is essential to clarify the anticipated timeframe for when the data will become available.

* **Question** - The Council is interested to know if ORS plans to disseminate the collected data publicly. Clear communication on this point will support transparency and inform stakeholders about the impact of Pre-ET services.

* **Comment** - Finally, the plan for implementing the results derived from the pilot data is a key aspect of the overall evaluation. Outlining how ORS intends to use these findings to improve services will demonstrate the agency's commitment to data-driven decision making and continuous improvement.

* **Comment** - Quality outcomes: In addition to WIOA indicators, the plan should highlight meaningful outcomes such as job retention, advancement, and consumer satisfaction.

Consumer satisfaction surveys: Expanding accessible survey options and incorporating IL consumer perspectives would strengthen quality monitoring. Data sharing: Coordinated data trends between ORS and CILs could better identify systemic barriers like housing, transportation, and AT needs that affect employment outcomes.

Impact of AI on Local Businesses - The Job Market and Entry-level Positions

* **Question** - What strategies does ORS plan to implement to handle the anticipated impact of AI on entry-level jobs?

The Council highlighted the likelihood of a transition from larger corporations to smaller, locally owned businesses. As AI becomes more established, the emphasis will primarily be felt in administrative roles rather than in service-oriented sectors. As an example, a partner shared a personal experience at a coffee shop that had integrated automated ordering systems, illustrating how technology is gradually entering smaller businesses while still maintaining some human interaction.

(d) Evaluation and Reports of Progress- VR and SE Goals (d) Evaluation and Reports of Progress- VR and SE Goals

Rebranding of ORS' Name

The Council notes that the rebranding/renaming of other states' VR agencies has met with success by removing the word "rehabilitation," which is often misunderstood. We fully believe that modernizing the agency name, to align more closely with employment, can make services more welcoming, and aligned with disability rights rather than outdated medical assumptions. The current framing can unintentionally reinforce stigma, especially for individuals whose disabilities are lifelong, part of their identity, or not something they want or need to change.

* **Question** - The SRC would like to understand if ORS has more definite plans to move forward with its rebranding efforts and if so, what the clear and concise measures of success will be, along with an established timeline that includes achievable milestones correlating to the measures of success.

GOAL 2: Increase Services to Underserved and Unserved Populations

Challenges in Increasing Services to Underserved and Unserved Populations

In general, the Council applauds ORS' efforts to meet its previously defined goals under state plans. However, we are concerned about the lack of quantitative data in reporting its progress and/or successes.

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While it is positive that ORS has returned to full staffing and eliminated wait lists for its own services, there remains a lack of clarity regarding the methods by which ORS is expanding services to underserved and unserved populations. The situation appears different when considering service providers (vendors), particularly in the area of supported employment. Many agencies continue to face Waitlists, and there are ongoing issues related to insufficient staffing. These staffing shortages directly impact the ability of vendors to deliver the support and services that ORS has authorized, limiting access for those who need them most.

* **Question** - What steps can ORS take to ensure that the vendors they refer to have the capacity to deliver services in a timely manner?

* **Comment** - The Council advises that ORS enhance vendor accountability for prompt service delivery by implementing explicit performance standards, establishing quantifiable service levels, and systematically tracking outcomes through routine reporting. It is recommended to enforce contractual remedies for delays and uphold consistent governance protocols that promote transparency, responsiveness, and ongoing improvement.

Expanding ORS' Employment Network Partnerships

ORS noted that it conducted training with Work Without Limits to facilitate involvement with vendors in becoming an Employer Network. As a result, one vendor expressed interest but backed out.

* **Question** - Can ORS provide more information on what other efforts ORS is conducting to expand its Employer Network and the results of those efforts.

* **Question** - The SRC has noted the burdensome application process for becoming a member of the ENP. Is this a factor that may be contributing to low involvement? What is being done to address this, if anything?

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

The SRC recognizes ORS's objective of fostering a culture among Supported Employment vendors that prioritizes industry-driven competitive integrated employment as the desired outcome of services. The Council expresses staunch support for achieving competitive integrated employment as the ultimate objective of supported employment initiatives.

ORS utilizes an array of virtual services for SE to ensure that individuals requiring SE will continue to receive vocational services. The SRC recommends the continued use of virtual services to allow individuals to take part in necessary services.

ORS's investment in a strong presence for transition-aged youth at high schools pursuant to the DOJ consent decree is helping to keep the focus on the expectation of successful employment outcomes for students with disabilities, as well as the services that are needed to achieve employment that ORS can provide. The SRC acknowledges that ORS is committed to providing extended services for supported employment up to age 25 for individuals with the most significant disabilities. **We would like to see ORS invest as strongly in the initial years of transition planning (beginning at age 14, as required by state and federal law), as beginning services at this time result in better outcomes for job placement and success as youth approach age 25.**

* **Comment** - The SRC recommends arranging contact with successful individuals with disabilities in a variety of fields. Integrating representation from professionals with disabilities

into career programming serves as a strategic intervention to dismantle persistent workplace misconceptions. For students with 504 Plans, this exposure validates the efficacy of accommodations and provides a clear incentive to engage with the Office of Rehabilitation Services (ORS) for long-term career development.

(i) Comprehensive System of Personnel Development

ORS has identified ongoing challenges regarding recruitment and retention in recent years. At present, the majority of positions are filled, and the Council acknowledges this positive development. The SRC maintains that ORS should continue to enhance efforts to attract talented and qualified professionals and appreciates the additional initiatives outlined in this plan update. Ensuring a sufficient number of highly skilled staff is essential, as it directly impacts clients' ability to achieve their goals of competitive, integrated employment.

(j) Coordination with Education Officials

I. Cooperative Agreement with Rhode Island Department of Education (RIDE)

The Council asserts that employing individuals with both visible and non-visible disabilities is fundamental to cultivating workplaces that accurately represent the diversity present in our society. By prioritizing disability inclusion, employers benefit from a broader spectrum of perspectives, problem-solving approaches, and varied experiences. These differences fuel creativity and innovation, helping organizations design better products, serve customers more effectively, and adapt more quickly to change. Inclusive hiring also strengthens workplace culture by fostering empathy, collaboration, and respect, which boosts morale and helps employees feel valued and supported.

Beyond cultural benefits, disability inclusion is a smart business strategy. Companies that welcome disabled employees often see higher retention, stronger loyalty, and improved overall performance. Many talented individuals with disabilities remain underemployed due to bias or inaccessible hiring practices, meaning employers who prioritize inclusion tap into a rich and often overlooked talent pool. Hiring people with disabilities also helps reduce stigma, normalize accommodations, and encourages openness about individual needs. Ultimately, inclusive hiring is not only ethically responsible — it's a powerful driver of growth, innovation, and long-term success.

The SRC is pleased that ORS has continued the Project Search initiative. Additionally, ORS encouraged vendors to provide a full continuum of SE Services including Pre-ETS and worked with providers to explore impediments to service delivery and strategized solutions to overcome obstacles. ORS also reviewed fee structure and increased fees for services for many services to allow CRPs to have a more stable workforce and fiscal outlook.

The SRC feels these are positive moves forward. However, the SRC would like to see more vendors and employment agencies, like Goodwill Industries of Rhod Island and other agencies with a broader range of services. The Council and ORS have identified a persistent challenge in ensuring access to Pre-ETS services for many students, including those in inclusion programs and those with 504 Plans. Misunderstandings regarding Pre-ETS programming, eligibility requirements, and the age at which students may engage with ORS services contribute to students being overlooked and graduating without employment experiences for which they are eligible.

The interagency collaboration between ORS and RIDE clearly describes the responsibilities of each agency, as well as those of Local Educational Agencies (LEAs) and schools. ORS provides

training to school staff about Pre-ETS services; however, a disconnect between policy and practical implementation often remains.

The Council recommends that ORS and RIDE address issues and concerns related to coordination and implementation of PRE-ETS and transition services in schools. The SRC further suggests that ORS seek the support of RIDE in efforts to assist LEAs on issues and concerns related to coordination and implementation of pre-employment transition services and transition services, particularly with respect to students underserved by ORS services.

(k) Coordination with Employers.

The Council asserts that employing individuals with both visible and non-visible disabilities is fundamental to cultivating workplaces that accurately represent the diversity present in our society. By prioritizing disability inclusion, employers benefit from a broader spectrum of perspectives, problem-solving approaches, and varied experiences. These differences fuel creativity and innovation, helping organizations design better products, serve customers more effectively, and adapt more quickly to change. Inclusive hiring also strengthens workplace culture by fostering empathy, collaboration, and respect, which boosts morale and helps employees feel valued and supported.

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(l) Interagency Cooperation with Other Agencies

The SRC encourages ORS to inform consumers about DRRI's capacity to support individuals facing delays or denials related to Assistive Technology (AT) devices or services. Furthermore, DRRI is nearing completion of a transition application designed for students with IEPs, aimed at facilitating all elements of the IEP process as well as addressing broader transition topics, including Supported Decision-Making. The Council strongly advises that ORS disseminate detailed information regarding this application to its staff, educators, and consumers.

Additionally, the ability of ORS to provide in-house training is a step toward maintaining and increasing the number of referrals for AT services and devices through ORS. Training must also include the fact that AT is excluded from ORS's comparable benefit requirement.

Out-of-school youth remain an underserved or unserved population and reaching those youth is critical. The State Plan must identify the reasons the subcommittees for youth did not meet this

year, and whether these meetings are scheduled to resume in 2026 (and if not, why that is). Additionally, with respect to employment goals and skilled job opportunities, SRC requests that ORS provide more specific information regarding outcomes and goals within the State Plan.

The SRC strongly recommends ORS support and/or provides information on Supported Decision-Making (SDM) to its staff and to education staff. DRRI has been pleased to offer SDM training to ORS staff and educators around the state for several years. We have a new online "Center for Supported Decision-Making" that will be live as of January 31, 2026 and we will provide the URL at that time.

The State Medicaid Plan Under Title XIX of the Social Security Act

* **Comment** - Please note that the Ticket to Work program (which serves those aged 16-64 and is a Medicaid buy-in option) is a separate entity from The Sherlock Plan (which is designated for individuals aged 65 and older).

Thank you for the opportunity to comment on the update to the two-year VR portion of the Combined State Plan. We are encouraged by the changes ORS has implemented based on needs assessments over the past few years. We look forward to a continuing collaboration to ensure that all Rhode Island residents with disabilities will have equal access to employment services and jobs of their choosing in settings of their choice.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

The Rhode Island Office of Rehabilitation Services wishes to thank the State Rehabilitation Counsel (SRC) for the thoughtful review and comments on the 2026-2027 Annual Update for the State Plan for Vocational Rehabilitation and Supported Employment. Our responses below follow the format which you had employed to make your comments.

(b) Comprehensive Statewide Needs Assessment (CSNA)

Response:

ORS would like to thank the SRC for this comment and offers of assistance in this area. ORS welcomes any additional feedback or suggestions. ORS continues to strengthen vocational skill development through collaboration with vendors and ORS staff. In addition, a sustained 25% vacancy rate among Rehabilitation Counselors for at least three years may have impacted our ability to maintain or expand successful industry-driven competitive employment placement. We expect this to improve now that we are more fully staffed.

Response:

ORS has been working with vendors to expand the range of services they provide but has identified a lack of training among many providers. ORS continues to identify, develop, and fund training programs such as Resume Development, Labor Market Information, and targeted services for Pre-ETS students. ORS has also attempted to recruit and identify additional vendors to provide services; however, although new vendors are added each year, the number remains insufficient to meet the full range of service needs. In addition, ORS has been collaborating with another State agency to develop a Peer Mentoring training program to help address needs that fall outside the current scope of ORS services.

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Response:

ORS thanks the SRC for this question. ORS has indicated that it signed a new Memorandum of Agreement to continue to work with the Tribal Nation.

Response:

ORS agrees that services to Tribal VR should be expanded. The counselor previously assigned to Tribal VR transitioned to another role, and the position remained vacant for several years. Now that a staff person has been assigned, ORS will work collaboratively with that individual and Tribal VR to increase awareness of ORS services and to assist with providing training for both ORS and SRC.

Response:

ORS agrees that collecting specific data is necessary to effectively compare progress toward meeting established goals. ORS will explore its capacity to collect this data through the new MIS system, INFORMED. The VR Administrator will work with the MIS team to assess the system's ability to capture specific data that can be used to measure the success and progress of services provided to underserved populations.

Response:

ORS has recently scheduled a meeting with OSCIL to begin developing a shared understanding of how the CIL can assist ORS in achieving employment goals.

(c) Cooperative Agreements with Agencies not Carrying out Activities Under the Statewide Workforce Development System

1. Federal, State and local agencies and programs

Response:

ORS can provide quarterly updates to SRC once the dashboards are received from RSA, as this information will document progress made through the implementation of this new initiative.

3. *Changes to Hiring Requirements and Certificate Program*

ORS has updated its job requirements and no longer mandates a Master's Degree specifically in Rehabilitation Counseling.

Response:
ORS agrees with the SRC and has successfully filled the nine vacant positions that had remained unfilled for more than two years. For individuals who do not have formal Rehabilitation Counseling training, there is a requirement to participate in a structured training program that includes in-person instruction, web-based training, and collaboration with Assumption College.

ORS and its new employees met with the Department Chair of Assumption to discuss pathways of learning for a certificate program or pursuing a Master's Degree in Rehabilitation Counseling. At this time, more than 75 percent of the new staff have expressed interest in pursuing the Master's Degree in Rehabilitation Counseling. This training is funded through a Rehabilitation Services Administration grant, with the only cost to the individual being textbooks. ORS has agreed to cover the cost of required books and supplies.

ORS is encouraged by staff's strong interest in pursuing advanced education in Rehabilitation Counseling.

(B) Overcome Barriers to Accessing VR and Supported Employment Services.

GOAL 1: To increase awareness of ORS and its scope of services / Objective 1

Response:
ORS concurs that an enhanced social media presence is necessary. We will carefully consider the recommendations and initiate steps to improve this area. ORS is in the process of working on our website both for accessibility and easier access for individuals to navigate including the Supported Employment Section. One of the initiatives in developing a community calendar of events that supports individuals in their path for employment as well as ORS-specific participation and/or sponsored events.

Response:
ORS agrees and will initiate collaboration with OSCIL to develop a clearer understanding of how the two agencies can work together to meet the needs of the individual and increase utilization of each other's services.

Response:
ORS is actively working to improve accessibility across multiple areas and will continue to strengthen accessibility on its website. For example, the Deaf and Hard of Hearing Unit has collaborated with CDHH to expand ASL-based information available on the website.

Response:

ORS agrees and will initiate collaboration with OSCIL to develop a clearer understanding of how the two agencies can work together to meet the needs of the individual and increase utilization of each other's services. We would appreciate OSCIL's help in developing disability awareness training to ensure better policy and philosophical alignment.

OBJECTIVE 3*: Develop, implement, and replicate the successful business partnerships already operating. ORS will:*

Response:

ORS is pleased to hear that the SRC wishes to collaborate with ORS regarding the BEST team. ORS welcomes the SRC and their collaborative efforts. We will report out on efforts at SRC meetings and encourage collaboration with the Outreach Committee.

GOAL 2: ORS will overcome barriers to accessing VR and supported employment services through the following objectives / Objective 3

Response:

ORS agrees and will initiate collaboration with OSCIL to develop a clearer understanding of how the two agencies can work together to meet the needs of the individual and increase utilization of each other's services. ORS looks forward to working more closely with OSCIL to better the IL and work skills for mutual individuals served.

GOAL 3: To provide a flexible service delivery system that helps individuals to remove personal and other barriers they face to obtain and maintain industry-driven competitive integrated employment.

Response:

ORS thanks the SRC for their comments. We continue to utilize and support community partners to ensure job placements meet the standards of industry-driven competitive integrated

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employment. ORS meets with Employment-Focused Providers at least quarterly to maintain open communication and provide ongoing technical assistance. Additional supports, including independent living and assistive technology providers, are engaged on an ongoing basis to ensure consistent collaboration with community partners and to strengthen service delivery for individuals.

GOAL 4: ORS will monitor and track the following performance measures quarterly via WIOA PY24 and PY25 RSA911 data submittals and timely compliance of case movement of applicants to eligibility and to IPE. ORS will also utilize Pre-ETS real time data collected through participation in a grant that measures the effectiveness of services delivered under Pre-ETS.

Response:

ORS wants to thank the SRC for their comments regarding participation in the Transition Readiness Toolkit. We have recently concluded this 3-year grant which is designed to enable The Office of Rehabilitation Services (ORS) to measure both the impact and quality of Pre Employment Transition Services (Pre-ETS). ORS remains committed to providing high quality services to students and families. The data collected will allow us to identify which services are most effective, as well as highlight areas and service components that may benefit from improvement. These results will guide continuous quality improvement and strengthen pre-ETS outcomes moving forward.

Response:

Full implementation and effective use of the Toolkit will require training for service vendors to ensure it is administered appropriately and consistently. These results will guide continuous quality improvement and strengthen pre-ETS outcomes moving forward

Response:

Once ORS is able to begin to measure the quality of services through the use of the toolkit, this information can be shared with partners to ensure consistent, high-quality services delivery and meaningful impact. The toolkit also allows the Vendors to access the results which will allow them to see in real time the impact a service is having with the individuals we are mutually working with. It also allows us to see what areas may need improvement and where we are excelling.

(k) Coordination with Employers.

Response:

ORS thanks the SRC for their comments regarding employers and vendors. ORS consistently works with vendors in helping them expand their services to innovatively adapt to the shifts in workforce development, and to offer the most individualized and beneficial service provisions to consumers.

Response:

As mentioned previously, once ORS is able to begin to measure the quality of services through the use of the toolkit, this information can be shared with partners to ensure consistent, high-quality service delivery and meaningful impact. The toolkit also allows the Vendors to access the results which will allow them to see in real time the impact a service is having with the individuals we are mutually working with. It also allows us to see what areas may need improvement and where we are excelling.

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Response:

ORS is exploring different formats and methods of distribution for consumer satisfaction surveys.

Impact of AI on Local Businesses - The Job Market and Entry-level Positions

Response:

ORS thanks the SRC for this question. ORS is working with Thrive and CVS in developing a total store training that prepares consumers for any jobs in CVS stores from pharmacy tech to retail. ORS will continue to collaborate with vendors to develop additional consumer trainings across multiple entry level positions.

The Council highlighted the likelihood of a transition from larger corporations to smaller, locally owned businesses. As AI becomes more established, the emphasis will primarily be felt in administrative roles rather than in service-oriented sectors. As an example, a partner shared a personal experience at a coffee shop that had integrated automated ordering systems, illustrating how technology is gradually entering smaller businesses while still maintaining some human interaction.

(d) Evaluation and Reports of Progress- VR and SE Goals

Rebranding of ORS' Name

Response:

ORS agrees with the SRC and believes that a name change will result in increased interest in and applications to the agency. Due to other priorities, including staffing and the implementation of a new MIS system, it was necessary to take a brief hiatus. However, ORS will begin discussions regarding the name change within the next few months. ORS intends to take the time necessary to select a name that clearly represents the work we do while reflecting a more modern identity. ORS welcomes the SRC involvement in this process.

GOAL 2: Increase Services to Underserved and Unserved Populations

Challenges in Increasing Services to Underserved and Unserved Populations

Response:

However, ORS has limited authority to require vendors to expand staffing levels. Nonetheless, ORS has provided training to numerous vendor staff on vocational services and ORS reporting requirements and expectations. Additionally, Rehabilitation Counselors should contact vendors prior to making referrals to discuss service availability and anticipated timeframes for service initiation.

Response:

ORS understands the comment; however, the agency has limited ability to implement some of the suggested actions. ORS has very specific deliverables that must be completed before payment for services is issued. If these deliverables are not met, invoices are held until the required services are provided.

Most vendors utilized by ORS operate under a fee-for-service model rather than formal contracts. Several years ago, RSA advised ORS to modify certain aspects of its vendor arrangements to align with federal guidance.

Expanding ORS' Employment Network Partnerships

Response:

ORS understands the comment. ORS has attempted several times to work with some vendors to become ENs without success, even with having some State ENs present to those vendors how they were successfully able to generate significant revenue streams through TTW. It is very well likely that the onerous application process and the increased monitoring has put vendors off becoming ENs. We are aware that TTW/SSA knows this is a concern.

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

Response:

The Office of Rehabilitation Services appreciates the SRC's comments regarding the importance of engaging transition aged youth in supported employment services earlier. ORS agrees that early exposure to work through work readiness training and work-based experiences leads to improved long-term outcomes and greater success for youth. In collaboration with the Regional Transition Centers and BHDDH, ORS has been communicating with schools to encourage earlier referrals of students for services. ORS wants SRC to know that services are being provided to supported employment students as early as 14 years old.

Response:

ORS thanks the SRC for this suggestion and will take it under advisement.

(i) Comprehensive System of Personnel Development

Response:

ORS agrees with this suggestion and is working on this issue. ORS welcomes any suggestions that the SRC may have to help in this area.

(j) Coordination with Education Officials

I. Cooperative Agreement with Rhode Island Department of Education (RIDE)

Response:

ORS wants to thank the SRC for their recommendation to address any concerns related to the implementation of Pre-Employment Transition Services (Pre-ETS) and transition services in school. ORS works closely with the Rhode Island Department of Education (RIDE) and The Regional Transition Centers to support the coordination and implementation of pre-ETS. ORS will continue to prioritize outreach to underserved students, including those on 504 plans.

(k) Coordination with Employers.

Response:

ORS thanks the SRC for their comments regarding employers and vendors. ORS consistently works with vendors in helping them expand their services to innovatively adapt to the shifts in workforce development, and to offer the most individualized and beneficial service provisions to consumers.

(l) Interagency Cooperation with Other Agencies

Response:

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The Office of Rehabilitation Services (ORS) thanks the SRC for its comments and question regarding youth subcommittees. ORS would like to assure the SRC that the agency is an active participant in youth subcommittee meetings, and these meetings are scheduled and maintained on the calendar. While meetings may occasionally be canceled due to unforeseen circumstances, they continue to take place quarterly. ORS also works closely with the Department of Labor and Training (DLT) contracted youth service providers to ensure that in school as well as out of school youth are actively engaged in services and have access to all available resources. Working with these partners is integral to ensuring a seamless handoff from services received through ORS to valuable lifelong resources available to them.

ORS would also like the SRC to know that educating staff in order to inform students, and families about informed decision-making options remains a priority for the agency. Disability Rights Rhode Island (DRRI) has provided training to transition counselors during monthly transition meetings and has also presented to all ORS staff at agency-wide quarterly meetings. Additionally, transition counselors have received this training through the Regional Transition Advisory Council meetings that take place monthly, which include vocational rehabilitation counselors, teachers, and other state partners. As new staff are onboarded, ORS will continue to prioritize this information and ongoing training.

The State Medicaid Plan Under Title XIX of the Social Security Act

Response:

ORS is currently on statewide Medicaid Buy-In Working Disabled Group with other state partners and non-profit agencies that are identifying issues such as Ticket to Work (Medicaid Buy-In) and The Sherlock Plan as separate entities and how to best relay this information to the public.

ORS is in the process of working on an inhouse training for field staff and counselors on being knowledgeable of both Ticket to Work (Medicaid Buy-In and The Sherlock Plan), provide information, to direct individuals to the appropriate the resources, and providing it in a language that benefits the individuals that ORS supports.

ORS would like to again thank the State Rehabilitation Counsel for your input.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

The Rehabilitation Act of 1973, as amended, mandates that the Rhode Island Office of Rehabilitation Services (ORS), in partnership with the State Rehabilitation Council (SRC), complete a Statewide Comprehensive Needs Assessment (CNA) at three-year increments. The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Supported Employment, who identify as minorities with significant disabilities, underserved or unserved individuals, youth with disabilities and individuals with disabilities served by other components of the workforce development network. In addition, the CNA is intended to identify the need to develop or improve Community Rehabilitation Programs

(CRPs). ORS views the CNA as a dynamic and evolving process that incorporates information from several diverse sources rather than from any one event or data source.

- ORS and the State Rehabilitation Council (SRC) jointly completed a CNA in FFY 2025 for the FFY2026 State Plan. ORS and the State Rehabilitation Council (SRC) will be completing a CSNA in FFY2027/2028. This assessment incorporated the new WIOA regulations and focused on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:
    - With the most significant disabilities, including their need for supported employment services
    - Who identify as minorities
    - Who have been unserved or underserved by the VR program
    - Who have been served through other components of the statewide workforce development system; and
    - Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.
- ORS and SRC addressed the Statewide Comprehensive Needs Assessment using several resources including:
    - Community Comprehensive Needs Assessment Surveys for Community Rehabilitation Providers (CRP)
    - Employer Comprehensive Needs Assessment Survey
    - Customer Satisfaction Survey
    - Environmental Scan of Data including United States Census Bureau, Social Security Administration, RI Department of Labor & Training, KIDS COUNT, RI Department of Education and Disability employment statistics
    - Office of Rehabilitation Services Staff Focus Groups
    - Focus groups with transition age youth/consumers and parents and ORS staff members.

ORS will:

1. Continue increasing the capacity and knowledge base of CRPs who provide Supported Employment services
2. Continue to improve access to vendors, awareness of cultural issues and distinctions, make services readily available for emerging populations/minorities, as well as access to services for individuals who are not English-speaking or English is their second language
3. Increase the capacity of CRPs to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment

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4. Look to CRPs to continue to develop a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities and to expand the number of qualified trained personnel to allow for the provision of supported employment services.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Vocational Rehabilitation services, who identify as minorities with significant disabilities, underserved or unserved individuals, youth with disabilities and individuals with disabilities served by other components of the workforce development network. The Comprehensive Needs Assessment (CNA) completed in 2025 identified the following as the most unserved/underserved populations served by the VR program:

1. People with physical disabilities
2. Students with anxiety
3. Students with low-functioning Autism
4. Adults with behavioral health concerns who also have Autism/Asperger's
5. Adults with disabilities who have legal/criminal backgrounds and who are experiencing homelessness
6. Individuals with Blindness/Visual Impairments, who also have a severe intellectual disability
7. Individuals with disabilities who identify as Asian

ORS will explore:

1. Enhancement of the cultural competency of ORS staff and CRPs to specific minority populations within the State.
2. Streamline access to ORS services for unserved, underserved and minority populations.
3. Incorporate interpretation and communication needs into the IPE for unserved, underserved and minority populations.
4. Engagement of the American Indian/Alaskan Native, Pacific Islander/Native Hawaiian and Asian communities through outreach and marketing strategies.

Ensuring services are readily available for emerging populations/minorities.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

The Results of the CSNA showed that:

Individuals with physical disabilities, behavioral health concerns, autism/IDD, learning disabilities, blindness/visual impairments, and those who are dually diagnosed disabilities were indicated as underserved by the Workforce Development System (WDS). Employers were also asked what information they could receive from ORS that would be helpful to recruit people with disabilities. Responses centered around marketing and communication, while other

responses were more specific and included: understanding laws about discrimination and employer requirements for employees; verification of high productivity; whether people with disabilities can work independently or need job coaching; does the individual require medication, or have allergies that would make it unsafe to perform job tasks; the need for thorough background checks; information regarding tax and work assistance programs; identification of connection points for company recruiters; training for hiring managers and supervisory personnel and an overall better understanding of the talent pool throughout populations with disabilities. All employer respondents indicated their companies would be willing to provide accommodations to employees with disabilities, including longer training time, allowing more time/days to work from home, assistive technology, potential job carving, extra shift breaks, accessible parking and other office modifications.

ORS will explore:

1. Better collaboration between ORS, WIOA Partnerships and the Workforce Development System through rebranding, marketing, communication, information sharing and training. In these collaborative efforts, ORS will identify and develop services and training to assist individuals with disabilities who the CSNA results identified as being in underserved or minority populations.

2. Additional collaboration with the Workforce Development System to improve service delivery to minorities such as those who identify as American Indian/Alaskan Native, Pacific Islander/Native Hawaiian and Asian.

3. Dissemination and/or awareness of resources available through the Workforce Development System and increased awareness of employer resources, as mentioned in the CSNA results.

4. Increased outreach to individuals with physical disabilities, behavioral health concerns, autism/IDD, learning disabilities, blind/visually impaired, and dual diagnosis disabilities, as identified by the workforce development system as being the most unserved/underserved populations.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

The 2025 Comprehensive Statewide Needs Assessment (CSNA) identified over 22,120 students from the ages of 3 – 21, in RI, with IEP's. This number could include students in a school setting, individuals who are home-schooled, individuals in other types of non-traditional school settings, etc.

Students with 504 plans, students with behavioral health concerns, students with anxiety, students who are more severe on the Autism spectrum, and students who are migrants are underserved populations, according to various educators in RI who work with these students.

ORS continues to enhance and expand access to pre-ETS including those students in juvenile justice system, an additional unserved/underserved population.

"At-risk" students with learning disabilities and/or those with 504 plans who at times do not want to be identified as having a disability, and therefore, are not potentially accessing services.

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Students indicated a positive experience with ORS, and that a high volume of "check-in" phone calls from their ORS counselor would not be over-burdensome. Students and parents/guardians would like to have more communications from their school guidance counselors about service agencies like ORS. Additionally, they would like to see more presentations/explanations of ORS services. Lastly, they would like more job coaching hours and increased help with interviewing skills.

Per the CSNA, students (and their parents) indicated they are unaware of the full scope of services available to them from ORS and what services ORS may, or may not, fund. Furthermore, they would like to see more mentoring from ORS counselors, along with more detailed information of ORS services. Based on the findings of the Transition focus group, the following possible strategies will be explored:

1. Increased awareness of the Purpose and Mission of ORS.
2. Continue to foster, promote, and encourage students with disabilities to have direct involvement with their ORS Counselor and ORS case, as this method ensures the need for consistent engagement between ORS and consumers.
3. Continue to grow opportunities for youth with disabilities to access ORS information outside of school (mental health centers, youth centers, higher education programs, etc.) to capture more youth with disabilities in need of ORS services.
4. Continue expanding outreach to other programs, such as youth centers, family resource centers, and career and technical education programs to help youth with disabilities receive the counseling guidance and services they need.
5. Assist schools in increasing communication and coordination for "at-risk" youth with disabilities.
6. Develop a clear understanding of the breadth of services that ORS can provide to students with disabilities. This would provide more informed choice and further promote independent, confident decision-making ability from those students and their parents/guardians.
7. Increase outreach to work with those who are SSI/SSDI beneficiaries with an assignable Ticket to Work (TTW).
8. Remind students with disabilities and parents of the options they have while working with ORS, increasing the level of independent involvement throughout their case, while encouraging them to exercise informed choice every step of the way.
9. Continue building frequent communication and check-ins between students with disabilities & their parents/guardians, their educators/guidance counselors, and their ORS counselors, all centering around informed choice, options for services that best suit the individual, along with the scope of help that ORS can provide to students with disabilities.
10. Continue group effort involvement in services for transition-aged youth with disabilities (i.e. student with disability, parent, special education teacher, vendor, ORS counselor, etc.).

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11. Continue hosting transition informational nights at RI schools to provide information about ORS, Social Security Ticket to Work and any services or methods ORS can take to help the students.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

ORS and the SRC distributed a survey via email to one hundred Community Rehabilitation Providers (CRP's) who are approved vendors of ORS. Twenty CRPs responded, for a response rate of 20%. CRPs were asked questions that ranged from demographic information, satisfaction with ORS services, suggested areas of improvement and how to strengthen collaboration to better serve people with disabilities, capacity of service and unserved/underserved populations. Additionally, focus groups were held with ORS counselors and supervisors from each geographic region of ORS, that in total, covers the entire state of RI. Demographic information collected in the survey included the geographic region where services were provided, type of services, primary population and ethnic population served, whether their organization provided services for emerging populations with barriers to employment and unserved/underserved populations.

All CRP survey respondents provide services to underserved and/or emerging populations with barriers to employment, including those from the following groups:

- Individuals with intellectual developmental disabilities (IDD)
- Individuals with autism and/or developmental disabilities due to lack of referral options, difficulty to gain access to services when they are older, or when diagnosed later in life
- Individuals with hidden disabilities
- Individuals with undiagnosed, or "mild" disabilities as they don't often receive a diagnosis via school systems and subsequently cannot qualify for the appropriate services in adulthood
- Individuals with disabilities who are homeless
- Individuals with disabilities who are veterans
    - Individuals with learning disabilities
- Individuals with a dual diagnosis
    - Individuals with disabilities who have separate funding sources for services

The range of services provided by CRPs who participated in the survey consists of assistive technology and rehabilitation engineering, benefits planning for Social Security recipients, community-based work experience, driver training, home modifications, job coaching, job development, job placement, job retention, life skills training, orientation/rehabilitation teaching, pre-ETS, summer work, vehicle modifications, virtual services, vocational assessment, vocational evaluation, vocational tools/equipment and vocational training.

When asked if their agency provided Supported Employment (SE) services, 75% responded "yes" and 25% responded "no". Of the five agencies that do no not provide SE services, 60% responded that they would be willing to provide SE services in the future. Furthermore, they stated that more staff and space, learning how to provide SE services, and training for their staff

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would be needed to provide SE services in the future. Additionally, 58% of CRP respondents indicated they are interested in servicing populations that they do not already service.

Respondents were asked who their disability service populations were: 90% indicated developmental disabilities; 80% indicated cognitive disabilities; 70% indicated behavioral health disabilities; 65% indicated physical disabilities; 60% indicated communicative disabilities; 45% indicated deaf/hard of hearing disabilities; 45% indicated orthopedic/neurological disabilities; 40% indicated blindness/visual impairments; and 20% indicated respiratory disabilities.

When asked which age populations they are servicing, 80% indicated they service the 14 – 24 age range; 90% indicated they service the 25 – 34 age range; 90% indicated they service the 35 – 44 age range; 85% indicated they service the 45 – 54 age range; 80% indicated they service the 55 – 64 age range; and 45% indicated they service ages 65 and up.

Respondents indicated they would like to receive training to provide the following populations with services from their agency: veterans with disabilities; individuals who are deaf or hard of hearing; high school students with disabilities; pre-ETS; individuals with developmental disabilities and "all" populations with disabilities.

When asked what trainings would be beneficial to their agency to advance their professional development, respondents indicated the following: job coaching; job development; employer networking; vocational skills; case management; =Association of Community Rehabilitation Educators (ACRE); customized employment, working with youth populations; assistive technology; implications of criminal backgrounds; mental health/psychiatric diagnoses and neurodiversity.

CRPs were asked what their agency would need to establish, develop, or improve service delivery to individuals with disabilities. The most common responses were increased training, larger physical space, referrals from a wider range of ORS Counselors rather than a select few, more referrals from ORS, more funding, more partnerships from non-profit agencies, vehicles for their agency, better explanation of CRP services from ORS Counselors.

Meeting the needs of the Business Community:

1. Increase marketing and awareness of ORS Services.
2. Enhance presence at business expos, job fairs and continue an ever-increasing online presence via agency website, social network platforms, chamber of commerce, etc.
3. Provide Business Community with information on Americans with Disabilities Act (ADA) and workplace accommodations

The CSNA identified a need to develop and improve CRPs.

Respondents from the employer survey were asked what information would be helpful to recruit people with disabilities. Some answers were centered around marketing and communication, while other responses were specific and included: understanding laws about discrimination and employer requirements for said employees; verification of high productivity; concerns as to whether the applicant could work independently, or whether they need job coaching; does the applicant take medication or have allergies that would make it unsafe to perform job tasks; the need for thorough background checks; information about tax and work assistance programs; identification of connection points for company recruiters; training for

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hiring managers and supervisory personnel; a better understanding of the talent pool, the types of qualification, and areas of specialization that people with disabilities would have.

All 17 respondents indicated their company would be willing to provide accommodations to employees with disabilities. Furthermore, respondents were asked what type of accommodations their company has provided to people with disabilities. The most re-occurring responses were longer training times, allowing more time/days to work from home, and assistive technology such as software, screen readers, headphones, standing desks and accessible doors. Other responses included job carving, translation tools/resources, extra shift breaks, accessible parking and other office modifications.

Respondents were asked what concerns, if any, would they have with hiring people with disabilities. Over half of the respondents indicated they would have no concerns. Other responses included identifying more resources used to keep people with disabilities trained and/or employed; the dangers of the job; and the inability to provide physical modifications to the workplace environment.

Meeting the Needs of the Consumer:

4. Hold monthly/quarterly meetings with CRPs to ensure service delivery is meeting our expectations.
5. Create pilots for job preparation, trainings for Supported Employment Council (SEC)through Innovative Strategies meetings.
6. Assistant Administrator of Transition will continue to explore new pilot programs that will be rolled out next PY26/27 that will be a partnership between ORS, CRPs, and individual school districts throughout RI.

CUSTOMER SATISFACTION SURVEY

The ORS monthly consumer satisfaction surveys (completed with input from the SRC State Plan, Policy and Quality Assurance sub-committee) was designed as an ongoing tool to be distributed at set intervals and provides longitudinal data on customer satisfaction. Surveys are sent to customers who have open cases with ORS that have developed IPEs, are in post-plan services and employment status. The surveys assist in capturing WIOA data and undergoes continued phases of analysis as an ongoing process.

The conclusions formulated on the results of the Surveys conducted between April 2024 through March 2025 indicated the following needs:

7. ORS can improve services by helping consumers obtain employment, providing more vocational exploration and increasing communication with consumers.
8. Nothing, or already being satisfied with ORS services, was the second most occurring response.

Additionally, the Customer Satisfaction Surveys indicated that:

1. Job placement, job retention, job coaching, and supported employment were indicated as the most important services.
2. Transition-aged individuals aged 14-24 were the largest population of survey respondents at over 35% of all individuals who responded in the survey.

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3. Individuals with mental health, developmental and cognitive disabilities were the most frequently identified of individuals who responded in the survey.

4. Response rate of those who identify as minorities stayed roughly the same since the 2021 CNA, with respondents indicating themselves 69.75% as White/Caucasian; 12% as Black/African American; 10.25% as Hispanic/Latino; 4.25% as American Indian/Alaskan Native; 1.75% as Asian; and 1.75% as Pacific Islander.

5. Three-quarters of respondents indicated that ORS matched their stated employment goals and interests, that they feel better prepared to enter employment, that their counselor responds to them within 2 business days, and that they would recommend ORS services to family and friends.

The further conclusions based on the results of the surveys conducted between April 2024 and March 2025 indicated the following needs:

1. ORS can improve their services helping customers obtain employment, providing more job exploration and "try-outs" and increase communication with consumers.

2. Nothing, or already being satisfied with ORS services, was one of the most frequently occurring response.

Additionally, the customer satisfaction surveys from April 2024 and March 2025 indicated that:

1. Job placement, job retention, job coaching, and supported employment were indicated as the most important services, with education being of lesser importance.

2. Transition-aged individuals aged 14-24 remain the largest population of survey respondents and grew over the past couple years to over 35% of all individuals who responded to the survey.

3. Individuals with mental health concerns, and developmental and cognitive disabilities were the most frequently identified individuals who responded to the survey.

4. Response rate of those who identify as minorities were of little to no change since the 2021 CNA, with respondents indicating themselves 69.75% as White/Caucasian, 12% as Black/African American, 10.25% as Hispanic/Latino, 4.25% as American Indian/Alaskan Native, 1.75% as Asian and 1.75% as Pacific Islander.

5. Over three-quarters of respondents indicated that ORS matched their stated employment goals and interests, that they receive services in a timely manner, and that they would recommend ORS services to family and friends.

6. Two-thirds of respondents indicated that they receive ORS services in a timely manner and another two-thirds indicated they are recipients of SSI and/or SSDI.

7. Over half of the respondents indicated they receive encouragement, support, respect and attentiveness from their ORS counselor.

ENVIRONMENTAL SCAN

The environmental scan included information from a variety of sources such as the United States Census Bureau, Social Security Administration, RI Department of Labor & Training, KIDS COUNT, RI Department of Education and Disability employment statistics

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The sources indicated the following:

1. According to the 2020 United States Census Bureau, Rhode Island's percentage of persons who identify as White alone accounts for 71% of the population. Those persons who identify as Hispanic or Latino of any race accounts for 17% of the population. Those who identify as Black/African American alone accounts for 6% of the population. Those who identify as Asian alone accounts for 4% of the population. Those who identify as two or more races accounts for 3% of the population.

2. The 2022 American Community Survey from the United States Census Bureau, reports that 4.2% of Rhode Islanders are without health care coverage. The survey indicates that 13.2% of Rhode Islanders have a disability, which is consistent with the nationwide average of 13%.

3. RI According to the Social Security Administration's 2022 Annual Statistical Supplement, 27,835 Rhode Islanders (2.5% of the state population) are receiving Social Security benefits as a result of a disability.

4. The most recent United States Census Bureau, documented that the median household income in RI 2022 was $81,854, compared to $74,580 nationally.

5. Social According to the 2022 American Community Survey from the United States Census Bureau, 39.6% of RI's population possesses a bachelor's degree or higher. This figure is higher than the nationwide average of 34.2%. According to the 2022 United States Department of Labor, the employment rate in RI was 61.2%, which ranks 26th in the nation. The employment rate for people with disabilities in RI is 36%, which ranks 30th through 33rd in the nation.

6. The RI Department of Labor and Training (DLT) Labor Market Information Division reported, in March 2023, that half of the employers (50.0%) in RI have between one and four employees; however, those businesses employ just 9.1 percent of the workforce. The largest employers (those with 1,000 or more employees) numbered 29 (0.1%) and employed 15.7 percent of Rhode Island's private sector workforce. Smaller employers (those with less than 20 employees) represented 92.4 percent of all employers in the state and employed over one quarter (26.9%) of the workforce. There are 554 (1.3%) employers in the state employing 100 or more workers. Together, these entities employ nearly half (46.1%) of the state's private sector employees. The state's 29 largest employers (1,000 or more employees) are found in Health Care and Social Assistance (6), Private Education (5), Retail Trade (5), Finance and Insurance (4), Management of Companies and Enterprises (3), Transportation and Warehousing (2), Manufacturing (1), Administrative and Waste Management Services (1), Accommodation and Food Services (1) and Utilities (1). RI workers were paid average annual wages above the national average in four economic sectors: Management of Companies and Enterprises, Educational Services, Wholesale Trade and Accommodation and Food Services.

7. "KIDS COUNT" is a project of the Annie E. Casey Foundation to track the well-being of children in the US. By providing high-quality data and trend analysis through its KIDS COUNT data center, the foundation seeks to enrich local, state, and national discussions concerning ways to secure better futures for all children and to raise the visibility of children's issues through a nonpartisan, evidence-based lens. In addition to data from

trusted national resources, the KIDS COUNT data center draws from more than 50 KIDS COUNT State Organizations that provide state and local data, as well as providing insights into trends affecting child and family well-being. Their data is utilized for the following statistics: Between 2022 – 2023, there were 137,452 students enrolled in public schools in RI. Of that number, 1,739 (1.27%) were identified as homeless by public school personnel. Only 27.3% (just over one quarter) of young children experiencing homelessness were enrolled in an early childhood program. The core cities of young children experiencing homelessness in RI are Providence (state capitol), followed by Central Falls, Pawtucket and Woonsocket (all three cities located in the northern part of the state). Additionally, 16.4% of kindergarten through grade 12 students were receiving special education services in RI. A total of 206 youth were incarcerated at the training school during 2023, which was a 43% increase from 144 youths in 2021.

VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT

ORS conducted regional focus groups with all rehabilitation technicians, rehabilitation counselors and rehabilitation supervisors in 2024 to obtain information on unserved/underserved populations, how ORS can improve service delivery, while remaining up to date with the evolving field of vocational rehabilitation. ORS has a total of seven regions that encompass all of RI. Five of the regions are organized by geographic location of the state. One region is devoted solely to statewide services for individuals who are deaf and hard of hearing and one region is devoted solely to statewide services who are blind and/or visually impaired.

The focus groups reflected the following needs:

Region staff focus groups were attended by ORS vocational rehabilitation counselors (VRC's), rehabilitation technicians and region supervisors. When discussing the needs of ORS staff, some needs were common across the agency and some needs were specific to each region. ORS staff indicated that they need ongoing technical assistance with the utilization of Informed, which is the MIS adopted by ORS in November 2023. Other staff needs outside of these common themes came from the regions below.

The SBVI region vocalized the need to add an additional VRC position, or rehabilitation technician position to their region, as the influx of their referrals remain high and in an upward trend. Additionally, the SBVI region indicated they could also benefit from having more varied access to consultants in order to assist with determining eligibility since the consultant's assessments have differed from one another.

The Providence region stated they have a need for assistance in complying with eligibility timeliness requirements for consumers who are homeless. The region felt that training in this area could be beneficial and that access to the "Therap System" utilized by the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) could also help VRC's with eligibility timeliness.

The Northern region indicated they could benefit from supported employment trainings and best practice refreshers. This is due to result of hiring new VR counselors, and because some of the agency procedures and processes have evolved. The Northern region is home to many non-English speaking consumers and staff said they have a need to learn how to better serve these consumers.

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The Central region indicated adding resources to have consumer testing centers on site at ORS to streamline the VR process for consumers. This could potentially bypass some of the waiting time consumers are experiencing for services due to CRP's currently being short-staffed. Lastly, this region requested for ORS to sponsor more approved trainings for CRC credits so that staff would not need to take as many trainings for their CRC maintenance during their own personal time.

WORKFORCE INNOVATION & OPPORTUNITY ACT (WIOA):

As outlined by WIOA, and given the 21st Century understanding of the evolving labor force and the needs of individuals with disabilities, ORS staff indicated the following top 3 areas of training that would be most beneficial:

1. Eligibility timeliness requirement, particularly for consumers who are homeless.
2. Supported Employment.
3. Vocational Rehabilitation best practices, particularly for those ORS staff who are new and onboarding to the agency.

C. GOALS, PRIORITIES, AND STRATEGIES

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

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

ORS, in conjunction with the SRC state plan team, routinely met to review the format and content of the state plan to prepare for this review. Since the last full update, ORS and the SRC developed a state plan timeline regarding drafts, reviews, completed sections, feedback, edits, etc. ORS' goals and priorities, regulations, and planning activities were worked on and jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals were generated from the latest Statewide Comprehensive Needs Assessment (CNA), compliance with federal Performance Measures as stated in WIOA, monitoring reviews, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

The 2025 CSNA and subsequent SRC review indicated four goals ORS should work on for PY 2027 through PY 2028. These four areas include:

1. Continued strategies to promote awareness of ORS and its scope of service;

2. Increase services to underserved and unserved populations;

3. Bridge gaps between employers and individuals; and

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4. Help individuals to remove personal and other barriers they face to obtain and maintain industry-driven competitive integrated employment.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

(A) Support innovation and expansion activities.

1. In April 2025, ORS implemented an agency-wide practice of meaningful engagement. This practice is a strategy whereby individuals with disabilities are moved through the rehabilitation process (referral to application, application to eligibility, eligibility to IPE development) as quickly and efficiently as possible and kept engaged through the VR process. Some of the guidelines consist of the VRC contacting the applicant within three business days of receiving an application; booking an appointment with the applicant within ten business days of receiving the application; retrieving social security award letters in a timelier fashion; utilizing eligibility determination in a timelier fashion (social security award letters/verification letters, review of medical/psychiatric/ educational records; counselor observations, applicant statements, previous employment, and/or training. Once eligibility is determined, the VRC and consumer will develop the IPE as quickly as possible, with respect to informed choice. In adherence to meaningful engagement, the IPE steps and objectives must be clear and specific as possible; contribute towards progress; contribute towards accountability; reduce conflict and appeal; act as a roadmap; must be documented, reasonable, allowable, allocable, and necessary for the individual to become employed.

2. ORS operates as the designated State unit in Rhode Island. Due to circumstances within the State and consistent with the requirements of 34 CFR 361.29(a)(1)(ii), ORS has determined it may be necessary to engage in activities to establish, develop, or improve facilities (or services) for community rehabilitation programs (CRPs) (hereinafter "establishment projects) in the State for the purpose of providing innovative vocational

rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services to students with disabilities who are eligible or potentially eligible for the VR program. In assessing the need for establishment projects in the State, Vocational Rehabilitation Services has determined it may be necessary to incur expenditures to support CRPs to expand services, increase capacity, acquire equipment or develop new and innovative strategies and services, which satisfy the definition of a CRP at 34 CFR 361.5(c)(8), in order to ensure the continuity of quality service delivery to individuals with disabilities seeking to receive services under the VR program. The State assures it will submit requests for prior written approval to RSA for those costs that exceed the capital expenditure threshold applicable to the State, or for any improvements necessary for its intended use under the VR program, consistent with requirements set forth in 2 CFR part 200."

On an annual basis, ORS will send out a survey to CRPs to have them identify and expound on new inventive/forward-thinking strategies and services consistent with requirements set forth in 2 CFR part 200. ORS will work with the CRPs to develop pilot establishment projects and assess successful outcomes.

3. ORS has recently revised its job requirements and no longer mandates a Master's Degree specifically in Rehabilitation Counseling. ORS will now consider candidates who hold other Master's Degrees—such as in education, sociology, and social work—provided they have relevant experience in vocational services or related fields. Acceptable qualifications include graduation from a college of recognized standing, with coursework that includes or is supplemented by classes in rehabilitation, vocational education, or sociology. Since new employees may not have formal training in vocational rehabilitation, ORS is interested in exploring a partnership with Assumption College to develop a certificate Program in Vocational Rehabilitation. This certificate aims to equip new hires with the necessary skills and knowledge to succeed in the field of vocational rehabilitation.
4. The needs of the SRC were fully funded.

(B) Overcome barriers to accessing VR and supported employment services.

The following goals and strategies will be measured by utilization of our RSA911 data collected electronically through case management system, internal controls, customer satisfaction surveys, etc.

GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES

ORS will set Region and/or VRC targets for applications and employment outcomes, thus allowing ORS to measure the following goal by monitoring the number of applicants, case reviews, increased referrals, and employment outcomes in PY26. ORS will also be asking each counselor to provide at least one "success story" noting successful outcomes, service provision, and notable or innovative solutions to assist in overcoming obstacles for individuals with disabilities.

OBJECTIVE 1: ORS will continue to participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, and Transition events. ORS will utilize the strategies below to measure progress towards this objective and report progress. ORS will collaborate with the Regional

Transition Centers and Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) to continue to present an Introduction to State Services to each public, private and alternative high school statewide to ensure consistent messaging occurs for schools, LEAs, and families on ORS services. ORS will:

1. Continue to conduct a monthly orientation to VR services in English and Spanish in order to increase referrals and applications for services and are providing orientations at the American job centers.
2. Collaborate, facilitate, and participate quarterly with Sherlock Center and BHDDH on BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer Supported Employment.
3. Explore technical assistance from VRTAC-QM (or its next incarnation) on how better to market ORS services to the public.
4. Continue to develop additional video content/presentations regarding transition, general VR, SE, Pre-ETS, etc, and post on ORS website.
5. Continue to update the electronic "Introduction to ORS Transition Services" that consists of necessary information about ORS and scope of services, including the Transition fact sheet, benefits counseling FAQ, and an introductory video; these materials could be customized to the individual VR Counselor and the students/districts they are working with.
6. Increase ORS on-line presence via LinkedIN, Work without Limits, Indeed, Facebook and other social media.
7. Present on ORS services at least annually at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE) and Rhode Island Parent Information Network Events (RIPIN) and BHDDH. Provider agencies in other supported employment organizations or stakeholders on a quarterly basis.
8. Train staff on Liaison responsibilities in order to develop and foster CRP relationships.
9. Outreach to provider agencies and rehabilitation centers that have not referred in past two years to coordinate service orientation/presentation to staff and consumers.
10. Utilize Bureau of Labor Statistics (BLS), CSNA and 911 reports to stay current on labor market trends, job growth, and availability of employment opportunities across the state to create career pathways for consumers.
11. Maintain active engagement with interagency coordination, such as continued participation with WIOA interagency team meetings.

OBJECTIVE 2: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather and provide current information about business sector needs and state responses. ORS will:

1. Disseminate information from the quarterly GWB meetings to VR Counselors.

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2. Educate and partner with WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.

3. ORS will continue to collaborate with WIOA partners to enhance the ORS Annual Employer Forum typically held during the National Disability Employment Awareness Month.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating. ORS will:

1. Implement, coordinate, and expand on Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD.

2. Partner with emerging, high wage business sectors and DLT/RealJobsRI initiative to identify new employment opportunities for individuals with disabilities.

3. Increase business engagement activities by VR counseling staff via the internal Business Engagement Specialist Team (BEST) a group of dedicated VR counselors, supervisors and administrators who focus on increasing outreach to the business community.

4. Develop strategies to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR.

5. Educate and require BEST members to utilize an internal tracking tool to monitor employers/business contacts, industries. BEST members will develop a job board.

6. Educate staff about job board.

7. Conduct liaison responsibilities training for staff.

8. Identify increased employer penetration via annual report to WIOA/DLT/GWB reporting. ORS will work with the other State WIOA partners to better and more accurately note the dual approach programs that our mutual customers are using.

9. Annual ORS Employer Excellence Award given during Octobers Disability Awareness Month to Employers that exemplifies a model employer in hiring and providing reasonable accommodations to individuals with disabilities.

GOAL 2: ORS will overcome barriers to accessing VR and supported employment services through the following objectives.

ORS will utilize data collected from the Case Management System and data provided by RSA in Dashboard Reports. ORS will also utilize Pre-ETS real-time data collected through an expansion of services via a grant that measures the effectiveness of services delivered under Pre-ETS. Supported Employment Assistant Administrator will collect data from the results of a yearly innovative strategies survey to identify and develop new services and strategies for individuals served.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into industry-driven competitive integrated employment.

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1. In-School Youth with Disabilities: ORS will enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will continue to outreach to 504 Coordinators for Pre-ETS service identification and to identify "at risk" youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS expanded its traditional Transition services to include middle school students with the goal of introducing Pre-ETS services at an earlier age. This will give students an earlier look at potential career interests and pathways as they enter high school. ORS will continue to expand this service statewide.

2. ORS Transition Counselors will continue to collaborate with BHDDH, School Districts, and Adult Providers in order to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life for our I/DD students and students with significant support needs and barriers to employment.

3. Under the consent decree ORS has been tasked with supporting school districts with the goal of employment for all students on a Career Development Plan (CDP) prior to exit from HS. ORS will be providing TA to schools around Job development and Job Coaching. ORS will also utilize our Business Engagement team to assist districts in identifying businesses in their areas willing to offer employment experiences and opportunities. ORS will offer SE JDP and coaching as needed to those students who have developed an IPE and have an identified job goal.

4. Assistant Administrator of Transition will continue to monitor new multi-year pilot program that that was rolled out in PY26/27 that is a partnership between ORS, CRPs, and individual school districts throughout RI with the goal of bringing much needed employment skill development to students who will potentially require a higher level of support to obtain and maintain employment.

5. Adults with Disabilities: ORS will ensure a wide array of service providers and training programs are available to enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.

6. ORS will design and modify programs and services as changing needs of customers are identified based on CNA responses.

7. ORS will utilize benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS.

8. ORS will continue to ensure benefits counseling is provided to those on SSI/SSDI who may be unserved/underserved at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.

OBJECTIVE 2: Ensure ORS materials meet the needs of populations being served and/or outreached to. ORS will:

1. Partner with Dorcas International to identify underserved populations and identify specific needs for materials in alternative formats.

2. Will review data and determine alternate formats for underserved populations. ORS has purchased 10 licenses from CommonLook to assist with making accessible documents. Staff will take online training to learn how to remediate all forms and documents using this software.

3. Work with WIOA Workforce Partners to determine additional needs of individuals with disabilities not currently being served in the Workforce Development system.

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

GOAL 3: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:

ORS will monitor the Rehabilitation Rate, utilize case review data, and RSA 911/Dashboard data to monitor the number of closures post IPE closed prior to a industry-driven competitive integrated employment closure.

OBJECTIVE 1: ORS will review and expand an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into industry-driven competitive integrated employment.

1. In-School Youth with Disabilities: ORS will enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will continue to outreach to 504 Coordinators for Pre-ETS service identification and to identify "at risk" youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS will continue to present at the Annual RI School Guidance Counselor Conference to increase awareness of ORS services and referrals of 504 students. ORS continues to provide and expand career awareness to Middle School students and families.

2. Adults with Disabilities: ORS will ensure a wide array of service providers and training programs are available to enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.

3. ORS will design and modify programs and services as changing needs of customers are identified and utilize suggestions from an annual innovative strategies survey sent to CRPS and staff surveys.

4. ORS will continue to offer virtual services on a hybrid basis. ORS has found that having this hybrid model has allowed for increased efficiency for services. ORS has utilized the array of Virtual Services for Pre-ETS, Supported Employment and non-Supported Employment programming.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that industry-driven competitive integrated employment is the goal from services. ORS will:

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1. Utilize an innovative strategies survey to help identify areas of training needs for CRPs and implement training opportunities to improve services with an aim on best practice and will also explore branching out with providers regarding specific fee-for-services such as job preparation.

2. Continue to conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.

3. Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.

4. Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.

5. Continue to examine annually and modify, as needed, the VR fee structure reflects current economic climate and trends.

6. Identify ways to continue to offer Virtual Service delivery options to optimize services to individuals who are unserved or underserved or cannot meet in person.

OBJECTIVE 3: Continue to explore ways to expand the Ticket to Work program and Employment Network capacity to ensure a continuum of available support and service delivery for clients who meet the Social Security Ticket Program eligibility. ORS will:

1. Continue to identify gaps and strategize solutions in the Ticket to Work Program related to services and VR Cost Reimbursement process.

2. Utilize the J Morrow Ticket tracker system into the InFormed ECMS program.

3. Continue to explore development of Employment Network Partnerships.

4. Continue to enhance staff knowledge of the Ticket to Work Program, including work incentives, referrals to Employment Networks, such as Work Without Limits attending trainings, sharing of relevant WIPA trainings and information, etc.

5. Remain active with CSAVR TTW Peer to Peer monthly meetings and SSA Quarterly All VR meetings.

6. Capitalize on SSI Cost Reimbursement for PRE-ETS services.

7. Continue to ensure benefits counseling is provided to those on SSI/SSDI at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.

8. Partner with Dorcas International to identify and reach out to culturally underserved populations to ensure awareness of vocational rehabilitation services.

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

GOAL 4:

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ORS will monitor and track following performance measures quarterly via WIOA PY26 and PY27 RSA911 data submittals and timely compliance of case movement of applicants to eligibility and to IPE. ORS will also utilize Pre-ETS real time data collected through participation in a grant that measures the effectiveness of services delivered under Pre-ETS.

Vocational Rehabilitation Program				
	Program Year 2026		**Program Year 2027**	
	Expected Level	**Negotiated Level**	**Expected Level**	**Negotiated Level**
Employment (Second Quarter after Exit) [22]	48.6		49.6	
Employment (Fourth Quarter after Exit) [22]	46.1		47.1	
Median Earnings (Second Quarter after Exit [1]	3950.00		4050.00	
Credential Attainment Rate	35.8		36.8	
Measurable Skill Gains	30.5		32.5	

OBJECTIVE 1: Ongoing Strategies to Meet WIOA performance accountability measures.

1. Utilize tools, data and technical assistance provided by RSA in determining the final negotiated levels of performance.
2. Ensure the ECMS development encompasses the requirements for WIOA measures and data reporting.
3. Continue contributing reporting data elements as required to the Department of Labor and Training/lead WIOA partner in the state.
4. Continue to educate staff to the importance of timely and accurate ECF documentation of the WIOA data elements.
5. Utilize ECMS to develop a reporting system to account for the increase/utilization of Pre-ETS services and their effectiveness.
6. ORS is involved in the final phase of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS. For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service. ORS is working with the vendor AVI and Libera to ensure this database is implemented accurately in the current ECMS.
7. Participate in Technical Assistance opportunities on capturing performance measures.

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OBJECTIVE 2: Meet the statutory requirements under the Rehabilitation Act and the implementing regulations. ORS will:

1. Determine eligibility within 60 days of application.
2. Explore technical assistance with VRTAC-QM or its next incarnation on expanding Meaningful Engagement Strategies regarding eligibility, plan development and movement to active services in a more rapid fashion.
3. Determine and utilize presumed eligibility as relevant for SSI/SSDI disability recipients.
4. Develop the Individualized Plan for Employment (IPE) prior to the 90 days of eligibility determination.
5. Utilize MIS to track adherence to these standards on a quarterly basis; utilize individual performance targets for staff to aim for.
6. Educate VR Supervisors and staff on best practices and procedures on relevant utilization for eligibility determination and IPE extension process.
7. Educate VR Supervisors and staff on utilization of ECMS system through dashboard request to monitor their own 60-day and 90-day compliance and utilize performance targets to staff to aim for.
8. Ensure that supervisors and staff will utilize MIS system to better monitor annual reviews and IPE amendments to ensure service delivery to meet client's changing needs.

OBJECTIVE 3: Utilize available agency data through the Quality Improvement process to enhance and support program development, staff and vendor training and services to customers. ORS will:

1. Review the current regulations and update procedures as needed based on QI data to ensure client access to services, supports and movement toward self-sufficiency and integrated competitive employment.
2. Review WIOA data contained in the RSA-911 and RSA Dashboard quarterly to assess agency outcomes, areas for enhancement and program development for staff, vendors, and customers.
3. Enlist VRTAC-QM or its next incarnation as relevant to provide technical assistance.
4. Review relevant data and enlist support and assistance from SRC as relevant.
5. Continue monthly customer satisfaction surveys. Utilize findings to shape program development and service needs, vendor, and staff training.
6. Continue QI quarterly case reviews and targeted case reviews as relevant.
7. Utilize QI findings to shape procedural consideration, training needs, and program development.
8. Ensure that ORS supervisors and staff utilize QI resources to assist with monitoring of 60 day and 90-day compliance, annual reviews, and IPE amendments to ensure service delivery to meet client's changing needs.

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9. ORS is involved in the final phase of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS. For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service. ORS is working with the vendor AVI and Libera to ensure this database is implemented accurately in the current ECMS.

OBJECTIVE 4: Provide agency staff with up-to-date tools and technology that enhance delivery of services to customers and capture reportable data. ORS will:

1. Provide Staff Training and support as the agency continues its transition to Electronic Case Management/MIS System.
2. Utilize the wage interface tool within the ECMS to upload reportable RI UI wage data.
3. Utilize available wage data tools such as the Work Number available through DHS and State Wage Interchange System (SWIS) to capture WIOA Post Exit wage data for cases not available in the RI UI data base.
4. Explore ability to develop a wage interface tool to upload SWIS data into the new ECMS for reportable data collection.
5. Continue to educate and enhance agency staff's knowledge and use of various electronic platforms that enhance the delivery of services to consumers such as Teams, ADOBE, virtual access, SharePoint, Zoom etc.
6. Continue to onboard the J Morrow "Ticket" tracker system into the ECMS program.
7. Continue to utilize and provide CareerScope, Virtual Job Shadow, and explore other tools and resources that may make VR Counselor work more efficient, such as SARA.
8. ORS is involved in the final phase of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS. For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service. ORS is working with the vendor AVI and Libera to ensure this database is implemented accurately in the current ECMS.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

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

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES

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ORS will set Region and/or VRC targets for applications and employment outcomes, thus allowing ORS to measure the following goal by monitoring the number of applicants, case reviews, increased referrals, and employment outcomes in PY26. ORS will also be asking each counselor to provide at least one "success story" noting successful outcomes, service provision, and notable or innovative solutions to assist in overcoming obstacles for individuals with disabilities.

OBJECTIVE 1: ORS will continue to participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, and Transition events. ORS will utilize the strategies below to measure progress towards this objective and report progress Collaborate with the four Regional Transition Centers and Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) to present an Introduction to State Services to each public, private and alternative high school statewide to ensure consistent messaging occurs for schools, LEAs, and families on ORS services.

ORS continued to participate as active members in various community forums including employer/job fairs, 4 regional Chamber of Commerce quarterly meetings, 2 Statewide Human Resource Management events, and four Transition events throughout the program year. ORS also hosted one event with community employers.

1. ORS conducts monthly orientations to VR services in English and Spanish in order to increase referrals and applications for services at the American Job Centers located in West Warwick, Providence, and Woonsocket.

2. ORS continued to collaborate, facilitate, and participate in quarterly meetings/trainings with Sherlock Center and BHDDH through the BH and DD Supported Employment Council (SEC) meetings. The goals of the BH and DD SEC meetings is to increase the knowledge base of providers and CRPs who offer Supported Employment services. This past FY we had training by Rhode Island Department of Labor and Training on their online Labor Market Information with Counselors and Provider Agencies to support individuals in making an informed choice based on Rhode Island specific job market. This year the trainings in the SEC Meetings will focus on Job Preparation with a Person-Centered Approach.

3. Discussions have taken place with VRTAC-QM on how to better to market ORS services to the public. ORS has been working with the DHS Communication Department to increase not only our on-line exposure but our physical presence in the community.

4. ORS has developed video content/presentations regarding transition and will expand to general VR, SE, Pre-ETS, etc, and post on ORS website. ORS has a video presentation on Pre-ETS services and an ASL video on applying for ORS services.

5. An electronic "Introduction to ORS Transition Services" has been completed and is now on the ORS website. It includes the necessary information about ORS and scope of services, including the transition fact sheet, benefits counseling FAQ, and an introductory video. These materials are customized to the individual VR Counselor and the students/districts they are working with.

6. ORS has increased its on-line presence by routinely posting client and service-related stories via LinkedIN, Indeed, Facebook and other social media platforms.

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7. ORS routinely presents about ORS services at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE) and Rhode Island Rehabilitation Association (RIRA) events.

8. Liaison training has been provided to the ORS staff.

9. Counselors who are current liaisons to various agencies have reached out to provider agencies and rehabilitation centers that have not made referrals in the past two years to coordinate service orientation/presentation to staff and consumers. Liaisons frequently coordinate Agency presentations so both ORS and Community Providers can work on updating their services.

OBJECTIVE 2: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather current information about business sector needs and state responses.

1. ORS continued to disseminate information about job leads via email to VR Counselors and BEST members daily.

2. In collaboration with DLT, ORS and WIOA partners included requirements that target individuals with disabilities in their hiring initiatives.

3. ORS continued to seek out assistance through the DLT to identify how best to align the On-the-job Training methodology that can be utilized in order to facilitate this type of program for individuals with disabilities.

4. ORS has updated the current funding model and Power Point for sequenced funding with our state partners at BHDDH. This funding model is discussed on an on-going basis with provider agencies.

5. ORS held two Employer Forums to allow BEST to assist with hiring needs of business sectors, as well as to increase disability awareness and reasonable accommodations. This past year it was Co-Sponsored with Governor's Workforce Board (DLT, BHDDH and Governor's Commission also participated.) This year will be the Third Annual ORS Employer Excellence Award. This event takes place during October as part of the National Disability Employment Awareness month.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating.

1. A second Adult Project Search site was identified at Bally's Casino and 2 full cohorts participated during the past two years. ORS is now searching for a different Adult Project Search site in order to expand the program's success in a different part of the state.

2. ORS continued to work with DLT/RealJobsRI in order to identify emerging, high wage business sectors and in order to identify new employment opportunities for individuals with disabilities.
   The ORS Business Engagement Specialist Team (BEST) was on a short hiatus while ORS had vacancies in their rehabilitation counselor positions. The team has since formed a new committee with some of the new hires interested in this activity. The goal was to

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expand into and teach the business community about the benefits of hiring individuals with disabilities.

3. ORS continued to develop strategies to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR.
   BEST members explored utilizing an internal tracking tool to monitor employers/business contacts, industries and creating a job board.

4. ORS has conducted a liaison training for VR Counselor staff.

5. ORS identified increased employer penetration via annual report to WIOA/DLT/GWB reporting.

GOAL 2: ORS will overcome barriers to accessing VR and supported employment services through the following objectives.

ORS has utilized data collected from Case Management System and data provided by RSA in Dashboard Reports. ORS has also utilized Pre-ETS real time data collected through participation in a grant that measures the effectiveness of services delivered under Pre-ETS. Supported Employment Assistant Administrator has collected data from the results of a yearly innovative strategies survey in order to develop new SE services.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into industry-driven competitive integrated employment.

1. <u>In-School Youth with Disabilities</u>: ORS continued to enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. Students with 504 plans and at-risk youth continue to be a focus for service delivery. VR Counselors will continue to outreach 504 Coordinators and School Guidance for Pre-ETS service identification and to identify "at-risk" youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS had met with Healthy Transition programs in order to collaborate to provide services to students with behavioral health needs that may not be referred through their high school. ORS continued to offer middle school students work readiness 101 with the goal of introducing Pre-ETS services at an earlier age. This gave students an earlier look at potential career interests and pathways as they enter high school. ORS has developed Future Pathway Academy, a multi-year year, rolling program that provides, work readiness and community-based work experience to our students with the most significant disabilities which led to supported employment activities as they transition from high school in adult services.

2. ORS has collaborated with The Regional Transition Center, BHDDH, School Districts, and Adult Providers utilizing Griffin and Hammis in a Discovery School to Work pilot for more significantly disabled students in order to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life. While this has been completed, it has evolved into an example of a best practice in ORS and BHDDH collaborating with schools.

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3. ORS Transition Counselors have worked collaboratively with School Districts, BHDDH, and CRPs to give mutual I/DD students the opportunity to participate in a wide range of exploration and community experiences with the goal of obtaining and maintaining employment prior to exit from high school. These services have been provided and are within the scope of the Consent Decree.

4. Under the DOJ Consent Decree ORS was tasked with supporting school districts with the goal of employment for all students on a Career Development Plan (CDP) prior to exit from HS. ORS provided TA to schools around Job Development and Job Coaching. ORS also utilized our Business Engagement team to assist districts in identifying businesses in their areas willing to offer employment experiences and opportunities. ORS offered SE JDP and coaching as needed to those students who have developed an IPE and have an identified job goal. The services have been provided and continue to fall within the scope of the consent decree.

5. Assistant Administrator of Transition explored new pilot program that was rolled out during PY24/25 that is a partnership between ORS, CRPs, and individual school districts throughout RI with the goal of bringing much needed employment skill development to students who potentially required a higher level of support to obtain and maintain employment. This is still ongoing as it's a 3-year program, and it just finished the first year.

6. ORS worked with other Community Rehabilitation Providers to identify a wide array of services available for Adults with Disabilities. The CRP Assistant Administrator obtained new vendors that offer services such as job placement in full-time positions that are high paying.

7. Through the innovative strategies survey sent out to CRPS, ORS began designing and modifying programs and services as changing needs of customers were identified based on CNA responses.

8. ORS continued to utilize benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS. ORS has recently established a training/ mentorship program with Sherlock Center to help train new Benefits Counselors in an effort to ensure all unserved/underserved individuals with disabilities receive appropriate training. ORS also explored opportunities to train an individual who utilizes ASL and a Spanish-speaking individual.

9. Benefits counseling is a service that is routinely provided to any client that is currently receiving SSI/SSDI benefits and who may be unserved/underserved. ORS routinely provides this service so that individuals with disabilities receiving SSI/SSDI have a better awareness of how their work income will affect their benefits.

OBJECTIVE 2: Ensure ORS material meets the needs of populations being served and/or outreached to.

1. ORS continued to partner with Dorcas International to identify underserved populations and identify specific needs for materials in alternative formats.

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2. ORS frequently reviewed its forms and communication documentation to ensure that it is appropriate for underserved populations and has made changes as applicable.

3. ORS has worked with WIOA Workforce Partners to determine additional needs of individuals with disabilities not currently being served in the Workforce Development system .

GOAL 3: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:

ORS has monitored the Rehabilitation Rate, utilized case review data and RSA 911/Dashboard data to monitor the number of closures post-IPE closed prior to a industry-driven competitive integrated employment closure to identify trends and need for training/technical assistance.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into industry-driven competitive integrated employment.

1. In-School Youth with Disabilities: ORS continued to enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. Students with 504 plans and at-risk youth continue to be a focus for service delivery. VR Counselors will continue to outreach 504 Coordinators and School Guidance for Pre-ETS service identification and to identify "at-risk" youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS had met with Healthy Transition programs in order to collaborate to provide services to students with behavioral health needs that may not be referred through their high school. ORS continued to offer middle school students work readiness 101 with the goal of introducing Pre-ETS services at an earlier age. This gave students an earlier look at potential career interests and pathways as they enter high school. ORS has developed Future Pathway Academy, a multi-year year, rolling program that provides, work readiness and community-based work experience to our students with the most significant disabilities which led to supported employment activities as they transition from high school in adult services.

2. Adults with Disabilities: ORS worked with other Community Rehabilitation Providers (CRP) to identify a wide array of services available for Adults with Disabilities. The CRP Assistant Administrator has obtained new vendors that offer services such as job placement in full-time positions that are high paying, including developing a training to assist consumers in becoming benefits planners for ORS resulting in two hires within the previous year. Additionally, ORS also within the last year added a benefits planner who is fluent in American Sign Language.

3. ORS adjusted rates for fee-for- service to reflect current economic trends.

4. ORS continued to offer virtual services on a hybrid basis for individuals who were not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions, or disability-related issues. ORS found that having this hybrid model allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been productive,

especially when face-to-face employment services were not available. ORS has utilized the array of Virtual Services for Pre-ETS, Supported Employment, and non-Supported Employment programming.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that industry-driven competitive integrated employment is the goal from services.

1. ORS utilized an innovative strategies survey to help identify areas of training needs for CRPs and implement training opportunities to improve services with an aim on best practice and begun branching out with providers regarding specific fee-for-services such as job preparation.
2. ORS conducts quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.
3. ORS continued to support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
4. ORS encouraged vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
5. ORS, in an annual review of the fee structure, made reasonable increases so that ORS is in alignment with other funding sources and current economic climate. ORS has and will continue to research local states to ensure that fees are similar in nature to other VR state agencies.
6. ORS provided alternate services as necessary for those who are unserved or underserved.

OBJECTIVE 3: Continue to explore ways to expand the Ticket to Work program and Employment Network capacity to ensure a continuum of available support and service delivery for clients who meet the Social Security Ticket Program eligibility.

1. ORS continued to identify gaps and strategize solutions in the Ticket to Work Program related to services and VR Cost Reimbursement process.
2. The J Morrow Ticket tracker" system has been integrated into the InFormed ECMS program.
3. ORS continued to explore the expansion of Employment Network Partnerships. ORS conducted a training with Work without limits to facilitate involvement of vendors in becoming an Employer Network. Although one vendor expressed an interest, they did not pursue an application to become one.
4. ORS counselors received annual training about the Ticket To Work Program. Work Without Limits and the Sherlock Center have provided counseling to ORS staff.
5. ORS remained active with CSAVR TTW Peer to Peer monthly meetings and SSA Quarterly All VR meetings.

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6. ORS continued to ensure benefits counseling is provided to those on SSI/SSDI at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.

7. ORS continued to partner with Dorcas International to identify and reach out to culturally underserved populations to ensure awareness of vocational rehabilitation services.

8. ORS continued to partner and outreach to LAZO and BEST Life (brokerage services) to help increase awareness for culturally underserved populations navigate community resources/benefits in order to meet their employment goals.

GOAL 4:

ORS will monitor and track following performance measures quarterly via WIOA PY24 and PY25 RSA911 data submittals and timely compliance of case movement of applicants to eligibility and to IPE. ORS will also utilize Pre-ETS real time data collected through participation in a grant that measures the effectiveness of services delivered under Pre-ETS.

Vocational Rehabilitation Program				
	Program Year 2024		**Program Year 2025**	
	Expected Level	**Negotiated Level**	**Expected Level**	**Negotiated Level**
Employment (Second Quarter after Exit) [22]	50.0	48.6	50.0	49.6
Employment (Fourth Quarter after Exit) [22]	46.6	45.1	46.6	47.1
Median Earnings (Second Quarter after Exit [1]	3865.07	3549.00	3865.07	4050.00
Credential Attainment Rate	39.8	33.7	39.8	36.8
Measurable Skill Gains	40.4	40.5	40.4	32.5

OBJECTIVE 1: Ongoing Strategies to Meet WIOA performance accountability measures. ORS:

1. Utilized tools, data and technical assistance provided by RSA in determining the final negotiated levels of performance. In November 2024, VRTAC provided training on Meaningful Employment which assisted us in reaching our goals;

2. Ensured the ECMS development encompasses the requirements for WIOA measures and data reporting. The ORS System 7 team works closely with Libera to ensure the information
for various reports, such as the 911, is accurate and reflects the work being performed;

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3. Continued to contribute data elements as required to the Department of Labor and Training/lead WIOA partner in the state. ORS has also had meetings with DOL to reconcile the information that has been submitted to them;

4. Discussed data elements during Quarterly Staff Meetings and reviewing the various data points from the Dashboard that is received from RSA. Training has also taken place regarding the critical data needed for the WIOA performance measures. ORS has been providing ongoing education to staff so they are more aware of the WIOA data elements;

5. Utilized ECMS to develop a reporting system to account for the increase/utilization of Pre-ETS services and their effectiveness;

6. Continued to be involved in the second year of a grant-funded three-year pilot to measure the effectiveness of services delivered under Pre-ETS. For each service provided under the 5 Pre-ETS categories, a pre- and post-assessment is done by the vendor to measure skills or knowledge gained. Results go straight into a real-time database, which is available to ORS and the vendors providing the service. ORS has been working with the IT department to obtain approval and clearance so that we can obtain this data in order to measure the effectiveness of the Pre-ETS services; and

7. Data Collection Quality Control Specialist is available and utilized by the ORS Counselors so that they remain effective and efficient in recording performance measures.

OBJECTIVE 2: Meet the statutory requirements under the Rehabilitation Act and the implementing regulations.

1. ORS worked to address Corrective Action Plan (CAP) issues during this past year. As of this writing, ORS has successfully met all 3 areas of the CAP and are no longer on the CAP. The VR administrator reviews the file statuses weekly and notifies the supervisors if there are any files with 60-day timeframe requirements. ORS continues to monitor timeframes for the Plan Development within 90 days.

2. VRTAC-QM provided a two-day mandatory training to all staff on Meaningful Employment.

3. Supervisors have monitored the use of presumed eligibility as relevant for SSI/SSDI disability recipients in order to reduce the wait times for ORS services.

4. The VR Administrator reviews plan timeframes in order to maintain compliance with the RSA regulations. ORS has a 99.5% compliance rate with this requirement.

5. ORS utilizes the MIS system and the RSA Dashboard to monitor compliance on a weekly and quarterly basis. ORS developed monthly productivity goals for Rehabilitation Counselors and these begin to take place beginning on July 1st 2025.

6. VR Supervisors and staff received training on best practices and procedures regarding eligibility determination and IPE extension process. It is their responsibility to train their direct reports regarding these goals.

7. Staff received training on the utilization of their dashboards so they can monitor their own 60-day and 90-day compliance.

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8. ORS supervisors and staff utilized MIS system to better monitor annual reviews and IPE amendments to ensure service delivery to meet client's changing needs.

OBJECTIVE 3: Utilize available agency data through the Quality Improvement process to enhance and support program development, staff and vendor training and services to customers.

1. ORS holds a monthly QI meeting in which current regulations and procedures are reviewed and updated as needed based on the QI data to ensure client access to services, supports, and movement toward self-sufficient and integrated competitive employment.
2. The Administration team reviews WIOA data contained in the RSA-911 and RSA Dashboard quarterly to assess agency outcomes, areas for enhancement and program development for staff, vendors, and customers. This information was discussed and reviewed with staff during the Quarterly Staff meetings.
3. ORS enlists VRTAC-QM when relevant to provide technical assistance.
4. ORS reviewed relevant data and requested assistance and support from SRC as relevant.
5. The strategic planning supervisor continued to conduct monthly customer satisfaction surveys on rotating basis. ORS has identified an improvement area and will explore a new process for the monthly satisfaction surveys which includes scanning a QR code to simplify the response process. The goal is to obtain more responses.
6. Continued QI biannual case reviews and targeted case reviews as relevant. Utilized QI findings to shape procedural considerations, training needs, and program development.
7. ORS supervisors and staff utilized QI resources to assist with monitoring of 60 day and 90-day compliance, annual reviews, and IPE amendments to ensure service delivery to meet client's changing needs.
8. ORS is involved in the final phase of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS. For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service. ORS is working with the vendor AVI and Libera to ensure this database is implemented accurately in the current ECMS.

OBJECTIVE 4: Provide agency staff with up-to-date tools and technology that enhance delivery of services to customers and capture reportable data. ORS:

1. Provided Staff Training and support as the agency transitioned to new Electronic Case Management/MIS System. The staff received multiple in-person training for the new MIS system and also received virtual training as needed for certain situations.
2. Utilized the wage interface tool within the ECMS to upload reportable RI UI wage data.
3. Continued to educate and enhance agency staff's knowledge and use of various electronic platforms that enhance the delivery of services to consumers such as Teams, ADOBE, virtual access, SharePoint, Zoom etc.

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4. Acquired and integrated the J Morrow "Ticket" tracker system into the ECMS program.
5. Utilized and provided CareerScope, Pathful (Virtual Job Shadow), and explore other tools and resources that may make VR Counselor work more efficient, such as SARA. Trainings in both CareerScope and Pathful have taken place to refresh or train some of our newer counselors.
6. ORS is involved in the final phase of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS. For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service. ORS is working with the vendor AVI and Libera to ensure this database is implemented accurately in the current ECMS.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

WIOA Performance Accountability – PY24

Data was obtained from the PY24 WIOA RSA performance assessment results.

	Negotiated Level	Adjustment Factor	Adjusted Level	Actual Level	Performance Assessment (Actual Level/Adjusted Level)
Measurable Skills Gains Rate	40.5%	-8.8%	31.7%	26.2%	82.7%
Employment Rate – 2nd Quarter After Exit	48.6%	-5.7%	42.9%	40.5%	94.4%
Median Earnings – 2nd Quarter After Exit	3549	-541	3008	3903	129.7%
Employment Rate – 4th Quarter After Exit	41.5%	-1.7%	43.4%	45.9%	105.6%
Credential Attainment Rate	33.7%	-3.1%	30.6%	42.9%	140.4%

Upon review of data, it appears that ORS met all goals.

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

- ORS ORS utilized I & E funds to support and augment the benefits counseling outreach provided by the Sherlock Center on Disabilities WIPA project.

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- ORS utilized I & E funds to support the Rhode Island College Paul V. Sherlock Center on Disabilities facilitation of the Developmental Disability and Behavioral Health Supported Employment Council meetings, including joint quarterly meetings to enhance the Supported Employment services provided to individuals who require them. The quarterly meetings provide education and resources to Supported Employment CRP providers of services, clients and families/support systems.

- ORS utilized I& E funds to support the activities of the SRC.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

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

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

ORS has elected to carryover many of the goals because of Consent Decree demands, provider capacity issues, and post pandemic climate. Supported Employment services are provided after placement and Title I funds are used prior to placement for those seeking supported employment outcomes. ORS continues to fund and sponsor ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, core values, and best practice has occurred with staff of ORS and with CRPs to increase participation in provision of the ORS Supported Employment program. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs to provide the extended support that sustain employment for individuals with significant disabilities.

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities for PY2024 through PY2027 are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with RSA practice standards, as stated in WIOA, monitoring reviews, the Department of Justice (DOJ) State Consent Decree and Interim Settlement Agreement, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES FOR SUPPORTED EMPLOYMENT:

OBJECTIVE 1: In order to increase awareness of ORS's supported employment program, ORS will participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, DD and MH SEC meetings, and Transition events. Information about the availability of supported employment services will be presented in this manner:

1. Collaborate with Regional Transition Centers and BHDDH to present on Introduction to State Services to ensure consistent messaging occurs for schools, LEAs, and families on availability and scope of ORS supported employment services.
2. Collaborate with Sherlock Center (contracted), BHDDH on facilitation of BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer SE.
3. Identify the training needs of Supported Employment Providers to enhance skill development.
4. Explore technical assistance from VRTAC-QM on how better to market the availability of ORS supported employment services to the public.
5. ORS will continue to identify and create vendors and services for the service needs of SE Transition individuals.
6. Develop some video presentations regarding supported employment and customized employment, and post on ORS website.
7. Present on ORS supported employment services at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE), The Sherlock Center, Supported Employment Council (SEC), Rhode Island Parent Information Network (RIPIN), and Rhode Island Rehabilitation Association (RIRA) events.
8. Collaborate with BHDDH and Sherlock Center to facilitate Annual Employer/Vendor Fairs to increase engagement with businesses and increase awareness of the availability of supported employment services to employers. These fairs will offer an opportunity for the CRP's who provide SE services, ORS counselors, BHDDH social workers and self-directed individuals to increase awareness of the scope of supported employment services and accommodations that areavailable. Employers will be able to raise the awareness to those CRPs that provide SE services with the areas they are in and what specific services are needed.
9. ORS will continue to expand SE services to youth prior to exiting high school, as directed in the most recent court actions under the Consent Decree, to secure employment prior to exit and in the process are facilitating an early introduction to adult providers.
10. ORS and BHDDH will work collaboratively on cross training ORS Transition staff, BHDDH Social Worker, Conflict Free Case Managers, and Independent Facilitators to understand each other's roles and responsibilities with the schools. This will enable a seamless transition for students exiting high school into the adult SE world.
11. ORS provided during FY25 a series of training for the SEC members (Provider Agencies and ORS Counselors) on utilizing Rhode Island Market Information to assist individuals to make an informed choice on their occupation goal. ORS will also provide a series of trainings on Job Preparation tools.

OBJECTIVE 2: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to help increase awareness of the supported employment

services that ORS can provide and utilize the ORS BEST team to gather current information about business sector needs and state responses.

The goal is to increase the awareness of what Supported Employment services are needed and what is available, and to:

1. Establish a system to disseminate information to VR Counselors whose focus is on individuals who require SE services.
2. Encourage WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
3. Explore opportunities with all State Partners for collaborative and sequenced funding models for supported employment service delivery via TA from VRTAC-QM.
4. Create and implement programs for I/DD youth to participate and gain exposure to career and technical education.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating.

1. Implement, coordinate, and expand on Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD and who need supported employment services.
2. Create and implement program for IDD youth to participate and gain exposure to career and technical education.
3. Partner with emerging, high wage business sectors and DLT/ RealJobsRI initiative to identify new employment opportunities for individuals with disabilities who need supported employment services.

GOAL 2: INCREASE SERVICES TO UNDERSERVED AND UNSERVED POPULATIONS:

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into industry-driven competitive integrated employment.

In-School Youth with Disabilities: enhance and expand the Transition program and service options for students and youth who need supported employment services to coordinate and deliver options for work experiences to youth who will require supported employment services. ORS continues to work to expand Pre-ETS to include a Career and Technical Education (CTE) collaborations with school districts, giving students an opportunity to gain knowledge and skill around specific career paths. ORS will be partnering with Sargent Center on a multi-year CTE pilot project to support students with disabilities to be successful in meeting the requirements of their CTE pathway. ORS has also completed the first of a multi-year collaborative pilot with a handful of school districts and SE adult providers called "Future Pathways Academy". This pilot is working with those identified SE students earlier, programming provides work readiness, community work experiences, travel exposure/training community connections and eventually SE job development placement and retention as they exit from school.

1. Adults with Disabilities who require supported employment services: ensure a wide array of supported employment service providers and training programs are available

to enable individuals who need supported employment services for them to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.

2. Design and modify programs and services as changing needs of customers are identified.

GOAL 3: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:

OBJECTIVE 1: Establish an array of SE services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities who require SE services, engages unserved and underserved individuals, and moves individuals who need supported employment services into industry-driven competitive integrated employment.

In-School Youth with Disabilities: enhance and expand the Transition program and awareness of SE service options to coordinate and deliver those services to provide work experiences to youth who require SE services. ORS continues to work to expand Pre-ETS to include a Career and Technical Education (CTE) collaborations with school districts, giving students an opportunity to gain knowledge and skill around specific career paths. ORS will be partnering with Sargent Center on a multi-year CTE pilot project to support students with disabilities to be successful in meeting the requirements of their CTE pathway. ORS has also completed the first of a multi-year collaborative pilot with a handful of school districts and SE adult providers called "Future Pathways Academy". This pilot is working with those identified SE students earlier, programming provides work readiness, community work experiences, travel exposure/training community connections and eventually SE job development placement and retention as they exit from school.

1. Adults with Disabilities: ensure a wide array of supported employment service providers and training programs are available to enable individuals who need supported employment services to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.

2. Design and modify programs and services as changing needs of customers are identified.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that industry-driven competitive integrated employment is the goal from services.

1. Identify areas of training needs for CRPs and implement training opportunities to improve services with an aim on best practice.

2. Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.

3. Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.

4. Participate in IPS Steering Committee meetings at both Behavioral Health Provider Locations that are CCBHC and the state IPS Steering Committee that is facilitated by BHDDH Behavioral Health.

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5. Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.

6. Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.

7. Continue to offer Braiding and Sequencing of ORS and BHDDH funding with BHDDH Employment Team to Provider Agencies.

8. Identify ways that Virtual Service delivery can optimize services to individuals who are unserved or underserved.

9. Encourage CRPs to identify transportation barriers prior to locating employment opportunities to ensure long term job capabilities and retention.

10. Provide training and technical assistance via VRTAC-QM on models such as the Integrated Resource Teams (IRT) to enhance wraparound services based on an individual's need and helps to meet their employment goal.

GOAL 4: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE FOR SUPPORTED EMPLOYMENT (SE) AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING STANDARDS.

OBJECTIVE 1: Meet WIOA performance accountability measures for Supported Employment (SE).

1. Utilize ORS SE data in order to meet state reporting requirements and cooperate with State-wide partners of data sharing agreements.

2. Continue to educate staff to the new data elements for SE that are required and need to be maintained, be timely, and accurate.

3. Continue to participate in Technical Assistance opportunities on capturing performance measures.

OBJECTIVE 2: Provide agency staff with up-to-date tools and technology that enhance delivery of SE services to customers and capture reportable data.

1. Continue to provide Staff Training and support as the agency evolves usage of the new Electronic Case Management/MIS System.

- Work with BHDDH and CRPs to track employment outcomes as required by DOJ Consent Decree.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two (Behavioral Health (BH) and Developmental Disabilities (DD)) Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to students with disabilities and obligates ORS to set aside 50% of its Title VI funds (when appropriated) for youth with the most significant disabilities.

ORS will continue to partner with Community Rehabilitation Providers (CRPs) of supported employment services so that customers can make informed choices about integrated competitive employment options through real work experiences. The timeframe for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job, if no long-term provider funding is available through BHDDH or any other sources. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25; however, ORS may not provide extended services to anyone other than these youth, which must be provided by CRPs or other sources. These long-term supports could and should include natural supports from the employer or others.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS through the BH and DD SE Councils with BHDDH representation, to meet the diverse employment needs of individuals who are significantly disabled with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for customers receiving supported employment services. Again, these supports could and should include natural supports if available.

The State of RI negotiated a 2014 Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of VR Services, including of Supported Employment Services in order to work. BHDDH, RIDE and ORS are working closely on all facets of the Consent Decree to ensure youth and adults with IDD or those identified as covered under the Consent Decree have access to varied SE services and experiences in their interest area and the supports needed for CIE. ORS also recognized the Individual Placement Services (IPS) model for BH.

CRP development will continue to meet the needs of all ORS adult, out-of-school youth, and in-school youth eligible for Supported Employment services and expand on CRP access to funding source options such as benefits of becoming a Ticket to Work employment network, Partnership Plus, and Department of Labor and Training/Governor's Workforce Board through identification of new CRPs and enhancing current CRPs.

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ORS continues to have an array of Virtual Services for SE to ensure that individuals requiring SE would continue to receive vocational services. This array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals and it was determined that the virtual services will remain available on a hybrid basis and will be utilized for individuals who are not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions, or disability-related issues. ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face supported employment services were not available.

The timing of transition to extended services

ORS, as a partner and funding source of Supported Employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability and Hospitals (BHDDH), are planned for, and included in the ORS customers' Individualized Plan for Employment (IPE). Supported Employment services are provided after placement and Title I funds are used prior to placement for those seeking supported employment outcomes. The IPE is based on the needs of the customer and define the scope, specific services, and duration of ORS-funded SE services. ORS, according to the Rehabilitation Act amended by WIOA, can fund SE services to 24 months for all individuals, and ORS will provide Supported Employment services to youth with the most significant disabilities, including ORS funded extended services for youth in accordance with the requirements set forth in 34 CRF prt361 and part 363 for a period not to exceed four years or at such time that a youth reaches age 25 and no longer meets the definition of a youth with a disability, whichever comes first. Natural supports from the employer or others can and should be identified and utilized as available.

The IPE identifies the CRP that accepts responsibility for providing the long-term and intermittent support services, funded by BHDDH, in order to maintain employment. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual. The transitioning of a customer from the support services provided by both ORS and the CRP to the supports are provided solely by the CRP. Again, natural supports from the employer or others can and should be identified and utilized as available.

ORS provides assistive technology supports to increase independence at the worksite. Examples of this are Smart Watch Technology to support an individual with executive functioning such as time management on a task or break or communicating with a support virtually for a touchstone or a question related to an employment task.

ORS Transition Counselors assist students and families to identify the CRP that will accept responsibility for providing core support services including extended supports for youth with disabilities aged 14 up until the age of 25 with the most significant disabilities. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual, including referrals to BHDDH and or other natural supports that may be available, as stated above.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO

COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide Supported Employment services, requirements of WIOA, RSA, and the RI Department of Justice/State Consent Decree (DOJ/CD), as a means to enable individuals with the most significant disabilities to have access to the supports needed to participate in industry-driven competitive integrated employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils for Developmental Disabilities and Behavioral Health, representation on the Developmental Disabilities (DD) Council, RI Association of People Supporting Employment First (RIAPSE), and the RI Transition Council.

ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. ORS is committed to providing and improving Supported Employment services to ORS customers. For those customers who meet the supported employment criteria, the Individualized Plan for Employment (IPE) becomes the foundation for meeting their individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support provider/vendor who will continue to provide support to the individual with a disability on a long-term basis. These long-term support providers/vendors are identified in an agreement of understanding, signed by the vendor agency and ORS.

SUPPORTED EMPLOYMENT SERVICE DELIVERY:

ORS has employment services that are available to adults, youth, and students with disabilities found eligible for VR Services who need intensive supported employment services, and extended services after the transition from support provided by ORS in order to perform work. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a State of RI DOJ/State Consent Decree. The Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, resulted in a Governor's proclamation declaring that RI is an Employment First state. The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth.

The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, adults and youth, have access to the services and supports that lead to industry-driven competitive integrated employment opportunities as the first and desired outcome of state funded services. Provider staff resources were therefore unavailable to support industry-driven competitive integrated employment efforts for adults, youth, and students with significant behavioral health and developmental disabilities. ORS and BHDDH, two of the parties of the DOJ/State Consent Decree are mandated to create a state-wide Supported Employment service-delivery system that ensures adults and youth with I/DD are afforded full access to Supported Employment services and long-term supports to maintain employment. There has been a significant increase in collaboration among the State Agencies and the provider network on how best to develop this systems' change.

The three state entities continue to refine and utilize a Transition timeline for staff, families, and school personnel to clarify each agency's obligations to implement the DOJ/State Consent Decree requirements for in-school youths' access to employment exploration and work experiences. An annual "Introduction to State Services" meeting with each high school, continues to be held.

ORS has maintained a very robust presence at each high school in the state to assist with and provide transition-related services for over 20 years. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement to in-school youth with disabilities, including youth with I/DD. The array of ORS transition services via Pre-ETS and other related transition programming is in place for both students and youth with disabilities and those youth eligible for Supported Employment services that meet the requirements of WIOA and the DOJ/State Consent Decree.

SUPPORTED EMPLOYMENT AGENCY NETWORK:

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental and behavioral health disabilities - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with developmental and behavioral health disabilities through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental and behavioral disabilities.

ORS has a referral, liaison, and consultative relationship with the CRPs. ORS funds a continuum of Supported Employment services through the customer-selected CRP. These services are provided after placement with Title I funds being used prior to the placement for those seeking supported employment outcomes. The objective of the SE services is to support an individual in maintaining a industry-driven competitive integrated employment outcome paid at or above minimum wage. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs who also rely on BHDDH funding to provide the long-term supports that help sustain employment. Long-term supports are planned for and included in the customer's ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and specific Supported Employment service. WIOA/RSA funding for SE services is limited by several considerations: 1.) services will be available for (individuals with the most significant disabilities found eligible for VR services and who need intensive supported employment services, 2.) extended services after the transition from support provided by ORS in order to perform work, 3.) a limitation of supported employment services up to 24 months, or for up to 48 months of extended services (after supported employment services) for youth until age 25 if no other funding source is available, and 4.) natural supports can and should be explored when available.

The IPE also identifies the CRP that is accepting responsibility for long-term and intermittent support services to the individual with a disability. The time frame for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job. ORS may provide up to four years of extended SE services to youth up to age 25; however, ORS may not provide these extended services to anyone other than youth, and those supports must be

provided by CRPs or other sources. In addition, natural supports can and should be explored when available.

ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services. Due to the complexities of implementation of the DOJ/State Consent Decree, ORS facilitates a quarterly meeting with all the I/DD Supported Employment CRPs. Those meetings focus on service delivery, increasing hours/week as an expectation of a successful employment goal, and to offer support and guidance to the providers.

ORS took the lead to ensure that staff have the expertise appropriate for the vocational services being provided to individuals with disabilities. ORS has been working with the Sherlock Center for Disabilities, and NCISI to identify, develop, plan, and execute training for employees of ORS-approved provider networks. Attending to the training needs of CRPs is an ongoing commitment for ORS. The Assistant Administrator for Vendor Affairs/Workforce Development and Supported Employment meet at least quarterly with providers/vendors who provide Supported Employment (SE) services to re-enforce the philosophy of Employment First. The two Assistant Administrators, in collaboration with field supervisors, counselors, and ORS administrators, are actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor; the hope is that this will increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and questions as well as clarify the elements of a quality employment outcome. ORS participates in a DD/BH combined Supported Employment Advisory Council as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities. These meetings are facilitated by Sherlock Center and BHDDH is an active participant.

ORS will continue to encourage CRPs to collaborate with each other, through regular meetings sponsored by either BHDDH or ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual, developmental, and behavioral health issues. This collaboration is also encouraged at joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed; however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its' supported employment population. The fee for service model continues to be updated and modified to cover needs of the SE customer.

ORS provides an array of Virtual Services for SE to ensure that individuals requiring SE would continue to receive vocational services. This array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals and it was determined that the virtual services will remain available on a hybrid basis and will be utilized for individuals who are not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions or disability-related issues. ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face supported employment services were not available.

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ORS provides Rhode Island School Districts with training in job development and job coaching. Training will continue to be offered to school districts into SY2026 with dates for both Job Coaching and Job Development. ORS meets with training providers on a regular basis to identify areas of need and expand the education/training around Job Development and Job Coaching.

F. ANNUAL ESTIMATES

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

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1 (Individuals with Most Significant Disabilities)	1135	1135	$3,129,098.44	N/A
2 (Individuals with Significant Disabilities)	413	413	$1,243,845	N/A
3 (All Other Eligible Individuals)	146	146	$126,473	N/A

B. SUPPORTED EMPLOYMENT PROGRAM.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1 (Individuals with Most Significant Disability)	1135	1135	$3,129,098.44	N/A

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO

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ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

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

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

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

N/A

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A): ...the term "individual with a significant disability" means an individual with a disability (i) who has a severe physical or mental impairment which seriously limits one or more functional capacities (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 or more physical or mental disabilities resulting from [list] ... or another disability ... to cause comparable substantial functional limitations."

First priority will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability, whether a mental or physical impairment, that seriously limits four or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

Second priority will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits one or more functional limitations capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

Third priority will be given to other eligible consumers who have a disability, whether a mental or physical impairment, that seriously limits one functional capacity in terms of an employment outcome and requires one or more services over an extended period of time.

Extended period of time: Six months or more.

Multiple services: Requiring two or more services.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING

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PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

ORS has all categories open, and this section is N/A.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No.

H. WAIVER OF STATEWIDENESS

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

Not Applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES IN 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.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
VRC1	16	16	24

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
VRC2	26	26	28
Supervisory	9	9	10
Administrative	10	10	10
Fiscal	6	6	9
Support Staff	10	11	15
Social Services	5	7	9
Direct Services	6	6	7

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

1. Ratio of qualified VR counselors to clients: 1: 85

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

Projected number of individuals to be served in 5 years:

PY 2030: 3,793

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Salve University	Masters in Rehabilitation Counseling	18	0
University of Massachusetts Boston	Masters in Rehabilitation Counseling	50	9
Assumption University	Masters in Rehabilitation Counseling	55	13

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B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY AND INSTITUTIONS OF HIGHER EDUCATION AND PROFESSIONAL ASSOCIATIONS TO RECRUIT, PREPARE, AND RETAIN PERSONNEL WHO ARE QUALIFIED, INCLUDING PERSONNEL FROM MINORITY BACKGROUNDS AND PERSONNEL WHO ARE INDIVIDUALS WITH DISABILITIES.

1. ORS has ongoing communication with Assumption College, Salve Regina University, and UMass Boston to ensure that the present and projected needs of ORS are considered in the program planning. All offer a MA, or MS in Rehabilitation Counseling via a combination of on-campus and distance learning.

2. ORS VR Administrator and Supervisors work with the schools to provide opportunities for students to meet with ORS to learn about Vocational Rehabilitation Services in the State VR agency, to promote the opportunity of paid practicum and internship opportunities, and the application process for posted positions as available.

3. Additionally, ORS maintains a recruitment list and sends position posting and internship opportunities to education institutions in the Northeast and interested individuals.

4. ORS VR Administrator and regional VR Supervisors meet annually in the Spring with VR students, recent alumni, and staff of Salve Regina University, Assumption College, and UMASS Boston to inform graduates of upcoming positions to be posted as well as educating attendees on the benefits of working for a State VR agency.

5. Additionally, ORS will continue throughout the year to send reminders of internship availability and position openings. Supervisors and VRCs reach out to, present at, and attend career days at local educational institutions who offer related human services degrees on the benefits of a career path, internships via the State of RI Internship Program, etc. in Human Services/Vocational Rehabilitation and working for a VR agency. Despite an ongoing recruitment effort by ORS, many of the students in these programs attend classes virtually and reside scattered throughout the country, which lowers the number of candidates for internships and employment opportunities.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

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A. Professional Development

1. Professional Development requests are granted based on the direct benefit to the mission of the organization, availability of funding and slots, and Supervisory consideration of workload requirements, coverage needs, and status of job requirements as related to the training.

2. Staff attending trainings understand that they may be asked to present materials/ information to agency staff via All Staff Meeting and/or Regional/Unit Meetings. Materials and resources will be reviewed with/given to Regional/Unit Supervisors.

3. A Professional Development budget will be set each FFY for each Region/Unit and is monitored by the supervisor of the Region/Unit. Fiscal will assist with identifying annual budgeted amount set aside for this purpose.

4. Professional Development requests that are above the allotted FFY budget per staff will require approval from the respective VR/SBVI Administrator(s).

5. Professional Development requests can only be paid by ORS/State of RI to approved vendors. It is incumbent on staff requesting to attend the training/conference and/or staff sending out the training/conference to ensure the entity receiving payment is a vendor who accepts authorizations and will invoice the agency. For electronic registration processes the ability to register and pay by invoice may also be a factor in that hinders the agency's ability to approve the request.

6. Due to the growing complexities of registration and payment processes for trainings, incomplete Professional Development requests and/or requests submitted with less than a two-week lead time of the training registration deadline may not be honored.

7. 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."

B. ORS supports and encourages staff training and professional development and maintains a procedural process for individual staff request. Additionally, ORS provides each staff with a monetary amount for their use in attending individual and/or professional development trainings that they and/or their supervisor see as professional development and skill enhancement. ORS conducts a biannually Comprehensive Staff Training Needs Assessment with the most recent one being completed in February 2025. The survey focused on staff training needs, professional development needs and training that would benefit both ORS and vendors. The results of this assessment assist in ORS with the prioritization of training needs as an agency and/or individually.

1. The agency also sees training as a dynamic process and introduces training topics on an ongoing basis based on data trends, changing needs of or the clients served, etc.

2. Staff indicated the following topics as the top ten (10) training needs: Mental Health Diagnosis, Causes, and Supports; Social and Emotional Needs, Understanding Cognitive & Psychological Assessments; Hands on Training for InFormed/ECMS; Core VRC Skills, Assessment, Job Analysis, Interviewing Skills, Client Engagement and Communication;

Business Engagement/Job Development for Job Ready Clients; Using Outlook. Word, Excel, Photo Shop, etc.; Gender Inclusivity, LGBTQ+ Issues in the Workplace and Employers; VR Regulations and Procedures, Sharing Information with Disability Rights Rhode Island; Transition; Disability Specific Trainings; Documentation Uniformity in Electronic Case File, Professional Writing.

3. How ORS might assist staff with Professional Development reflected the following: Continue to provide trainings, monetary and time support to attend trainings; Provide opportunities for cross departmental job shadowing/exploration of duties and informational, meetings with experienced staff i.e., Pre-ETS and Supported Employment; Continue to maintain CRCC credit availability, offer trainings as varying times, recorded trainings with CRCC credits. ORS has purchased YesLMS to train new bachelor's level counselors and counselors that do not have a master's degree in Rehabilitation. CEU credits are also offered to counselors to help maintain their CRC certification.

4. ORS provided specific Behavioral Health trainings during the past year, and future trainings include Personality Disorder and Autism Spectrum Employment. There will be ongoing technical assistance for staff on the ECMS (Informed).

5. ORS staff indicated the following as training that would benefit both ORS and Vendors of ORS: Employer Outreach, Business Engagement, and Worksite Development and Placement Skills with Creative Strategies and Accommodations in the Workplace; How to Improve Collaboration and Communication; Effective Partnership/Teamwork between Counselors, Vendors and Clients; Gender Inclusive Training, LGBTQ+; How to Properly Fill out Reporting Forms; Report Writing/Goal of Referrals and Assessments, How to Work with Difficult Clients and Various Populations.

6. ORS utilizes a variety of trainers and TA providers to assist with providing a diverse and comprehensive training agenda with included required trainings, quarterly VR Meeting trainings and independent professional development. Examples include training provided by Disability Rights Rhode Island/CAP included: Employment Rights/ADA which was also co-presented with Governors Commission on Disabilities; Guardianship which also included CRPs, and a Refresher on CAP and DDRI. Center for Staff Development and Learning/Department of Human Services; Annual HIPPA, Confidentiality and FTI, Multicultural Competency Trainings Series Advanced Anti-Oppression in the Workplace, Understanding Social Identity, Power and Privilege in the Workplace, Disrupting Implicit Bias with Inclusive Behaviors in the Workplace and Combating Microaggressions with Inclusive Language in the Workplace.; Safety and Security Training(s), Domestic Violence. IT required trainings throughout the year. Staff utilized the CRCC E University; Ethical Issues When Working with Offender People, Evidence Based Practices & Rehabilitation Counseling Case Management, Benefits of Employer Provided Accommodations & Role of VRC, Developing a Labor Market Survey, etc. Cross Department Trainings included SNAP & ET Overview, ORS Services on VR, SBVI and DDS to DHS staff, OSCIL and ORS cross training on services. Workforce American Job Center Partners Cross Training. RI Learning Center training included Microsoft Quick Start, Intentional Inclusion, and Thriving in a Multigenerational Work Environment, Inclusive Leadership: Leading a Diverse Team and Effective Communication. SVR training included Ethics: Gender informed VRC,

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Contemporary Approaches to VR, Innovative Job Placements, How Rehab Bus. & Professionals can Help Employers Strengthen Their Accommodation Process, Employment Supports for People with Serious Mental Illness.

7. Work Incentives Planning and Assistance: Introduction, SSA Cost Reimbursement 101, Emerging Leadership Training, Case Documentation, Introductions to the pending ECMS included Academy Modules, Fiscal Interface, Wage and TTW Interface, VRC Walkthrough Demo, Support Staff Demo, etc. Enhanced Financial Management Training to Assist with Accurately Completing Financial Reports and RSA Updates/Reports, ASL Classes, Tilting at Windmills, UMASS Work Without Limits EN Services. Integrated Resource Team, Tarasoff, Duty to Report, Pathful, and CareerScope.

8. ORS continues to seek out guidance and expertise of the various technical assistant entities such as VRTAC. These resources have been and will continue to be important in assisting ORS with maintaining knowledge and expertise as the provision of vocational rehabilitation services, employer engagement and outcomes continues to evolve. Additionally, with ongoing staff transition within the VR program and agency, ORS has utilized these resources to assist with Emerging Leadership Development, Non-Delegable Responsibilities & Organizational Structure Update, Improving Retention of State VRCs, Meaningful Engagement, VR Grants Management Training Certificate Program, Credential Attainment, Hispanic Individual's with Disability Building Business Partnerships, etc.

9. ORS provided combined trainings for Vendors and VR staff examples include Guardianship by DRRI, Supported Employment Braiding & Sequencing of Funds for BHDDH-funded Providers and What does it Take to Become a Benefits Counselor.

10. ORS staff have access to the resources available through Assistive Technology Access Program (ATAP) and Adaptive Telephone Equipment Loan (ATEL). The ATAP program director and partners provide training and updates to staff on the changing technology. Staff are notified of training opportunities.

11. ORS will continue to utilize the Technical Assistance Center(s) (VRTAC-QM) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocational Rehabilitation services.

12. ORS purchased a YesLMS plan. YesLMS is built specifically for government programs, with accessibility at its core and provides professional VR specific training for staff through a training portal. ORS also utilizes both Pathful and Careerscope to assist individuals with disabilities in their search for employment.

13. ORS will continue to enlist the VRTAC-QM to assist in addressing the following WIOA requirements: (1) Effective Implementation of Pre-ETS; (2) Effective transition to the common performance outcome measures; (3) Internal Controls, (4) Develop partnerships to better meet business engagement and employer supports, and (5) Meaningful Engagement.

14. ORS will continue to distribute articles, information, and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and

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training sessions. All staff utilize the internal ORS Rehab Counselor email for distribution and sharing of resources.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFESSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

A. Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. Office of Rehabilitation Services collaborated with the State Rehabilitation Council and State Personnel Office to change the requirements for the vocational rehabilitation counselor position. Although a Master's in Rehabilitation Counseling is preferred, requirements state Education: Graduation from a college of recognized standing with a Master's degree in Rehabilitation Counseling; and Experience: Employment at a level of a Rehabilitation Counselor in a private or public rehabilitation agency, or, any combination of education and experience that shall be substantially equivalent to the above education and experience. ORS will provide comprehensive vocational rehabilitation coursework to those individuals not having a Master's in Rehabilitation Counseling.

- Other states have reduced the education and experience requirements to a Bachelor's in a related field. ORS has adopted similar requirements. ORS will ensure that the Education and experience requirements are consistent with the VR program regulations for personnel standards as describe in 34 C. F. R. 361.18(c).
- ORS will continue to offer paid practicum/internship opportunities for students in MA Rehabilitation Counseling programs and will continue to work with institutions of higher education to recruit qualified individuals to fill vacancies.
- ORS will also continue to accept interns through the State Internship program which affords high school and college level individuals an opportunity to work in and experience the VR Program.
- ORS will continue to reach out to local colleges with Human Services programs and attend career days to promote a career as a Rehabilitation Counselor. ORS discusses how a Rehabilitation Counselor could be part of a career path for individuals in the Human Services field.
- ORS will continue to fill all fiscal, support staff and case aide vacancies with individuals who meet state requirements for education and experience.
- ORS will continue to encourage and support staff seeking a CRCC by paying for the exam preparation class. The agency will continue to seek Commission on Rehabilitation

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Counselor Certification (CRCC) credits approval for training provided by ORS. Also, ORS has established the ability for all staff to access training via the CRCC E-University. Currently ORS has 19 VR Counselors, Supervisors, and Administrators who are CRC certified.

B. ORS supports and encourages staff training and professional development and maintains a procedural process for individual staff request. Additionally, ORS provides each staff with a monetary amount for their use in attending individual and/or professional development trainings that they and/or their supervisor see as professional development and skill enhancement. ORS conducts a by-annual Comprehensive Staff Training Needs Assessment with the most recent one being completed in May of 2023. The survey focused on staff training needs, professional development needs, and training that would benefit both ORS and vendors. The results of this assessment assist in ORS with the prioritization of training needs as an agency and/or individually.

- The agency also sees training as a dynamic process and introduces training topics on an ongoing basis based on data trends, changing needs of or the clients served, etc.
- Staff indicated the following topics as the top ten (10) training needs: Mental Health Diagnosis, Causes, and Supports; Social and Emotional Needs, Understanding Cognitive & Psychological Assessments; Hands on Training for InFormed/ECMS; Core VRC Skills, Assessment, Job Analysis, Interviewing Skills, Client Engagement and Communication; Business Engagement/Job Development for Job Ready Clients; Using Outlook. Word, Excel, Photo Shop, etc.; Gender Inclusivity, LGBTQ+ Issues in the Workplace and Employers; VR Regulations and Procedures, Sharing Information with Disability Rights Rhode Island; Transition; Disability Specific Trainings; Documentation Uniformity in Electronic Case File, Professional Writing.
- How ORS might assist staff with Professional Development reflected the following: Continue to provide trainings, monetary and time support to attend trainings; Provide opportunities for cross departmental job shadowing/exploration of duties and informational, meetings with experienced staff i.e., Pre-ETS and Supported Employment; Continue to maintain CRCC credit availability, offer trainings as varying times, recoded trainings with CRCC credits. Through supervision and opportunities to check in with other staff.
- ORS staff indicated the following as training that would benefit both ORS and Vendors of ORS; Employer Outreach, Business Engagement, and Worksite Development and Placement Skills with Creative Strategies and Accommodations in the Workplace; How to Improve Collaboration and Communication; Effective Partnership/Teamwork between Counselors, Vendors and Clients; Gender Inclusive Training, LGBTQ+; How to Properly Fill out Reporting Forms; Report Writing/Goal of Referrals and Assessments, How to Work with Difficult Clients and Various Populations.
- ORS utilizes a variety of trainers and TA providers to assist with providing a diverse and comprehensive training agenda with included required trainings, quarterly VR Meeting trainings and independent professional development. Examples include training provided by Disability Rights Rhode Island/CAP included: Employment Rights/ADA which was also co-presented with Governors Commission on Disabilities; Guardianship which also included CRPs, and a Refresher on CAP and DDRI. Center for Staff

Development and Learning/Department of Human Services; Annual HIPPA, Confidentiality and FTI, Multicultural Competency Trainings Series Advanced Anti-Oppression in the Workplace, Understanding Social Identity, Power and Privilege in the Workplace, Disrupting Implicit Bias with Inclusive Behaviors in the Workplace and Combating Microaggressions with Inclusive Language in the Workplace.; Safety and Security Training(s), Domestic Violence. IT required trainings throughout the year. Staff utilized the CRCC E University; Ethical Issues When Working with Offender People, Evidence Based Practices & Rehabilitation Counseling Case Management, Benefits of Employer Provided Accommodations & Role of VRC, Developing a Labor Market Survey, etc. Cross Department Trainings included SNAP & ET Overview, ORS Services on VR, SBVI and DDS to DHS staff, OSCIL and ORS cross training on services. Workforce American Job Center Partners Cross Training. RI Learning Center training included Microsoft Quick Start, Intentional Inclusion, and Thriving in a Multigenerational Work Environment, Inclusive Leadership: Leading a Diverse Team and Effective Communication. SVR training included Ethics: Gender informed VRC, Contemporary Approaches to VR, Innovative Job Placements, How Rehab Bus. & Professionals can Help Employers Strengthen Their Accommodation Process, Employment Supports for People with Serious Mental Illness.

- Work Incentives Planning and Assistance: Introduction, SSA Cost Reimbursement 101, Emerging Leadership Training, Case Documentation, Introductions to the pending ECMS included Academy Modules, Fiscal Interface, Wage and TTW Interface, VRC Walkthrough Demo, Support Staff Demo, etc. Enhanced Financial Management Training to Assist with Accurately Completing Financial Reports and RSA Updates/Reports, ASL Classes, Tilting at Windmills, UMASS Work Without Limits EN Services. Integrated Resource Team, Tarasoff and Duty to Report.

- ORS continues to seek out guidance and expertise of the various technical assistant entities such as VRTAC. These resources have been and will continue to be important in assisting ORS with maintaining knowledge and expertise as the provision of vocational rehabilitation services, employer engagement and outcomes continues to evolve. Additionally, with ongoing staff transition within the VR program and agency, ORS has utilized these resources to assist with Emerging Leadership Development, Non-Delegable Responsibilities & Organizational Structure Update, Improving Retention of State VRCs, Rapid Engagement, Integrated Resource Team, VR Grants Management Training Certificate Program, Credential Attainment, Hispanic Individual's with Disability Building Business Partnerships, etc.

- ORS provided combined trainings for Vendors and VR staff examples include Guardianship by DDRI, Supported Employment Braiding & Sequencing of Funds for BHDDH funded Providers and What does it Take to Become a Benefits Counselor.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL ARE ABLE TO COMMUNICATE IN APPROPRIATE MODES OF COMMUNICATION WITH OR IN THE NATIVE LANGUAGE OF APPLICANTS OR ELIGIBLE INDIVIDUALS WHO HAVE LIMITED ENGLISH-SPEAKING ABILITY.

1. Interpreters and translators are available to staff to communicate with diverse customer populations, for staff trainings, and supervision. The Electronic Case Management

System allows for entry of individual's primary language and preferred communication. It is also Jaws compatible for ORS staff who require that program to maximize functionality.

2. ORS recently purchased Allyant software to enable staff to create new forms and remediate older forms so that they are accessible to screen readers.

3. ORS utilizes Purple VRI an AT communication device to provide for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers.

4. The Blind Service region of ORS has staff who routinely employ alternate forms of communication including enhanced print or contrasted print materials, Braille, tactile sign, software, and voice over programs for text recognition, in addition to a variety of computer/electronic assistive devices and technologies. Additionally, ORS developed guidance for staff in the use of Closed Captioning for Virtual Platforms such as Zoom and Microsoft Office Teams.

5. The staff of the Blind Service VR unit of ORS include VR professionals who are themselves blind, as well as those trained in vision rehabilitation teaching and technology, and who serve as a resource for staff development and training in addition to their direct service responsibilities.

6. The staff of ORS have access to the resources available through Assistive Technology Access Program (ATAP) and Adaptive Telephone Equipment Loan (ATEL). The ATAP Program Director and partners provide training and updates to staff on the changing technology.

7. The State of Rhode Island has secured the following interpreter services which enable access to ORS information and services: PinPoint, Interpreter Service Video Remote Interpreter and Language Line - The Big Word. Additionally, ORS utilizes vendor interpreters from a variety of resources and bilingual staff.

8. ORS brochures, letters, and forms are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

5. AS APPROPRIATE, DESCRIBE THE PROCEDURES AND ACTIVITIES TO COORDINATE THE DESIGNATED STATE UNIT'S COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT WITH PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

The Cooperative Agreement between the Rhode Island Department of Elementary and Secondary Education (RIDE) and the Rhode Island Office of Human Services/Office of Rehabilitation Services (DHS/ORS) was completed to facilitate the successful transition of students with disabilities from school into vocational rehabilitation services, and then to successful employment. As the lead agencies under this agreement, RIDE and DHS/ORS agreed:

1. All personnel assigned to responsibilities described in the agreement would comply with the certification requirements of the respective lead agencies.

2. As new federal or state requirements or initiatives are identified, DHS/ORS and RIDE will provide joint training for school personnel and ORS staff when possible.

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3. ORS will plan for statewide implementation of Pre-ETS and transition services in keeping with the Agreement, as well as applicable policies, procedures, and guidelines. ORS will accept referral of students with disabilities during the transition planning process for the provision of Pre-ETS and transition services.

4. ORS will provide consultation and training to school district staff on transition planning to prepare a student to move from school to work or postsecondary education in accordance with the student's unique needs and provide pre-employment transition services.

As part of the MOU, DHS/ORS and RIDE agree to provide cross-training with agency staff and local school district personnel as needed. RIDE and DHS/ORS will utilize DHS/ORS Comprehensive Needs Assessment, Transition Council, and the DHS/ORS State Rehabilitation Council assessment information to establish training priorities. The agencies will provide professional development and will notify RI Transition Council partner agencies of new programs that are developed. Both parties will jointly fund and sponsor training for their respective staff members and LEA personnel. Training will focus on existing and new state or federal requirements or initiatives that impact the provision of services by both entities concerning education of individuals with disabilities, their transition from school to employment, vocational rehabilitation services, assistive technology, higher education, and training opportunities.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

I. COOPERATIVE AGREEMENT WITH RHODE ISLAND DEPARTMENT OF EDUCATION (RIDE)

- INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. An updated MOU has been completed and signed with the Rehabilitation Services Administration, advisory to ensure that the new MOU meets the federal standards, and RIDE and ORS agreed to amend the new MOU to reflect those advisories.

The plans and procedures for coordination with RIDE and ORS, and RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for over twenty years. The formal agreement between ORS and RIDE describes interagency collaboration and coordination, explains the roles and responsibilities of each partner, and the process for resolving disagreements. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services. This collaboration has enabled ORS to have a Rehabilitation Counselor at

each high school to provide and coordinate an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services and consultation in addition to WIOA Pre-Employment Transition Services (Pre-ETS.)

Two Memorandum of Understanding (MOU) are in place for state agencies Rhode Island Department of Education (RIDE), Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) and ORS. One MOU defines the working relationship between the three parties, and the other MOU addresses data sharing for the state agencies. The Department of Justice (DOJ)/State Consent Decree required that each of these MOUs be developed and implemented to ensure that the responsibility for services and implementation of Employment First principles occurs within RI in a manner consistent with the mandates of the DOJ/State Consent Decree. In-school youth with significant intellectual disabilities are entitled to access of an array of transition planning, career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection and sharing to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed.

- VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

The Cooperative Agreement between ORS and RIDE provides the foundation for ORS Vocational Rehabilitation Counselors' presence within each public high school in the state.

The referral to ORS from the Local Education Authority (LEA), with parental/guardian consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This initial meeting creates the foundation for ORS Transition and the start of Pre-Employment Transition Services (Pre-ETS). This process promotes informed choice for student/family guiding them to register just for Pre-ETS services or apply for the full array of VR services. Under the auspices of the Cooperative Agreement, ORS can assist in-school youth with disabilities in collaboration with each LEA. These transition services and pre-employment transition services fall under the requirements outlined in the 2014 Workforce Innovation and Opportunities Act (WIOA) to prepare students for employment after high school. Counselors meet with potentially eligible students with disabilities and their parents/guardians to give them informed choice options as described above. Office of Rehabilitation Services strives and is committed to assist all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. Inherent in the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility, updated as appropriate, and again prior to graduation. ORS will reserve the ability to close categories if funding levels or staffing levels change.

The IPE establishes an employment goal, and the associated steps/services needed to reach that goal. The IPE goal for students with disabilities is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-ETS provided to students with disabilities includes the five required services, as well as additional services under an IPE which include: Counseling and Guidance, Job Exploration and Assessments, Community-Based Work Experiences, Tri-Employment Program, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training. Over the past couple of years ORS has piloted and has now fully implemented multiple services which include our Middle School

career awareness program, a 9th and 10th grade Work Readiness Program; interviewing-skills workshop; and a collaboration with The University of RI's S.T.A.R.T. URI, a transition program working with students with Autism/Asperger's. ORS continues to work to expand Pre-ETS to include a Career and Technical Education (CTE) collaborations with school districts, giving students an opportunity to gain knowledge and skill around specific career paths. ORS will be partnering with Sargent Center on a multi-year CTE pilot project to support students with disabilities to be successful in meeting the requirements of their CTE pathway. ORS has also completed the first of a multi-year collaborative pilot with a handful of school districts and SE adult providers called "Future Pathways Academy". This pilot is working with those identified SE students earlier, programming provides work readiness, community work experiences, travel exposure/training community connections and eventually SE job development placement and retention as they exit from school.

The DOJ/State Consent Decree has additional expectations of ORS services for in-school youth with significant intellectual disabilities (I/DD). DOJ expects all students with I/DD to have an opportunity to experience 120 days of Work Based Learning experiences prior to exit from public education. Therefore, ORS services incorporate a review of the Career Development Plan (CDP) with the Transition team of any community/work experiences that have already occurred. The team, including the student and family, determine the additional school/home/ community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include ORS-supported services. This information will assist the Transition team to achieve the two 60-day Work Based Learning Experiences mandate of the DOJ/State Consent Decree.

In December 2022 there were eight transition court actions which became part of the consent decree. These court actions center around moving students with I/DD from work trial to full employment prior to exit from high school. In collaboration with RIDE and BHDDH, ORS has developed a multi-tiered approach to support and collaborate with school district to meet mutual CD goals.

The student and his/her family's involvement with ORS will support the student's transition from high school to adult services/employment. The relationship established between the student, family, and Vocational Rehabilitation Counselor is already in place upon graduation.

Per State of Rhode Island laws, the age range for pre-employment transition services is at minimum 14 years through age 22.

2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION

PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

A. RIDE has contracts with the Regional Transition Centers to support transition, planning, and disseminate information about transition and adult services within each high school. Each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Transition Coordinator (RTC), and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. In 2024 the Regional Transition Centers, in collaboration with ORS and BHDDH, created an Intro to State Services video to reach a wider audience within school districts, ORS and BHDDH. This "Introduction to State Services" is to inform school staff about services and eligibility for programs and includes employment/supported employment programming that may be available, as well as services from the State's Department of Developmental Disabilities as appropriate. This Orientation meeting serves as an opportunity to reinforce the referral process to ORS. The RTC supports the sharing and dissemination of ORS information.

In addition to the school-based interventions and consultation with the LEA, ORS is involved in each region's Transition Advisory Committee (TAC), the statewide Transition Council, and a myriad of other system development efforts to enhance work experiences and transition for in-school youth with disabilities, regardless of IEP/504 status.

Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, CDPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

B. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of

their individualized education programs (IEPs) under Section 614(d) of the Individuals with Disabilities Education Act;

B. ORS and each Local Education Authority (LEA) collaborate to meet the transition needs of youth with significant disabilities. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, and accept referrals.

ORS may provide transition or pre-employment transition services to eligible or potentially eligible students with disabilities. ORS will provide all five of the required Pre-ETS services and other services which may include, as appropriate, counseling and guidance, job exploration and assessments, work readiness workshops, Community Based Work Experience, Tri Employment Program, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects, and travel training; however only the five required pre-employment transition services may be provided to potentially eligible students with disabilities. All other services may be provided to eligible students with disabilities under an IPE. The results of these interventions are shared with the student, families, and school personnel so that planning and academic programming in school is influenced by the findings and needs identified through ORS transition services. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any career exploration, internships, or volunteer activities completed by the LEA provide valuable vocationally relevant information to the discussion and planning process. These activities are considered work experiences, and so are important to consider as ORS and the LEA plans next steps and post high school objectives and needs.

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD or those who may be eligible for adult services (many youths who qualify for DD do not have a primary disability of I/DD, i.e., Autism, Cerebral Palsy, etc.) beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience two 60-day Work Based Learning Experiences prior to graduation. Therefore, ORS services incorporate a review with the CDP team (Student, family, LEA, BHDDH & ORS representation) of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community-Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work experiences. This information will assist the team and the Vocational Rehabilitation Counselor in achieving the two 60-day Work Based Learning Experience mandate of the DOJ/State Consent Decree. As mentioned previously, as of December 2022 each student under the CD and on a CDP will be expected to leave high school with paid employment. ORS will work collaboratively with school districts by continuing to provide all the valuable assessments, and exploratory employment services and as students develop their employment interest and skills ORS in partnership with schools and CRP's can develop employment sites and supports to be successful in the community.

C. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;

A. FINANCIAL: RIDE and LEAs will be responsible for transition services mandated by Federal and State laws and regulations. DHS/ORS will be responsible for Transition and Pre-Employment Transition services (PRE-ETS) consistent with the Rehabilitation Act, as Amended by WIOA 2014. RIDE will be responsible for ensuring that a free and appropriate education (FAPE) is made available to eligible students, including special education services included in the individualized education program (IEP), as authorized by the IDEA.

Pursuant to 34 C.F.R. §300. 1 54(b)361.22(c), nothing in this part will be construed to reduce the obligation under the Individuals with Disabilities Education Act (20 U .S.C. 1400 et seq.) of a local educational agency or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education (FAPE) to children with disabilities within the State involved.

Section 113(a)(b) of the Rehabilitation Act, as well as final §361.48(a)(2), requires ORS, in collaboration with the RIDE, to ensure that the required five PRE-ETS services are made available statewide to all students with disabilities in need of such services. RIDE will support ORS's collaboration with Local Education Authorities (LEA) in providing or arranging for the five required PRE-ETS described in this agreement to students with documented disabilities (students 14 years of age through their exit from high school) as defined under §361.5(c)(51), based on individual need once a student requests or is recommended for one or more of the PRE-ETS services. Any PRE-ETS service that ORS provides will be available to students identified by the school of record or to a student known as a person with a disability by the VR counselor. ORS will continue to offer a series of Pre-ETS for students age 14 through 22, to better prepare students with disabilities about employment.

B. JOINT RESPONSIBILITIES: Both RIDE and DHS/ORS are the lead agencies in executing the Cooperative Agreement (CA) as follows:

1. All personnel assigned to responsibilities described in this agreement will comply with the certification requirements of the respective lead agencies.
2. RIDE and DHS/ORS will utilize the RI Transition Council and the State Rehabilitation Counsel as a venue for developing transition-related policies in the respective agencies.
3. RIDE and DHS/ORS will follow their own agency's policies for the review and development of policies including the review of the Special Education Advisory Committee.
4. RIDE and DHS/ORS will notify each other when new policies are in development or of policies that are being revised, to encourage collaboration in policy development related to transition.
5. As new federal or state requirements or initiatives are identified, YR and RIDE will provide joint training to school personnel and YR staff whenever possible.
6. ORS and RIDE will address issues and concerns related to coordination and implementation of PRE-ETS and transition services in schools.
7. If roles and responsibilities for the provision of PRE-ETS and transition services are unclear, ORS will contact the appropriate RIDE IDEA staff to clarify the roles and responsibilities of each entity.

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8. RIDE will support ORS staff in efforts to assist LEAs on issues and concerns related to coordination and implementation of pre-employment transition services and transition services.

9. Inform staff, students, legal guardians, and parents of the mandates found in the 2013 Consent Decree between the DOJ and the state of Rhode Island which have requirements about integrated work experiences and competitive employment as expectations of Rhode Island as an Employment First state.

C. DHS/ORS RESPONSIBILITIES: The DHS/ORS Associate Director or his/her designee will assign a Vocational Rehabilitation Counselor to each comprehensive high school in the state. The list of assigned Vocational Rehabilitation Counselor will be included in RIDE and DHS/ORS promotional materials.

1. Assigned Vocational Rehabilitation Counselors will maintain a schedule of availability in each assigned school and convey this schedule to appropriate local education agency personnel.

2. DHS/ORS is responsible for the implementation and compliance of Title IV of the Rehabilitation Act as amended by WIOA and all related Rhode Island laws and regulations.

3. DHS/ORS will request LEAs, through the high school department chair or designee, to make every effort to schedule Individual Education Program (IEP) meetings during the scheduled hours of the Vocational Rehabilitation Counselor no less than one month prior to the IEP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student, and parent will have materials about Vocational Rehabilitation Services available for the IEP. Assigned Rehabilitation Counselors will make every attempt to attend IEP meetings for DHS/ORS eligible students expecting to graduate in two years or less.

4. Rehabilitation Counselors will make efforts to attend meetings and events at assigned schools to share information about Vocational Rehabilitation including PRE-ETS, adult services, transition services, materials and the Order of Selection with students, parents, special education staff and school personnel. Rehabilitation Counselors will provide brochures and materials about the VR process and services to the school districts for distribution to students, parents, legal guardians, teachers, and others.

5. Students with disabilities, including those who have not yet applied for or been determined eligible for VR services will be informed by ORS of their ability to participate and receive the PRE-ETS services they may need. These services will be described and included in the IEP as appropriate, along with the identified Transition services.

6. ORS will plan for statewide implementation of PRE-ETS and transition services in keeping with this Agreement, policies, procedures, and guidelines.

7. ORS will accept referral of students with disabilities during the transition planning process for the provision of PRE-ETS and Transition services.

8. ORS will provide consultation with and training to school district staff on transition planning to prepare a student to move from school to work or post-secondary education

in accordance with the student's unique needs as determined through the IEP/504 process and provision of pre-employment transition services.

9. Assess, plan, develop and provide VR services for eligible individuals with disabilities who have been referred for VR services, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that such individuals may prepare for and engage in competitive, integrated employment.
10. Develop an Individualized Plan for Employment (IPE), which is consistent with, and which takes into consideration the student-client's Individualized Education Plan (IEP), within 90 days of VR eligibility determination, unless an extension is approved.
11. Provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs.
12. Provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the Individuals with Disabilities Education Act (IDEA).
13. Provide information to parents and/or guardian(s), student/clients regarding VR eligibility, Order of Selection, vocational assessment for employment and postsecondary planning and Client Assistance Program (CAP).
14. Obtain written consent for the release of confidential information, pursuant to ORS policy and procedures, federal and state laws, and regulations regarding confidentiality.
15. Share information regarding policies, procedures, guidelines, programs, and services for the purpose of improving the access to, and availability of, PRE-ETS and Transition services.
16. Promote employer participation in providing opportunities for work-based learning for students with disabilities.
17. DHS/ORS will assist with identification of students with disabilities for PRE-ETS and Transition services and who may be eligible for services.
18. DHS/ORS will ensure applications are widely available to students with disabilities and their families; describe the referral process, application procedures, as well as timelines for each; provide informational literature; and explain eligibility requirements and the eligibility determination timeline. When an application is submitted, ORS will make an eligibility determination within 60 days unless exceptional and unforeseen circumstances beyond ORS's control preclude making an eligibility determination within 60 days and ORS and the students with disabilities agree to a specific extension of time.
19. DHS/ORS will maintain an active presence and receive referrals of students with disabilities for pre-employment transition services as well as potential ORS applicants at: parent support groups, parent forums hosted by high schools, transition and career fairs, programs providing independent living skills training, organizations serving youth who are blind, partially sighted, deaf, hard of hearing or deaf-blind.

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20. Referral for ORS services can occur at any time during the school year and will be processed immediately upon receipt. ORS will communicate by phone, mail, or email with the referred students with disabilities and parents, as needed and appropriate, to submit an application and/or schedule an intake appointment.

D. RIDE AND LOCAL EDUCATON AGENCY (LEA) RESPONSIBILITES:

1. High school department chair or designee will strive to schedule Individual Education Program (IEP) meetings during scheduled hours of the Rehabilitation Counselor no less than one month prior to the IEP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student, and parent will have materials about ORS for the IEP meeting.
2. The development, scheduling and coordination of the IEP meeting.
3. Mechanisms to monitor the implementation of this section of the CA will be included in the RIDE School Support Monitoring process.
4. RIDE and LEAs will support ORS in the dissemination and implementation of pre-employment transition services information and programming.
5. RIDE will assign the State Transition Coordinator. This CA does not reduce the obligation under IDEA of a local education authority or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities within the state.

D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;

D. The LEA identifies students with disabilities who may be eligible for transition services with ORS and facilitates a formal referral to the agency with parental approval. The LEA provides education records as part of the referral packet to ORS. Upon receipt of the referral packet, approved by the parents, the ORS Vocational Rehabilitation Counselor schedules a meeting with the student and family to explain the program, become familiar with the student, and plan next steps. The Vocational Rehabilitation Counselor will explain Pre-ETS services, Order of Selection, and provide informed choice options, including whether to register for Pre-ETS services or apply for VR services. Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility.

At times, school personnel may request Vocational Rehabilitation Counselor presence at an IEP meeting prior to a formal referral to ORS. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

E. Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

E. Section 511 of the Rehabilitation Act requires that anyone age 24 or younger may not start at subminimum wage unless it is documented that the person received pre-employment transition

services or transition services under the Individuals with Disabilities Education Act (IDEA). and/or applied for ORS services and was unable to be successfully employed in an industry-driven competitive integrated employment setting. For the purposes of a 2013 Consent Decree between the DOJ and state of RI, RIDE supports ORS in promoting Supported Employment Services where the individual is compensated at or above minimum wage in a industry-driven competitive integrated employment setting.

F. Assurance that, in accordance with 34 C.F.R. § 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

F. State of Rhode Island has not had subminimum wage or 14(c) certificates since 2019.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

1. ***VR Services***

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer customers paid, community-based, integrated work experiences consistent with customer interests. This service provides a unique opportunity for ORS to assess an individuals' work skills and behaviors within a "real" business environment. The employer provides feedback to the agency and the customer about the individual's skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. Additionally, ORS continues to develop other possible Adult Project Search sites to be implemented throughout the state of RI. This is an effort that utilizes collaborative funding between ORS, DLT/RealJobsRI, and BHDDH.

The Workforce Development Assistant Administrator and the agency's Business Engagement Specialist Team (BEST) has continued to expand employer partnerships with a myriad of companies in Rhode Island. Each partnership has a liaison, or one point of contact assigned to that business. The liaison not only works with that business assisting with their workforce needs but also is available for disability awareness training, tax incentive information and information regarding assistive technology or accommodations. When provided with job openings from these partners, the liaison will then share that information with the BEST Team who then review the information with their respective regions so that qualified candidates can be identified. Once a qualified job seeker has applied and after a confidential release has been obtained, an ORS BEST representative contacts the employer and job develops on the qualified job seeker's behalf. ORS is collaborating with Peak Performance, an agency that works with Veterans and people with disabilities to secure permanent, or temp-to-permanent jobs with the goal of achieving permanent, competitive, integrated employment. ORS continues to explore different business engagement models with VRTAC-QM as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development

efforts. The Workforce Development Assistant Administrator also receives daily job postings from the Department of Labor and Training, JOBfindah Network, VOCcentral and NET (National Employment Team).

ORS offers an array of Virtual Services to ensure that individuals have additional accessible options to receive vocational services. The array of virtual services continues to produce successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals. This hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face employment services were not available. These Virtual Services were developed across SE, Non-SE and Pre-ETS fee for service programming. ORS has also recently added new vendors who offer virtual short term non degree trainings, including a number of Computer and IT trainings. This service has opened employment opportunities for customers who otherwise would not have been able to attend a training in person. For example, one of these new vendors, LearnKey, offers virtual computer and IT trainings in multiple languages. Rather than offering interpreting for their services, LearnKey locates a qualified trainer who speaks the language of the individual(s) attending the training, including ASL.

ORS will continue to work with employers and CRPs to develop a coordinated effort to ensure that employers get the qualified candidates for their vacancies, and customers are provided more opportunities for jobs out in the community. The BEST team will work with other VR staff to consult on cases, discuss job openings and make connections as appropriate to employers. ORS will further coordinate with DLT on sharing leads that ORS cannot fill to ensure that employers needs are optimally met. ORS continues to host Employer Forums annually and will reach out to all their employer contacts and will have the state agency partners, and community providers do the same. The Forum will consist of presenters. Employers will have the opportunity to separate into small groups and discuss how ORS can assist them with their workforce needs, disability awareness and other disability related information and training.

ORS is exploring how to increase capacity and competency of Direct Support Professionals with BHDDH and DLT.

ORS is outreaching to employers to develop Adult Project Search locations. These efforts will continue to be offered to participants Statewide and funding will be via collaborative sequenced funding through ORS, BHDDH and DLT.

Vendors are cross training Direct Support Professionals (DSP) to do VR services if an employee is out for a period of time. This will allow for service delivery to be consistent, in turn assisting employers to meet their needs for retention services.

<u>COMPREHENSIVE NEEDS ASSESSMENT:</u>

ORS conducted a Comprehensive Statewide Needs Assessment (CSNA) in collaboration with the SRC in 2025. This CSNA incorporated a component related to the needs of the business community to bridge gaps between employers and individuals with disabilities. Additionally, the CSNA serves to create a foundation to develop new and innovative trainings and services specific to help individuals remove barriers they face to obtain and maintain competitive, integrated employment. The findings are being incorporated into State Plan goals and strategies.

<u>MARKETING/OUTREACH STRATEGY:</u>

ORS will continue collaboration with its state partners and the SRC to explore development of a marketing plan to target specific business sectors. This will help the continuation of strategies to promote better awareness of ORS and its scope of services. Collaboration with the Governor's Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education (RIDE), and Rhode Island Department of Labor and Training (DLT) is critical as the state implements the Comprehensive System Change Plan (CSIP).

2. *Transition services, including pre-employment transition services, for students and youth with disabilities.*

PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs across many various fields of employment. Project Search is a business led program model which emphasizes the commitment to Employment First principles for individuals with significant intellectual disabilities. Project Search is a nationally recognized program with successful outcomes for persons with I/DD. Rhode Island's first Project Search program at The Miriam Hospital started in 2014, was a success, and the program was replicated with Blue Cross Blue Shield in 2015, and an additional site in 2016 at Newport Hospital. Project Search is offered statewide to youth in transition and is funded in part by ORS, the local school district with BHDDH identified as the long-term funding source for employment supports. .

In addition, ORS has funded summer work experiences for youth since 2010. ORS has added a multitude of Pre-ETS services and Work experience opportunities including virtual services, which connects employers with students who have gained career specific skills through college or post-secondary school. ORS has also developed additional services that meet the needs of our students with the most support needs as well as students that are entering CTE programs and need additional support to complete programming with their peers. All of these work experiences are in integrated community-based work settings paid at minimum wage or above.

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can also report on the overall numbers as identified in census as registered for Pre-ETS. Current ORS census has 1,813 identified Pre-ETS individuals.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

ORS continues to be the lead and implementing agency for the State Grants for Assistive Technology. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living (OSCIL), TechACCESS of RI, and West Bay Educational Collaborative to provide performance-measured services including device loans, demonstrations, device re-utilization, public awareness, and information and assistance.

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ORS also operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program, that is included in the ATAP partnership. Based on ATAP's strong collaboration, ORS utilizes ATAP services for ORS clients who need access to the above services for resources, vocational assessments, and job retention, as well as making sure an individual is able to utilize technology recommended to them to increase their vocational and independent living potential. Device loan allows an individual to trial a piece of technology to increase their skills or bridge a gap in services. The goal is to provide quality assistive technology access and allow individuals to make an informed choice.

In conjunction with ORS', ATAP in-house staff and ATAP Partners provides training to ORS Vocational Rehabilitation Counselors and ORS Vocational Fee for Service Vendors about assistive technology and the services of the program to better support the individuals we support.

Every Fall ATAP Partners also participate in TechACCESS of Rhode Island's Assistive Technology Conference of New England. In the Spring, ATAP partners participate in an Assistive Technology Awareness Day, providing assistance, information, and demonstration. ORS' ATAP in-house staff and ATAP partners continue to increase their knowledge of assistive technology that is constantly changing, and the paradigm shifts that go with it to provide expert supports to individuals working with ORS to achieve their vocational goals.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

ORS does not have such cooperative agreements at this time.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

ORS has cultivated a strong working relationship with numerous agencies that support out-of-school youth. The RI Ocean State Center for Independent Living (OSCIL) offers services to augment vocational rehabilitation services. OSCIL can provide support services, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services. Other agencies that support out-of-school youth include: LAZO, Fast Track, Launched Beginnings, and BestLifeRI. ORS also participates with the DLT in reviewing their requests for proposals for training programs and other services. ORS is an active participant on DLT youth sub committees. These subcommittee meetings are scheduled quarterly. ORS works closely with the Department of Labor and Training contracted youth service providers to ensure that in school and out of school youth are actively engaged in services and have access to all available resources. Working with these partners is integral to ensuring a seamless handoff from services received through ORS to valuable lifelong resources available to them.

4. STATE USE CONTRACTING PROGRAMS;

ORS does not participate in State use contracting programs.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT:

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is

administered by the Department of Human Services (DHS). However, the complexities of increased income on other benefits such as the Developmental Disability agency's service cost share, subsidized housing, and food stamps requires considerable coordination among the state agencies. ORS participates on a monthly case coordination team that examines the Sherlock Plan to identify obstacles, increase inter- and intra-agency collaboration, and develop possible solutions.

In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive benefits planning information through a complete individualized Benefit Analysis by a Benefits Counselor. ORS is working with DHS, Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), Disability Rights Rhode Island, and Advocates in Action to report on obstacles to individuals, to explore increasing capacity, and to examine how the service can be reimbursed by Medicaid. ORS has collaborated with the Sherlock Center on Disabilities (RI's University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD) program) to ensure that community forums are set up to disseminate benefits counseling information to families, individuals, stakeholders, and transition aged youth as the first step in increasing knowledge of work incentives. For the past several years, ORS has paid for the benefits counselors' time in these public forums to ensure more WIPA funds are available for 1:1 benefits counseling. ORS has collaborated with the Sherlock Center, which currently holds the WIPA grant, to increase the overall number of benefit counselors available in the state since available Benefits Counselors are declining due to attrition.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

ORS has a long-standing history of collaboration with the Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH). BHDDH is the lead state agency responsible for services to individuals with developmental disabilities – DDH. ORS funds an array of Supported Employment services for adults and youth with Developmental Disabilities through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental disabilities. ORS continues to provide Supported Employment services as a means to enable individuals with the most significant disabilities to have access to industry-driven competitive integrated employment opportunities. ORS also works with BHDDH on Braiding and Sequencing of Funds Training for Provider Agencies.

ORS sponsors Supported Employment Council (SEC) and participates in the Developmental Disabilities Council and Behavioral Health IPS Steering Committees. ORS also has representation on the board of the RI Chapter of the Association of Professionals Supporting Employment First (RIAPSE.)

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services through the customer-selected CRP.

The objective of the Supported Employment Services is industry-driven competitive integrated employment as an outcome. Vocational Rehabilitation recognizes a minimum of ten hours per week at commensurate wages. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs. The CRPs utilize BHDDH funding to provide the long-term supports that help sustain employment for individuals with significant developmental disabilities. Long-term supports are planned for and included in the customers' ORS

Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services via ORS funded trainings, presentations, technical assistance and mentoring by liaison staff from ORS.

As the funding source, ORS holds a quarterly meeting with all the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support. ORS and BHDDH have also enlisted technical assistance providers to explore collaborative "sequenced" funding to maximize SE dollars. ORS and BHDDH have provided annual training to the CRP's about Braiding and Sequencing of available funds. ORS has increased the fee-for-service rates in all its service fees to pay Vendors a rate that is more commensurate with the national vocational rehabilitation rates.

In 2014, the State of RI negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment services to work. The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE), and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, both adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully-informed choices about work. The three state agencies are obligated by the DOJ/State Consent Decree to develop Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA. These obligations have been developed and are in place currently, with quarterly reporting to the DOJ and Court Monitor on data, process, and continuous quality improvement.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with mental health issues - Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH).

ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.

ORS sponsors and participates in the Supported Employment Council for Behavioral Health. Rehabilitation Counselors function as liaisons to CRPs and agencies that offer SE services to individuals with behavioral health issues.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in industry-driven competitive integrated employment outcomes. Supported employment services are available after job placement. As a leader, trainer, and funding source of supported employment services, ORS engages CRPs who rely on BHDDH funding to provide

the long-term supports that help sustain employment for individuals with behavioral health disabilities. Natural supports from an employer or others can and should be identified and utilized as available.

ORS continues to collaborate with the BHDDH to work towards increasing the utilization of ORS and Medicaid funding for employment services. ORS and BH jointly met with the local Mental Health Agencies to consult and discuss potential referrals and services. ORS and BH have jointly participated in Individual Placement and Support (IPS) Training and are consulting with agencies who also utilize that model for Industry-driven competitive integrated employment.

The objective of the SE services is in industry-driven competitive integrated employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service; however, the Rehabilitation Act provides for time limits in WIOA for SE services. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job if no other funding source for the long-term supports is identified. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25 after the transition to extended services; however, ORS may not provide extended services to anyone other than these youth, which must be provided by CRPs or other sources. Natural supports from an employer or others can and should be identified and utilized as available.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

The Rhode Island Office of Rehabilitation Services (ORS) collaborates with programs and agencies providing services that will assist an individual with a disability to establish and reach an employment goal. Types of agencies that ORS collaborates with include: hospitals, medical and disability support organizations, educational institutions (both public and private), professional associations, domestic violence and homeless shelters, community centers, community mental health agencies, local educational authorities, substance abuse treatment facilities, private medical offices, state agencies, federal agencies, community employers, private businesses, and advocacy groups.

Memorandums of Understanding (MOU)/Cooperative Agreements (CA) have been negotiated with Department of Veterans Affairs (VA), Institutions of Higher Education (IHE - Rhode Island College, University of Rhode Island, and Community College of Rhode Island), Rhode Island Department of Labor and Training (DLT), Mashantucket Pequot Tribal Nation, Workforce Partnership of Greater Rhode Island, Cranston/Providence Workforce Development, and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) has been completed and signed with RSA advisory to ensure that the new MOU be revised to meet the federal standards.

In order to enhance the recruitment of qualified rehabilitation counselors, ORS has a Memorandum of Understanding with Assumption College and Salve Regina University to provide practicum and internship opportunities to graduate level Rehabilitation Counseling students.

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ORS has cultivated a strong working relationship with the State's independent living center to augment the services provided by ORS. Rhode Island has one IL center that provides support services, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services to adults, out-of-school, and in-school youth.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. ORS relies on a fee-for-service outcome-based fee structure with a network of private vocational community rehabilitation providers (CRPs) in order to meet the vocational rehabilitation needs of its customers. The ORS Fee-for-Service structure provides a means of evaluating and monitoring the quality of deliverables as agency-generated authorizations to the CRP/vendor, reports, outcomes, and client satisfaction are variables involved in payment for client services.

A prospective Community Rehabilitation Provider (CRP) or vendor completes an application, is vetted through the state Department of Accounts and Control, Ocean State Procurement System, the federal System for Award Management (SAM) website, and the Secretary of State prior to approval by ORS.

CRPs/vendors requesting approval to provide services on fee-for-service basis will be evaluated based on ORS's need for that service/training. ORS examines the geographic, population specific, labor market, and /or training content need of the agency based on CNA, and/or client feedback. ORS also reviews the Department of Labor and Training's ETPL (Eligibility Training Provider List) annually to ensure DLT's and ORS's training fees are consistent. Based on these findings, in addition to the results of the core partner strategic planning sessions, ORS identifies service/training expansion needs and may approve a new service/training vendor (after completing the vetting process) on a trial basis or not approve the service/training. Pilot programs are often used with new or existing vendors, and provide an opportunity to develop, monitor and evaluate if a service delivery model (designed to meet the rehabilitation needs of a specific disability group) is effective prior to committing long term to the service. A pilot offers the opportunity to make appropriate changes to ensure a positive outcome from a new initiative.

The DOJ/State Consent Decree has added additional requirements to the approval process of CRPs who are working with youth and adults with I/DD:

- CRP staff must meet certain baseline credentialing criteria to provide Job Coaching and Job Development services to customers with significant intellectual disabilities; and,
- CRPs providing Supported Employment Services must participate in a Continuous Quality Improvement review quarterly.

VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

CERTIFICATIONS

States must provide written and signed certifications that:	
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 title IV of WIOA,[8] and its State Plan supplement under title VI of the Rehabilitation Act;

2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency or the designated State unit when the designated State agency has a designated State unit)[9] agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[10], the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[11], policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[12], the Rehabilitation Act, and all applicable regulations[13], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4.	The designated State unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

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The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:
1. **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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. **Administration of the VR services portion of the Unified or Combined State Plan:** The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
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. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
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. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements 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.

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The State Plan must provide assurances that:
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 as set forth in section 101(a)(18)(A).
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)(E) 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
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 the requirements for the development of an individualized plan for employment in accordance with section 102(b) 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 sections 101(a)(14) and 511 of the Rehabilitation Act.
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.

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The State Plan must provide assurances that:
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. **Program Administration for the Supported Employment Title VI Supplement to the State plan:**
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.
6. **Financial Administration of the Supported Employment Program (Title VI):**
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)(H) and (I) 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:**
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

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The State Plan must provide assurances that:
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

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

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

CAREER AND TECHNICAL EDUCATION PROGRAMS AUTHORIZED UNDER THE THE CARL D. PERKINS CAREER AND TECHNICAL EDUCATION ACT OF 2006, AS AMENDED BY THE STRENGTHENING CAREER AND TECHNICAL EDUCATION FOR THE 21ST CENTURY ACT (PERKINS V) (TITLE 20, UNITED STATES CODE (20 U.S.C. 2301 ET SEQ.))

NOTE: Unless otherwise noted, statutory references in this section are to Pub. L. 115–224,— *The Strengthening Career and Technical Education for the 21st Century Act* ("Perkins V" or "the Act"). (20 U.S.C. 2301 et seq.) The term "the State" used throughout this section refers to the State Perkins Eligible Agency and "the State Plan" refers to the "Perkins State Plan".

(OMB Control Number: 1830-0029)

A. PLAN DEVELOPMENT AND CONSULTATION

1. Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in section 122(c)(2) of Perkins V. See Text Box 1 for the statutory requirements for State plan consultation under section 122(c)(1) of Perkins V.

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2. Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in section 122(e)(1)(A)-(C) of the Act. If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V)
3. Describe opportunities for the public to comment in person and in writing on the State plan. (Section 122(d)(14) of Perkins V)

Text Box 1: Statutory Requirements for State Plan Consultation

- (c) PLAN DEVELOPMENT.—
- (1) IN GENERAL.—The eligible agency shall—
    - (A) Develop the State plan in consultation with—
        - (i) Representatives of secondary and postsecondary career and technical education programs, including eligible recipients and representatives of 2-year minority serving institutions and historically Black colleges and universities and tribally controlled colleges or universities in States where such institutions are in existence, adult career and technical education providers, and charter school representatives in States where such schools are in existence, which shall include teachers, faculty, school leaders, specialized instructional support personnel, career and academic guidance counselors, and paraprofessionals;
        - (ii) Interested community representatives, including parents, students, and community organizations;
        - (iii) Representatives of the State workforce development board established under section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in this section as the ''State board'');
        - (iv) Members and representatives of special populations;
        - (v) Representatives of business and industry (including representatives of small business), which shall include representatives of industry and sector partnerships in the State, as appropriate, and representatives of labor organizations in the State;
        - (vi) Representatives of agencies serving out-of-school youth, homeless children and youth, and at-risk youth, including the State Coordinator for Education of Homeless Children and Youths established or designated under section 722(d)(3) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11432(d)(3));
        - (vii) Representatives of Indian Tribes and Tribal organizations located in, or providing services in, the State; and

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Text Box 1: Statutory Requirements for State Plan Consultation

        - (viii) Individuals with disabilities; and
    - (B) Consult the Governor of the State, and the heads of other State agencies with authority for career and technical education programs that are not the eligible agency, with respect to the development of the State plan.
- (2) ACTIVITIES AND PROCEDURES.—The eligible agency shall develop effective activities and procedures, including access to information needed to use such procedures, to allow the individuals and entities described in paragraph (1) to participate in State and local decisions that relate to development of the State plan. (3) CONSULTATION WITH THE GOVERNOR.—The consultation described in paragraph (1)(B) shall include meetings of officials from the eligible agency and the Governor's office and shall occur—
    - (A) During the development of such plan; and
    - (B) Prior to submission of the plan to the Secretary.

(Section 122(c)(1) of Perkins V)

Glossary of Key Terms and Abbreviations

- AP – Advanced Placement
- CCRI – Community College of Rhode Island
- CLNA – Comprehensive Local Needs Assessment
- CTE – Career and Technical Education
- CTE Board – Career and Technical Education Board of Trustees
- CTSO – Career and Technical Student Organization
- DLT – Department of Labor and Training
- GO – Governor's Office
- GWB – Governor's Workforce Board
- ELL – English Language Learner
- ESSA – Every Student Succeeds Act
- FY – Fiscal Year
- ILP – Individual Learning Plan
- LEA – Local Education Authority
- OPC – Office of the Postsecondary Commissioner
- PD – Professional Development
- Perkins V – The Strengthening Career and Technical Education for the 21st Century Act
- PrepareRI – Prepare Rhode Island

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- RIDE – Rhode Island Department of Elementary and Secondary Education
- WBL – Work-Based Learning
- WIB – Workforce Investment Board (WIB)
- WIOA – Workforce Innovation and Opportunity Act

II.A.1. Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in section 122(c)(2) of Perkins V and as provided in Text Box 1 on the following page.

In the summer of 2019, RIDE and the Career and Technical Education Board of Trustees (CTE Board) hosted seven stakeholder meetings totaling over 20 hours of in-person discussion with diverse groups of stakeholders, including specific invitations to each of the representatives of stakeholder groups named in section 122(c)(2) of Perkins V.

Key Questions

These meetings were organized around RI's established key questions for the State Plan development, as outlined in Rhode Island's FY20 transition plan:

State Alignment: How can Rhode Island align its PK-20 workforce development initiatives? This includes, but is not limited to, aligning Prepare Rhode Island (PrepareRI) to career and technical education (CTE) and the needs of Rhode Island's employers.

Secondary to Postsecondary Transition: How can Rhode Island increase alignment between secondary and postsecondary CTE programs, particularly the Perkins-grant-eligible Community College of Rhode Island?

Middle School: How can and should Rhode Island increase career awareness, exploration, and programming in our earlier grades?

Funding: How can Rhode Island strengthen our Perkins grant distribution models and leverage additional sources of funding to align with state goals for CTE and meet employer needs, as established by the CTE Board?

Equity: How can Rhode Island increase the participation and outcomes of underrepresented student groups in CTE programs?

Careers in Priority Sectors: How should Rhode Island's CTE system prepare students for the future of work and recognize high-skill, high-growth industries, emerging industries, and industries that are not identified as either?

Measuring Program Success: How can Rhode Island continue to improve upon our system to hold our state and grantees accountable for ensuring students are graduating high school and postsecondary institutions prepared for career success and ready to meet the needs of industry?

Stakeholder Meetings

RIDE and the CTE Board hosted seven meetings across the state to engage as many stakeholders as possible and to provide multiple opportunities for feedback as the state plan continued to evolve. Meetings were held over the course of four months (June - October 2019) and throughout the planning process to ensure stakeholder feedback was integral to the plan's development. These meetings were advertised in the Commissioner's Field Memo and the

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PrepareRI Newsletter—which collectively reach over 23,100 people—and through direct communication with CTE programs.

The schedule and meeting topics were:

June 27: Introduction to the Planning Process & Application Guidelines

July 11: Secondary Programs

July 18: Postsecondary Programs

August 22: Academic & Workforce Readiness

August 29: Funding Sources, Part 1

September 12: Funding Sources, Part 2

October 3: Presentation of Draft Plan (focusing on program requirements, measuring success, and funding sources)

Attendees represented a variety of stakeholder groups, including district and school leadership, CTE centers, community and industry partners, as well as business leaders and members of the CTE Board. Materials were sent via email to everyone who had signed up to receive Perkins V notifications, in case they were not able to attend.

Each meeting began with introductory remarks, including "partnership spotlights" of successful partnerships between industry and schools. These spotlights helped to highlight exemplary models that other schools could replicate and shine a light on successes from the field. They also provided an opportunity for employers to articulate their support for CTE and to share their future workforce needs.

Half of each meeting was a background presentation. Representatives from RIDE provided a summary of the key information needed to make the policy decision under discussion. This usually included a summary of existing policies, relevant outside federal or state policies, and data on the current landscape.

After the background section, RIDE presented the key policy question and a set of policy options. For example, the question for one meeting was "How should RIDE distribute Perkins funds to schools and districts?" and the policy options included different approaches to using consortia to receive Perkins funds.

After these presentations, the second half of the meeting was organized around small-group policy discussions. Attendees were broken into small groups with a facilitator, and discussed the policy question and options presented. The facilitators took detailed notes, which were then compiled and tallied. This included qualitative feedback as well as rating each policy option from "Strongly Disagree" to "Strongly Agree." The meeting structure was designed to maximize attendee participation with the use of both large group presentations and facilitated small group feedback sessions. The structure allowed time for attendees to provide feedback in small groups, providing for space for multiple voices to be heard.

After each meeting, RIDE compiled feedback from the small group discussion and surveys. This information was used to revise the policy recommendation in the State Plan. This recommendation was then presented at the subsequent stakeholder meeting and incorporated into the State Plan draft.

Incorporating Feedback

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In addition to the stakeholder meetings described above, RIDE released six surveys throughout the summer focusing on key policy questions and proposals aligned to the questions above. These surveys were released statewide after each stakeholder meeting. The results of each survey were then shared at the subsequent stakeholder meeting.

Feedback from the plan was debriefed during weekly meetings of the PrepareRI Core Team, which consists of representatives of the Rhode Island agencies responsible for state education and workforce strategy, including: the Rhode Island Department of Elementary and Secondary Education (RIDE), Governor's Workforce Board (GWB), Department of Labor and Training (DLT), Rhode Island Commerce, Governor's Office, Office of the Postsecondary Commissioner (OPC), and Community College of Rhode Island (CCRI). These meetings also facilitated the coordination of alignment between the development of the Perkins Plan and the Workforce Innovation and Opportunity Act (WIOA) Plan.

The plan was presented and discussed at monthly CTE Board meetings, from September 2019 through February 2020. The CTE Board consists of representatives from private industry, labor, trade associations, government, K-12 schools, RIDE, postsecondary, adult education, economic development, and the Governor's Workforce Board. RIDE solicited feedback from members of the Board to revise the plan.

Including the in-person meetings and surveys, Rhode Island gathered and analyzed over 5,000 feedback statements to inform the development of the draft plan. Data shows that respondents included representatives of all stakeholder groups named in the Perkins consultation list.

To make it easier for all stakeholders to understand the key changes in the Perkins plan, RIDE created a two-page summary of the major changes under Perkins V. This document was posted on the RIDE website, and sent out to the field in both the Commissioner's Field Memo (which goes out to more than 21,000 people across the state, including all superintendents, principals, and teachers) and the PrepareRI newsletter (which goes out to 1,166 people across the state, including leaders from schools, businesses, and non-profits).

CTE Board Endorsement

The plan was also discussed at the monthly meetings of the CTE Board. The plan was formally endorsed by the CTE Board on February 7, 2020.

Public Comment

Following the development of the draft plan, RIDE released the plan for a formal public comment period of 30 days. During this time, RIDE held two formal public comment sessions with 14 participants and collected nine online survey responses. Most CTE stakeholders that talked with RIDE during this period said that they already knew the plan and had shared their feedback during the stakeholder meetings and CTE Board meetings, and they therefore felt no need to add formal public comment. Upon closing the public comment session, RIDE analyzed the comments and made some clarifications to the plan to address the feedback received.

The plan was provided to the Governor for her review and endorsement on March 14, 2020. The Governor's letter of endorsement can be found as Appendix A.

II.A.2. Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in section 122(e)(1)(A)-(C) of the Act. If a State agency, other

than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V).

RIDE serves as the administrative entity for Perkins secondary, postsecondary, and adult education. RIDE serves as the primary policy-making entity for all these areas. Therefore, the State Plan does not require consultation with any other state agency in the areas of adult, postsecondary, and adult education. Nonetheless, RIDE included the Governor's Workforce Board (GWB), the Office of Postsecondary Commissioner, the Community College of Rhode Island (CCRI), and the Governor's Office in the ongoing refinements of the plan, through the weekly PrepareRI Core Team meetings. RIDE has also coordinated with the CTE Board, as it has statutory responsibilities related to CTE.

June 2, 2023 - The requested change to the Rhode Island Perkins V State Plan noted that RIDE opted to drop two of the optional performance metrics (5S4 and 5S5) as data collection and processing did not align with the Perkins V CAR submission timeline. To avoid an ongoing delay due to these factors the state opted to drop two optional metrics. Stakeholders were informed and there was no response to public comment.

II.A.3. Describe opportunities for the public to comment in person and in writing on the State plan. (Section 122(d)(14) of Perkins V)

Following the development of the draft plan, RIDE released the plan for a formal public comment period of 30 days. During this time, RIDE and the CTE Board of Trustees hosted two formal public comment sessions to summarize the changes in the state plan, and received feedback. The public comment sessions had 14 attendees who shared zero responses. (Most CTE staff and attendees at the sessions noted that they were already familiar with the plan from the stakeholder engagement sessions and the CTE Board presentations on Perkins V.) RIDE also administered an online survey with nine responses.
Key takeaways from those sessions were shared at the following CTE Board meetings, PrepareRI Core Team meetings, and have been incorporated into the final state plan. Most of the online survey responses voiced concern about admissions policies for some CTE programs creating equity gaps in access to the programs. This Perkins V plan addresses those concerns by requiring CTE programs to report their admissions policies to RIDE, as well as data on the admissions patterns of students in the programs. If there is evidence of a disproportionate impact on student subpopulations, then RIDE will work with programs to close those equity gaps.

B. PROGRAM ADMINISTRATION AND IMPLEMENTATION

- 1. State's Vision for Education and Workforce Development
    - a. Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and technical education programs and programs of study are aligned with and address the education and skill needs of the employers in the State identified by the State workforce development board. (Section 122(d)(1) of Perkins V)
    - b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's

career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)

- c. Describe the State's strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965. (Section 122(d)(3) of Perkins V)
- d. Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of Perkins V for each of the purposes under section 124(a) of the Act. See Text Box 2 for the required uses of State leadership funds under section 124(a) of Perkins V. (Section 122(d)(7) of Perkins V)

Text Box 2: Required Uses of State Leadership Funds

(a) GENERAL AUTHORITY.—

From amounts reserved under section 112(a)(2), each eligible agency shall—

- (1) Conduct State leadership activities to improve career and technical education, which shall include support for—
  - (A) Preparation for non-traditional fields in current and emerging professions, programs for special populations, and other activities that expose students, including special populations, to high-skill, high-wage, and in-demand occupations;
  - (B) Individuals in State institutions, such as State correctional institutions, including juvenile justice facilities, and educational institutions that serve individuals with disabilities;
  - (C) Recruiting, preparing, or retaining career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals, such as preservice, professional development, or leadership development programs; and
  - (D) Technical assistance for eligible recipients; and

(2) Report on the effectiveness of such use of funds in achieving the goals described in section 122(d)(2) and the State determined levels of performance described in section 113(b)(3)(A), and reducing disparities or performance gaps as described in section 113(b)(3)(C)(ii)(II).

(Section 124 of Perkins V)

- 2. Implementing Career and Technical Education Programs and Programs of Study

- a. Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients. (Section 122(d)(4)(A) of Perkins V)
- b. Describe the process and criteria to be used for approving locally developed programs of study or career pathways (see Text Box 3 for the statutory definition of career pathways under section 3(8) of Perkins V), including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 1321 [1] will—
    - i. Promote continuous improvement in academic achievement and technical skill attainment;
    - ii. Expand access to career and technical education for special populations; and
    - iii. Support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V)
- c. Describe how the eligible agency will—
    - i. Make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;
    - ii. Facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;
    - iii. Use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;
    - iv. Ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;
    - v. Coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;
    - vi. Support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students

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with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and

- vii. Improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

Text Box 3: Statutory Definition of Career Pathways

The term 'career pathways' has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102)

(7) Career pathway.--The term "career pathway'' means a combination of rigorous and high-quality education, training, and other services that—

- (A) Aligns with the skill needs of industries in the economy of the State or regional economy involved;
- (B) Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the "National Apprenticeship Act''; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an "apprenticeship'', except in section 171);
- (C) Includes counseling to support an individual in achieving the individual's education and career goals;
- (D) Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- (E) Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- (F) Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and
- (G) Helps an individual enter or advance within a specific occupation or occupational cluster. (Section 3(7) of the Workforce Innovation and Opportunity Act [Public Law 113-128])

(Section 3(8) of Perkins V)

- d. Describe how the eligible agency, if it opts to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education. (Section 122(d)(4)(D) of Perkins V)
- e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic

counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d)(12) of Perkins V)

- f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V. See Text Box 4 for the statutory requirements for local applications under section 134(b) of Perkins V.
- g. Include a copy of the comprehensive local needs assessment template and/or guidelines that the eligible agency will require of eligible recipients to meet the requirements of section 134(c) of Perkins V. See Text Box 5 for the requirements for the comprehensive local needs assessment under section 134(c) of Perkins V.
- h. Provide the eligible agency's definition for "size, scope, and quality" that will be used to make funds available to eligible recipients pursuant to section 135(b) of Perkins V.

Text Box 4: Statutory Requirements of Local Applications

- (b) CONTENTS.—The eligible agency shall determine the requirements for local applications, except that each local application shall contain—
- (1) A description of the results of the comprehensive needs assessment conducted under subsection (c);
- (2) Information on the career and technical education course offerings and activities that the eligible recipient will provide with funds under this part, which shall include not less than 1 program of study approved by a State under section 124(b)(2), including—
    - (A) How the results of the comprehensive needs assessment described in subsection (c) informed the selection of the specific career and technical education programs and activities selected to be funded;
    - (B) A description of any new programs of study the eligible recipient will develop and submit to the State for approval; and
    - (C) How students, including students who are members of special populations, will learn about their school's career and technical education course offerings and whether each course is part of a career and technical education program of study;
- (3) A description of how the eligible recipient, in collaboration with local workforce development boards and other local workforce agencies, one-stop delivery systems described in section 121(e)(2) of the Workforce Innovation and Opportunity Act (29 U.S.C. 3151(e)(2)), and other partners, will provide—
    - (A) Career exploration and career development coursework, activities, or services;
    - (B) Career information on employment opportunities that incorporate the most up-to-date information on high-skill, high-wage, or in-demand industry sectors or occupations, as determined by the comprehensive needs assessment described in subsection (c); and

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Text Box 4: Statutory Requirements of Local Applications

  - (C) An organized system of career guidance and academic counseling to students before enrolling and while participating in a career and technical education program;

- (4) A description of how the eligible recipient will improve the academic and technical skills of students participating in career and technical education programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education programs to ensure learning in the subjects that constitute a well-rounded education (as defined in section 8101 of the Elementary and Secondary Education Act of 1965);
- (5) A description of how the eligible recipient will—
  - (A) Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency;
  - (B) Prepare CTE participants for non-traditional fields;
  - (C) Provide equal access for special populations to career and technical education courses, programs, and programs of study; and
  - D) Ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations;
- (6) A description of the work-based learning opportunities that the eligible recipient will provide to students participating in career and technical education programs and how the recipient will work with representatives from employers to develop or expand work-based learning opportunities for career and technical education students, as applicable;
- (7) A description of how the eligible recipient will provide students participating in career and technical education programs with the opportunity to gain postsecondary credit while still attending high school, such as through dual or concurrent enrollment programs or early college high school, as practicable;
- (8) A description of how the eligible recipient will coordinate with the eligible agency and institutions of higher education to support the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable State certification and licensure requirements (including any requirements met through alternative routes to certification), including individuals from groups underrepresented in the teaching profession; and
- (9) A description of how the eligible recipient will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions such recipient will take to eliminate those disparities or gaps.

(Section 134(b) of Perkins V)

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Text Box 4: Statutory Requirements of Local Applications

Text Box 5: Statutory Requirements for Comprehensive Local Needs Assessment

- (c) COMPREHENSIVE NEEDS ASSESSMENT.—
- (1) IN GENERAL.—To be eligible to receive financial assistance under this part, an eligible recipient shall—
    - (A) Conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and
    - (B) Not less than once every 2 years, update such comprehensive local needs assessment.
- (2) REQUIREMENTS.—The comprehensive local needs assessment described in paragraph
    - (1) Shall include each of the following:
    - (A) An evaluation of the performance of the students served by the eligible recipient with respect to State determined and local levels of performance established pursuant to section 113, including an evaluation of performance for special populations and each subgroup described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965.
    - (B) A description of how career and technical education programs offered by the eligible recipient are—(i) sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient; and (ii)(I) aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in this section as the ''State board'') or local workforce development board, including career pathways, where appropriate; or (II) designed to meet local education or economic needs not identified by State boards or local workforce development boards.
    - (C) An evaluation of progress toward the implementation of career and technical education programs and programs of study.
    - (D) A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions.
    - (E) A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including— (i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations; (ii) providing programs that are designed to enable special populations to meet the local levels of performance; and (iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry

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Text Box 4: Statutory Requirements of Local Applications

sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.

(Section 134(c) of Perkins V)

- 3. Meeting the Needs of Special Populations
    - a. Describe the eligible agency's program strategies for special populations, including a description of how individuals who are members of special populations—
        - i. Will be provided with equal access to activities assisted under this Act;
        - ii. Will not be discriminated against on the basis of status as a member of a special population;
        - iii. Will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;
        - iv. Will be provided with appropriate accommodations; and
        - v. Will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)
- 4. Preparing Teachers and Faculty
    - a. Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)

[1]Based on the context of this requirement, the reference to the local application process under "section 132" appears to be a typographical error in the Perkins V statute. The correct section for local applications in Perkins V is section 134. Therefore, eligible agencies should respond to this item using the provisions in section 134 of Perkins V.

CTE Board of Trustees

The Rhode Island CTE Board of Trustees (CTE Board) is a statutorily-created board that establishes policies and provides oversight to Rhode Island's CTE programs and the use of state and federal resources related to CTE.

The CTE Board was created by Rhode Island General Law 16-53 in 2014 to oversee an integrated and efficient CTE system in Rhode Island that is aligned to the real needs of Rhode Island's industries and economy. Members of the Board are appointed by the governor, and seats are reserved for state leaders from industry, government, and labor. The CTE Board holds

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public meetings on a regular basis to ensure that all stakeholders in the CTE landscape are fulfilling the state's commitment to prepare all students for success in college and career.

The CTE Board oversees a number of statewide Industry Advisories, organized around specific industry sector. The specific industry sectors correspond to the US Department of Education's Career Clusters. Each of these advisories is composed of representatives from K-12 schools, industry, and postsecondary; the advisories are chaired by a representative from industry and education. Starting in 2016, these advisories began developing new, more rigorous, career-specific CTE program standards. CTE Board program standards are developed in the Industry Advisories, approved by the CTE Board, and adopted by RIDE. The CTE Board has approved over 50 program standards in all 16 clusters, including Priority Sectors. (See page 40 for a full discussion of Priority Sectors.) Each CTE Board Standard requires that students earn:

- Academic skills. All of the CTE Board Standards include requirements for both academic coursework and technical coursework. The CTE Board recognized that students cannot be career-ready if they do not have academic skills. Proficiency in reading, writing, math, and other subjects are foundational to both college and career success. All of these academic skills are also connected to relevant majors at Rhode Island's postsecondary institutions.

- Industry-recognized credentials and/or college credit. The decision about what counts as an "industry-recognized credential" is made by industry representatives and is formally adopted by the CTE Board. This ensures Rhode Island's CTE programs are meeting the specific needs of actual Rhode Island employers. The credentials of value also align with Rhode Island's WIOA plan and the state's overall credentials system.

- Coursework and curriculum. The CTE Board Standards outline approved curricula or course sequences that help students earn the industry-recognized credentials and college credit described above.

- Work-based learning. The CTE Board Standards may include work-based learning requirements. These standards outline the specific needs of employers in that career field. These career field standards build upon the minimum criteria set by the Governor's Workforce Board, but provide more rigorous requirements and detail relevant to the specific industry.

- Employability skills. Recognizing that employability skills are essential to students' success in the workplace, the CTE Board Standards will clarify the specific skills that students should be developing for the workplace.

Collectively, these CTE Board Standards are written by schools and employers, with a goal of schools meeting the needs of employers. All CTE programs must demonstrate their alignment to these standards and report out annually on their students' achievement of the culminating credentials. All CTE Board Standards are posted on the RIDE CTE website.

According to statute, the CTE Board has 15 members, allocated in the following manner:

- Nine individuals who are representative of the private employment sector:

o Five representatives of business, industry, and agriculture:

 Two members who are representatives of general business concerns

 One member who is a representative of small business concerns

 One member who is a private sector member of the governor's workforce board, or the Rhode Island workforce investment board, or state job training coordinating council (established pursuant to section 122 of the Job Training Partnership Act, 29 U.S.C. § 1532)

 One member who is a representative of the CTE Trust

o Two members who are representatives of labor organizations, one of whom must be a career and technical teacher

o Two members from trade associations representing employers in the state

- Five individuals who are representative of secondary and postsecondary educational institutions, including:

o One member who is a representative of the Rhode Island School Superintendents Association

o One member who is a representative or the director of career and technical education programs and/or facilities

o The commissioner of elementary and secondary education, or his/her designee

o The commissioner of higher education, or his/her designee

o One member who is a representative of adult education and skills training

- The secretary of commerce or his/her designee shall be the fifteenth (15th) member ex officio

State-Approved CTE Programs

CTE in Rhode Island is designed for individuals who are interested in entering the workforce or are preparing for careers and want to take advantage of postsecondary education and training opportunities. With more than ten regional centers, 54 comprehensive high schools, charter schools, postsecondary institutions and adult programs in the network, Rhode Island learners have unprecedented access to a broad array of educational programs.

CTE programs are required to:

- Align to a set of industry-specific career program standards established by the CTE Board
- Include a series of at least three non-duplicative courses, including academic coursework
- Include work-based learning experience for every student aligned to Governor's Workforce Board Guidance and, as applicable, any CTE Board work-based learning standards
- Allow students to earn "culminating credential" of an industry-recognized credential and/or postsecondary credit, as established by the CTE Board
- Help students develop employability skills

Since 2014, the number of CTE programs in the state of Rhode Island has increased from 70 to 226 (280% growth).

Under Rhode Island's CTE Regulations, passed in 2012, students may attend any CTE program in the state, regardless of their home district. This open enrollment policy ensures that 100% of high school students have access to CTE programming in a Priority Sector.

P-TECH

Pathways in Technology Early College High School (P-TECH) offers high school students the opportunity to earn an associate degree while in high school. The P-TECH initiative, based upon IBM's successful grade 9-14 model, helps Rhode Island's high school students prepare and train today for the jobs of tomorrow.

Through collaboration between the state, school districts, the Community College of Rhode Island, and Rhode Island employers, the initial P-TECH programs opened at three high schools (Rogers High School in Newport, Providence Career and Technical Academy, and Westerly High School) in 2016. Two more P-TECH programs launched in fall 2017 at North Providence High School and Woonsocket Area Career and Technical Center. A vital aspect of the P-TECH model involves aligning high school and college coursework to employer needs, creating internships that prepare students to succeed in college and career, and industry mentorship. In 2019, Rhode Island Commerce announced the development of a Center for Advanced Manufacturing at William M. Davies, Jr. Career and Technical High School in Lincoln that is incorporating the key elements of the P-TECH model.

PrepareRI

Rhode Island has created an integrated and aligned statewide system to prepare all students for success in college and career. This umbrella initiative is called Prepare Rhode Island (PrepareRI). PrepareRI launched in 2017, based on a multi-year, interagency PrepareRI Action Plan written jointly by the Governor's Office, the Rhode Island Department of Education, the Governor's Workforce Board, the Office of the Postsecondary Commissioner, and Rhode Island Commerce.

Prepare Rhode Island is one of the most ambitious plans in the nation to improve career readiness. It represents a strategic partnership between the Rhode Island government, private industry leaders, the public education system, universities, and non-profits across the state.

The initiative was built on the belief that all young people – regardless of their background or intended career – will need some form of postsecondary credential and work experience. The goals for the PrepareRI initiative parallel the goals of the Rhode Island CTE Board of Trustees (CTE Board).

Governor's Workforce Board (GWB)

The Rhode Island Governor's Workforce Board (GWB) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. GWB's Board consists of industry leaders from across the state who are appointed by the Governor to oversee workforce development activities statewide. Local Workforce Investment Boards (WIBs) fall under the auspices of GWB, which is part of the PrepareRI umbrella. GWB also has a seat on the CTE Board to further ensure alignment between the CTE Board and the workforce investment boards.

State Initiatives to Increase Career Readiness

Internship Program

Part of PrepareRI's approach has been to work with a Statewide Career Readiness Intermediary to form a bridge between businesses and schools. The organization that won the contract for this intermediary role, Skills for Rhode Island's Future, designed and implemented a summer internship program. Starting in summer 2018, the PrepareRI Internship Program began placing

Rhode Island high school juniors in paid summer internships with the state's top employers in a range of industries. Through a partnership with a local college, students also earn college credit for completing the internship.

The internship program benefits both students and industry. For students, the internships prepare youth with the skills they need to pursue meaningful, fulfilling futures through professional skills training, on-the-job experience, and connections to adult mentors who can help them achieve their career goals. For employers, the internships help diversify their workforce and build a strong pipeline of young, skilled workers who can keep Rhode Island's future economy vibrant and strong.

The PrepareRI Internship Program has seen tremendous growth, interest and success from both students and employers. In the second year of the program (2019), over 10% of all 11th grade students in the state applied. This level of interest is partially the result of an intensive recruitment and awareness campaign from Skills for Rhode Island Future, which placed an emphasis on recruiting students of color and students attending schools with high poverty rates. In 2019, over 326 students were accepted to the program and completed all requirements. Rhode Island plans on continuing to expand the PrepareRI Internship Program in coming years.

Computer Science for Rhode Island

Computer Science for Rhode Island (CS4RI) is among the most comprehensive statewide computer science initiatives in the country. CS4RI uses a coalition approach by combining national initiatives with local expertise to increase and broaden participation in quality computer science education and professional development. This ensures that computer science learning opportunities and access are available to all Rhode Island students in the years ahead.

In 2015, prior to the launch of CS4RI, only 1% of Rhode Island high school students enrolled in Computer Science (CS) courses and 42 students took the Advanced Placement Computer Science exam. No students of color passed. Today Rhode Island is proud to be among the national leaders in CS education with CS offered in 100% of its school districts and every school in the state participating in CS4RI. Many of these CS programs are state-approved programs, and RIDE aims to increase that number.

Through this effort, Rhode Island has seen record adoption of new CS programs in schools around the state, tripled the number of AP programs, and achieved more than a 500% increase in the number of students taking an AP CS exam since 2015. CS4RI has trained more than 940 educators through free, high-quality CS professional development programs, and empowered students to earn more than 2,500 computer science college credits while still in high school at no cost to the students. 18 out of 32 districts have students taking Computer Science related Concurrent or Dual Enrollment Courses through the University of Rhode Island; of those eighteen districts, eight (44%) are urban districts.

On an annual basis, the CS4RI Summit brings together over 2,000 high school and college students, industry professionals, training providers, and community members to showcase projects, research, education, and career opportunities related to computer science and technology. The goal is to excite students from across Rhode Island with the varied educational and career opportunities that result from studying computer science.

PrepareRI Dual Enrollment Fund

Rhode Island is committed to supporting students in taking college courses to earn credit while still in high school. In 2013, the Rhode Island General Assembly passed legislation (RIGL 16-

100) that called for the adoption of a statewide policy for dual enrollment that allows students to take college courses to earn credit at both the secondary school and the higher education institution. Subsequently, the Board of Education adopted regulations in April of 2015 that provide all qualified Rhode Island high school students access to college level coursework while still in high school.

The PrepareRI Dual Enrollment Fund allows any public high school student to access dual enrollment courses with University of Rhode Island (URI), Rhode Island College (RIC), and Community College of Rhode Island (CCRI) at no cost to the student or their family. Each public college has both concurrent and dual enrollment opportunities available to students covered by the PrepareRI Dual Enrollment Fund, but each school has different names for their respective programs.

Students can access college-level courses in two ways by taking:

- Concurrent enrollment courses at their high school: these courses are the same courses that are taught at the college but are approved to be taught at the high school, by the high school teacher.

- Dual enrollment courses at the institution's campus: these courses are part of the institution's regular schedule and are taught by a college professor.

Apprenticeships

Rhode Island has two comprehensive apprenticeship programs, the PrepareRI Youth Apprenticeship program (PRIYA) and Propel America (Propel).

PRIYA is an opportunity for high school seniors to earn while they learn, embarking on a specific career pathway while still in high school. Career pathways available for the 2019-2020 school year include: Pharmacy Technician, Medical Assistant, Process Technologist, and Horticultural and Landscape Technician. PRIYA students are high school seniors that enroll full-time at the Community College of Rhode Island (CCRI), through its Running Start program. Students work part-time, take classes that directly relate to their employment experience, and work closely with their employer and CCRI to coordinate the beginning of a career path while still in high school. Each employer partner works closely with CCRI staff to coordinate touchpoints to CCRI coursework and guidance to and through associate degree programs that directly link to the student's work and career development. Employers are committed to offering flexible scheduling that allows a student to continue working after high school, while a student is working towards a degree at CCRI through the Rhode Island Running Start or enrichment programs.

Propel America (Propel) is a national nonprofit that helps young adults go from high school into a strong career and higher education within one year of high school graduation. Propel connects high schools, job-training organizations, community colleges, and local employers to build a clear path forward for students. Propel is only available to second semester seniors that are due to graduate in the spring.

Individual Learning Plans (ILPs)

As part of RIDE's strategy to prepare every student for college and career, every child in Rhode Island in grades 6-12 is now required to have an Individual Learning Plan (ILP). The ILP is a student-directed planning and monitoring tool that customizes learning opportunities throughout students' secondary school experiences, broadens their perspectives, and supports the attainment of goals. The ILP documents students' interests, needs, supports, course

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selections (including access to college-level programming), transition placements, and other learning experiences both in and out of school. This information produces a thoughtful program of study leading to proficiency for graduation and postsecondary experiences.

The ILP is more than a repository of information about a student; it is a dynamic tool that maps academic plans, and reflects each student's unique set of interests, needs, learning goals and graduation requirements. The ILP process engages all students in a way that advances goal setting, decision-making, and self-advocacy skills that support their lifelong learning.

To support the implementation of ILPs RIDE has:

- Created an ILP framework, adoption toolkit, and school adoption success plan
- Created a menu of state approved ILP platform vendors and provides increased support and training for counselors
- Expanded career exploration programming in middle schools through grants, partnerships with quality curriculum providers, and career fairs
- Hosted the Junior Achievement career fair, which supported nearly 50% of Rhode Island's 8th graders

Career Exploration Grants

PrepareRI has developed the Career Exploration Grant program to support schools in implementing strong career awareness programs beginning in middle school. The grants are intended to accelerate the integration of career exploration activities with existing learning experiences in middle school to help expose students to careers in Priority Sectors. Career Exploration Grants require a partnership between middle schools and industry. In 2019, 18 schools received this grant and are benefiting from ongoing support provided by RIDE and the CTE Board.

For a more detailed discussion of Career Exploration Grants see Section II.C.2.a on page 66.

School Report Cards: Postsecondary Success Index

RIDE values transparency and believes that education data should be as accessible and easy-to-understand as possible.

In 2018, as part of the state's updated system of school accountability under the Every Student Succeeds Act (ESSA), the federal education law, Rhode Island created a new and user-friendly Report Card platform that makes it easier than ever for students, educators, and families to understand how their school community is performing. The Report Card platform displays a range of education data, including student performance, school-level spending, and the results of the state's annual school climate and culture survey (called SurveyWorks).

In 2019, RIDE released new two measures for high schools, collectively called "Diploma Plus." The name refers to the fact that, in today's economy, students need to graduate with a diploma plus additional credentials and specialization. One of the Diploma Plus metrics, called the Postsecondary Success Index, measures how many students graduate with industry-recognized credentials (as defined by the CTE Board) and/or college credit. This index provides schools with a clear incentive to improve their students' career readiness through CTE.

PrepareRI Ambassadors

The PrepareRI Ambassadors are a select group of education leaders who use their expertise, knowledge, and connections to advance PrepareRI's goal of building career pathways for all Rhode Island youth. The Ambassadors have diverse backgrounds, and may be currently working as a superintendent, district administrator, principal, school administrator, teacher, college professor or administrator, community leader, or any other position related to youth career pathways. They have supported RIDE and the CTE Board in understanding the needs of our schools as they advise on the development of policies including work-based learning, subcommittee standards, and teacher certification. Ambassadors continue to work full-time in their previous roles, but commit five hours per week to their Ambassadorship and receive a small stipend.

Ambassadors advance PrepareRI's goals in three key ways. First, the Ambassadors create a toolkit that helps stakeholders in the state implement some component of the PrepareRI Action Plan. Second, the Ambassadors serve as policy advisors, leveraging their expertise to provide feedback and insights to PrepareRI's core team and their fellow ambassadors. Third, Ambassadors are spokespeople for PrepareRI, spreading the goals of PrepareRI through their professional networks, and validating the importance of PrepareRI through their endorsement and participation.

II.B.1.b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)

Governor's Vision

In her 2019 Inaugural Address, Governor Raimondo declared: "We won't stop until every Rhode Islander has a shot at a good paying job. Our world is changing so quickly. This change requires all of us to be lifelong learners. No matter who you are, where you come from or what point you're at in your career, you deserve access to job training, an apprenticeship, and education that will help you get ahead in whatever field you choose." The Governor's challenge envisions a Rhode Island where individuals from all income and skill levels, no matter their present circumstance, can rise up the career ladder and improve the economic circumstances for themselves and their families. In the process, Rhode Island employers receive a distinct competitive advantage in the form of a vibrant and talented labor market from which they can draw.

PrepareRI is the structure Governor Raimondo has used to advance this vision. Stated succinctly, the mission of PrepareRI is to:

Prepare all Rhode Island students for success in college and career

PrepareRI is built around a four-stage process of workforce preparation for all students:

1.Career exploration: Starting no later than 6th grade, students explore a variety of different industries and job sectors to discover their passions. Students then work with a school counselor (or other faculty member) to create an Individual Learning Plan (ILP), which becomes a roadmap to their future career.

2.Expertise: Starting in high school, students build expertise and content knowledge in their specific career field of interest. Students learn through CTE programs and college-level coursework aligned to real-world requirements of their future career.

3.Experience: While skills and knowledge gained in the classroom is important, true mastery involves students applying their skills in the real world of work. All high school students should participate in a rigorous work-based learning experience, such as internships, apprenticeships, industry projects, service learning, or school-based enterprises.

4.Career: Following high school or postsecondary (depending on the career field), students enter the workforce in a high-wage, high-demand industry aligned to their passions.

Goals

The CTE Board has partnered with RIDE to develop long-term goals for CTE. The CTE Board is the driver of creating standards and providing program oversight to ensure students will be prepared to meet the current and future needs of industry, and grow the state's economy.

In order to fulfill this mission, the following goals have been developed based on the labor and economic conditions of our state, future needs of industries, and the strengths of the workforce network. All programs within the state workforce network have committed to these goals, each playing their own respective role within the larger mission. Attaining these goals will not be possible without making significant strides in services to all students, including youth and individuals with barriers to employment. Collectively, these goals create a focus on guiding all Rhode Islanders towards success in the state's economy.

The long-term goal for Rhode Island's CTE programs is for Rhode Island youth to have a job, be enrolled in an educational program, or enlist in the military within six months of graduation.

CTE Programs' Role in Preparing a Skilled Workforce

To achieve the state's long-term goals, CTE programs will:

1. Align to Rhode Island's Priority Sectors and emerging industries, wherever possible, to prepare students for the future Rhode Island economy

2. Provide students with the core academic skills needed for college and career success

3. Allow students to earn college credits and/or an industry-recognized credentials of value

4. Provide students with access to high-quality, rigorous work-based learning experiences that include the development of identified employability skills that meet the CTE Board Standards

5. Connect to career exploration programming in middle schools and students' Individual Learning Plans (ILPs) with a focus on awareness of Priority Sectors and emerging industries

6. Use data-driven decision-making, with the oversight and collaboration of the CTE Board and RIDE

7. Align and leverage funding sources to ensure the quality and growth of CTE programming

8. Build a pipeline of qualified CTE teachers, and continuously improve the practice of the existing teacher workforce through professional learning

RIDE's Office of College and Career Readiness (OCCR) achieves these goals by defining core values and using them to guide how the office operates and makes decisions. OCCR is guided by these four core values:

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• Equity: We value diversity, and provide whatever supports are needed to help all people achieve excellence.

• Learning: We are always hungry to do better, and constantly seek out new opportunities for growth.

• Results: We are unwavering in our goals, but flexible in our approach.

• Partnership: We break down barriers so we can go further together.

Equity is a foundational value of RIDE and the CTE Board. Our CTE system is based on the belief that all students will be prepared for college and career success. Students from special populations will succeed when provided with the necessary resources and supports. It is the state's responsibility to provide those resources and supports to help all of Rhode Island's students thrive in the state's economy.

II.B.1.c. Describe the State's strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965. (Section 122(d)(3) of Perkins V)

CTE Board of Trustees

The Board of Trustees is an employer-majority board responsible for ensuring a comprehensive and coordinated career and technical education system within the state. The 15-member board includes representatives from the private sector, K-12 education, postsecondary education, workforce boards, and economic development agencies.

For more information on the CTE Board, see Section II.B.1.a on page 13. For more information on how the CTE Board sets standards for CTE programs, see section II.B.2.a on page 31.

CTE Statewide Industry Advisories

The CTE Board oversees a number of statewide Industry Advisories, organized around specific industry sectors, which correspond to US ED Career Clusters. Each of these advisories is composed of representatives from schools and industry, and are chaired by a representative from industry and education. For more information on the statewide Industry Advisories, see Section II.B.1.a on page 13.

Alignment to Priority Industry Sectors

Determining Priority Sectors involves expertise in economic modelling, analyzing labor market information, and surveying trends in the local economic landscape. RIDE and the CTE Board rely on the Rhode Island's Long-Term Economic Development Plan, required by state statute and overseen by Rhode Island Commerce, to make these determinations. RIDE and CTE Board, with the advice of the Governor's Workforce Board, maps the plan's Priority Sectors to specific fields in the CTE Board Standards.

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RIDE and the CTE Board (including the related state agencies of the Governor's Office, Commerce, Office of Postsecondary Commissioner, and Governor's Workforce Board) work to ensure CTE programs in the state provide students with a breadth of offerings, but emphasize growth in Priority Sectors. Priority Sectors are industry sectors that are high-skill and high-demand. Rhode Island's CTE system will prepare students for jobs that will provide a rewarding career that will grow over the course of their lifetimes.

For more information on the Priority Sector determination, please see section II.B.2.c.iii on page 40.

CTE Program Approval

Programs must demonstrate industry role in curriculum identification, and overall program endorsement, as part of the approval process. Through the program approval process, schools must provide letters of support from employers and assure ongoing industry involvement through advisory and work-based learning.

Programs must maintain industry relationships and ensure students complete work-based learning as part of each program. The growth of the CTE Industry Advisories has increased the presence of industry in all state programs and supporting schools by aligning programs to employer-identified skills. As identified in the state's WIOA industry and workforce analysis, employers have highlighted a need for all students to be prepared with employability skills and STEM-related skillsets. Program needs are validated through labor market information and student demand. RIDE, Governor's Workforce Board (GWB), and the CTE Board have identified and prioritized work-based learning as a primary strategy for ensuring all students are able to gain these critical employability skills.

Funding for CTE programs

In addition to federal Perkins dollars, RIDE further supports CTE programs with Rhode Island state CTE Categorical Funding. To encourage growth in Priority Sectors, starting in FY19, CTE Categorical Funds are only generated by, and used for, programs in Priority Sectors. Programs receiving CTE Categorical Funds will report on the use of their funds to RIDE and the CTE Board on a quarterly basis.

Statewide Action Plan

In 2016, Rhode Island developed an interagency PrepareRI Action Plan for education and workforce by 2020. The plan led to dramatic improvements in Rhode Island career preparation landscape.

Rhode Island is currently in the process of developing a new five-year plan, for 2020-2025. This plan is being developed to integrate and align directly with this Perkins V plan and the state's WIOA plan, all of which are being drafted together.

PrepareRI

Over the past five years, Rhode Island has worked to align priorities, resources, and processes across the state agencies responsible for economic and workforce development. To build on this work, Rhode Island has decided to submit the Rhode Island State Plan in the overall WIOA state plan. This will help to ensure continued coordination between the responsible agencies.

RIDE plans to continue a core inter-agency working group, known as the PrepareRI Core Team, which had been developed to facilitate inter-agency cooperation to build career pathways for all Rhode Island youth. This group is comprised of representatives from the following agencies:

- Governor's Office (GO)
- Department of Labor and Training (DLT)
- Governor's Workforce Board (GWB)
- RIDE
- Rhode Island Commerce
- Office of Postsecondary Commissioner (OPC)
- Community College of Rhode Island (CCRI)
- Other agencies and/or organizations that lead core programs or policies related to workforce readiness of RI students and adults

Starting in 2017, the PrepareRI Core Team began meeting weekly to leverage the collective power of the major players in Rhode Island's workforce development landscape around a common action plan. The Core Team establishes new strategic priorities, adopted from the long-term Action Plan, every six months and sets monthly benchmarks for expected progress. The Core Team tracks progress on those priorities during every meeting.

In addition to policy and program alignment, this group works to align resources including the coordination of related state and federal funds. This has led to a dramatic increase in programs supporting students' career readiness, as outlined in Section II.B.2.a on page 31.

Once a month, the PrepareRI Core Team provides updates to the leaders of the each of the agencies listed above. Members of this group include: the Commissioner of Elementary and Secondary Education, the Postsecondary Commissioner, the Director of the Department of Labor and Training, the Executive Director of the Governor's Workforce Board, and senior representatives of the Governor. Status updates are given through a conference call coupled with a PowerPoint presentation. Important policy decisions and ways to continue to eliminate barriers for important stakeholders are also discussed during these meetings.

Given the success of the PrepareRI initiative, the Commissioner for RIDE has pushed for the idea of inter-agency teams as a best practice for similar initiatives. In December 2019, the state launched an Adult Education Interagency Core Team. This team is based on the PrepareRI model and brings together a similar group of agencies to better unite the state's efforts to prepare adults for jobs.

Workforce Development Legislation

The strength of the PrepareRI Core Team is that it brings together important stakeholders on a weekly basis, including most of the agencies that oversee workforce development legislation in Rhode Island. This legislation includes:

- RIDE
  - Strengthening Career & Technical Education for the 21st Century Act (Perkins V)
  - Adult Education and Family Literacy (WIOA Title II)
- Department of Labor and Training (DLT)
  - Adult (Title I)
  - Dislocated Worker (Title I)

- o Youth (Title I)
- o Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)
- o Trade Adjustment Assistance for Workers Program (Chapter 2, Title II Trade Act); Jobs for Veterans State Grants (Title 38, Chapter 41)
- o Migrant and Seasonal Farmworker Program (Title I)
- o Senior Community Service Employment Program (Title V Older Americans Act)
- Department of Human Services (DHS)
- o Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)
- o Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)

Governor's Workforce Board (GWB)

The Rhode Island Governor's Workforce Board (GWB) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. GWB ensures that the state workforce activities are aligned with the efforts of economic development, education, workforce development, government, and business stakeholders at the local and state level. This multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Rhode Islanders.

Governor's Workforce Board (GWB) Advisory Committees

RIDE relies on two specific advisory committees to provide input and guidance regarding CTE programs: the Education and Employment Advisory Committee (EEAC) and the Career Pathways Advisory Committee (CPAC).

EEAC is responsible for overseeing programs that ensure adults and out-of-school youth in/or approaching participation in the labor force have access and opportunity to obtain industry and/or postsecondary credentials, and jobs that provide living wages.

CPAC is responsible for overseeing the development and growth of career pathways that connect populations throughout the state with career opportunities. Central to this function is overseeing execution of the state's PrepareRI Action Plan to provide all youth K-24 with access to flexible and quality career pathways programming through high quality delivery models inclusive of, and beyond, traditional CTE. This includes monitoring the implementation of a mixed-delivery career pathways system and holding various parties accountable for outcomes.

RIDE makes it a priority to attend both committee meetings to provide input and support.

WIOA Planning

Weekly meetings of the PrepareRI Core Team facilitated the coordination of alignment between the development of the Perkins Plan and the Workforce Innovation and Opportunity Act (WIOA) Plan. The Core Team recognized an opportunity to align all policies affecting workforce development. This proactive approach will allow key agencies to serve more youth and adult learners in the state of Rhode Island. Youth with Alternative Learning Plans, as well as Opportunity Youth were taken into deep consideration when formulating both plans. (Opportunity Youth are defined as young people between the ages of 16 and 24 who are neither enrolled in school nor participating in the labor market.) Members of the PrepareRI Core Team were intentional about attending Stakeholder Engagement Sessions for both plans.

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II.B.1.d. Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of the Act for purposes under section 124 of the Act. (Section 122(d)(7) of Perkins V)

Each year, Rhode Island will reserve up to 10% of the federal Perkins allocation for the following uses:

- Provide technical assistance to grant recipients including: the use of data for continuous improvement as measured by federal and state metrics; building, maintaining, and strengthening recipient partnerships with industry and community partners; and increasing alignment of policy and programs in support of secondary to postsecondary education transition. The exact amount dedicated to this each year may vary.

- Conduct evaluations of effectiveness of CTE-related technical assistance, policy, and/or programs implemented at the state or local level.

- Increase school buy-in and support of Career and Technical Student Organizations (CTSOs) by dedicating a portion of leadership funds earmarked for these organizations to be distributed to schools through the secondary formula.

- Develop, implement and maintain centralized resources to support student, family and community access to information regarding CTE opportunities, with a focus on ensuring this information is accessible to special populations.

- Provide funding and support to incarcerated youth and adults to receive industry-aligned career and technical education. Rhode Island will reserve at least 2% of its state allocation per Perkins law.

II.B.2. Implementing Career and Technical Education Programs and Programs of Study

II.B.2.a. Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients. (Section 122(d)(4)(A) of Perkins V).

Industry-led development of CTE standards

Rhode Island, through the CTE Board of Trustees (CTE Board), has developed state standards for secondary programs within all 16 career clusters identified by the US Department of Education. These CTE Board Standards identify requirements for coursework, expected postsecondary outcomes (including a "culminating credential" of either industry credentials and/or postsecondary credits), work-based learning, and employability skills. The CTE Board Standards that have been approved by the CTE Board and adopted by RIDE can be found on the RIDE CTE website.

CTE Board Standards are developed by statewide CTE Board Advisories, subcommittees of the CTE Board that are organized around major industry sectors or career clusters. These Advisories are led by two co-chairs: one from industry and one from education. The CTE Board of Trustees voted in 2019 to add representatives from public institutions of higher education as non-voting members of the Board, and to add postsecondary co-chairs to the sector-specific subcommittees. This creates an additional line of continuous communication and collaboration between secondary and postsecondary eligible recipients. The intention of the CTE Board Advisories is to ensure that students graduate high school both college and career ready. The Advisory for each industry sector drafts the CTE Board Standards for career fields within that

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industry. Once finalized, these standards are presented to the full CTE Board for a vote. If approved by the CTE Board, the standards are sent to RIDE for implementation.

All CTE Board of Trustees Standards include the following components:

- CTE curriculum and coursework requirements, including at least a three-course, non-duplicative sequence
- Academic course requirements
- A "culminating credential" of an industry-recognized credential and/or postsecondary credit
- Work-based learning requirements aligned to the Governor's Workforce Board (GWB) guidance, and any relevant CTE Board work-based learning standards
- Industry-specific labor market information, job outlook information, and occupations related to this career cluster
- Identification and development of relevant employability skills
- Any required teacher certifications, as identified by RIDE

Connecting secondary and postsecondary

Each of the secondary CTE programs is mapped to an aligned "Guided Pathway" at the Community College of Rhode Island (CCRI) and University of Rhode Island (URI). Guided Pathways are groups of majors at URI and CCRI, similar to career clusters.

RIDE has mapped the CTE Board Standards for secondary programs to postsecondary Guided Pathways, so all students can easily follow a CTE program of study that spans secondary and postsecondary.

II.B.2.b.i Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will promote continuous improvement in academic achievement and technical skill attainment;

Program Approval and Renewal

Secondary Programs

For secondary programs, RIDE and the CTE Board has established a program approval process in which programs may be approved for terms of up to five years. Components of the application include:

- Evidence of meeting the RIDE CTE Regulations from 2012
- Indicating which of the aforementioned CTE Board Standards the program will meet.
- Demonstrating industry involvement in the development of the program and courses.
- Identifying school-level personnel who will attend regular statewide CTE Board Advisory meetings pertaining to the program's sector.
- Identifying the teachers for the courses in the sequence, and providing evidence of proper certification.

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- Identifying intentional, coordinated alignment of academic, technical, and employability skills.

- Indicating how the program will collect and analyze disaggregated data to support continuous improvement and confirm their state reporting abilities for the state CTE Program accountability system.

- Identifying work-based learning experiences that all students will complete, and which meet GWB guidance and any CTE Board work-based learning standards.

RIDE reviews applications for new CTE programs, and presents its recommendations to the CTE Board for discussion and vote, which may include input from the CTE Advisories. RIDE issues official letters of approval to programs.

RIDE-approved CTE programs will be given an approval designation for up to five years and RIDE reserves the right to withdraw RIDE-approved designation if there are major changes in the structure of the program from what was originally approved, or if student outcomes are consistently not meeting expectations.

Postsecondary Programs

For postsecondary programs, programs will apply through an annual Perkins funding application in which they must demonstrate industry demand, alignment and credit contributions towards available degree programs, data collection mechanisms and processes for analyzing collected data for the purposes of continuous improvement. RIDE-approved CTE programs will be given an approval designation for up to five years, and RIDE reserves the right to withdraw RIDE-approved designation if there are major changes in the structure of the program from what was originally approved, or if student outcomes are consistently not meeting expectations.

CTE Accountability

Beginning in 2019, RIDE began releasing CTE Accountability data based on the statewide CTE Board of Trustees requirements. The goal of this accountability data is to provide more transparency and accountability for programs, allowing districts, schools, and families to make data-driven decisions about the quality of CTE programs in their community. The CTE Accountability metrics were approved by the CTE Board in winter 2018. A key metric in the CTE Accountability system is the program completion rate, a measure of how many graduating students met all state standards in their CTE program.

Professional Learning through CTE Board Industry Subcommittees

CTE Board Advisories meet, at a minimum, twice each academic year. During these meetings, the Advisories may: review overall program operations, identify or validate instructor professional development opportunities, propose any modifications to the CTE Board Standards in their industry cluster or develop a new career-specific standard for growth occupations or emerging industries.

II.B.2.b.ii Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will expand access to career and technical education for special populations.

Statewide Open Enrollment for CTE

Per the CTE Regulations passed in 2012 by Rhode Island's Council on Elementary and Secondary Education, all students shall have the right to request, from their resident Local Education Agency (LEA), access to a RIDE-approved career preparation program of their choice. This right of access shall be limited only by the following three conditions:

1. Availability of enrollment seats;
2. Geographic location; and,
3. Fair, equitable and reasonable admission standards.

Any student denied access to a career preparation program reserves the right of appeal through the policies and procedures managed by the LEA responsible for the denial of access.

Reporting on Admissions to CTE Programs

Local Education Agencies (LEAs) operating RIDE-approved CTE programs have the right to develop and employ appropriate program-specific admission criteria. All admission criteria should comply with all relevant state and federal civil rights laws and regulations. Admissions criteria should:

- Be clearly derived from the academic and instructional demands of the approved CTE program;
- Represent the minimum levels of student readiness so as to reasonably ensure student success in the CTE program;
- Adhere to all relevant RIDE-developed admissions standards; and,
- Not result in discriminatory admissions decisions.

LEAs that employ program-specific admission criteria should develop and implement an admissions policy that is formally adopted and made publicly available. The policy should include no less than (1) the admissions criteria used in the selection process; (2) the application process and continuing enrollment conditions; and (3) a review and appeal process for any student denied admissions to a RIDE approved CTE program.

To fill available seats, RIDE-approved CTE programs shall use a lottery process that fairly and equitably selects students from the entire pool of applicants meeting the minimum admissions standards. When applicable, LEAs shall retain the right to prioritize program enrollment for resident students.

Students denied access to a program based on the admissions process or admissions criteria reserve the right of appeal and the right to apply for another RIDE-approved CTE program of their choice.

Technical Assistance for Analyzing Data

Rhode Island will collect and analyze state and local program data, disaggregated by student subgroup. Recipients are required to review this data regularly for use in program improvement. Rhode Island will focus technical assistance on this analysis and program improvements in support of closing participation or performance gaps.

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Expanding Access

RIDE is expanding access in a number of ways, including:

- Increasing marketing funds available to promote CTE opportunities;
- Launching a new Unified Enrollment Platform: This platform will provide students with the ability to enroll in different courses and programs available through RIDE in one centralized location; and
- Through Equity Grants: grants offered to CTE programs with the objective of closing participation or performance gaps. These grants require applicants to analyze program data, determine a root cause for any participation or performance gap by any student subgroup, and propose an actionable, sustainable solution for addressing the identified gap. Equity Grants are a way to ensure that programs are being designed with student access at the forefront.

II.B.2.b.iii Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V).

Rhode Island will support the inclusion of employability skills in CTE programs by:

The CTE Board, through the CTE Advisories will create a definition of employability skills, and develop a process for measurement of employability skills that will be required for approved secondary CTE programs.

Changing funding and management of career and technical education student organizations (CTSOs) from flat state grants to school-driven investments aligned to programs offered in each school. Rhode Island's program approval will ask schools to indicate if they are aligning CTSOs to programs, how they will integrate into program curriculum and ensure program participation. Rhode Island sees strategic, aligned CTSOs as an opportunity for students to build employability skills. (See the funding section II.C.2.a. on page 66 for more information.)

Ensuring that schools are utilizing comprehensive counseling programs, and in particular Individual Learning Plans (ILP), to promote academic, career, and social emotional development. ILPs are required for all students beginning in sixth grade by the Council on Elementary and Secondary Education's Regulations Governing Secondary Education Environments. ILPs assist in guiding students in possible career paths, while empowering students to take the lead in their own growth.

Including work-based learning as a statewide strategy for students to acquire employability skills. All students in CTE programs are required to meet the Governor's Workforce Board guidance and any relevant CTE Board work-based learning standards.

Ensuring postsecondary programs identify ways that each program will integrate and assess employability skills.

II.B.2.c.i Describe how the eligible agency will make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special

populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;

Unified Enrollment and Information System

While RIDE has an open enrollment policy for CTE programs within the state in Section II.B.1.a on page 15, students and families will only be able to take advantage of this policy if information on programs is easy to access and understand. With that in mind, Rhode Island will develop a centralized enrollment and information system. This tool will help students and families navigate the various programs available to them throughout the state.

Rhode Island has begun efforts to develop this during FY20, with plans to ultimately encompass all CTE, dual and concurrent enrollment, Advanced Course Network, Charter Schools and other opportunities in coming years. This system will include admission processes and enrollment procedures. In January 2020, RIDE issued an RFP for a vendor to fill this role.

Rhode Island will publish CTE Program Report Cards annually. These reports will help students and families make choices about the right opportunity for their needs, and will help schools to determine gaps and needs for program improvement. See Section II.B.2.b.i, page 33 for more information about the CTE Program Report Cards.

Sharing Information with Schools

RIDE is employing multiple channels of communication with school and district personnel to ensure they have the information they need to run successful CTE programs. The structures for communication with schools include:

- CTE Board Meetings and Industry Advisories

o The CTE Board holds public meetings on a regular basis to discuss matters of importance for CTE in the state. Industry Advisories meet to provide industry-sector specific information and discussions.

- Career Coordinators Network

o RIDE organizes statewide monthly meetings with Career Coordinators to disseminate relevant information. The Career Coordinators are staff members at high schools who serve as liaisons between RIDE, school administrators, and students. Currently, nearly 90% of high schools in the state have identified a Career Coordinator.

- PrepareRI Newsletter and Commissioner's Field Memo

o RIDE shares updates with people across the state, including all superintendents, principals, and teachers through the PrepareRI Newsletter (on a monthly basis) and the Commissioner's Field Memo (on a weekly basis).

- PrepareRI Ambassadors

o This group of education and community leaders help to guide PrepareRI's implementation. They use their unique perspective and skills to advise the PrepareRI team, create resources and trainings to help their colleagues, and serve as spokespeople for the initiative.

- PrepareRI Summits

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o Educators and community influencers have an opportunity to gain professional development through PrepareRI Summits. Summits allow for the sharing of best practices, including the implementation toolkits developed by the PrepareRI Ambassadors.

- Employer groups

o Employer groups, trade associations, chambers of commerce, and other related stakeholders will share information relevant to their members.

Career Exploration

Before students fully commit to a CTE program in a particular career field, they should explore the many different possible careers available to them.

RIDE has developed the Career Exploration Grant program to support schools in implementing strong career awareness programs, beginning in middle school, which connect schools and industries, particularly those in Priority Sectors and emerging industries. RIDE began a pilot program of the Career Exploration Grant program in 2019, and provided grants to 18 middle schools. Starting in FY21, the Career Exploration Grants will be offered annually, using Rhode Island's Perkins Reserve Fund.

RIDE is also developing a database of resources to support academic, career, and social emotional development and goal setting as it relates to comprehensive counseling programs and Individual Learning Plans. This tool is targeted for use by educators and administrators in middle and high schools.

II.B.2.c.ii. Describe how the eligible agency will facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;

Participation in CTE Board Advisories

To facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study, Rhode Island requires all state-approved programs to designate school-level personnel to regularly participate in CTE Board Advisories. The advisories are tasked with developing program standards, continuous improvement of state program expectations, and continued alignment with industry expectations, including (but not limited to) work-based learning and employability skills. The CTE Board Advisories are also expected to promote best practices for teaching CTE in their career field.

II.B.2.c.iii. Describe how the eligible agency will use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;

Using Data to Define Priority Sectors

Under Rhode Island General Legislation 42-64.17, the state of Rhode Island must develop a "long-term economic development vision and policy for the state of Rhode Island" every four years. This report, hereafter called the Long-Term Economic Development Plan, provides a detailed analysis of Rhode Island's economy, based on labor market information, historical data, and likely future trends. Rhode Island Commerce manages this report. This report identifies the high-skill, high-demand industry sectors (hereafter called "Priority Sectors") in the state of Rhode Island.

RIDE and the CTE Board, in partnership with Rhode Island Commerce, the Department of Labor, and the Governor's Workforce Board, identify which CTE Board Standards and career fields fall under the Priority Sectors identified in the Long-Term Economic Development Plan.

The first such report was conducted by the Brooking Institution in 2016, and was entitled "Rhode Island Innovates." This report led to the identification of the following Priority Sectors:

- Bioscience
- Business
- Construction
- Defense
- Education & Training
- Healthcare
- Hospitality & Tourism
- Information Technology
- Manufacturing
- Marine Trades

RIDE and the CTE Board have adopted this list for use in prioritizing resources. In order to be eligible for Perkins dollars, all LEAs must have at least one state-approved program in a Priority Sector.

Rhode Island Commerce released an updated Long-Term Economic Development Plan in February 2020 under the title "Rhode Island Innovates 2.0." This new report will be used to update the list of Priority Sectors in the CTE Board Standards document.

Aligning State CTE Funding to Priority Sectors

RIDE will use state, regional, or local labor market data to determine the alignment of eligible recipients' programs of study to the needs of the state, regional, or local economy, including Priority Sectors, and to align career and technical education with such needs.

Established with the support and input of the CTE Funding Working Group in 2018 and the CTE Board, this approach to CTE funding applies the same process to all schools of choice: charters, state schools, and CTE programs. This formula factors in local per pupil costs, state share, and community wealth.

To be eligible for state CTE Categorical Funding, CTE programs must:

- Prepare students for careers in Priority Sectors; and

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- Meet the program standards adopted by the CTE Board

Effective July 1, 2020, CTE Categorical Funding will be invested into the program that generated the funds. Funds may not be reallocated to different CTE programs within the same school.

Each recipient will be required to submit an annual expenditure report detailing how funding was invested. LEAs may request a waiver from some or all of this requirement. Waiver requests must be made to RIDE, which will evaluate the request based on standards set by the CTE Board and notify the CTE Board of any waivers granted at the CTE Board's next meeting. Schools are required to demonstrate business demand through the state program approval process and the local needs assessment.

Rhode Island General Law 16-53 outlines the duties and responsibilities of the CTE Board on the policy principles and goals that govern the distribution of financial assistance from state funds.

II.B.2.c.iv. Describe how the eligible agency will ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;

RIDE will ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations through:

• The program approval process, which considers program recruitment, admission, enrollment and retention policies.

• The program accountability system, which reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE will require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.

• State-coordinated communication through a central information and enrollment platform to be developed in FY20 and FY21.

See Section II.B.3 on page 51 for more information.

II.B.2.c.v. Describe how the eligible agency will coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;

Rhode Island's Board of Education is the chief policy-setting body overseeing K-20 education in Rhode Island. Through its designated powers and duties, the Board helps shape the course of public education to ensure that all of the state's students receive the best possible education. The Board is divided into a Council of K-12 Education and a Council of Postsecondary Education.

The 17-member Rhode Island Board of Education was created by the Rhode Island General Assembly in 2014 and replaced the Board of Regents for Elementary and Secondary Education and the Board of Governors for Higher Education. This consolidated governance of all public education in Rhode Island is an innovative integration of policymaking and planning for elementary, secondary, and higher public education in our state.

In 2012, The Rhode Island Board of Regents for Elementary and Secondary Education approved and adopted, effective July 1, 2012, the Board of Regents Regulations Governing Career and Technical Education (CTE) in Rhode Island, which supersedes all previous rules and regulations pertaining to career and technical education and vocational education. This body is commonly

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called the CTE Board of Trustees (CTE Board). These regulations can be found on RIDE's CTE website.

RIDE is the eligible agency coordinate with the State Board and the CTE Board to support the local development of career pathways.

II.B.2.c.vi. Describe how the eligible agency will support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and

Work-based learning (WBL) allows students to apply their skills in a real-world setting and build competencies that will make them successful in their future careers. Therefore, RIDE and the CTE Board require that all CTE programs in the state include work-based learning.

The CTE Board has adopted the GWB Work-Based Learning Guidance in its standards for programs. Work-based learning in Rhode Island must meet the standards created by the Governor's Workforce Board's (GWB) guidance. CTE programs must also meet any additional work-based learning requirements included in the CTE Board Standards for their career field.

The GWB defines a work-based learning activity as a planned, structured learning experience that provides youth (ages 14-24, in school or out-of-school) with real-life or simulated work experiences where they can develop and apply academic, technical, and essential skills; and contributes to the achievement of their postsecondary and employment goal(s). The GWB is employing a flexible definition of WBL, encompassing the activities below:

- **Internship:** A position for a student or trainee to work in an organization, sometimes without pay, to gain work experience, satisfy requirements for a credential, and/or gain course credit.
- **Apprenticeship:** Highly-formal job training experience that involves studying with a master of the trade on the job.
- **Service learning:** A program or project which combines community service with an outside organization with a structured opportunity for reflection about that service, emphasizing the connections between service experiences and academic learning.
- **School-based enterprise:** Students produce and sell goods or services in the school and learn about business skills and entrepreneurship. This may be part of an entrepreneurship course, and a business professional may serve as a mentor and advisor for the enterprise.
- **Industry project:** Individual, group, or class-wide projects in which students address a real-world, industry-focused question or problem with the guidance of industry professionals.

The GWB recommends that schools, districts, industry partners, businesses, community-based organizations, and others engaged in work-based learning design and implement activities which are safe, follow all State and Federal labor laws, allow students to earn academic credit and/or wages, and meet standards for quality outlined below, and in the additional detailed work-based learning guidance document.

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- **Rigorous:** Skill-based and tied to measurable outcomes. The experience should allow a student to gain measurable skills, whether those be essential skills (also known as professional skills, soft skills, or 21st century skills) or hard technical skills. The entire activity, including corresponding classroom time, should encompass a minimum of eighty hours.
- **Relevant:** Connected to a student's interests, as indicated in his/her Individualized Learning Plan (ILP) and to the real world of work. Projects and tasks should mirror those that exist in a real workplace, and should align to Priority Sectors in Rhode Island.
- **Reflective:** Engages the student in reflection and analysis throughout and after the experience, including guided self-reflection (for example, through the ILP process) and meaningful evaluations from the industry professionals. In this process, students should connect the work-based learning experience to their academic work as well as future professional and educational goals.
- **Interactive:** Providing multiple and extended opportunities for students to interact with industry professionals, whether as supervisors, mentors, advisors, or collaborators.
- **Integrated:** Connected with the student's school-based curriculum. A work-based learning experience is a practical application of academic and/or technical learning and should allow the student to practice the theory learned in the classroom in a real-world setting.

II.B.2.c.vii. Describe how the eligible agency will improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

RIDE will ensure equal outcomes to approved CTE programs of study and activities assisted under this Act for special populations through:

- The **program approval process** which considers program admission, enrollment and retention policies.
- The **program accountability system** which reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE will require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.
- **State-coordinated communication** through a central information and enrollment platform to be developed in FY20 and FY21.
- RIDE will publish **CTE Program Report Cards** annually. These reports require breakouts by student population. These reports will help students and families make choices about the right opportunity for their needs, especially for members of special populations and will help schools to determine gaps and needs for program improvement.

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Equity Grants

For programs for which the data shows that students of special populations are not participating or succeeding, RIDE will offer "Equity Grants" – grants with the objective of closing participation or performance gaps. These grants require applicants to analyze program data, determine a root cause for any participation or performance gap by any student subgroup, and propose an actionable, sustainable solution for addressing the identified gap. Applicants must be able to provide lessons learned and/or materials to support other schools in implementing the action if successful. Ultimately, this strategy will create a database of tested strategies for ensuring equity of access, participation, and performance of all student subgroups. RIDE will consult the CTE Board in making its funding decisions and reporting on outcomes.

This grant program will be available to schools through Perkins Reserve Funds. Grants support the development of resources that can be shared with schools around the state in support of closing participation and performance gaps. Eligible recipients (including secondary and postsecondary applications) must first complete a root cause analysis, then develop a research-based approach to addressing the program. Applicants may then submit a proposal to implement the proposed solution. As a requirement of the grants, the recipient must develop a related toolkit for potential future application and/or lessons learned and analysis of information in cases where improvement was not observed.

The outcomes of the Equity Grant program will live in a database available to educators and administrators with the intent of amplifying financial impact of the grant investment, and ultimately creating a library of proven approaches to participation and/or performance gaps.

Additionally, the CTE Program Report Card reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE may require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.

II.B.2.d. Describe how the eligible agency, if it chooses to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education. (Section 122(d)(4)(D) of Perkins V)

RIDE will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs and/or early college high school through:

PrepareRI Dual Enrollment Fund

Rhode Island General Law 16-100-3(a) of 2012 mandated the creation of a statewide dual enrollment policy that increased access to dual, concurrent, and early college programs for all RI public school students. Further, annually since 2015, Rhode Island has included a fund, the PrepareRI Dual Enrollment Fund, to cover the tuition and fees for all students, thereby eliminating previously experienced financial barriers to the program. The fund includes covering tuition and fees for concurrent enrollment courses that have been embedded in CTE programs. Additional funding from Perkins supports the implementation of the CTE-related courses from the Community College of Rhode Island (CCRI).

Transcripted Credit Requirements

The CTE Board Standards for many career fields identify required postsecondary transcripted college credit requirements. Where identified, programs must demonstrate that all students have the opportunity to earn transcripted college credit to be approved as a state CTE program.

P-TECH

As of 2016, RIDE recognizes the Pathways in Technology Early College High School (P-TECH) model as a CTE program. As of the 2019-20 school year, RIDE has five established P-TECH programs in Rhode Island. Students from any district may enroll in these programs to pursue their high school diploma, an associate degree, and first-in-line employment opportunities with each respective industry partner.

Postsecondary Partnership Grants

Eligible postsecondary institutions may apply for Postsecondary Partnership Grants from Rhode Island's Perkins Reserve Fund to better support transcripted, program-aligned college credit earned while in high school CTE programs, and industry-specific teacher professional development.

Updated Secondary School Regulations

As of 2014, Rhode Island adopted a competency-based model of student learning through the Rhode Island Council on Elementary and Secondary Education's Regulations Governing Secondary Learning Environments. Since that time, Rhode Island has supported schools in adopting competency-based approaches through partnerships with the Center for Collaborative Education and the Nellie Mae Foundation, the Rhode Island Foundation and other partners.

II.B.2.e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d) (12) of Perkins V)

As previously described, RIDE will involve parents, academic and CTE teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its CTE programs, through:

- The public publishing of a central enrollment and information system
- The public publishing of CTE Program Report Cards
- Public CTE Board meetings and CTE Board Advisories meetings

Further, since fall 2017, RIDE has hosted a public event, known as the PrepareRI Summit, which serves as an opportunity for sharing opportunities and engaging various stakeholders in state priorities regarding college and career readiness. As part of the PrepareRI initiative, Rhode Island has hired PrepareRI Ambassadors – parents, community leaders, educators, and industry representatives – to take on discrete projects to increase engagement with specific communities, develop toolkits for implementing state initiatives, and provide stakeholder voice in policy and program development. PrepareRI Ambassadors lead sessions at the PrepareRI Summits to gather input and/or share out their projects with the state

II.B.2.f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V.

Perkins V Funding Application

OVERVIEW

CTE career preparation programs, initiatives, and planning activities must include a budget and budget narrative detailing how the CTE program funds will be budgeted to achieve the desired goals as described in the Comprehensive Local Needs Assessment (Needs Assessment). All funding applications must also indicate the milestones that will be used to progress monitor and track progress toward continuous improvement.

This application picks up where the Needs Assessment left off. How funds are budgeted for the 2020-21 program year should reflect year 1 expenditures of the two-year Theory of Action described in Section 6 of the Needs Assessment.

Submit your application no later than 11:59PM June 14th.

INSTRUCTIONS

The funding application is divided into the following sections:

Section 1: Alignment Analysis

Section 2: Budget (Excel File)

Section 3: Budget Narrative

Section 4: Progress Monitoring

SECTION 1: Needs Assessment Alignment Analysis

1. Refer to Section 6, Part 1 and review the 1-sentence summaries provided.

2. Next, for each of the SMART goals identified in Part 2 of Section 6, provide a summary of the way(s) in which funding priorities align to each goal. Limit your responses to 100 words or less.

SMART Goal 1 Alignment

SMART Goal 2 Alignment

SMART Goal 3 Alignment

SMART Goal 4 Alignment

SMART Goal 5 Alignment

SECTION 2: Budget

Provide a full accounting of how you intend to fund your CTE programs to achieve your goals. Include both state categorical and federal Perkins V funding in the budget below.

As a reminder, Effective July 1, 2020, CTE Categorical funding shall be invested into the program that generated the funds. Funds may not be reallocated to different CTE programs within the same school. Each recipient will be required to submit an annual expenditure report detailing how funding was invested. LEAs may request a waiver from some or all of this requirement. Waiver requests must be made to RIDE, which will evaluate the request based on standards set by the CTE Board, and notify the CTE Board of any waivers granted at the CTE Board's next meeting.

CTE Funding Budget Summary (by Object Code/UCOA) – Excel Spreadsheet

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	State Categorical	Perkins V Federal Funding	Total Budgeted
51000-Personnel Services-Compensation			
52000-Personnel Services-Employee Benefits			
53000-Purchased Professional & Technical Services			
54000-Purchased Property Services			
55000-Other Purchased Services			
56000-Supplies & Materials			
57000-Property & Equipment			
58000-Miscellaneous			
60000-Indirect Costs			

Need to provide indirect cost rate.

SECTION 3: Budget Narrative

Part 1: Describe how you plan to utilize state categorical and Perkins funds to support key program components. Limit your response for each component to 100 words or less.

1. Meeting CTE Board Standards

2. Work-based learning opportunities (5 areas)

3. Advanced coursework and/or industry credentials

4. Teacher recruitment, training and ongoing professional development

5. Property/Equipment

6. Program Scope

7. Equity, Access & Participation Supports

8. Individualized Learning Plan

Part 2, Budget Rationale: Why is this the most efficient use of funds for the 2020-21 program year? In what ways does the budget support the highest "return on investment" or ROI?

SECTION 4: Progress Monitoring

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Describe the desired outcomes as well as the frequency and process by which you will reflect on those outcomes? These may be the SMART goals you created in the Needs Assessment or a "milestone" designed to measure growth towards achieving a goal by the end of the 2021-22 school year. Consider what data you will routinely analyze as a part of progress monitoring and use the template below to share your plan.

2020-21 Progress Monitoring Plan

Outcome 1:	
Data to Examine:	Frequency:
Outcome 2:	
Data to Examine:	Frequency:
Outcome 3:	
Data to Examine:	Frequency:
Outcome 4:	
Data to Examine:	Frequency:
Outcome 5:	
Data to Examine:	Frequency:

II.B.2.g Include a copy of the local needs assessment template that the eligible agency will require eligible recipients to submit pursuant to section 134(c) of Perkins V.

Comprehensive Local Needs Assessment

OVERVIEW

The Strengthening Career and Technical Education for the 21st Century Act, otherwise known as Perkins V, was signed into law in July 2018. This legislation reauthorized the Carl D. Perkins Career and Technical Education Act of 2006 which governs the federal support for career and technical education (CTE). One of the most significant changes introduced in Perkins V is the new Comprehensive Local Needs Assessment (Needs Assessment).

Specifically, the legislation states, "To be eligible to receive financial assistance under this part, an eligible recipient shall — (A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than once every 2 years, update such comprehensive local needs assessment."

Section 134(c) of Perkins V describes requirements for the Needs Assessment. Secondary and postsecondary eligible recipients shall include the following steps in the process:

1. Organize group of stakeholders

2. Analyze student and labor market data

3. Evaluate current CTE programs

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4. Create strategies and actionable activities

Purpose

The purpose of the Needs Assessment is to align planning, spending, and accountability activities under Perkins V to support high-quality CTE programs. As part of the Rhode Island CTE program approval process, applicants must first submit a Needs Assessment to inform the local application. The program approval application due later this spring will build on this work and explain how the program will address the needs identified in the Needs Assessment. Any gap areas identified through the development of the Needs Assessment should directly align to the goals and action steps in the RI Local Application.

Stakeholder Engagement

The Needs Assessment should be developed in partnership with a diverse group of stakeholders. The law specifies that, at a minimum, the following stakeholders should be included:

- CTE program representatives at the secondary and postsecondary levels, including teachers, faculty, administrators, career guidance and advisement professionals, and other staff
- State or local workforce development board representatives
- Representatives from a range of local businesses and industries
- Parents and students
- Representatives of special populations

During school closures due to COVID-19, LEAs are encouraged to leverage virtual meetings and stakeholder conference calls to gather feedback. RIDE acknowledges that these are unusual times. For this reason, LEAs may want to also review notes and insights from previous meetings with local advisories, industry partners and the CTE Board of Trustees. Stakeholder engagement does not have to occur all at once, nor does it have to include every stakeholder in a single meeting.

Data

A strong CLNA is based on data. The RI Report Card site provides Diploma Plus metrics, including a Postsecondary Success Index Score which includes the number of 2018 graduates that earned a CTE credential. Dive deeper and examine program concentrator data in aggregate and by subgroup. Graduation rates, proficiency percentages and program enrollment data are required data points for every Needs Assessment.

Alignment analysis of local programs to CTE Career Field Standards as well as the RIDE CTE Program Standards are all data to consider.

Root Cause Analysis

A needs assessment attempts to identify the underlying factors or “root causes” that explain why a performance gap exists. There are many protocols and frameworks for conducting a root cause analysis, all of which ultimately boil down to asking "why?" until useful responses stop coming or the solution falls outside of District/Center control2. Engage stakeholders through this process or a similar one to examine data and gather feedback.

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Needs Assessment Instructions

Rhode Island CTE programs exist to provide all Rhode Island students with skills, experiences, and credentials that will propel their success in life and the workforce. The Needs Assessment is a tool designed to support LEA's through a process that will identify the underlying factors within a school or district's control that explain any gaps in CTE programming, quality and access. Any conclusions from this process will then become critical inputs for the Program Approval Application.

The Needs Assessment is divided into the following sections:

- Student Performance: the extent to which students are currently achieving the necessary skills and indicators of readiness, both in aggregate and by subgroups
- Labor Market Needs: the skills and areas where students will find opportunities for success in the future
- Student Access & Participation: the extent to which all students have access to and are accessing CTE
- Program Scope & Alignment: the ability of current programs to prepare students for success
- Educator Recruitment, Retention & Training: the tools and experiences educators will require in order to prepare students for the opportunities of the future
- Conclusions: a summary of the findings that have surfaced as a result of the analysis and the theory of action that will transform CTE programs in your community.

Complete the Needs Assessment Survey by 11:59 p.m. on June 14, 2020 to share insights and highlights from data dives and stakeholder feedback. Instructions are provided in more detail below.

Please Note:

- Each section includes short answer questions as well as a long answer summary. Complete all questions.
- The survey cannot be saved and continued at a later date. Instead, use this document and supporting links to prepare responses in advance and paste them into the form.
- Additional resources can be found on the CTE landing page, including a Briefing Deck and Frequently Asked Questions (FAQs).

Cover Sheet

Be prepared to provide basic contact information for the District/Institution as well as contact information for the individual completing the form. Two data points are requested:

- List the approved CTE programs that currently operate in the district/institution and also provide for which CTE Board Standard each has been approved.
- What is the current total enrollment for all CTE programs in the district/institution?

Stakeholder Engagement Contact Information

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Provide the names and contact information for those individuals who cEontributed to the Needs Assessment. Download and complete the Stakeholder Engagement Tracker in advance and upload it when you complete the survey. Include the District/Center Name in the name of file.

SECTION 1: Student Performance

How well are our students performing? What can we do to increase performance across all subgroups?

Short Answer Questions:

Using the RI Report Card Postsecondary Success Index data and CTE Standards, answer the following questions:

- How many of our CTE concentrators earning industry-recognized credentials, as recognized in the CTE Board Standards? Do you see any patterns in who earns industry-recognized credentials and who does not?
- Are specific subgroups more or less likely to earn industry recognized credentials? What is driving those differences in performances?

Using the local CTE performance data (e.g. concentrator achievement by program, by subgroup, by priority sector, etc.), answer the following questions:

- How are learners from different genders, races and ethnicities performing in our programs? Break this analysis down at the LEA level, program level, and disaggregate by Priority Sector programs and non-Priority Sector programs and share high level insights.
- (Secondary Only) Which CTE concentrators are succeeding in the CTE course sequences' academic coursework (including advanced coursework and dual/concurrent enrollment)? Have specific subgroups been more or less successful?

Analysis Summary (Long Answer): What root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 2: Labor Market Alignment

How well are programs aligned with state, regional and local workforce and career needs?

Short Answer Questions:

1. What lessons have we learned from participants of our program about how our program prepares students for the labor market? What patterns do we see with the skills they demonstrate or jobs they end up doing?

Examine Rhode Island Labor Market information and review pages 35-61 of the Rhode Island Commerce Corporation report and answer the following questions:

1. What are the highest projected growth industries in our region? What occupations are part of that industry?
2. How are the CTE programs we offered aligned to the demand? How do we know?

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Section 2 Analysis Summary (Long Answer): Provide a summary of lessons learned, patterns of success and areas of concern from the prompts above? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 3: Student Access & Participation

Do we ensure that all students have access and support to our CTE programs?

Short Answer Questions:

Examine local data to answer the questions below, including:

- Program application (student-level) data,
- Acceptance (student-level) data
- Program Completion (student-level) data
- District Individualized Learning Plan

1. Who is currently entering (or applying to enter) our CTE programs? In your response, consider whether all student subgroups are applying to or entering programs proportionately to the school population.
2. How does participation in some programs compare to other CTE programs we have? What are the differences? Does participation match the demographics of our school?
3. What efforts have been made to recruit and retain diverse populations of learners into our programs, particularly in programs leading to Priority Sector career fields and occupations?
4. What barriers might students requiring extra supports (credit recovery, language acquisition programs, and or developmental core content) face in accessing our programs? What supports do we provide to serve students with special needs?

Secondary-only prompts:

1. If we accept students from out of district, are some student subgroups more or less represented in who applies or attends?
2. Are students utilizing their Individual Learning Plans and school counseling to determine a program? What evidence do we have?
3. Are middle school career exploration programs supporting all or some of our programs?

Section 3 Analysis Summary (Long Answer): What potential root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 4: Program Scope & Alignment

Are our current programs able to meet the needs of students to enter high wage, high demand career opportunities? For detailed information about secondary funding eligibility, see Section II.C.1 of the Perkins V State Plan.

Short Answer Questions:

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Using CTE Board Standards, answer the following questions:

1. Are our programs meeting the full requirements of the CTE Board Standards for which they were approved? How could we better meet or exceed the standards included in that document?

1. How do course offerings in each program build upon each other, from basic knowledge and skills to more complex knowledge and skills?

Using the Governor's Workforce Board Work-based Learning Activities and Standards Guidelines, answer the following questions:

1. What work-based learning experiences (industry projects, service learning, internships, apprenticeships and/or school-based enterprises) are available within our programs?

1. Are learning experiences of sufficient scope to meet the needs of all students? How do we know?

Section 4 Analysis Summary (Long Answer): Provide a summary of lessons learned, patterns of success and areas of concern. Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 5: Educator Recruitment, Retention & Training

How can we improve recruitment, retention, and training of CTE teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions?

Short Answer Questions:

Using CTE teacher certification requirements, the RIDE eCert portal, and local data sources (i.e. teacher Professional Learning Units, surveys, professional development calendar, etc.), answer the following questions:

1. Do we have adequate staff credentialed to teach our CTE programs? How do we know? What gaps exist, if any, and what is our plan to minimize them?

2. What processes are in place to recruit, induct and retain faculty and staff? Are these processes efficient and effective, especially for instructors coming from industry? How recently have teachers had program-related work experience?

3. What steps are we taking to ensure our staff/faculty reflect the demographic makeup of our student body?

4. How often do we offer regular, substantive professional development opportunities for faculty, staff and administrators, including involvement in student advising? How effective are these experiences at improving student outcomes? What evidence do we have?

5. Are there patterns of higher CTE concentrator achievement in programs that have educators with specific education type, certification types, and specific types/lengths of experience or professional development opportunities?

Section 5 Analysis Summary (Long Answer): What potential root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

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SECTION 6: Conclusions

Now that you have thoroughly examined the data and discussed the underlying factors that explain any gaps in current programs (and highlights the strengths as well), create a one page summary to guide your strategy moving forward. Organize the one-pager into two parts.

Part 1: Needs Assessment Findings

Provide a 1-sentence summary of your findings for each section of your needs assessment.

- Based on your observations of the data and determination of root causes of those observations from each component, what conclusions are you drawing about the needs of your current program? Which programs are the strongest? Which need to be transformed or retired? What feedback and/or data provided the most "food for thought"?

Part 2: Theory of Action

Create a drawing or outline to summarize what will happen next to transform CTE in your community. Provide 1) an aspirational vision for CTE in your community; 3-5 key levers or strategies that you will enact to realize that vision; and the 3-5 SMART goals you are aiming for to ultimately transform CTE in your community.

Think about the theory of action as an "if-then" scenario. The "ifs" are the 3-5 key levers or strategies while the "thens" are the 3-5 corresponding goals you are you are aiming to achieve.

As a reminder, SMART goals are Specific, Measurable, Achievable, Relevant and Time bound.

Use the following template to organize the one-pager:

Summary
Section 1. Student Performance:
Section 2. Labor Market Alignment:
Section 3. Student Access & Participation:
Section 4. Program Scope & Alignment:
Section 5. Teacher Recruitment, Retention & Training:
Vision:
Strategies
1.
2.
3.
4.
5.

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Summary

II.B.2.h Provide the definition for "size, scope, and quality" that the eligible agency will use to make funds available to eligible recipients pursuant to section 135(B) of Perkins V.

Size, Scope, & Quality: Secondary

Perkins funds may only be spent on CTE programs that have been state-approved or have received preapproval. Preapproved programs will have 18 months to receive full state approval.

In order to be considered for state approval, all secondary CTE programs must include all of the following:

- Include at least three non-duplicative courses that meet CTE Board Standards
- Meet RIDE's CTE Regulations from 2012
- Meet CTE Board Standards, culminating in students earning CTE Board-recognized credentials or credit
- Include work-based learning experience for every student aligned to Governor's Workforce Board (GWB) guidance and, as applicable, any CTE Board work-based learning standards
- Evidence that all CTE teachers have proper certification
- Evidence that students are provided opportunities to demonstrate employability skills

Additionally, LEAs must have:

- At least one state-approved program in a Priority Sector; or be developing such a program, receive pre-approval from RIDE and the CTE Board, and submit it for approval within 18 months of first fund use.
- Non-discriminatory admissions policies

For more detailed information about secondary funding eligibility, see Section II.C.1 on page 58.

Size, Scope, & Quality: Postsecondary

The only postsecondary institution receiving local formula funds in Rhode Island is the Community College of Rhode Island (CCRI). Other postsecondary institutions in Rhode Island, including both public and private institutions, may receive Perkins funds through the Reserve Fund, via competitive Postsecondary Partnership Grants.

All courses for secondary school students paid for by Perkins dollars must offer students transcripted academic credit that is transferrable to other universities. Courses that offer articulated credit (that is, credit which is only accepted at the issuing postsecondary institution) are not eligible for Perkins funds.

Postsecondary Programs for K-12 Students

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Funded programs may offer courses via dual enrollment or concurrent enrollment. Dual enrollment courses are courses offered at the postsecondary institution. Concurrent enrollment courses are courses offered at the high school by an instructor approved by the postsecondary institution. To be eligible for Perkins funds, concurrent enrollment courses must meet the same standards of quality and rigor as dual enrollment courses. Funded programs may be asked to present to the CTE Board.

Postsecondary Programs for Postsecondary Students

College-level programming must lead to students earning industry-recognized credentials of value. Programs must embed work-based learning opportunities and employability skills training aligned to relevant state standards. Programs must engage students in some form of career counseling. Funded programs may be asked to present to the CTE Board.

For more detailed information about postsecondary funding eligibility, see Section II.C.1.

II.B.3. Meeting the Needs of Special Populations

II.B.3.a. Describe the eligible agency's program strategies for special populations, including a description of how individuals who are members of special populations—

1. ***will be provided with equal access to activities assisted under this Act;***
1. ***will not be discriminated against on the basis of status as a member of a special population;***
1. ***will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;***
1. ***will be provided with appropriate accommodations; and***
1. ***will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)***

RIDE has long fought to ensure students with disabilities receive the support they need to meet high expectations, and exit the public education system as productive citizens, lifelong learners, and contributing members of the workforce. RIDE strives to ensure that individuals with diverse learning needs and children receiving special education services are provided access to a rigorous public education—including, but not limited to, CTE programs—and that schools develop effective strategies for meeting the needs of these unique learners.

RIDE is responsible for advancing the education of:

- Children and youth with disabilities who require special education.
- Children and youth who are English Language Learners (ELL), Multi-Lingual Learners (MLL), or Limited English Proficient/Non-English Speaking (LEP).
- Children and youth who are disadvantaged and/or participate in Title I, who are experiencing homelessness, and/or who are neglected, delinquent, or at-risk.
- Children and youth who are gifted or Learning Beyond Grade Level.

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- Children and youth who learn through Expanded Learning Opportunities (ELOs). This includes after-school or summer programs, which support learning opportunities for students outside of the regular school day or school year.

- Children and youth whose health and safety are advanced through nurturing school environments.

RIDE is currently working on a Multi-Tiered System of Support (MTSS), which is a framework for ensuring all students receive the support they need to be successful. This framework ensures that all students are supported for meeting academic, behavioral, and social-emotional outcomes. CTE is for all students, and that means all students—including multilingual learners, differently-abled students, and any student who needs more support to be successful. RIDE believes any student can be successful, if given the proper supports.

In a Multi-Tiered System of Support, all students have equitable access to strong, effective core instruction using high-quality curriculum and differentiated instructional practices at Tier 1, evidence-based group interventions at Tier 2, and intensive, evidence-based interventions at Tier 3. (See diagram below.) By providing these supports in schools and communities where children and youth in special populations reside and visit, Rhode Island's education system is setting students up for success.

Multi-Tiered System of Support (MTSS)

RIDE aims to be a champion for educational equity, and has committed to lead the way in addressing inequities of the past by focusing on providing learning opportunities for all students. RIDE will maintain a relentless focus on student outcomes that ensures stakeholders deliver on the promise of equity for all students. RIDE will strive to ensure individuals of special populations are able to access CTE programs, including programs in Priority Sectors. All students should be able to earn credentials and complete work-based learning experiences that prepare them for further learning and for competitive, integrated employment. RIDE will achieve this vision for inclusive CTE through the following mechanisms:

- In applications for the creation or renewal of CTE programs, programs must provide evidence that they provide adequate supports, staffing, and/or resources for students with Individualized Education Plans (IEPs).

- Through yearly reporting and applications for new/renewed programs, LEAs must demonstrate that any program utilizing Perkins funding maintains inclusive, nondiscriminatory admission, enrollment, and retention policies. This includes both in-district and out-of-district student enrollment.

- RIDE will increase communication and access to program opportunities through a statewide unified enrollment and information system for students. RIDE will begin rolling out this system in FY21.

- In the annual reports required of all programs receiving Perkins formula funds, programs must report disaggregated student outcome data. RIDE and the CTE Board may ask programs with participation or performances gaps to conduct a needs analysis and action plan.

- RIDE will provide technical assistance to support schools in analyzing disaggregated program data, and implementing evidence-backed strategies for supporting student from special populations.

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- RIDE will provide professional development to help special educators, counselors, teachers, and other school personnel work with students to align IEPs with Individual Learning Plans (ILPs) that provide students with a roadmap for how to develop the academic, career, social-emotional, and employability skills they need for postsecondary success.

- RIDE will ensure CTE programs meet federal Office of Civil Rights (OCR) requirements through regular reviews, as overseen by OCR.

Schools should provide access to CTE programs to members of special populations in accordance with their interests and career goals —not based on their status as members of a special population. Perkins fund recipients are encouraged to work together to assess performance data for all students across all special populations, to identify performance gaps and trends, and subsequently select strategies to address any inequalities in student performance.

RIDE intends to use the annual Equity Grants program, funded through Perkins Reserve Funds, to encourage schools to develop innovative supports for students from special populations. During and after the term of their Equity Grant, recipients will work with RIDE to provide professional development to other schools that are struggling with similar equity gaps. This process will help develop a community of practice that works together to spread best practices for serving students with diverse needs. The Equity Grants should thus help Rhode Island develop reality-tested resources for how to serve all students in CTE programs, and help create a culture among Rhode Island's CTE programs that prioritizes equity.

II.B.4. Preparing Teachers and Faculty

II.B.4.a. Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)

CTE Teacher Pipeline

RIDE will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals, to provide world-class CTE instruction in Rhode Island. RIDE is adopting a few strategies, outlined below, to build the teaching corps that Rhode Island's CTE students deserve.

CTE Teacher Certification

RIDE has been working to make it easier for schools to hire qualified professionals to teach CTE in Rhode Island. In December 2019, the Council on Elementary and Secondary education passed revisions to the teacher certification regulations to better align RIDE's requirements with industry requirements. Previously, all CTE teachers were required to hold a bachelor's degree to become a certified teacher, regardless of their level of expertise in their career field or the standard degree expectation for that field. This policy had the unintended effect of keeping many qualified mid-career professionals from teaching CTE programs.

The revised regulations provide more flexibility around the degree requirements for CTE teachers. CTE teachers must have whatever level degree is typical for the career field they teach. For example, CTE programs in many trade professions do not require a bachelor's degree, but

computer science programs do require one. To determine the degree requirements expected by industry, RIDE adopted the recommendations of industry and education professionals in each of the career field Advisories of the state CTE Board.

CTE Teacher Grant

RIDE will leverage part of the secondary Perkins Reserve Fund for CTE Teacher Grants, which support the certification and training of CTE teachers. For more information, see section II.C.2.a on page 66.

CTE Teacher Certification at Roger Williams University

A key component of developing a robust CTE teacher pipeline is making CTE teacher certification programs easily accessible to potential teachers. Unfortunately, until a few years ago, Rhode Island did not have any approved CTE teacher certification programs in the entire state. To address that issue, RIDE released a request for proposal (RFP) to launch an in-state CTE teacher certification program. This led to the creation of the CTE Teacher Certification program at Roger Williams University, a private college in Rhode Island. The program is located at Roger Williams's University College and provides a competency-based education designed with working adults in mind. Assignments are designed to be practical, job-embedded, and closely connected to classroom learning. Micro-courses are held each month with additional learning experiences, resources, and assignments available at all times. The program launched in fall 2019.

Teacher Endorsements

Under the revised teacher certification regulations passed in 2019, RIDE created the opportunity for teachers to earn micro-credentials, called "endorsements," to demonstrate expertise in a particular subject area. In 2020, the Council on Elementary and Secondary Education approved a Computer Science Endorsement. This endorsement was created to encourage and recognize teachers who have demonstrated expertise in computer science, one of the CTE Priority Sectors RIDE is hoping to expand. RIDE will evaluate the impact of the Computer Science Endorsement on the state's computer science teaching corps, to determine if such a similar approach should be adopted for other CTE career fields.

Professional Learning

While Rhode Island needs a strong pipeline to get qualified CTE teachers in front of students, these teachers also need ongoing learning and professional development to be effective. RIDE understands that both teachers and students should engage in a process of continuous learning and improvement.

PrepareRI Summits

Starting in fall 2017, RIDE and the PrepareRI partner agencies began hosting PrepareRI Summits, a statewide conference for leaders from schools, industries, and colleges. At the Summits, these cross-sector stakeholders meet each other and learn about state and local efforts to build career pathways for Rhode Island's young people.

Career Coordinators Network

In 2018, RIDE asked every high school in Rhode Island to designate a "Career Coordinator," a staff member who serves as the point person for employer partnerships and coordinates work-based learning. As of January 2020, nearly 90% of Rhode Island's high schools had designated a Career Coordinator and submitted that person's contact information to RIDE. Beginning in the

2018-19 school year, RIDE began convening a monthly statewide professional development session for Career Coordinators, dubbed the Career Coordinator Network. This forum allows RIDE to share information related to career pathways work with personnel at nearly every high school in the state and creates a professional learning community focused on sharing best practices.

Professional Learning Communities for Individual Learning Plans

Starting in the 2019-20 school year, RIDE began hosting a Professional Learning Community (PLC) for school counselors. The focus of these PLCs is helping school counselors work with students to develop Individual Learning Plans (ILPs) that help students plan how to navigate their K-12 experience to prepare for a career aligned to their passions.

C. FISCAL RESPONSIBILITY

- 1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—
    - a. Each eligible recipient will promote academic achievement;
    - b. Each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and
    - c. Each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)
- 2. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed—
    - a. Among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace; and
    - b. Among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace. (Section 122(d)(8) of Perkins V)
- 3. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State. (Section 131(g) of Perkins V)
- 4. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.
- 5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the

population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)

- 6. If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—
    - a. Include a proposal for such an alternative formula; and
    - b. Describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

- 7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—
    - a. Include a proposal for such an alternative formula; and
    - b. Describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

- 8. Provide the State's fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort, and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

II.C. Fiscal Responsibility

II.C.1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—

a) each eligible recipient will promote academic achievement;

b) each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential;

Eligibility Criteria: Secondary Schools

State Approval

Perkins funds may only be spent on CTE programs that have been state-approved. Funds may be spent to seed new programs if the program has received pre-approval from RIDE and the CTE Board; such programs must be submitted for state approval within 18 months of first fund use.

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All CTE programs must meet RIDE requirements for "size, scope, and quality" (see Section II.B.2.h on page 48 above. Specifically, programs must:

- Include at least three non-duplicative courses and meet RIDE's CTE Regulations from 2012
- Align to CTE Board program standards, culminating in students earning CTE Board-recognized credentials or credit
- Include work-based learning experience for every student aligned to Governor's Workforce Board (GWB) guidance and any CTE Board work-based learning standards
- Teach employability skills

The state approval process is designed to ensure that all CTE programs in the state provide students with skills that are actually valued by Rhode Island employers. The CTE Board Standards, which are developed by Industry Advisories consisting of representatives from both education and industry, set standards that include recognized postsecondary or industry credentials, as well as requirements regarding academic course sequences.

Priority Sectors

To be eligible for Perkins funds, LEAs must have at least one state-approved program in a Priority Sector, as defined in Rhode Island's Long-Term Economic Development Plan and adopted by RIDE. If the LEA does not yet have a state-approved Priority Sector program, LEAs may receive Perkins funds if they receive pre-approval from RIDE and the CTE Board for a Priority Sector program; such programs must be submitted for full state approval within 18 months of first fund use.

The Perkins funds that LEAs receive do not need to be solely spent on the LEA's Priority Sector programs; they may be spent on any state-approved CTE program within the LEA. By contrast, state CTE Categorical funds may only be used for CTE programs in Priority Sectors.

Admissions

Rhode Island's CTE Regulations from 2012 allow students to enroll in any CTE program in the state, including those at high schools outside the LEA of their residence. To be eligible for Perkins funds, LEAs cannot have discriminatory admissions processes for their CTE programs. This includes restricting access based on race, gender, disability status (IEP), language, and/or income status.

Programs must report admissions requirements to RIDE and the number of students admitted/rejected from different student populations annually. RIDE and the CTE Board reserve the right to identify programs with admissions policies that have a disproportionate impact on student subpopulations, and will work with schools to develop admissions requirements that ensure all student groups are equitably served by CTE programs.

Use of Funds

RIDE and the CTE Board will issue use-of-funds guidance to support an effective use of Perkins formula funding. It will outline effective strategies for increasing the career readiness of youth.

Middle schools. Recipients will be eligible to use up to 10% of their Perkins allocation for career exploration activities and programs in grades 5 to 8. The primary objective of these allocations

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should be career exploration programming that helps middle school students identify which career fields and CTE programs interest them.

Non-instructional expenses. RIDE reserves the right to set a cap on the allowable percentage of Perkins funds spent on non-instructional expenses.

Funding Application

Rhode Island will release an annual application for Perkins funding. This application may include a narrative application, required evidence, and budget. The application's focus will be how the program will use the funds to meet the CTE Board Standards and prepare students for career success. RIDE and the CTE Board are focused on maximizing the return on investment (ROI) of Perkins dollars on student outcomes.

RIDE and the CTE Board shall create a process for review of eligible recipients to present their annual funding application, proposed budget, and needs assessment to the CTE Board and RIDE. All programs may be required to follow this process; the CTE Board and RIDE will jointly decide which programs must follow this presentation process in a given year.

If programs need to modify their approved budgets, they must notify RIDE and the CTE Board. Major modifications require prior approval from RIDE.

Annual Reporting

All LEAs are required to submit data and a year-end report to RIDE every year. This data submission will be used for RIDE's school-level Report Cards under ESSA, as well as for program-level CTE Program Report Cards.

If these annual reports indicate the program is not meeting expectations for student outcomes, RIDE and the CTE Board reserve the right to work with CTE programs to improve those outcomes.

Programs are required to report any changes to their program related to their ability to meet RIDE and CTE Board Standards. For example, if programs change the course sequence within the term of their approval, they must notify RIDE and CTE Board. If the new course sequence does not meet CTE Board Standard for which they were originally approved, they may lose their RIDE approval.

Eligibility Criteria: Postsecondary Institutions

The only postsecondary institution receiving local formula funds in Rhode Island is the Community College of Rhode Island (CCRI). Other postsecondary institutions in Rhode Island, including both public and private institutions, may receive Perkins funds through the Reserve Fund, via competitive Postsecondary Partnership Grants.

Postsecondary Programs Serving Secondary Students

All courses for secondary school students paid for by Perkins dollars must offer students transcripted academic credit that is transferrable to other universities. Courses that offer articulated credit (that is, credit which is only accepted at the issuing postsecondary institution) are not eligible for Perkins funds. This policy ensures that high school students receive college credits that provide value, regardless of which postsecondary institution students' end up attending.

A portion of funding each year must be dedicated to ensuring coordinated communication strategies for helping schools, students, and families learn about postsecondary CTE

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opportunities. RIDE encourages postsecondary programs to dedicate a portion of funding each year to aligning academic content requirements between state-approved high school CTE programs and corresponding postsecondary programs, particularly those in Priority Sectors.

Funded programs may offer courses via dual enrollment or concurrent enrollment. Dual enrollment courses are courses offered at the postsecondary institution. Concurrent enrollment courses are courses offered at the high school by an instructor approved by the postsecondary institution.

To be eligible for Perkins funds, concurrent enrollment courses must meet the same standards of quality and rigor as dual enrollment courses. Specifically, concurrent enrollment courses must offer:

- The same college course (delivery, assessment, and content) for high school students as offered on the college campus.
- College-provided teacher mentorship/ professional development for course.
- College-led course quality reviews

Postsecondary Programs Serving Postsecondary Students

College-level programming must lead to students earning industry-recognized credentials of value. Representatives from the PrepareRI agencies—including the Rhode Island Governor's Office, RIDE, Department of Labor and Training (DLT), Governor's Workforce Board (GWB), Office of the Postsecondary Commissioner (OPC), Rhode Island Commerce, and the CTE Board are working to more precisely define industry-recognized "credentials of value" for postsecondary students.

- Programs must offer transcripted, not articulated, credit to students. (See the previous section for a discussion of articulated versus transcripted credit.)
- Programs must embed work-based learning opportunities and employability skills training, aligned to relevant state standards.
- Programs must engage students in some form of career counseling.

Applications and Reporting for Formula Funds

CCRI is the only postsecondary institution in Rhode Island that will receive formula funds. RIDE will release an annual application for Perkins funding for these funds. This application may include a narrative application, required evidence, and budget. The focus of the application is how the postsecondary institution is using the funds to prepare students for career success. RIDE and the CTE Board are focused on how to maximize the return on investment (ROI) of Perkins dollars on student outcomes. If the postsecondary institution needs to modify the budget that received RIDE approval in the original funding application, it must notify RIDE and the CTE Board. Major modifications require prior approval from RIDE.

The postsecondary institution will be required to submit data and a year-end report to RIDE and the CTE Board every year. If these annual reports indicate the program is not meeting expectations for student outcomes, RIDE and the CTE Board reserve the right to work with the postsecondary institution to improve those outcomes. Student outcomes are tied to transcripted postsecondary credit, industry recognized credential(s), work-based learning opportunity,

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employability skills, and a demonstrated connection to secondary CTE programs. This may include modifying the terms of approval from the original funding application.

Postsecondary Partnership Grants

Postsecondary Partnership Grants are competitive grants that may be offered to any postsecondary institution in Rhode Island. These grants are offered through the Reserve Fund, and awards are granted based on evidence of providing students with valuable postsecondary/industry credentials, academic skills, and industry-specific teacher professional development. See page 64 for more information.

II.C.1.c. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)

Structure of the Comprehensive Local Needs Assessment

All recipients must demonstrate strong local industry, student interest, and community support to be eligible for Perkins funds. The Comprehensive Local Needs Assessment is the mechanism programs will use to demonstrate this demand.

Program application will require recipients to complete a Comprehensive Local Needs Assessment using a state provided template which requires the eligible recipient to consider local economic and education needs, including, where appropriate, Priority Sectors, as defined by Rhode Island Commerce (see Section II.B.2.c.iii on page 40 for more information) and applied to the CTE Board Standards by the CTE Board and RIDE. Grants will not be distributed to applicants who do not demonstrate completion of the Comprehensive Local Needs Assessment with fidelity.

The Comprehensive Local Needs Assessment asks specific questions around the size, scope and quality of each program. The tool considers:

- Labor Market Information: the skills and areas where students will identify career opportunities that allow for career progression and life success in growth industries
- Program Quality: the alignment and ability of programs to deliver, support, and meet the academic, technical, and employability skills necessary for students to enter the world of work and be successful in future careers in growing fields
- Educator Certification and Professional Development: Support the development of a pipeline of individuals able to meet the requirements of CTE Programs and address related instructor certification requirements. Further, develop the tools and related experiences educators require to prepare students for those opportunities
- Student Access to Programs: ensuring all students have access to quality programs that will prepare them for these opportunities
- Student Performance: whether students in the program are achieving the necessary skills and indicators of readiness for those opportunities

Timing and Frequency of Local Needs Assessments

During the FY20 planning year, all Perkins recipients will be required to fill out a Comprehensive Local Needs Assessment explaining how all of their CTE programs provide students with the skills they need to succeed in the Rhode Island economy. If student performance data indicates that programs are not meeting the agreed upon expectations of the CTE Program Standards, then RIDE may request that the Comprehensive Local Needs Assessment be updated annually.

Secondary

After the FY20 planning year, LEAs must complete an updated Comprehensive Local Needs Assessment on a biannual basis. The Comprehensive Local Needs Assessment will be a required part of the renewal process for CTE programs. Programs may receive up to a five-year approval. RIDE reserves the right to request additional information, as determined by student performance data and CTE program outcomes. Comprehensive Local Needs Assessments will be included as part of the application process for the approval of new CTE programs.

Postsecondary

Postsecondary institutions receiving formula grants must complete a Comprehensive Local Needs Assessment in FY20, and biannually thereafter. Under this plan, CCRI is the only Rhode Island postsecondary institution receiving formula grants.

Postsecondary institutions receiving competitive Postsecondary Partnership Grants through Perkins Reserve Funds shall be required to complete a Comprehensive Local Needs Assessment as part of the original grant application and any subsequent renewals of the grant.

II.C.2.a. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace.

RIDE will allocate 5% of Perkins funds for State Administration, 10% for State Leadership, and 85% for Local Formula Distribution.

Increasing Reserve Fund to 15%

Of the 85% to be distributed through Local Formula Distribution, RIDE will increase the percentage allocated to the Reserve Fund from 10% in FY21 to 15% in FY23. The Reserve will be 10% in FY21, 12.5% in FY22, and 15% in FY23 onwards.

The Reserve Fund will be allocated as follows: 75% for secondary programs and 25% for postsecondary programs. The secondary Reserve Funds will be used for Equity Grants, Career Exploration Grants, and CTE Teacher Grants. The postsecondary Reserve Funds will be used for Postsecondary Partnership Grants. RIDE will award all these Reserve Fund grants on a competitive basis, and all grantees will be required to report on outcomes to RIDE. For the Career Exploration, Equity, and Postsecondary Partnership Grants, grantees must report on student outcomes and fulfillment of grant requirements. For the Teacher Grants, grantees must report on teacher outcomes and fulfillment of grant requirements. These grant programs replace the previous use of Reserve Funds grants, namely the Vocational Training for Adults (VTA) and Secondary to Postsecondary Articulation for Technology Education (SPATE) programs.

Allocation of Perkins Funds

	FY21	FY22	FY23	FY24
State Administration	5%	5%	5%	5%
State Leadership	10%	10%	10%	10%
Local Formula Distribution	85%			
Reserve: 10%				
Secondary: 75%				
Postsec.: 25%				
Formula: 90%				
Secondary: 90%				
Postsec.: 10%	85%			
Reserve: 12.5%				
Secondary: 75%				
Postsec.: 25%				
Formula: 87.5%				
Secondary: 90%				
Postsec.: 10%	85%			
Reserve: 15%				
Secondary: 75%				
Postsec.: 25%				
Formula: 85%				
Secondary: 90%				
Postsec.: 10%	85%			
Reserve: 15%				
Secondary: 75%				
Postsec.: 25%				
Formula: 85%				
Secondary: 90%				
Postsec.: 10%				

See Section IV on page 86 for a more detailed budget.

Equity Grants

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LEAs may apply for these funds to address access, participation, or performance gaps of specific student subgroups in CTE programs in Priority Sectors. Eligible subgroups include, but are not limited to, special populations and groups such as those defined by: gender, race, socioeconomic status, English Language Learner status, disability status, and others. To be eligible, applicants must identify the gap, complete a root cause analysis, and propose programmatic and/or policy solutions to address the identified root cause. They are funded through the 75% of the Reserve Fund allocated to secondary programs. These funds may be used for approved programs, or for new programs that have not yet been approval; if used for new programs, the grantee must apply for program preapproval.

Career Exploration Grants

LEAs may apply for these funds to help middle school students explore and build awareness of possible careers—particularly those in Priority Sectors—and high school CTE programs where they could continue pursuing this career progression. All applicants must have an industry partner, connect programming to students' Individual Learning Plan (ILP), and integrate career exploration curriculum into core content classes and report student outcomes. They are funded through the 75% of the Reserve Fund allocated to secondary schools.

CTE Teacher Grants

LEAs may apply for these funds to pay for the costs associated with providing professional development for CTE teachers and for reimbursing teachers for the cost of certification to teach in CTE programs. These grants are funded through the 75% of the Reserve Fund allocated to secondary schools.

Postsecondary Partnership Grants

Postsecondary institutions in Rhode Island may apply for these funds to support programs that allow high school students to earn transcripted, portable credits that prepare students for careers, and provide teachers industry-specific professional development. They are funded through the 25% of the Reserve Fund allocated to postsecondary programs.

Career and Technical Student Organizations (CTSOs)

Career and Technical Student Organizations (CTSOs) are currently funded through 15% of State Leadership Funds. RIDE will maintain current funding levels within State Leadership funds for a CTSO Allocation.

CTSOs are effective at improving the career readiness of students, and RIDE believes they are particularly impactful when directly managed by schools and aligned to their programs. Therefore, RIDE will provide the CTSO Allocation directly to LEAs for their decision-making, rather than having RIDE manage the relationships. These funds will be distributed to LEAs using the same formula used for the Local Formula Distribution. The use of these funds will follow the same rules as Local Formula Distribution dollars. (See page 65 for more information on those rules.) LEAs may decide to spend as much or as little of their CTSO Allocation and their formula allocation on CTSOs as they think will maximally benefit their students.

Leadership and Administrative Funds

RIDE will use Leadership and Administrative funds for funding of technical assistance, support of incarcerated youth and adults in earning industry recognized credentials and skills, and increasing access and participation in CTE programs, specifically among special populations (as

defined by United States Department of Education), and staffing and administrative costs at RIDE.

II.C.2.b. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace. (Section 122(d)(8) of Perkins V)

Previously, RIDE required LEAs to join regional consortia, and RIDE distributed all Perkins funds to the fiscal agent of the regional consortia. RIDE is ending that policy under Perkins V. Starting in FY21, LEAs may decide, at their discretion, to join consortia or to receive funds from RIDE directly. RIDE believes schools and district are best able to make these decisions, and therefore RIDE will empower LEAs to make their own decisions about how to receive their Perkins funding.

In order to submit an application for Perkins fund for FY21 onwards, LEAs must submit notice to RIDE about whether they would like to receive the funds generated by their LEA directly, or whether they should be allocated to another fiscal agent as part of a consortium. LEAs may form consortia of any type allowed under federal and state law, regional or otherwise.

Any funds distributed through a consortium will be in accordance with the terms of the consortia's agreed upon practices and procedures that best support the consortium's purpose for serving students. Consortiums must demonstrate all members have considered how to most effectively provide students with the skills needed to succeed in the workplace, and that the proposed distribution model is in service to that goal. RIDE may develop common business rules for all consortia to ensure transparency around funding decisions for LEAs.

The formula for distributing grants among LEAs will not change for FY21 onwards. These grants will follow the methodology used by the United States Department of Education for district level allocations. These are determined based on US Census data with 30% of funding based on overall population and 70% of funding based on poverty in the population. Census data adjusted to account for schools without a corresponding geographic region, using the same method RIDE follows for the distribution of other federal funds, such as Title I.

II.C.3. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State. (Section 131(g) of Perkins V)

Based on the FY20 federal allocation, RIDE expects to allocate $4,301,174 for secondary programs using Census data in accordance with the formula in Section 131(a). As noted above, RIDE may distribute these funds directly to LEAs or to consortia, depending on the LEA's stated preference.

II.C.4. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.

Based on FY20 federal allocation, RIDE expects to allocate $477,908 for postsecondary programs. The entire amount will be distributed to the Community College of Rhode Island, as

it is the only institution that meets the criteria of being public and offering a two-year technical program of study.

II.C.5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)

Because the Census data used for allocating funds is based on municipalities and does not include charter schools or state schools, RIDE adjusts the data to shift students from their district of residence to the appropriate charter or state school based on the most recent enrollment figures available. For a poverty measure, RIDE assumes that the number of students at the charter or state school in poverty reflect the same proportion as the district they came from. This method is the same one that is also used for other Rhode Island education funding based on poverty (for example, Title I).

There are no charter schools or schools funded by the Bureau of Indian Affairs in Rhode Island.

II.C.6.If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—

a) include a proposal for such an alternative formula; and

b) describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V). Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

RIDE will not submit an application for a waiver to the secondary allocation formula.

I.C.7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—

a) include a proposal for such an alternative formula; and

b) describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V). Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV)

RIDE will not submit an application for a waiver to the postsecondary allocation formula.

II.C.8. Provide the State's fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort, and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

Rhode Island's aggregate annual expenditures for CTE is $27,585,825, based on FY19. This not a new baseline and is not a waiver request.

D. ACCOUNTABILITY FOR RESULTS

- 1. Identify and include at least one (1) of the following indicators of career and technical education program quality—
    - a. The percentage of CTE concentrators (see Text Box 6 for the statutory definition of a CTE concentrator under section 3(12) of Perkins V) graduating from high school having attained a recognized postsecondary credential;
    - b. The percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or
    - c. The percentage of CTE concentrators graduating from high school having participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

Include any other measure(s) of student success in career and technical education that are statewide, valid, and reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins V) Please note that inclusion of "other" program quality measure(s) is optional for States.

Provide the eligible agency's measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

- 2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined performance levels or each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)

Text Box 6: Statutory Definition of CTE Concentrator

The term 'CTE concentrator' means—

- (A) At the secondary school level, a student served by an eligible recipient who has completed at least 2 courses* in a single career and technical education program or program of study; and
- (B) At the postsecondary level, a student enrolled in an eligible recipient who has—
    - (i) Earned at least 12 credits within a career and technical education program or program of study; or
    - (ii) Completed such a program if the program encompasses fewer than 12 credits or the equivalent in total. (Section 3(12) of Perkins V)

* This means that once a student completes 2 courses in a single CTE program or program of study, they are counted as a CTE concentrator.

(Section 3(12) of Perkins V)

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- 3. Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—
    - a. A description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance (see Text Box 7 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V);
    - b. An explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8; and
    - c. A description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

- 4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V).

As part of the written response, include a description of any the changes made to the State determined performance levels as a result of stakeholder feedback.

- 5. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V)

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP),[2] the eligible agency could indicate that it will analyze data on the core indicators of performance to identify gaps in performance, explain how they will use evidence-based research to develop a plan to provide support and technical assistance to eligible recipients to address and close such gaps, and how they will implement this plan. The eligible agency is not required to submit a new State plan prior to the third program year in order to address this requirement.

Text Box 7: Statutory Requirements for Consultation on State Determined Performance Levels

- (B) PUBLIC COMMENT.—
    - (i) IN GENERAL.—Each eligible agency shall develop the levels of performance under subparagraph (A) in consultation with the stakeholders identified in section 122(c)(1)(A).
    - (ii) WRITTEN COMMENTS.—Not less than 60 days prior to submission of the State plan, the eligible agency shall provide such stakeholders with the opportunity to provide written comments to the eligible agency, which shall be included in the State plan, regarding how the levels of performance described under subparagraph (A)—

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Text Box 7: Statutory Requirements for Consultation on State Determined Performance Levels

- (I) Meet the requirements of the law;
- (II) Support the improvement of performance of all CTE concentrators, including subgroups of students, as described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and
- (III) Support the needs of the local education and business community.

- (iii) ELIGIBLE AGENCY RESPONSE.—Each eligible agency shall provide, in the State plan, a written response to the comments provided by stakeholders under clause (ii).

(Section 113(b)(3)(B) of Perkins V)

[2] See page 11 of Committee Report at https://www.congress.gov/115/crpt/srpt434/CRPT-115srpt434.pdf.

II.D. Accountability for Results

II.D.1. Identify and include at least one (1) of the following indicators of career and technical education program quality—

a) the percentage of CTE concentrators (see Text Box 2 on the following page) graduating from high school having attained a recognized postsecondary credential;

b) the percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or

c) the percentage of CTE concentrators graduating from high school having participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

Provide the eligible agency's measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

For Perkins accountability purposes, Rhode Island will adopt work-based learning (option C) as a secondary-level program indicator. Work-based learning (WBL) is a requirement of all students in CTE programs.

RIDE will continue to support and expect all students in programs to earn industry-recognized credentials and/or related college credit. Under the CTE Board Standards, all CTE programs must culminate in industry credentials and/or college credit. Since the culminating credential is college credit for some career fields and industry credentials for other career fields, RIDE would not be able to hold all programs accountable to a statewide target related only to college credit or only to credentials. However, programs in all career fields are required to meet any CTE Board Standards and the GWB work-based learning guidance, so that metric is more appropriate for RIDE's program quality metric.

The GWB created a guidance document for work-based learning that RIDE adopted as the minimum requirement for all work-based learning CTE programs. The GWB defines five types of work-based learning: internships, apprenticeships, service learning, industry-projects, and

school-based enterprises. See Section II.B.2 on page 43 for a more information on the GWB work-based learning guidance.

The CTE Board is currently in the process of developing career field-specific work-based learning standards. These standards will be aligned to the GWB guidance, but may be more rigorous and specific. Once those standards are approved by the CTE Board and adopted by RIDE, RIDE will adjust this metric to align to those revised work-based learning standards.

5S3

Program Quality: Work-Based Learning

Numerator: Number of program concentrators in a graduating class completing high-quality work-based learning, as defined by the CTE Board Standards and the GWB Guidance

Denominator: Number of program concentrators in a graduating class

Include any other measure of student success in career and technical education that is statewide, valid, and reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins IV)

The following are the list of credentials that count toward the Postsecondary Success

II.D.2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined levels of performance for each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)

See Section V.

II.D.3.a Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of the Act, which at a minimum shall include a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance under that section as provided in the text box on the following page;

RIDE has aligned state-determined level of performance for Perkins with previously-established state goals whenever possible. For metrics where there were not previously-established goals and targets, RIDE considered historic data to determine target levels of performance.

The performance levels, alongside the state plan, were open to public comment from February 1, 2020 through March 2, 2020. RIDE made intensive efforts to engage stakeholders from the beginning of the plan development via stakeholder feedback sessions, surveys, summary documents, public presentations to the CTE Board, and a public comment period to promote accurate communication about changes in the plan.

II.D.3.b Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of the Act, which at a minimum shall include an explanation for the State determined levels of performance; As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

Secondary Measures

1S1

Secondary: Concentrator Graduation rate

Description: The percentage of CTE concentrators who graduate high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965). Under the ESEA, Rhode Island is required to calculate four-year adjusted cohort graduation rate (ACGR).

Numerator: The four-year ACGR is the number of students who graduate from high school within four years with a regular high school diploma

Denominator: The number of CTE concentrators in the graduating class

"CTE concentrators" at a secondary level is defined as students who complete the second course in a state-approved CTE course sequence.

The "graduating class" cohort is defined as the number of students who enter grade 9 for the first time adjusted by adding into the cohort any student who transfers in later during grade 9 or during the next three years and subtracting any student from the cohort who transfers out.

Baseline: 84%

Target: 95% (6-year graduation rate for all students by 2025 – ESSA)

1S2

Secondary: Extended Graduation rate

Description: The percentage of CTE concentrators who graduate high school, as measured by the SIX year cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

Numerator: The number of CTE concentrators who graduate high school within six years with a regular high school diploma.

Denominator: The number of CTE concentrators in the six year adjusted cohort (following the federal ACGR definition: the number of students who enter grade 9 for the first time in the designated school year, adjusted by adding into the cohort any student who transfers into the school during the next five school years and subtracting any student from the cohort who transfers out).

Baseline: 87.26%

Target: 95% (6-year graduation rate for all students by 2025 – ESSA)

2S1

Secondary: Academic Proficiency in Reading/Language Arts

Description: "CTE concentrator proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act."

Proficiency is measured for high school students through the 11th grade SAT. Proficiency is defined as meeting the College Board's College Ready benchmark.

Numerator:

Number of concentrators in graduating class with an SAT score on the ELA section above the College Ready benchmark

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Denominator:

Number of concentrators in graduating class

Baseline: 38%

Target: 69% (ESSA target)

2S2

Secondary: Academic Proficiency in Mathematics

Description: "CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act."

Proficiency is measured for high school students through the Mathematics section of the 11th grade SAT. Proficiency is defined as meeting the College Board's College Ready benchmark.

Numerator: Number of concentrators in graduating class with an SAT score on the Mathematics section above the College Ready benchmark

Denominator: Number of concentrators in graduating class

Baseline: 31%

Target: 68% (ESSA target)

2S3

Secondary: Academic Proficiency in Science

Description: "CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act."

Rhode Island is in the process of developing a statewide science proficiency assessment. That exam has not yet been released statewide.

Numerator: Number of concentrators in graduating class with scores on the Rhode Island science assessment above the proficiency threshold.

Denominator: Number of concentrators in graduating class

Baseline: N/A (exam not yet released)

Target: N/A (targets for the science exam will be developed in a future ESSA state plan)

3S1

Secondary: Concentrator Postsecondary Enrollment

Description: "The percentage of CTE concentrators who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed."

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Rhode Island does not currently collect data on students who are in advanced training, military service, or eligible service programs. RIDE is exploring mechanisms to collect this data in future years.

Numerator: Number of concentrators who are in postsecondary education

Denominator: Number of concentrators in graduating class

Baseline: 63%

Target: 2 percentage points improvement each year

4S1

Nontraditional Program Concentration

Description: The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

* Nontraditional fields are defined as those in which a subgroup is significantly underrepresented. For gender, "significantly underrepresented" is defined as 25% or less of a gender in a particular field. RIDE will develop numerical benchmarks for other subgroups.

Numerator: CTE concentrators in graduating class in non-traditional fields

Denominator: CTE concentrators in graduating class

Baseline: 5%

Target: 2 percentage point improvement each year

5S3

Secondary: Work-Based Learning

Description: The percentage of CTE concentrators graduating from high school having participated in work-based learning that meets the standards from the Governor's Workforce Board Guidance and any relevant CTE Board Standards.

See Section D.1 on page 71 for more information.

Numerator: Number of graduating concentrators having completed qualifying work-based learning

Denominator: Number of graduating concentrators

Baseline: Baseline will be set in FY20.

Target: 2 percent improvement per year

Postsecondary Measures

1P1

Postsecondary: Post-program placement

Description: "The percentage of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and

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Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are placed or retained in employment."

Rhode Island does not currently collect data on students who are in advanced training, military service, or eligible service programs.

Numerator: CTE postsecondary concentrators who remained enrolled in postsecondary education

Denominator: CTE postsecondary concentrators

"CTE postsecondary concentrators" are defined as a student enrolled in an eligible Perkins-funded postsecondary program who has earned at least 12 credits within a CTE program, or completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

Baseline: Baseline will be set in FY20.

Target: 2 percentage point improvement each year

2P1

Postsecondary: Earned Recognized Postsecondary Credential

Description: The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within one year of program completion.

Numerator: CTE postsecondary concentrators in earning credential within one year

Denominator: CTE postsecondary concentrators who graduated one year earlier

Baseline: Baseline will be set in FY20.

Target: 2.5 percentage point improvement each year

3P1

Postsecondary: Concentrator in programs leading to nontraditional fields

Description: The percentage of CTE concentrators in career and technical education programs and programs of study that lead to nontraditional fields.

Numerator: CTE postsecondary concentrators in nontraditional fields

Denominator: CTE postsecondary concentrators

Baseline: Baseline will be set in FY20.

Target: 2 percentage point improvement each year

II.D.3.c. a description of how the state determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

Under the Every Student Succeeds Act (ESSA), RIDE updated its School and District Report Cards. These report cards provide the foundation for RIDE's system of school accountability and include a broader range of performance metrics. RIDE sees this as an opportunity to anchor its accountability work in the levers that RIDE knows make a difference, including not only

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traditional indicators—like test scores—but also leading indicators like attendance and suspension rates, which give a more holistic view of school climate, culture, and performance.

These Report Cards are designed to provide data in an accessible, transparent way for educators, policymakers, and—most importantly—students and families. RIDE wants all stakeholders to feel empowered to not only understand their school community, but also to make informed decisions for their families.

Wherever possible, RIDE aligned these performance goals to the goals set in ESSA and measured by these Report Cards. Other goals are aligned to the goals and policies of the CTE Board, which was created under Rhode Island General Law Chapter 16-45.

More specifically:

- The student graduation rates (1S1 and 1S2) are aligned to the graduation rate goals established in Rhode Island's ESSA plan.

- The indicators of academic proficiency in Reading/Language Arts (2S1), Mathematics (2S2) and Science (2S3), are aligned to the academic goals established in Rhode Island's ESSA plan.

- The work-based learning indicator (5S3) is aligned to the policies of the Governor's Workforce Board and the CTE Board.

- The postsecondary Earned Recognized Postsecondary Credential (2P1) is aligned to the policies of the Department of Labor, Governor's Workforce Board, Office of the Postsecondary Commissioner, and CTE Board.

II.D.4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V). As part of the written response, include a description of any the changes made to the State determined performance levels as a result of stakeholder feedback.

RIDE did not receive any feedback during public comment related to state-determined levels of performance. Most of the feedback focused on how to better serve student subgroups, so RIDE added more details about how it defines student groups for the goals and metrics outlined in this plan.

II.D.5. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V)

Through the previously-mentioned annual CTE program accountability reporting and Perkins accountability reporting, RIDE will analyze data on program concentrators and the core indicators of performance to identify gaps in participation and performance. Where local gaps exist, RIDE will work with schools to determine root cause and apply research-based practices to close gaps. Where state level gaps are found, RIDE will identify state-wide research-based practices for implementation and conduct technical assistance to eligible recipients to address and close such gaps.

These implementation measures may be supported in part or whole through the previously described Equity Grant program funded through the Perkins Reserve Fund.

V. State Determined Levels of Performance (SDLP)

State Determined Performance Levels (SDPL) Form

State Name: Rhode Island

		FY 2024	FY 2025
Secondary Indicators			
1S1: Four-Year Graduation Rate	84%[1]	92%	93%
1S2: Extended Graduation Rate	87.2%[2]	91%	92%
2S1: Academic Proficiency in Reading/Language Arts	38%[3]	62%	67%
2S2: Academic Proficiency in Mathematics	31%[4]	61%	66%
2S3: Academic Proficiency in Science	0%[5] (Data not yet available)	10%	12%
3S1: Post-Program Placement	63%[6]	72%	72%
4S1: Non-traditional Program Concentration	5%[7]	15%	15%
5S1: Program Quality – Attained Recognized Postsecondary Credential	*N/A*	*N/A*	*N/A*
5S2: Program Quality – Attained Postsecondary Credits	*N/A*	*N/A*	*N/A*
5S3: Program Quality – Participated in Work-Based Learning	0%[8] (Data not yet available)	10%	12%
Postsecondary Indicators			
1P1: Post-Program Placement	0%[9] (Data not yet available)	8%	8%
2P1: Earned Recognized Postsecondary Credential	0%[10] (Data not yet available)	10%	12%

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		FY 2024	FY 2025
3P1: Non-traditional Program Concentration	0%[11] (Data not yet available)	10%	12%

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(OMB Control Number: 0970-0145)

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)

Plan effective July 1, 2026

The Rhode Island Department of Human Services (DHS) is the state agency responsible for administration of the federal Temporary Assistance for Needy Families (TANF) Block Grant. DHS is also responsible for implementation of the Rhode Island Works Act of 2008. Together, these federal and state programs provide essential services for low-income families throughout the State to assist them in meeting their basic family needs, while at the same time providing parents with a range of supports to help them prepare for and access the job market while achieving stabilization, as identified by the family.

In accord with the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), the State of Rhode Island has developed its TANF State Plan based upon the four major purposes of TANF, which are to:

• Provide assistance to needy families so that children may be cared for in his or her own home or in the home of a relative;

• End dependence of needy parents on government benefits by promoting job preparation, work, and marriage;

• Prevent and reduce the incidence of out of wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and

• Encourage the formation and maintenance of two-parent families

Rhode Island Works Program

The RI General Assembly revised the state TANF law in June 2008 (RIGL 40-5.2 et seq.). Entitled The Rhode Island Works Program, it was designed to help low-income families toward independence while at the same time improving the State's efforts to achieve the required TANF Work Participation Rates. Since 2008, the General Assembly has made several adjustments to the law. Rhode Island has had several changes to the Rhode Island Works law including

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expanded the time limit from 48 months to 60 months, increasing the standard of assistance by an additional twenty percent from the previous increase, eligibility at pregnancy onset, adding an earning disregard for newly employed recipients, increasing the resource limit, and discounting more earned income so families can retain more cash assistance.

Eligibility for RI Works/TANF Program:

A "family" is defined for the RI Works/TANF cash assistance program as (a) a pregnant woman from onset of her pregnancy; and/or (b) a child and the following eligible persons living in the same household as the child: (A) each biological, adoptive or stepparent of the child, or in the absence of a parent, any adult relative or legal guardian who is responsible, in fact, for the care of such child, and (B) the child's minor siblings, whether of whole or half-blood: provided, however, that the term "family" shall not include any person receiving benefits under title XVI of the Social Security Act, 42 U.S.C. 1381 et seq. A family may be the same as the Assistance Unit.

A low-income family includes a child under the age of 18, or under 19 if a full-time student, and family income is 250% of the federal poverty level or below.

An eligible family must meet age, relationship, citizenship/alienage, residency, and cooperation requirements, as well as remain within the income and resource limits of the program. As long as single parents and two (2) parent families meet income and resource limits of the program and are otherwise eligible, they qualify for cash assistance, child care, supplemental nutrition assistance program, and health care coverage.

Eligibility is limited to families whose available resources reduced by any obligations or debts with respect to such resources, total less than five thousand dollars ($5,000). Eligibility is denied or terminated if the value of non-exempt resources exceeds the five-thousand-dollar limit. With regards to vehicle ownership, the State has chosen to exclude as a resource one (1) vehicle for each adult household member, not to exceed two (2) vehicles per household.

To determine eligibility for cash assistance, the total of a family's countable earned income, after an earned income disregard of the first $525/month and one half the remainder of earnings, and unearned income is compared with the appropriate assistance payment standard for the unit. The payment standard is equal to the sum of the following:

- For the first person: five hundred ten dollars ($510) or four hundred forty-five dollars ($445) for a family residing in subsidized housing;
- For the second person: one hundred ninety-one dollars ($191)
- For the third person: one hundred sixty-four dollars ($164), and
- For each additional person: one hundred and twenty-five dollars ($125) for each additional person.

If during an emergency the Departments deems it necessary, DHS household will receive a non-recurrent short-term benefit, sometimes referred to as a NRST. This payment structure will not exceed four (4) months. The emergency benefit will be in accordance with 45 CFR §§ 260.31(b); 286.10(b).

Cooperation with the child support enforcement agency is required as a condition of eligibility for cash assistance. To continue to be counted as a family member for the purpose of cash assistance, a child is allowed temporary absences from the home for no more than ninety (90) days per episode, with a second ninety (90) day renewal authorized only through supervisory approval. The program requires minor parents to live with a parent, relative, or in a supervised setting and remain in school, unless otherwise authorized by the Department for specific good cause reasons and the minor resides in an approved supervised supportive living arrangement.

Rhode Island Works Program Time Limit: The Rhode Island Works law (RIGL 40-5.2 et seq.) provides cash assistance a maximum of sixty (60) months.

Time limit begins with the first issuance of cash assistance. An applicant is required to sign an Employment Plan as a condition of eligibility for cash assistance. Some recipients are exempted from immediate work activities, such as parents who are waived under the Domestic Violence Waiver process. Time limit applies to families in which citizen children receive assistance although their non-citizen parents do not.

Exceptions to time limit applies in the instances of: (1) a minor child(ren) living with a single parent who receives SSI benefits, or with two-parents who both receive SSI benefits; and (2) a minor child(ren) living with a legally responsible non-parent caretaker relative who is not in the cash assistance payment.

Hardship Extension to Time Limit: Any individual approaching the time limit is notified that they may request a reassessment to determine whether or not they meet the criteria for an extension to the time limit. Additionally, any parent who has met or exceeded the time limit may reapply and be assessed to determine if they meet any of the criteria for an extension beyond the time limit.

A parent who is undocumented, who has received benefits for their citizen child(ren), may request a hardship extension for the child(ren) at the time limit. A parent who does not meet the alienage requirements required for eligibility for cash assistance under federal PRWORA (e.g., those Legal Permanent Resident families in which the parent has been in the United States less than five (5) years), who has received benefits for her/his citizen child(ren), may also request a hardship extension for the child(ren).

A hardship extension may be granted to all otherwise eligible families who meet at least one of the following criteria:

- has a documented significant physical or mental incapacity and can verify/document a pending application for SSI or SSDI and has submitted an application for or is active and making progress in her/his Employment Plan with the Office of Rehabilitation Services (ORS); or
- is caring for a significantly disabled family member who resides in the home and requires full time care; or
- is homeless — meaning a lack of a fixed and regular nighttime residence or a primary nighttime residence, such as a supervised shelter, a halfway house, a temporary residence, a temporary accommodation (e.g., hotel/motel), a residence of another for not more than ninety days, or a place not designed for regular sleeping accommodations (e.g., bus station); or
- is unable to pursue employment because of a current, documented domestic violence situation; or
- is unable to work because of a critical other condition or circumstance, other than citizenship or alienage status.

For TANF program purposes, families extended beyond sixty (60) months of TANF cash assistance under the categories listed above will be included in the federally-funded twenty percent (20%) hardship exceptions.

The DHS has initiated a benefit to help RI Works families transition to employment and minimize the benefits cliff affect. The Post Employment Benefit (PEB) is 12 months of assistance for families who are exited from RI Works due to employment of at least 30 hours per week,

earning at least minimum wage. The PEB is $200 months for 12 months for families that are at or below 250% of the federal poverty level.

The DHS implemented a Housing Stability Pilot (HSP) to assist families at or below 250% of the federal poverty level to resolve a housing crisis using non-reoccurring short-term assistance to resolve the crisis. HSP is directed toward eviction prevention and assisting families to obtain a stable and permanent housing arrangement.

Public Involvement

Since passage of PRWORA in August 1996 and the implementation of Rhode Island's own welfare reform legislation in May 1997, RI DHS has maintained a strong and viable partnership with the initial Welfare Reform Implementation Task Force (WRITF). With the enacted Rhode Island Works Program, the WRITF group is now known as the Rhode Island Works Advisory Committee. The membership consists of representatives of state agencies, anti-poverty organizations, and community-based organizations that are committed to assisting the State and the Department in efforts to deliver an effective program for low-income families.

The Rhode Island Works Program Advisory Committee has met quarterly and receives data reports, reviews and comments on policy and regulations, and offers recommendations to the Director on best practices and effective solutions to challenges and opportunities facing the State of Rhode Island.

The DHS has implemented a Parent Advisory Committee to solicit feedback and guidance from those with lived experience of receiving benefits. The Committee is implemented and administered via a contracted provider.

Through both the formal public hearing process as well as the ongoing advisory committee meetings, the State of Rhode Island continues its commitment of transparency and openness with regard to its public assistance programs. The Department will continue to work closely with the community to ensure continuous improvement in our progress toward helping families out of poverty.

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)

1. Work Requirements and Participation Requirements under RI Works Program

All parents and caretaker relatives, legal guardians, including those who are acting in loco parentis, if they are included in the cash assistance grant, who request and receive assistance are required to enter into an employment plan and participate, unless temporarily exempt, in DHS-approved work-related activities. Employment plans are required prior to eligibility being granted to recipients, unless the adult recipient is exempted, an SSI recipient, or a non-requesting member of the households, also called child only.

2. One Parent Family Requirements

Single parents shall participate for a minimum of twenty (20) hours per week for parents whose youngest child in the home is under the age of six (6), and for a minimum of thirty (30) hours per week for parents whose youngest child in the home is six (6) years of age or older, in one or more of the following work activities, as appropriate, in order to help the parent obtain stable

full-time living wage employment. For teen parents, the first activity must be secondary education or completion of a GED program, if either certificate has not yet been obtained.

Core Activity Opportunities for One Parent Families:

- Unsubsidized employment;
- Subsidized private sector employment;
- Subsidized public sector employment;
- Work experience. A parent participating in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required twenty (20) core hours if actual participation falls short of the required minimum hours per week. For parents whose youngest child is six (6) or more years old and whose required minimum hours per week are thirty (30), any hours permissible by FLSA that are short of thirty (30) hours must be satisfied in some other TANF work activity;
- On-the-job training;
- Job search and job readiness. Except in the context of supportive service employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period. The DHS shall extend job search and job readiness assistance for up to twelve (12) weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;
- Community Service;
- Vocational educational training not to exceed twelve (12) months. Participation in a two-year degree program, a vocational certificate program, or a BA degree or advanced degree program may count as vocational educational training. Those participants who are in programs longer than twelve (12) months may use this activity as counting toward participation in a non-core job skills training, if they meet the requirement for a different core activity for sufficient hours. All supervised homework plus up to one hour of unsupervised homework per each hour of class time may count as meeting part of the total hours required for compliance with the RI Works employment plan. However, total homework time cannot exceed the hours required or advised in writing by the educational program;
- Adult education in an intensive work readiness program;
- Child care for an individual participating in a community service program.

Non-core Activity Opportunities for One Parent Families:

- Job skills training directly related to employment, allowable in addition to participation for twenty (20) hours per week in one of the above core activities;
- Education directly related to employment, allowable in addition to participation for twenty (20) hours per week in one of the above core activities;
- Satisfactory attendance at a secondary school or in a course of study leading to a GED. In the case of a parent under the age of 20, such satisfactory attendance in secondary school or in a GED program is countable as a core activity.

Other Required Work Activity Opportunities for One Parent Families:

- Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the twenty (20) hour requirement for parents with a child under age six (6), or for an equivalent number of hours toward the

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thirty (30) hour requirement for parents whose youngest child is age six (6) or older. The DCYF Social Caseworker II and/or vendor provides the actual number of hours of participation per week required in order for the parent to comply with their service plan. The DHS worker then makes these hours part of the total hours required for compliance with the RI Works employment plan.

Temporary Exemption for Single Parents Work requirements outlined above shall apply to a single parent if, and for so long as, the Department finds that they are:

- Caring for a child below the age of one, provided that a parent may opt for deferral for a maximum of twelve (12) months during a 60 month period of eligibility for cash assistance, but noting that a minor parent without a high school diploma or the equivalent, shall not be exempt for more than twelve (12) weeks from the birth of the child;
- Caring for a child or family member with a significant documented disability who resides in the home and requires full-time care;
- A recipient of SSI or RSDI/SSDI or other disability benefit that has the same standards of disability as defined by the Social Security Administration;
- An RIW applicant or recipient who has completed an application for SSI or SSDI, remained compliant with the application process, and who has been determined by a designated DHS vendor to be likely to become eligible for SSI or SSDI;
- An individual receiving assistance who is a victim of domestic violence;
- An applicant for assistance in her third trimester of pregnancy or a pregnant woman in her third trimester who is a recipient of assistance and who has medical documentation that she cannot work.
- A parent who has a demonstrated an inability to obtain appropriate needed child care for a child younger than age 6.

The Department of Human Services establishes the criteria and definitions for determining the "inability to obtain appropriate needed child care" as follows:

- "Appropriate child care": An individual or program that: (1) has met the requirements established by the Department of Human Services to participate in the CCAP; and (2) entered into a signed and valid agreement with the Department specifying the terms and conditions for enrolling eligible children and receiving payment for CCAP allowable child care expenses.
- "Reasonable distance": The distance between the child care provider and the individual's residence and/or their job or work activity is not substantially greater than the distance that others living in the same town or city would travel for child care services and then to their work activity.
- "Unsuitability of informal child care": Care that does not meet the criteria in the definition of appropriate child care would be considered unsuitable.
- "Affordable child care arrangements": All child care arrangements for Rhode Island Works/TANF recipients are deemed affordable, as these families are not required to pay a co-payment to RI DHS CCAP Rhode Island Approved Providers. In addition, providers are prohibited from charging families the difference between the maximum reimbursement rate and their private pay rate.

Parents are informed of the determination verbally during the interview portion of assessment and in writing via a notice.

3. Two Parent Family Requirements

In families consisting of two parents, one parent is required and shall be engaged in work activities as defined below, for at least thirty-five (35) hours per week during the month, not fewer than thirty (30) hours per week of which are attributable to one or more of the following listed work activities. Two parent work requirements shall be defined as follows:

Core Activity Opportunities for Two-Parent Families:

- Unsubsidized employment;
- Subsidized private sector employment;
- Subsidized public sector employment;
- Work experience; • On-the-job training;
- Job search and job readiness. Except in the context of supportive service employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period. The DHS shall extend job search and job readiness assistance for up to twelve (12) weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;
- Community Service program;
- Vocational educational training not to exceed twelve (12) months;
- The provision of childcare services to a participant individual who is participating in a community service program;
- Adult education in an intensive work readiness program.

Above thirty (30) hours per week, the following three (3) activities may also count for participation: Non-Core Activity Opportunities for Two-Parent Families:

- Job skills training directly related to employment;
- Education directly related to employment; and
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence. Satisfactory attendance in secondary school or in a GED program is countable as a core activity in the case of a parent who is married and is under twenty (20) years old.

Other Required Work Activities for Two-Parent Families:

- Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the thirty-five (35) hour requirement. The DCYF Social Caseworker II and/or vendor provides the actual number of hours of participation per week required in order for the parent to comply with their service plan. The DHS worker then makes these hours part of the total hours required for compliance with the RI Works employment plan.
- Housing search, if the family is homeless (or about to become homeless), may be approved for the second parent in a two-parent family, if the first parent is participating in a core activity at least thirty (30) hours per week. This activity may be approved for the first parent, if the second parent receives SSI/RSDI/SSDI. Housing search is classified as job readiness, which is a core activity.

In a two-parent family in which one (1) parent is engaged for at least thirty-five (35) hours per week in the work activities specified above, the other, second, parent may also participate in and have an assessment completed. The second parent must then sign an employment plan.

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A family with two parents, whether or not receiving child care, in which one or both parents participate in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required thirty (30) core hours if actual participation falls short of the required minimum hours per week. For families that need additional hours beyond the core activity requirement, these hours must be satisfied in some other TANF work activity. Except in the instance of a work experience or community service program which must meet the requirements of the FLSA as described above, if the family receives child care assistance and an adult in the family is not disabled or caring for a severely disabled child, then the work-eligible individuals must be participating in work activities for an average of at least fifty-five (55) hours per week to count as a two-parent family engaged in work for the month. At least fifty (50) of the fifty-five (55) hours per week must come from participation in the activities listed in the Core Activities above. Above fifty (50) hours per week, the three (3) activities listed in Non-Core Activities above may also count as participation.

Teen Two-Parent Family Requirements

In a two-parent household in which both parents are under age twenty (20), the DHS worker should assess the educational history of both parents. For either parent who has not completed high school or obtained a GED, as a first activity in the RI Works program, the DHS worker should approve and enter an employment plan for that parent; or for both parents if neither have the high school diploma or GED; that shows full time attendance in secondary education or completion of a GED program as the first activity. When both have either reached the age of twenty (20) or completed the first activity of education as described above, all two parent family rules will come into full force and effect.

Exemptions for Two-Parent Families

The work requirements shall not apply if, and for so long as, the Department finds that:

- both parents receive Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI); or
- both parents have completed applications for SSI or SSDI, remained compliant with the application process, and both have been determined by a designated DHS vendor to be likely to become eligible for SSI or SSDI; or
- one parent is caring for a child or family member with a significant documented disability who resides in the home, and who requires full time care and the other parent receives SSI/RSDI/SSDI and is medically documented to be unable to provide care for the disabled family member.

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

How Workforce Activities Address Employment and Training Services

RI Works employment plans are comprised of a component and several activities associated with each component. Each activity is centered around building up the participant, providing coaching, long term goal setting, and barrier mitigation on that recipient's pathway to a more stable future. Every employment plan is comprised of at least one component and one activity.

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All activities are focused on engaging that family with holistic services to provide a change in their family's pathway to self- sufficiency. The five components in RI are organized to be step system to provide services for families so they can access training and work preparation. These components include: Supportive Services to help stabilize families in crisis with the goal of long term self-sufficiency; Teen and Family Development provides education services for parents under 20 year of age; Adult Education so parents can enter training or workforce services that have minimum education requirements; Vocational Training to provide specific trainings for parents in fields that are seeking employees; and Work Readiness which provides work experience and interview skills with a job search focus.

Non-Compliance with Work Requirements

All parents and caretaker relatives not specifically exempted are required to participate in an employment plan and appropriate activities. Failure to do so may result in a penalty, if good cause is not provided for the non-participation. Current policy states: The amount of cash assistance to which an otherwise eligible family is entitled shall be reduced by the portion of the family's benefit attributable to a parent who, without good cause, has failed to comply with his or her individual employment plan; quit or refused employment or failed to attend a required appointment or assessment or failed to comply with any other requirements for the receipt of cash assistance. The benefit reduction due to noncompliance shall be one hundred five dollars ($105).

The Department shall continue the sanction until the parent complies with the employment plan, work activities and all program requirements.

The penalty becomes effective on the next payroll date after the adverse action period. The participant is notified of the penalty by a system-generated notice.

If the family's benefit has been reduced , whether or not consecutive, due to the parent's failure to comply with the terms of his or her individual employment plan, benefits shall be restored to the full amount beginning with the initial payment made on the first of the month following the month in which the parent demonstrates compliance with the terms of their employment plan or develops a new plan and demonstrates compliance with the terms of the new employment plan, as such plan may be amended by agreement of the parent and the Department.

If the family's benefit has been terminated due to the failure by one or more parents to enter into an individual employment plan the family may re-apply for benefits and benefits shall be restored to the family in the full amount the family is otherwise entitled to under this chapter beginning on the first of the month following the month in which all parents in the family who are subject to the employment plan requirements (1) enter into an individual employment plan and demonstrate compliance with the terms thereof, or (2) demonstrate compliance with the terms of his or her existing individual employment plan, as such plan may be amended by agreement of the parent and the Department, i.e., the parent must sign a new Employment Plan, demonstrate compliance with the Plan for at least two (2) weeks, and continue to participate, for the penalty to be considered cured and the case accepted beginning with the first of the month following the month that she or he began to comply.

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)

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In accordance with the General Laws of Rhode Island 40-6-12 all records pertaining to the administration of public assistance are declared to constitute confidential matter. It is unlawful for any person to make use of, or cause to be used, any information contained in these records for purposes not directly connected with program administration, except with the consent of the individual concerned. Any person violating any provisions of this state law, or the lawful rules and regulations made there under will be deemed guilty of a misdemeanor and fined not less than two hundred dollars ($200) or will be imprisoned for not more than six (6) months or both.

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)

1. Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan

DHS had an active role in a formal partnership with the RI Department of Health (RIDOH), Department of Education, the Department for Children, Youth and Families, and several community-based organizations, the partnership was originally formed to address the complex issues of teenage pregnancy and to develop Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan. The Plan lead by RIDOH, which was completed in June 1999 and revised in 2004, was based on research findings, results of community forums, and professional expertise in teenage pregnancy prevention. The Plan contained information on federal and state funding sources, programs that educate at-risk teens, programs that provide pregnancy prevention education, a review of current literature pertaining to this topic, state level initiatives and financial resources for teach training.

That prevention plan was the basis for the collaboration between DHS and RIDOH for the Youth Success program, now called Teen and Family Development (TFD). TFD has been a collaborative effort with both RIDOH and DHS vendors meeting regularly to ensure that both TFD and Medical eligible youth are being educated about the programs in both DHS and RIDOH. A cross referral for these programs ensures that young parents are aware of programs and able to access RI Works. Additionally, RI Works vendors are conducting pregnancy prevention outreach as well as intensive services for "at risk" youth. A service within TFD includes life skills training focused on preventing pregnancy.

The Department also contracts with additional Community Based Organizations to provide teen services across the State. These contracts have a targeted focus of supporting efforts to prevent teen pregnancy and serve pregnant and parenting teens. Provide pregnancy prevention, career exploration or goal setting, financial literacy, and leadership skills to RI youth.

2. Youth Responsibility and the Adolescent Self-Sufficiency Collaborative became the Teen and Family Prevention

Since April 1, 2009, the Department began contracting with an association of nine (9) community-based organizations to provide an intervention program for at-risk and pregnant/parenting populations, formerly called the Youth Success Program, now called Teen and Family Development (TFD). All contracted organizations had either their own educational (GED) program or access to each other's programs, should a teen not remain in high school, which is the primary educational goal. Academic instruction focused on a high school diploma or its equivalent, pregnancy prevention education, skills development, service learning, and career exploration/work experience. The TFD program provided case management services, referrals to health and dental care to ensure needs are met, improves teen character development and increases life skills, especially academic and parenting skills. Substance abuse

services, domestic abuse/trauma services, mental health services and coordination with the Office of Child Support Services are all present in-house in these nine-member agencies.

The Family Needs Assessment used by TFD is in compliance with the ACF's Teen Parent Responsibility Plan. As partner agencies may also operate Early Head Start, Head Start and licensed child care centers, participating youth receive priority for Head Start and child care services when appropriate. Further, as three of these agencies are regional leads in the Family Care Community Partnership (FCCP) operated by RI's Department of Children, Youth and Families, outreach is coordinated with the FCCP to reduce instances of teen pregnancy. An example of this Department's partnership with the FCCP and with the RI Department of Health (RIDOH) is the joint effort to add resources to the Nurse-Family Partnership Program and other Family Visiting Programs by RIDOH. Using strategies scientifically proven effective to reduce initial and repeat pregnancy, the TFD works with teens, individually or in groups, in schools, in community sites, and/or in the teens' own homes. The TFD also tracks, monitors, and reports to DHS each pregnant and parenting teen's school attendance and works to resolve issues of non-compliance with DHS requirements, such as attending school.

Minor parents are required to live at home with their parents, with a relative, or a legal guardian in order to be eligible for cash assistance through the RI Works Program. Unless otherwise authorized, the cash assistance is issued to the parent, relative, or the legal guardian on behalf of the minor parent. When there is good cause for a minor parent to live outside the allowable living arrangements above, and there is no suitable relative or legal guardian, the minor parent must live in an adult-supervised supportive living arrangement which ensures regular adult supervision and which requires the minor parent to participate in secondary education and the TFD program.

As of March 2018, Youth Success was renamed to Teen and Family Development (TFD). TFD is now part of the performance-based contracts for vendors overseeing RI Works activities. Two prime vendors are contracted for TFD. The previous principles and standards for Youth Success are largely the same for TFD. Both vendors are working cooperatively with the RI Department of Health (RIDOH), to continue a close partnership with the Nurse Family Partnership and other family visiting programs. Joint meetings are held between RIDOH, DHS, and all vendors to ensure coordinated services for this population.

3. New Opportunity Homes

New Opportunity Homes (NOH) is a key component of DHS's teen and young adult programs. The New Opportunity Homes are supervised living arrangements which offer an alternative option for pregnant and parenting RI Works Program applicants/recipients who are unable to remain at home with their own parents or guardians. New Opportunity Homes provide young adults with a positive environment that is safe and nurturing. A multi-disciplinary team reviews prospective residents to determine the appropriateness of a NOH, using screening criteria and assessments to assure that participant's needs may be met by a NOH. Moreover, each resident is assigned a case manager. Together, the NOH and the case management agency offer each resident educational supports and opportunities to develop social and life skills, including parenting skills, necessary to become positive parents and self-sufficient, productive adults.

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)

Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan has recommended that "Rhode Island should clarify, communicate, enforce and strengthen existing statutory rape and child molestation laws." A collaborative effort has therefore developed between each Teen and Family Development (TFD), and the DHS funded Domestic Violence Prevention program which provides education and training on the problems of statutory rape and child molestation to state and local law enforcement officials, educators, and adolescent counselors, all of whom are required to notify the RI Department of Children, Youth and Families when sexual abuse of a child is suspected. The TFD Program outreaches fathers in an effort not only to establish paternity and child support, but to encourage them to maintain an emotional relationship with their child. TFD is open to all eligible participants, regardless of sex, so that the recipient can receive specific services aimed to maximize services to younger RI Works recipients. DHS works with the Office of Child Support Services that provides services to non-custodial parents to seek work training opportunities and other resources such as counseling, if needed.

In accordance with Section 402(a)(8) of the Social Security Act (42 U.S.C. 602(a)(8)); Consolidated Appropriations Act, 2022, section 703), Rhode Island herein certifies compliance with the new expanded "Family Violence Option". The Family Violence Option provides enhanced flexibilities within Temporary Assistance for Needy Families (TANF) for domestic violence survivors. These enhanced flexibilities for Rhode Island Works recipients include exemptions from work activities, waiver from non-custodial parent requirements, and address blocks to safeguard customer wellbeing.

Rhode Island has established a contractual agreement with the Rhode Island Coalition Against Domestic Violence (hereafter Coalition) to assist the Rhode Island Department of Human Services (hereafter Department) with the expansion to the current domestic violence protections and trainings for TANF. The Coalition, with assistance from the Department's training unit, will create and record trainings for the Department's staff as well as conduct trainings for case managers, potential TANF applicants, and TANF applicants in accordance with the below.

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)

RI's EBT Restrictions

Pursuant to Section 4004 of Public Law 112-96, it is prohibited for a TANF recipient to use their TANF cash assistance benefits received under RI Works, Rhode Island General Laws 40-5.2 et seq., in any electronic benefit transfer transaction (EBT) in:

• any liquor store;

• any casino, gambling casino, or gaming establishment; or

• any retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

DEFINITIONS - For purposes of above:

LIQUOR STORE- The term 'liquor store' means any retail establishment which sells exclusively or primarily intoxicating liquor. Such term does not include a grocery store which sells both

intoxicating liquor and groceries including staple foods (within the meaning of section 3(r) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(r))).

CASINO, GAMBLING CASINO, OR GAMING ESTABLISHMENT- The terms 'casino', 'gambling casino', and 'gaming establishment' do not include:

• a grocery store which sells groceries including such staple foods and which also offers, or is located within the same building or complex as, casino, gambling, or gaming activities; or

• any other establishment that offers casino, gambling, or gaming activities incidental to the principal purpose of the business.

It is illegal to withdraw TANF benefits from an ATM located in one of the prohibited locations, or to use TANF benefits at a point of sale (POS) terminal located in a prohibited location.

Rhode Island will compile a report of the EBT restricted transaction quarterly. Any person receiving cash assistance through the RI Works program who uses an EBT card in violation shall be subject to the following penalties:

• For the first violation, the household will be sent a warning that a prohibited transaction occurred;

• For the second violation, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location;

• For the third and all subsequent violations, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location AND for the month following the month of infraction, the amount of cash assistance to which an otherwise eligible recipient family is entitled shall be reduced by the portion of the family's benefit attributable to any parent who utilized the EBT card in a restricted location. For a family size of two (2), the benefit reduction due to noncompliance with use of EBT at a restricted location shall be computed utilizing a family size of three (3), in which the parent's portion equals one hundred thirty-seven dollars ($137).

If an individual believes that the intended action regarding usage of EBT cash at restricted locations is incorrect, they may request a hearing before the Executive Office of Human Services Hearing Officer within thirty (30) days of the mailing of the notice of adverse action. The individual may request that benefits be continued pending the outcome of the hearing if the request is made within ten (10) days of the mailing of the notice.

Adequate Access to Cash Assistance

Recipients, and authorized payees, access EBT cash benefits by using a plastic Rhode Island EBT card and their personal identification number (PIN). The RI EBT system provides access to cash benefits at bank, credit union, and retail store automated teller machines (ATMs). Some retail establishments also provide access to cash accounts at point-of-sale (POS) terminals which display the QUEST logo. This service is called a cash back transaction and policies on its availability and limits on the amount of cash dispensed are set by the individual store. The EBT card can be used in RI and nationwide at participating ATMs and point-of-sale (POS) devices. Any location that uses the NYCE or QUEST logo will allow for EBT card usage. There are over 900 POS locations statewide alone, these locations are in every city and town in Rhode Island.

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 term 'electronic benefit transfer transaction' means the use of a credit or debit card service, automated teller machine, point-of-sale terminal, or access to an online system for the withdrawal of funds or the processing of a payment for merchandise or a service. Payment of RI Works Program cash benefits through an electronic benefit transfer (EBT) system is authorized by RIGL. 40-5.2-31. Cash benefits are credited to an EBT account in the recipient's name on the first and sixteenth of the month including weekends and holidays.

Recipients, and authorized payees, access EBT cash benefits by using a plastic Rhode Island EBT card and their personal identification number (PIN). The RI EBT system provides access to cash benefits at bank, credit union, and retail store automated teller machines (ATMs). Some retail establishments also provide access to cash accounts at point-of-sale (POS) terminals which display the QUEST logo. This service is called a cash back transaction and policies on its availability and limits on the amount of cash dispensed are set by the individual store. The EBT card can be used in RI and nationwide at participating ATMs and point-of-sale (POS) devices. Any location that uses the NYCE or QUEST logo will allow for EBT card usage. There are over 900 POS locations statewide alone, these locations are in every city and town in Rhode Island.

Each month, recipients can make a total of two (2) free cash withdrawals from ATMs. For each additional ATM cash withdrawal in the month, a fee of two dollars is charged. The fee is automatically deducted from the recipient's cash benefit account. No fee is charged when cash benefits are accessed at POS terminals.

RI EBT cards are issued via mail, or under certain circumstances issued in a DHS field office using special card printing. Cardholders must report lost, stolen, or damaged RI EBT cards to the Customer Service Help Line at 1-888-979-9939. A Customer Service Representative invalidates the card thereby protecting the unused benefit amounts. If someone uses the card before its status has been changed, the benefits cannot be replaced. No fee is charged for the replacement of any lost, stolen, or damaged RI EBT card. Cardholders may request a new card by contacting the local DHS office and completing a DHS EBT-10, EBT Replacement Form. Replacement RI EBT cards are mailed by noon the next business day after the authorization file has been successfully transmitted.

Fees And Surcharges for EBT Transactions

The following verbiage is on the EBT usage brochure provided to RI Works clients and available at all DHS field offices:

There is never a transaction fee for using your Cash Benefits to get cash at a POS machine. At ATMS, after your second cash withdrawal in a month, a two dollar transaction fee is automatically taken out of your Cash account each time you withdraw cash. A surcharge is an additional fee that can be charged by the owner of an ATM or POS for using that machine. Surcharges will be taken from your account automatically. If you do not want to pay the surcharge, cancel the transaction and go to another ATM or POS location that does not charge a surcharge.

DHS Website

In addition, the RI Works policy, including EBT information on fees and surcharges is located on the DHs website: Supplemental Nutrition Assistance Program (SNAP) | RI Department of Human

Services and the RI Secretary of State website at: Rhode Island Works Program Rules and Regulations (218-RICR-20-00-2) - Rhode Island Department of State.

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)

The State of Rhode Island does not intend to treat families moving into the state differently than established residents.

J. INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

The RI Works Program has adopted the provisions in section 402 (b) of PRWORA with regard to legal non-citizens. This requirement to comply with PRWORA will remain in effect according to all applicable changes made to the federal law, as that Act may hereafter be amended. Legal non-citizens must meet income and resource criteria including their sponsor's income and resources. Such individuals will be eligible for cash assistance at the same levels and under the same rules as citizens. In order to be eligible, the non-citizen must be:

- A qualified non-citizen who entered the U.S. prior to 8/22/96; or
- A qualified non-citizen who entered the country on or after 8/22/96 and is exempt from the five (5) year ban as defined below; or
- After the five (5) year ban, a qualified non-citizen who entered the U.S. on or after 8/22/96.
- Qualified non-citizens who are exempt from the five (5) year ban include:
    - Refugees, under section 207 of the Immigration and Nationality Act (INA);
    - Asylees, under section 208 of the INA;
    - Amerasian entrants as defined under section 584 of the Foreign Operations, Export Financing and Related Programs Appropriations Act of 1988;
    - Cuban or Haitian entrants under section 501 (e) of the Refugee Education Assistance Act of 1980;
    - Lawfully residing honorably-discharged veterans (except one discharged for reasons of immigration status), and the non-remarried widow or widower of the veteran;
    - Non-citizens on active duty in the U.S. Armed Forces, their lawfully residing spouses and unmarried dependent children;
    - Battered victims with a petition pending under 204 (a) (1) (A) or (B), or 244 (a) (3) of the INA; or
    - Victims of human trafficking in accordance with section 107 (b) of the Victims of Trafficking and Violence Protection Act of 2000.
- Qualified non-citizens who entered the U.S. on or after 8/22/96, who are subject to the five (5) year ban include:
    - Lawful permanent residents (LPR)
    - Parolees for at least one (1) year under 212 (d) (5) of the INA
    - Conditional entrants under 203 (a) (7) of immigration law in effect before 4/1/80
    - Certain American Indians born outside the U.S.
    - Compacts of Free Association (COFA) members.

A person who is not a United States citizen and does not meet the alienage requirements established in PRWORA, as amended, is not eligible for cash assistance. Those applicants who are ineligible include undocumented and/or illegal immigrants and persons documented as temporary visitors.

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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)

Rhode Island provides an objective process for the delivery of benefits and the determination of eligibility, for fair and equitable treatment, and for complaints and an appeals process for those recipients that have been adversely affected. Specific details pertaining to the policy and procedures are contained in Rhode Island DHS Manual Sections Civil Rights Compliance and Complaints and Hearings.

Furthermore, a parent or caretaker who requests assistance for a child shall meet or speak with an agency representative as soon as possible and no later than five (5) days from the date of request for assistance. The application for assistance shall be accepted or denied by the Department no later than thirty (30) days following the date of application.

A family found by the Department to meet the eligibility criteria shall be entitled to receive cash assistance from the date of submitting a signed application. The family members shall be eligible for cash assistance for so long as they continue to meet the eligibility criteria and parents shall be eligible so long as they meet the terms and conditions of the work requirements.

Any applicant or recipient aggrieved because of a decision by the Department, including but not limited to, a decision regarding eligibility for benefits, the amount of benefits, terms of an Employment Plan or a delay in making a decision with respect to an application for assistance shall be entitled to an appeal. The Department shall provide an applicant with written notice of a decision to deny benefits and shall provide recipients written notice at least ten (10) days in advance of a decision to terminate or reduce benefits to the family. Notices shall be in easy to understand language and shall explain the reason for the Department's decision and cite the relevant section of the Department's regulations. The family may appeal the decision by filing a written request with the Department within thirty (30) days of the date the notice was mailed. If the recipient files the request within ten (10) days of the date the notice was mailed, the recipient may receive benefits without reduction pending the outcome of the appeal. Hearings with respect to public assistance shall be conducted by the Department

L. INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

The Patient Protection and Affordable Care Act of 2010 added a provision to the Social Security Act requiring each state to indicate its intention to assist individuals in training for, seeking and maintaining employment in the eldercare workforce. Rhode Island notes its status as one of the most elder-populated states (proportionately) in the country, and has been proactive historically in ensuring our TANF recipients are prepared to work effectively in this field which serves 19.7% of the state’s population (2020 census). The current national average is that the

elderly represent 18.1% of the US population, and this proportion will increase both nationally and in Rhode Island, per the Administration on Aging. It is predicted that, in 2030, elderly persons will be 19.7% of the national population, and 21.4% of Rhode Island's population.

Vocational trainings, which the Department supports for TANF recipients who choose them, in the areas of Healthcare Exploration, Homemaker, Certified Nursing Assistant and Medical Assistant are provided by multiple agencies in Rhode Island. These agencies have incorporated much material devoted to preparation for work with the elderly

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 of Rhode Island expends funds to administer and support a range of benefits and services to assist low-income needy children and families. For purposes of Rhode Island's TANF State Plan, the definition of low-income needy family means a family which includes a dependent child(ren) under age 18, or 19 if full-time student, and a parent/caretaker relative with a gross household income level which is at or below 250% of the Federal Poverty Level (FPL) or 60% of the AMI, whichever is higher. While it is recognized that income and resource limits may differ somewhat from program to program, in order to receive benefits or services through programs described in this section of the R. I. TANF State Plan, a family must meet this state's definition of low income.

The following outlines benefits and services which are funded as either a separate State Program and meets one or more of the four purposes of TANF and thus qualify as state maintenance of effort (MOE) expenditures, claimable under TANF regulations.

1. Separate State Programs:

• Child Care Assistance for both cash assistance and non-cash low income working families up to 261% of the FPL to match current policy for the Child Care Assistance Program.

– Child care subsidies are provided to active RI Works parents engaged in approved activities and for all low income working families engaged in employment for 20 or more hours per week, as well as low income youth enrolled with the Teen and Family Development program who are completing their high school diploma or GED with employment plans for at least 20 hours/week. Current eligibility criteria for non-cash assistance parents who meet the income criteria are outlined in Rhode Island's Child Care and Development Fund (CCDF) State Plan. Child Care Assistance ends dependence of needy families on government benefits by promoting job preparation and supporting working families. Consistent with TANF Purpose 2.

• State funded Head Start Services for low-income children who are not able to be served through federally funded Head Start Programs - State-funded head start is a means tested program and accepts only those families who are determined low income needy as defined above. Children between 3 and 4 years of age benefit by school readiness programs and parent involvement which is required by all families and these parents gain information about adult education, job skills training and work opportunities, thus improving their ability to become economically independent. Consistent with TANF Purposes 1, 2, 3, 4.

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• Emergency Assistance and residential services for vulnerable youth, through the RI Department of Children, Youth and Families - Emergency Assistance (EA) as allowed under prior law with direct TANF funding. supports the maintenance of services for those families who would have qualified for EA under the prior program as described in Rhode Island's State Plan in 1995. Services are provided to children who are victims of abuse and/or neglect, or at risk of abuse and neglect. EA is used for TANF MOE only to the extent that State-only dollars are expended to support the range of family intervention, counseling and case management services provided. Separately, state-funded residential services through DCYF, for those with active reunification plans, also provide a safe temporary environment for children as families seek stability. In such circumstances, children may not be absent from the home for more than 180 days even if reunification plans are maintained. These expenditures are not matched with any other federal or non-federal funding source. Consistent with TANF Purposes 1 and 3.

• Child Support Pass-through payments to children - The state pass-through of eligible payments to children of non-custodial parents increases the family's income and supports the likelihood that the custodial parent's household income will increase, by both regular child support payments and with the TANF work program, their ability to prepare for and enter the job market. Consistent with TANF Purpose 2.

• Rental Assistance Payments through the State Community Action Fund - Rental assistance may be provided through CAP agencies using state-only dollars. Low income families qualify if they can demonstrate an ability to maintain themselves in the home or apartment and have a short-term need for special assistance. Consistent with TANF Purposes 1 and 4.

• State funded low-income heating assistance - Low income families may receive state funded heating assistance during the year. This is administered by the RI Community Action Programs. Consistent with TANF Purposes 1 and 4. • State funded Supportive Housing and Development Services for low income families administered through Office of Housing and Community Development and Rhode Island Housing - The State of Rhode Island supports housing for low income families who need help in transitioning to permanent housing, who may be working toward qualifying for the purchase of affordable housing, or who need emergency intervention to prevent the loss of otherwise stable housing. Stable housing is a core need of families who are trying to prepare for or maintain themselves in a job. Consistent with TANF Purposes 1, 2, and 4.

• Governor's Workforce Board job training and education for disadvantaged youth and adults – The RI Governor's Workforce Board (GWB) has funded a significant number of programs throughout Rhode Island which are designed to provide low-income youth and adults with job training and access to employment resources. Services include job finding skills and for many in Rhode Island, skill upgrading programs. Both youth and adults are either unemployed or underemployed and are held to a means tested application process. Some programs are geared to meet the special needs of young parents, for both custodial and non-custodial parents. Consistent with TANF Purposes 1, 2, 3, and 4. • State funded Adult Literacy Services - Rhode Island has adult education programs through the Rhode Island Department of Education (RIDE). RIDE has worked very closely with the TANF Program to create contextualized learning opportunities for low-income parents who are not academically eligible for much post-secondary programming. - Consistent with TANF Purposes 1, 2, 3 and 4.

• Youth exiting the foster care system - Intervention and Treatment Services administered by RI Department of Children Youth and Families are essential services which help vulnerable youth to move into productive life skill/management programs. Services provided to youth are designed to ensure that they avoid early pregnancy, graduate high school, follow appropriate

healthy living habits, and have access to responsible and supportive adults either within their respective families or through mentorships provided by programs paid for with state-only dollars. - Consistent with TANF Purposes 3, and 4.

• Under the category known as short-term, non-recurrent benefit programs, funds may emanate from state general revenue, charitable organizations, non-profit, or local government resources. Programs may include a benefit to a custodial parent in lieu of child support, a onetime benefit to those who qualify for Rhode Island's Earned Income Tax Credit or to any low-income family, including those receiving some form of public support, and one-time benefits may take any form, including but not limited to, food, restoration of utilities or avoidance of utility shut-offs, appliance replacement to enable food storage or meal preparation, auto repairs, or other basic necessities - Consistent with TANF Purposes 1 and 2.

• State-funded higher education grants to low-income youth helps families prepare older youth for careers - Consistent with TANF Purposes 2 and 3.

Systems for tracking and managing funding streams, beneficiary education, training, work activities, and other child and families support programs are in place as well as data reporting to meet requirements outlined in Final TANF Regulations. Administrative costs for technology would also be claimable as MOE under the State's TANF Program.

2. Non-Assistance

The state supports several other MOE-funded services for low-income needy families including, but not limited to, recurring short-term benefits, as noted below.

• Short-term Cash Assistance or Benefit Programs - Under the RI Works Program, the state may implement a short term (not more than 4 consecutive months) cash payment or benefit program for qualifying applicants for cash assistance and low-income families. The state may also provide non-recurrent, short-term benefits to low-income families while TANF Emergency Contingency Funds, or its successor legislation, is available to these families.

• State Earned Income Tax Credit - The Rhode Island State Earned Income Tax Credit (SEITC) has both a non-refundable as well as a refundable tax credit which is based upon twenty-five (25%) percent of the federal Earned Income Tax Credit. Consistent with RIGL. 44-20-2.6 (d) and 44-30- 98, Article 30, Rhode Island taxpayers filing for State EITC who meet both financial eligibility criteria as defined by federal tax law to claim EITC, and who have at least one (1) dependent child in their family, will receive a refundable amount equal to up to twenty-five (25%) percent of the federal EITC. The Rhode Island General Assembly may legislatively adjust, from time to time, the percentage of the federal rate used by this State, to determine the State EITC amount refunded to low income working families.

• Disaster Relief - The State of Rhode Island provides short-term non-recurring benefits to victims who have been affected by Hurricanes and other officially declared disasters from time to time.

• Property Tax Relief for Income Eligible Home Owners and Renters - The State of Rhode Island provides property tax relief in the form of tax refunds to individuals 65 and older, disabled individuals as well as non-disabled/non-elderly individuals and families who meet income eligibility requirements and who file for such tax refunds. Consistent with RIGL. 44-33, the refundable tax credit is based upon the amount that property taxes or rent constituting property taxes exceeds the amount of the low-income thresholds established in law and for purposes of TANF MOE, the State would only claim expenditures paid to low-income families.

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• Community-Based Work, Training, Housing, Food Assistance, Emergency Needs, and Family Support and Development Programs for low-income parents and children funded through state and local non-profit funding streams such as:

The Rhode Island Foundation, the United Way of Rhode Island, which collectively support a wide range of employment and training, shelter, food assistance, emergency needs and community development initiatives targeted to improve outcomes for youth and families in the areas of economic self-sufficiency. Only non-matched qualifying funds and services may be claimed toward Rhode Island's TANF MOE, including, but not limited to third-party and charitable contributions supporting the RI Community Food Bank's distribution of food to low income Rhode Island families. Other non-profit agencies that contribute to TANF MOE include: The Roam Catholic Diocese of Providence, the Rhode Island Alliance of Boys and Girls Clubs, and the Salvation Army of Providence.

• State-funded Programs for Youth and Families administered through the Community Action Network. Programs and services funded through the RI Community Action Network assist children and families throughout the state. These state funded programs and services meet at least one or more of the four purposes of TANF and include but are not limited to youth development, state funded nutrition programs, energy, early childhood programs, housing services programs.

• State funded legislative grants to community based special programs and services. The State legislature funds a wide range of programs and services which benefit the needs of families, children and the community. Family intervention services, truancy intervention, substance abuse counseling, transportation, youth mentoring, parenting, and other types of special programs are delivered to at-risk youth, children, and/or parents. These services meet at least one of the four purposes of TANF.

• Adult Literacy and Job Training Development funded by the Governor's Workforce Board. State funded programs which target youth as well as custodial parents and non-custodial parents are provided throughout the state for those who need basic education, GED, and job skills in order to compete in the Rhode Island job market. Such programs improve the economic well-being of youth and families by assisting both unemployed, under-employed individuals, some of whom may be transitioning from youth training school or adult correctional institution and need re-entry services. These programs are administered through the RI Department of Labor and Training, RI Department of Corrections, as well as the RI Department of Education. These goals are consistent with all four purposes of TANF and thus meet the requirements for TANF-MOE.

• State funded Supplemental Security Income (SSI). In accord with DHS Policy Section 0402.10, Standards of Assistance, SSI State Supplements paid to children and parents receiving Supplemental Security Income. These payments augment the federally funded SSI payments and assist families who are typically unable to improve their household resources because they are either unable to work themselves or must remain in the home to care for a disabled child(ren).

• RI Works Vendors - RI Works has contracted with vendors who are responsible for delivering services, managing work activities, reporting hours, and notifying DHS of required sanctions or closures. All contracts are performance based and critical for the success of the RI Works program. Vendors braid funding from a multitude of sources and are asked to contribute to TANF-MOE when applicable.

TANF CERTIFICATIONS

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States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the state will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which state agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—	
3. (A) have been consulted regarding the plan and design of welfare services in the state so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the state and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the state program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the state program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes

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The State Plan must include	Include
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6. (A) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6. (B) refer such individuals to counseling and supportive services; and	Yes
6. (C) 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 (section 402(a)(7) of the Social Security Act).	Yes
7 Establish and enforce standards and procedures to*—	
7. (A) ensure that applicants and potential applicants for assistance under the state program funded under this part are notified of assistance made available by the state to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking;	Yes
7. (B) ensure that case workers and other agency personnel responsible for administering the state program funded under this part are trained in—	
7. (B) 1. the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking;	Yes
7. (B) 2. state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault,	Yes

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The State Plan must include	Include
or stalking; and	
7. (B) 3. methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking; and	Yes
7. (C) ensure that, if a state has elected to establish and enforce standards and procedures regarding the screening for, and identification of, domestic violence, sexual assault, or stalking pursuant to paragraph (7)—	
7. (C) 1. the state program funded under this part provides information about the options under this part to current and potential beneficiaries; and	Yes
7. (C) 2. case workers and other agency personnel responsible for administering the state programs funder under this part are provided with training regarding state standards and procedures pursuant to paragraph (7).	Yes

TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above?

Yes

JOBS FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

Components of the Jobs for Veterans State Grants State Plan

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

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A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

Job Centers offer specialized services to eligible veterans and/or eligible persons under the Jobs for Veterans State Grant Program (JVSG). Non-JVSG staff will conduct an assessment to determine if a client is an eligible veteran or eligible person with one or more qualified Employment Barriers (EBs), or additional populations as identified by the Secretary of Labor. If applicable, they may be referred to a Disabled Veterans Outreach Program (DVOP) Specialist staff to render individualized career services. DVOPs will conduct a comprehensive assessment of education, skills, and abilities of each referred veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment and training goals, interim objectives, and appropriate services that will enable the veterans to meet their goals. When a veteran is determined job ready and/or completes training, DVOPs will collaborate with a Local Veterans Employment Representative (LVER) and American Job Center (AJC) staff for information about veteran employment opportunities. DVOP and LVER appointments are currently conducted through the Microsoft Bookings platform and by in-person appointments.

If training has been identified in the Individual Employment Plan, DVOPs will make an appropriate referral to a suitable training program including, but not limited to, the following:

1. Occupational Skills Training
2. On-the-Job Training
3. Job Readiness Training
4. Adult Education and Literacy
5. Employer Customized Training

In addition, DVOPs will continue to provide individualized career services, in combination with follow-up activities. DVOPs will monitor the veteran's progress throughout training. When a veteran is determined to be job ready and/or completes training, DVOPs will collaborate with a LVER and/or Job Center staff, as staffing levels allow, for information about veteran employment opportunities. LVERs and/or Job Center Staff will provide eligible veterans and eligible persons with sufficient opportunities for job placement through the following services:

1. Referrals to local, state, and federal job opportunities
2. Training on "veteran-only" online employment resources
3. Referrals to employers who are interested in hiring veterans
4. Referrals to local federal defense contractors
5. Facilitating networking workshops, in conjunction with employers, that promote the benefits of hiring veterans; and
6. Promoting job fairs for veterans

LVER staff will conduct follow-up activities with employers to ensure veterans and eligible persons are successful throughout the hiring process.

B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

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The eligible veteran population to be serviced under the JVSG program has been outlined in Veteran Program Letter (VPL) No. 05-24.

The eligibility criteria ensure DVOP specialists serve those participants who are most in need of individualized career services and have adequate time to devote services to specialized populations prioritized under 38 U.S.C. § 4103A. DVOP-eligible populations who are not referred to a DVOP specialist must be referred to other workforce programs in accordance with priority of service requirements, as described in VPL 07-09 and TEGL 10-09.

Populations Eligible for DVOP Services

DVOP specialists must limit their activities to providing services to eligible populations who:

- Are interested in receiving one or more individualized career services, and
- Meet at least one of the following two criteria:
    - Are defined as an eligible veteran or eligible person and are experiencing at least one of the qualifying employment barriers (EBs) defined in Section VI.A.1 below; or
    - Are members of additional populations eligible for DVOP specialist services as authorized by the current annual appropriations act, as outlined in Section VI.A.2. below.

1. Qualifying Employment Barriers (EBs). To receive DVOP services, an eligible veteran or eligible person must affirm that they are experiencing at least one of the following (EBs):

a. Has a disability, which may include any of the following:

i. Special disabled veteran, defined in 38 U.S.C. § 4211(1) as a veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined to have a serious employment handicap; or person who was discharged or released from active duty because of a service-connected disability.

ii. Disabled veteran, defined in 38 U.S.C. § 4211(3) as a veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs(2); or a person who was discharged or released from active duty because of a service-connected disability.

iii. Other disability. Eligible veterans and eligible persons who self-identify as having a disability, as defined by the Americans with Disabilities Act, 42 U.S.C. § 12102.

(2) An individual who attests to having a disability claim pending with the VA should be considered to have an approved claim for the purposes of determining the qualifying employment barrier. A veteran with a 0 percent rating does not qualify as being "entitled to compensation" within the meaning of the statute.

b. Is a Vietnam-era veteran, as defined by 38 U.S.C. § 4211(2) as an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era, as defined by 38 U.S.C. § 101(29).

c. Is a recently separated veteran, defined in 38 U.S.C. § 4211(6) as a veteran who was discharged or released from active duty within the last three years.

d. Has been referred for employment services by a representative of the Department of Veterans Affairs.

e. Is experiencing homelessness, as defined in Sections 103(a) and (b) of the McKinney Vento Homeless Assistance Act (42 U.S.C. § 11302(a) and (b)).

f. Is justice-involved, as defined in WIOA Section 3(38), 29 U.S.C. § 3102(38) (definition of "offender").

g. Is between the ages of 18-24 years of age at the time of enrollment.

h. Is educationally disadvantaged, meaning that the individual lacks a high school diploma or equivalent certificate.

i. Is economically disadvantaged, which means any of the following:

j. Meets the definition of a low-income individual in WIOA Section 3(36), 29 U.S.C. § 3102(36).

ii. Unemployed.

iii. Heads of single-parent households containing at least one dependent child.

Note: An eligible person must personally meet eligibility criteria. In other words, they must both: a) meet the definition found in 38 U.S.C. § 4101(5), and b) be experiencing at least one of the criteria listed above (e.g., homeless, justice-involved, etc.). An eligible person who is not a veteran may not claim eligibility for DVOP services based on their spouse's status as, for example, a Vietnam-era veteran.

2. Additional Populations. Annual appropriations acts may authorize JVSG staff to serve certain non-veteran populations. Continued service to these individuals is contingent upon future appropriations act authorization. States are responsible for consulting with the DVET and reviewing the appropriations act each year to ensure DVOP specialists are serving only eligible populations. At the time of publication of this VPL, Congress has authorized DVOP specialists to serve, and LVERs to work with employers on behalf of, the following additional populations:

a. Transitioning Service Members (TSM) who, at the time of enrollment have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling.

b. Wounded, ill, or injured members of the Armed Forces who are receiving treatment in military treatment facilities or warrior transition units.

c. Spouses or other family caregivers of those wounded, ill, or injured service members described in subparagraph b.

3. *Participant Eligibility and Privacy*. States must accept an individual's verbal, written, or electronic confirmation of their eligibility status and experiences as sufficient evidence for referral to DVOP services.

States must protect participants' privacy to the greatest extent possible. When requesting information about a participant's disability or employment barriers, states must:

a. Clearly state that the information is solely for determining eligibility and service prioritization.

b. Emphasize that participation is voluntary.

c. Guarantee confidentiality of all shared information.

d. Affirm that refusing to provide information will not result in negative consequences.

e. Assure that information will be used only in compliance with legal guidelines.

DVOPs outreach to veterans with one or more qualifying Employment Barriers (EBs). State strategies have also been developed to address veterans that do not qualify for federal homeless programs and/or Veteran Readiness and Employment (VR&E) services. The state will target non-qualifying veterans and refer them to the local Job Centers for re-employment and training services offered by Wagner-Peyser and WIOA.

Rhode Island's veteran population includes incarcerated veterans who are served by the Department of Corrections along with the Job Center and DVOP staff after the veteran is released from the Adult Correctional Institution (ACI), and Native American veterans who receive services in collaboration with Job Center staff and the Rhode Island Indian Council in Providence. Through the collaboration with the Rhode Island Indian Council Native American veterans with EBs will be identified and outreached in an attempt to provide services by DVOP staff.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

Disabled Veterans Outreach Program (DVOP) Specialists

As an integral part of the State's workforce system the DVOP staff's primary focus is to meet the needs of eligible veterans, eligible persons that have one or more qualifying Employment Barriers (EBs), and other authorized populations. As outlined, under 38 U.S.C. 4103 (a), DVOP Specialists will provide individualized career services and facilitate job placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor.

DVOP staff will only service eligible veterans with EBs, other eligible veterans, and eligible persons as defined by the Secretary of Labor. Veterans requiring individualized career services will be assigned to a DVOP Specialist after receiving an initial Intake Assessment conducted by the identified Job Center staff member or when referred by another agency that has determined to be eligible for DVOP services.

The DVOP Specialist will conduct a comprehensive assessment of education, skills, and abilities of each referred veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment goals, interim objectives, and appropriate services that will enable the veteran to meet their employment goals, recording all services in State's MIS system (EmployRI.org) Regular contact between the DVOP and participant by phone, in-person or virtually is utilized to provide participants with individualized and comprehensive services. Services are delivered in-person, via phone or conducted through Microsoft Bookings and may

be scheduled directly or on the Bookings appointment link on the DLT website. All activities, services and case notes and appropriate data are entered by the DVOP Specialist into the state's case management information system and virtual one-stop for monitoring and reporting purposes.

In order to maximize services to eligible veterans and eligible persons, DVOP staff conducts outreach activities in-person or virtually at a variety of sites including, but not limited to:

1. VA Veteran Readiness and Employment (VR&E)
2. Homeless Veterans Reintegration Program (HVRP) grantees
3. Department of Veterans Affairs Medical Center and Vets Center
4. Homeless shelters
5. Community Stand Down Events
6. State vocational rehabilitation agencies
7. Community and Social Support agencies and resources

Local Veterans Employment Representatives (LVER)

As a vital part of the state labor exchange system the LVER staff will focus on the primary role of employer outreach on behalf of the job ready veterans, as outlined in VPL 05-24 and 38 U.S.C 4104 (b).

The principal duties of a LVER are:

- Conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups; All activities, services and case notes and appropriate data are entered by the LVER into the state's case management information system and virtual one-stop for monitoring and reporting purposes and;
- Facilitate employment, training, and placement services furnished to veterans in a state under the applicable state employment service delivery systems.

In the effort to promote the hiring and retention of eligible veterans and eligible persons the LVER staff perform outreach to local employers, small and large. To facilitate and promote the hiring of veterans LVERs establish a rapport with each employer by making employer site visits and following up with them via phone and email. This rapport allows the LVER to emphasize the benefits of hiring veterans to employers. LVER staff continue relationship building in response to the employer's needs and objectives to retain better employees. LVERs plan employer workshops and promote job fair and recruitment events. LVERs also promote job development and provide information on hiring incentives for employers that hire and retain qualified veterans.

Integration of LVER staff in Job Centers connects the LVER with the Business Service Specialist (BSS) team to provide services to eligible veterans and employers. This integrated employer engagement team has both LVER and BSS who are cross trained to share employer knowledge to the team. The MIS system is one of the methods used by the team which facilitated information sharing. Team meetings are also utilized to support direct transfer of knowledge. Registered Apprenticeship (RAP) is a proven model for businesses and job seekers. RAPs offer the opportunity to train participants in high demand occupations, while the participants are earning wages. The LVER has direct contact with the DLT apprenticeship liaison to refer employers to become a Registered Apprenticeship within the State. The DLT liaison works closely with LVER and DVOP staff to increase the number of veterans and eligible persons within the apprenticeship program.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

The integration of DVOP staff in each Job Center connects veteran clientele to all programs and services the Job Center has to offer. This may include partner programs such as Workforce Innovation and Opportunity Act (WIOA) or the State Office of Rehabilitation Services (ORS) and/or ongoing activities including job recruitments, workshops, computer classes and job fairs.

DVOP staff are fully integrated members of the Job Center team and are required to actively participate in all Job Center activities so their clients can take full advantage of all available employment and training services. Staff meetings and training sessions amongst Job Center partner programs and agencies such as WIOA, Trade Adjustment Assistance Program (TAA), Rapid Response, Reemployment Services and Eligibility Assessment (RESEA), and employment services to partner programs including ORS, and RI Department of Elderly Affairs (DEA), Department of Human Services (DHS), are critical to the professional development of the DVOP staff. Their participation in these partner staff meetings broadens their knowledge of programs and resources, thus improving their capacity to effectively serve their client base.

Veteran clientele benefit from the team approach for service delivery and internal networking among staff. On behalf of their clients, DVOP staff are dedicated to the veteran's program and work closely with partner staff whose expertise include WIOA, TAA, Rapid Response, RESEA, and Employer Services, as well as partner programs including ORS, DEA, and DHS. Outreach activities ensure that the veteran community is aware of the services provided by the DVOP staff as well as the Job Center. To help veterans access and connect to Job Center partner programs, resources and services, outreach activities are conducted either in-person or, if possible, at the following locations:

a. Veteran Community Care Center at the VA Regional Hospital;
b. Homeless Veterans Projects at the Rhode Island Veterans Home;
c. Veteran Readiness and Employment (VR&E) unit at the VA Regional Office;
d. TAPS seminars and follow-up activities at the Newport Naval Base;
e. National Guard demobilization event; and
f. Yellow Ribbon Events

Rhode Island employs a Veterans Employment & Training Manager to oversee the implementation and delivery of veteran services in the state. This individual is responsible for the assessment and monitoring of all services provided to veteran clients; ensuring compliance with federal Veterans Priority of Service requirements, coordination of services among partners, and the effective utilization of employment and training services. The success of this plan will be monitored and assessed by the review of case notes, regularly generated system reports, and quarterly reports made available via the State's EmployRI database.

The LVER staff are integrated into the Job Center Business Service Unit and participate in monthly meetings to review and update current employer outreach strategies. These employer outreach reviews are to ensure that veterans and eligible persons are integrated into service delivery strategies. The Employer Engagement Integrated team allows the co-sharing of information about the workforce needs of employers in the community, as well as a direct communication pathway for Employers to learn about services that the State offers. This integrated team communicates both within the One Stop staff and meets with managers about

how best to serve employers in the community. Both direct communication and an MIS system use, allow the knowledge to be easily available to the team.

At this time, Rhode Island does not operate a Consolidated DVOP/LVER Position (CP). While CPs are authorized at the national level under JVSG guidance, the State has not implemented a consolidated position and continues to operate with separate DVOP and LVER roles. Rhode Island remains open to exploring the potential use of a Consolidated Position in the future. The State will continue to assess operational needs, staffing models, and best practices from other states, and will engage in discussions with federal partners and state counterparts should implementation of a CP be considered.

Rhode Island recognizes the importance of dedicated veteran staff who can fully meet the needs of the military community of Rhode Island.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

Section 28.1 of the Collective Bargaining Agreement (CBA) between the State of Rhode Island and Local 401 of the Service Employees International Union states that both parties “agree to meet and discuss issues arising with regards to matters wholly omitted” in the current collective bargaining agreement. Per the terms of the CBA; management may not unilaterally create provisions not included within the contract, which would include any financial or nonfinancial performance based bonuses under the JVSG 1% set aside since such a program is not explicitly present in the current contract. Negotiation of such an incentive program covering only JVSG-funded staff persons would require renegotiation of entire collective bargaining agreement; a complex, laborious, and expensive process. For this reason, Rhode Island elects not to participate in the incentive award program as they are not reasonably compatible with current collective bargaining agreements.

2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE PERCENT INCENTIVE AWARD ALLOCATION;

N/A

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

N/A

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

Section 28.1 of the Collective Bargaining Agreement (CBA) between the State of Rhode Island and Local 401 of the Service Employees International Union states that both parties “agree to meet and discuss issues arising with regards to matters wholly omitted” in the current collective bargaining agreement. Per the terms of the CBA; management may not unilaterally create provisions not included within the contract, which would include any financial or nonfinancial performance based bonuses under the JVSG 1% set aside since such a program is not explicitly

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present in the current contract. Negotiation of such an incentive program covering only JVSG-funded staff persons would require renegotiation of entire collective bargaining agreement; a complex, laborious, and expensive process. For this reason, Rhode Island elects not to participate in the incentive award program as they are not reasonably compatible with current collective bargaining agreements.

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

JVSG Performance Measures	**Goals**
Employment Rate 2nd Quarter After Exit	**63.3%**
Employment Rate 4th Quarter After Exit	**61.0%**
Median Earnings 2nd Quarter After Exit	**$9,750.00**

UNEMPLOYMENT INSURANCE (UI)

(OMB Control Number: 1205-0132)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

Rhode Island's most recent SQSP was updated in December 2025. A copy of the SQSP will be submitted with the 2026 State WIOA Plan Modification.

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SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

(OMB Control No. 1205-0040)

A. ECONOMIC PROJECTIONS AND IMPACT

1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D)) (MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)

Using the U.S. Bureau of Labor Statistics data for Employed persons by detailed occupation and age (source: Employed persons by detailed occupation and age : U.S. Bureau of Labor Statistics), the first table below identifies the current occupations with 100,000 employed individuals or great, that have the the highest percentage of workers age 55 and older (33% or greater). While some of these occupations reflect more longevity in the position, rather than a new hire placement opportunity for older workers (ex. Clergy, Chief Executives, Psychologists, etc.); others offer robust potential employment opportunities for older workers.

The second table utilizes state Labor Market Information office occupational projections for the ten year period of 2022-2032. This analysis identifies which of the aforementioned occupations employing the highest percentage of workers age 55 and older are projected to grow in the state of Rhode Island, including the projected total openings and median and entry wage. The results removed any occupations requiring an Associates Degree or higher to identify the most promising occupations that may provide employment opportunities for older workers. According to the data, in addition to high demand retail and hospitality positions; positions relating to Bookkeeping, Home Health and Personal Care Aides, Bus Drivers, Janitorial, and Administrative and Secretarial appear to be the most promising for older workers.

Occupation	**Total Employment (in thousands)**	**% over 55**
Bus drivers, school	201	56.22%
Farmers, ranchers, and other agricultural managers	858	52.91%
Bus drivers, transit and intercity	271	51.66%
Clergy	395	43.29%
Facilities managers	142	41.55%
Chief executives	1,728	40.91%
Bookkeeping, accounting, and auditing clerks	1,197	39.10%
Real estate brokers and sales agents	1,016	37.70%
Motor vehicle operators, all other	231	37.66%
Executive secretaries and executive administrative assistants	234	37.18%
Other psychologists	163	36.81%
Secretaries and administrative assistants, except legal, medical, and executive	1,758	36.75%
Property, real estate, and community association managers	790	36.71%

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Musicians and singers	168	36.31%
Home health aides	656	34.30%
Personal care aides	1,667	34.19%
Librarians and media collections specialists	180	33.89%
Machinists	281	33.10%
Janitors and building cleaners	2,304	32.94%
Maintenance and repair workers, general	725	32.83%

Title	**Total Openings**	**2024 Lower Entry Wage**	**2024 Median Wage**	**Typical Education**
Fast Food and Counter Workers	26,528	**$14.00**	**$14.64**	No formal educational credential
Cashiers	19,986	**$14.00**	**$14.92**	No formal educational credential
Retail Salespersons	19,168	**$14.16**	**$16.76**	No formal educational credential
Home Health and Personal Care Aides	15,183	**$15.00**	**$20.14**	High school or equivalent
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	11,124	**$14.67**	**$17.49**	No formal educational credential
Bookkeeping, Accounting, and Auditing Clerks	5,694	**$17.86**	**$25.83**	Some college, no degree
Maintenance and Repair Workers, General	4,835	**$17.98**	**$24.00**	High school or equivalent
Secretaries and Administrative Assistants, Except Legal, Medical, Executive	4,798	**$18.29**	**$24.76**	High school or equivalent
Bus Drivers, School	2,776	**$18.19**	**$23.77**	High school or equivalent
Property, Real Estate, and Community Association Managers	1,207	**$23.67**	**$38.32**	High school or equivalent
Machinists	1,195	**$21.11**	**$28.60**	High school or equivalent
[Musicians and Singers]	*623*	***$24.96***	***$109.90***	*No formal educational credential*
Executive Secretaries and Executive Administrative Assistants	517	**$21.07**	**$33.36**	High school or equivalent
Personal Care and Service Workers, All Other	153	**$15.14**	**$16.44**	High school or equivalent

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Opportunities for Older Workers

Building opportunities for older workers to find employment and contribute their skills to the economy is a national imperative but is particularly important in Rhode Island. According to US Bureau of Labor Statistics data, in 2015 - 35% of the United States labor force was 55 years or older compared to 36% of Rhode island's labor force. Ten years later in 2025 - the share of the US labor force that is 55 years or older has risen to 38% while the share of Rhode Island's labor force that is 55 years or older rose to 40%. And with low birth rates and an aging population; that rate is expected to grow even further in the coming years.

The positive news is that Rhode Island businesses are continuing to hire older workers. The labor force participation rate for Rhode Islanders aged 55-64 was 72.1% in 2023, while the labor force participation rate for Rhode Islanders 65 or older was 21.2%. Nationally, the labor force participation rate for these two groups were 67.2% and 19.2%, respectively.

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))

According to the Rhode Island Department of Labor and Training's Labor Market Information (RI DLT LMI) Unit, the following industries are projected to rank among the fastest growing from 2022 to 2033: Food Preparation & Serving Related occupations (93,308 projected openings), Office and Administrative Support Occupations (68,876 projected openings), Sales and Related Occupations (64,730 projected openings), Transportation & Material Moving occupations (49,088 projected openings), and Healthcare Support occupations (41,128 projected openings). As previously mentioned, Rhode Island currently has a larger percentage of working age residents aged 55-64 than the national average and a larger percentage aged 65 and older than the national average– a share of older workers that is projected to grow even larger in the next decade. The imperative to retain and retrain its older population for employment will arguably be stronger in Rhode Island than in other states.

Rhode Island supports unsubsidized employment for SCSEP participants through a holistic focus that begins with ensuring that participants are placed in Host Agency training opportunities that not only connect with participant's transferable skill set, but that are aligned with high growth occupations that would offer the most opportunity for success. Rhode Island's SCSEP counselors are also cross trained WIOA Title I and Title III staff which ensures that there is dedicated job search assistance available throughout the SCSEP placement. Given the projected openings as compared to growing population of older workers; skills training would likely focus on general work readiness skills, time management, teamwork, communication, recordkeeping, problem solving and cultural and linguistic awareness, which would benefit jobseekers in an increasingly diverse economy.

The Rhode Island SCSEP program has had success in providing Rhode Island SCSEP participants with training in the "supportive services" to the above industries. RI SCSEP Past trainings and job placements have included positions such as Food Preparation and Service; Education, Trainings (computer literacy), Office and Administrative Support; Maintenance and Custodial Services; Community and Social Services; Management. RI has had success with this strategy, and it has been proven to be effective in providing SCSEP participants with the tools necessary to find unsubsidized employment. RI will continue to follow current trends in Rhode Island economic growth to ensure SCSEP participants are receiving up to date trainings and experience that best ensures a streamlined transition to unsubsidized employment.

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))

Statewide Occupations with the Highest Projected Openings 2022-2032, with Education and Training Requirement

SOC CODE	Title	Total Openings	Typical Education
35-3023	Fast Food and Counter Workers	26,528	No formal educational credential
41-2011	Cashiers	19,986	No formal educational credential
41-2031	Retail Salespersons	19,168	No formal educational credential
35-3031	Waiters and Waitresses	16,917	No formal educational credential
31-1120	Home Health and Personal Care Aides	15,183	High school diploma or equivalent
31-1131	Nursing Assistants	14,444	Postsecondary non-degree award
43-4051	Customer Service Representatives	13,694	High school diploma or equivalent
35-2014	Cooks, Restaurant	13,537	No formal educational credential
53-7065	Stockers and Order Fillers	12,217	High school diploma or equivalent
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	11,124	No formal educational credential

Reflecting the top occupations with the highest projected openings. occupationally specific skills include:

SOC | Title and description

35-3025 Fast Food and Counter Workers, Training may include POS software, training on recogding customer orders, computing bills, using cash registers, and multi-counting machines.

41-2011 Cashiers, Customer services training, POS training, computer training.

41-2031 Retail salespersons, Training may include, POS training, inventory management, customer service skills, and specific product training for the type of retail store they are working in

35-3031 Waiters and waitresses, Training may include, product information, what is in the product and how it is made. Customer service training, appropriate communication with other staff and customers and computer training.

35-3021 Combined food preparation and serving workers, including fast food, Training may include, specific food prep, food safety training, customer service training and POS training.

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31-1120 Home Health and Personal Care Aides, Training may include housekeeping tasks, such as cooking for clients who have special dietary needs; as well as basic safety techniques, including how to respond in an emergency. If state certification is required, specific training may be needed.

Employment in Rhode Island is projected to grow at all education and skill levels, from jobs requiring less than a high school diploma to those requiring advanced degrees. During the 2022-2032 projection period, it is estimated that employers will need to find workers to fill over 32,943 new jobs and to replace over 592,000 workers.

Parallel to the national distribution, jobs requiring a high school diploma for entry into an occupation represent the largest portion of the Rhode Island labor market. Thirty seven percent (37.0%) of Rhode Island jobs typically require a high school education; slightly lower than the national percentage (38%). Between 2022 and 2032, there are over 237,000 openings projected for occupations at this educational level. This allows for increased opportunity for many SCSEP participants who may not have traditional educational pathways. For many of the above jobs there is an expectation of on-the-job training. Through intentional and well-crafted Host Agency training, SCSEP participants receive this on-the-job training, along with development of the afore-mentioned 'soft skills'. Many SCSEP participants transition to unsubsidized employment at the same Host Agency, -creating a significant benefit for employers.

Jobs requiring college degrees (Associate, Bachelor's, Master's or Doctoral) represent nearly a third (31.9%) of the current occupational distribution in Rhode Island, roughly comparable the national average (31.2%). During the projection period it is estimated that there will be more than 135,235 openings for occupations requiring a minimum of an associate degree in Rhode Island.

Education Level	2022	2032	Exits	Transfers	Growth	Total Openings
Doctoral or professional degree	18,492	19,812	5,294	3,548	1,320	10,162
Master's degree	15,562	17,428	5,386	5,588	1,866	12,840
Bachelor's degree	124,040	133,571	38,447	53,124	9,531	101,102
Associate degree	11,426	12,373	4,360	5,824	947	11,131
Postsecondary non-degree award	36,777	40,054	18,177	24,122	3,277	45,576
Some college, no degree	11,865	11,953	6,391	6,328	88	12,807
High school diploma or equivalent	197,696	207,597	99,276	128,485	9,901	237,662

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No formal educational credential	115,429	121,442	86,734	101,048	6,013	193,795

Prior work experience in a previous occupation is required for thirteen percent of the occupations in the workforce.

Typical Work Experience Needed	2022	2032	Exits	Transfers	Growth	Openings
5 years or more	20,299	21,859	6,119	10,030	1,560	17,709
Less than 5 years	60,256	65,527	26,015	35,659	5,271	66,945
None	450,732	476,844	231,931	282,378	26,112	540,421

Occupational distribution of the typical on-the-job training needed to attain competency for Rhode Island occupations.

Typical Education Needed For Job	**2022**	**2032**	**Exits**	**Transfers**	**Growth**	**Total Openings**
Internship/residency	9,824	10,641	2,746	2,359	817	5,922
Apprenticeship	11,974	13,214	4,245	6,390	1,240	11,875
Long-term on-the-job training	18,293	19,349	7,663	9,234	1,056	17,953
Moderate-term on-the-job training	92,737	97,629	40,270	54,268	4,892	99,430
Short-term on-the-job training	195,511	204,218	134,391	158,086	8,707	301,184
None	202,948	219,179	74,750	97,730	16,231	188,711

Rhode Island continues to focus on SCSEP participant training opportunities that encourage essential skills growth. For almost a decade, the National Association of Colleges and Employers has surveyed employers about their most-wanted skills. Invariably, the emotional intelligence and transferable skills are those that employers report as adding significant value. These skills combined with the projected growth in employment opportunities that require a high school diploma, allows SCSEP participants an opportunity to seamlessly backer-enter the workforce upon receiving training and support while in the program.

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:

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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))

The Rhode Island Department of Labor and Training (RI DLT) administers the SCSEP program statewide and is a partner in the American Job Center System. The RI DLT has a Memorandum of Understanding (MOU) with both of Rhode Island's local area workforce development boards. RI DLT's SCSEP job coaches are also cross trained Title I/Title III merit staff, enabling collaboration across all three programs. Where applicable, SCSEP participants are given the opportunity to access trainings and services through WIOA title I programs. SCSEP information is shared with the Job Centers, such as program eligibility requirements and priorities, open training slots, and workshop information. In addition, information is shared regarding the fastest growing industries, occupations and businesses that offer appropriate job opportunities for SCSEP participants. SCSEP marketing materials, such as pamphlets (including bilingual materials) are placed at the Job Centers and updated and replenished during frequent visits. SCSEP staff and participants continue to participate in Job Recruitments in-person and online. In addition, they will cross flow job market and training information between the AJC's and SCSEP program staff. RI DLT staff will disseminate information regarding training vacancies and refer potential applicants to the SCSEP program. RI DLT also works with returning citizens who are 55 and older and helps them transition back into the community by enrolling them into SCSEP. Exiting participants will be encouraged to continue their association with the Job Centers. Participants who have reached their individual durational limit for SCSEP services - but who have not yet obtained unsubsidized employment - will be referred to the Job Centers for further job search and training support through WIOA Title I services.

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))

Rhode Island SCSEP collaborates with other Older Americans Act programs, such as the nutrition and health and wellness programs. These partnerships have led to the establishment of referral and awareness efforts as well as effective training assignments that provide much needed services to older Rhode Islanders. Rhode Island SCSEP maintains ongoing coordination with our closest National SCSEP grantee to guarantee services for all eligible participants within the state. By closely communicating with the National Grantee regarding waitlist management, host agencies, and placements, Rhode Island SCSEP ensures that every eligible SCSEP participant receives optimal services. Rhode Island plans to continue this robust and successful collaboration in the coming years.

C. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH- BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))

The SCSEP program works together and leverages resources with many organizations to provide training and supportive services for the participants. Many of these entities include host training sites, educational organizations to support participants where English is a second language, veteran representatives, vocational rehabilitation activities, nonprofit social service agencies, and the state Office of Healthy Aging. In addition, RI SCSEP coordinates with many agencies to help participants in need of services such as subsidized housing or temporary shelters; no-cost medical and prescription programs;; energy assistance; food stamps; information regarding Supplemental Security Income; reduced fares on transportation; food

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and clothing assistance; and nutrition programs provided through the Older Americans Act. Participants who will exit SCSEP without a job, will have the opportunity to work with an American Job Center WIOA Title I job coach until they obtain employment. They will continue to have the opportunity to access supportive services as needed and be referred to other local agencies to assist them until they can obtain employment. RIDLT has made a concerted effort to increase its Host Agency opportunities, particularly focusing on other public entities, and Community Based Organizations (CBO) in the state.

D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

RI SCSEP will remain a close liaison with the State's American Job Centers (AJC) to monitor job market trends and opportunities. Working relationships will be maintained with Job Center partners including Disability Specialists from the Office of Rehabilitative Services (ORS) and Veteran Representatives. Labor market information including the Occupation and Industry Projections will be analyzed and considered when making training decisions. AJC partners will be closely involved as they provide daily support in the transition of SCSEP participants to jobs. SCSEP participants are also kept informed of other training and employment opportunities throughout the state, including state funded enterprises such as the Real Jobs RI industry sector training program. The Real Jobs RI program has a myriad of training opportunities that may compliment a Host Agency placement. These sector partnerships train for employer requested skills. When combined with SCSEP opportunities these trainings can ensure full connection to opportunity.

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)

RI SCSEP will continue its collaboration with the One-Stop system, including the American Job Centers and the Providence/Cranston Workforce Development Board. SCSEP program managers and staff are located at the Job Centers and are constantly updated on any new programs, workshops or training that may be of value to participants. SCSEP marketing materials, such pamphlets (including bilingual materials) are placed at the Centers and updated and replenished when necessary. Access to intensive training services will continue to be considered with the above collaborative actions. Cross-training and reference guides are made available to all partner programs so that each can speak knowledgably about one another's program (SCSEP included) and make referrals when necessary and/or appropriate.

F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

According to the SCSEP final rule where rural is defined as "areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile", there do not exist in Rhode Island any communities that are considered rural communities. However, a number of towns in the state could meet a more 'informal' definition of rural, in that they are a considerable distance from urban centers, are marked by low population density and more open spaces. In these communities, the SCSEP program shares program literature and information in post offices, town halls, and other communal locations.

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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.)

RI SCSEP remains focused on transitioning participants to successful unsubsidized employment. SCSEP management updated its policies and procedures to ensure SCSEP participates are receiving with the most effective combination supportive services and training to obtain unsubsidized employment. A substantial portion of that effort goes towards establishment working relationships with the organizations that hire SCSEP participants and in establishing new relationships with potential employers. Program staff develops job leads and identifies potential employers in the public and private sectors by advertising job postings, offering job fairs, and contacting employers (in person, by telephone, virtually, and email). This includes collaboration with WIOA funded employer outreach staff in each American Job center. The Program will continue to use the American Job Centers to access various job search sites in an effort to identify job opportunities for SCSEP participants.

The SCSEP relationship with the American Job Center will continue to be maintained and improved. Program managers and staff are always in communication with one another around potential job leads and trainings. Once SCSEP participants have been transitioned to his or her unsubsidized job, follow ups will be completed with the successful participant and his or her new workplace to facilitate long term unsubsidized employment.

The Rhode Island SCSEP program will follow up with employers who have hired participants in the past to show goodwill and potential future job prospects. Follow-up activities that are required by program regulations, as well as maintaining strong relationships with employers will increase the possibility of retention and allow employers to communicate with SCSEP management if additional jobs become available. Prior to having a SCSEP participant apply for a job, staff will ensure they are prepared for interviews and have all the skills necessary for that position. This practice will enforce good job retention and employer relations, which will build confidence with employers to hire future SCSEP participants. Employers will be informed of federal and state hiring incentives on all hires. Most SCSEP participants accept part-time employment with daytime hours during the normal work week. Thus, the program mostly targets community service organizations and small businesses, since these employers primarily offer the types of jobs that SCSEP participants are seeking. Such positions are in high demand according to Labor Market Information projections. Typically, SCSEP participants are unwilling to relocate or travel far which means the program focuses on the local, community job markets. As remote or hybrid employment continues to grow in popularity, the SCSEP program will continue to push for digital literacy skills for SCSEP participants to increase the range of employment options that may be available to them. A significant portion of the Program's unsubsidized placements occur when the host training sites hire the SCSEP participants that are assigned to them. SCSEP program manager has done an outstanding job targeting host agencies in communities where our SCSEP participants live. RI SCSEP has onboarded several new host agencies that are in communities of need to help support our participants. Program managers and staff will continue to routinely visit host training sites to encourage them to hire their assigned SCSEP participants when there are job openings and available funds. The value and benefits of hiring their SCSEP trained participants will continue to be emphasized.

3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))

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Historically, the majority of participants in RI SCSEP have been minority individuals. For example, the most recent U.S. DOL SCSEP minority report indicates that the state's overall incidence of all minorities in the population was 38.4% while the SCSEP enrollment percentage is 56.5%. RI SCSEP has emphasized and will continue to focus on minority enrollments. RI SCSEP enrollment levels for minorities in PY 2025 have been positive. For example, the

percentage of minority enrollees in the Program Year 2025 thus far total 66%; and the Hispanic enrollment level is around 22%. RI SCSEP will continue to recruit the minority population in many ways, such as: (1) continuing contacting community agencies, minority churches, faith based organizations and organizations that serve multi-cultural populations; (2) assigning participants to host training sites which serve and communicate with the minority population; (3) encourage all participants, including minority individuals, to make program referrals for family, friends, and other contacts.

4. A LIST OF COMMUNITY SERVICES THAT ARE NEEDED AND THE PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

The Program views the distribution of community service needs across the State as being in-line with the equitable distribution of program-eligible individuals.

1. Communities in Need:

The following list based on the most data available identifies those localities for which projects of the type authorized by Title V are most needed (20 CFR 641.325 (d).) These areas are where both the most recent annualized unemployment rate and poverty rate exceeded the state average.

City/Town	Unemployment (Sept 2025)	Poverty Rate (2023, ACS)
Woonsocket	4.9%	19.7%
Providence	4.6%	17.5%
Central Falls	4.8%	22.3%
Pawtucket	4.4%	17.0%

SCSEP will continue to focus efforts in the areas of greatest needs based on the unemployment rate and occurrences of poverty. To better serve individuals with a priority for service, the Department of Labor and Training works closely with the Department of Human Services, the Department of Behavioral Health, Development Disabilities and Hospitals, and the Office of Healthy Aging (formerly the Division of Elderly Affairs).

2. Needs of Individuals:

Many SCSEP participants are in need of various supportive services. The most common observed need among SCSEP participants is transportation. Despite Rhode Island's small size, many older individuals do not have adequate or reliable transportation to allow them access to employment and training in the larger population centers. Other services that are needed throughout the service area, based on United Way and other area needs assessments, include: the availability of fresh, affordable food; access to affordable and accessible healthcare; the

availability of food service to persons who are homebound or limited mobility; the availability of affordable housing for seniors;; and the availability of programs to support literacy and English proficiency. These services are needed in all workforce areas of the state. The lack of access to computers and internet is also a detriment to job seeking resources for many participants.

RI SCSEP has updated policies increase the support of the needs of individuals. SCSEP management explain in great detail the benefits one can receive while in the SCSEP program. When a support need is job-related, SCSEP management will meet with the Participant's training site supervisor and devise a plan for moving forward to ensure success. If the subgrantee cannot satisfy a Participant's personal or social need, there will be access to a full array of services through information and referral networks and procedures. Services include legal assistance, health care agencies, educational opportunities, Social Security benefits; and, clothing, housing, home heating fuel and transportation assistance. In addition, incidentals necessary for training site assignments (e.g., safety glasses, work shoes, etc.) will be obtained by referral to social agencies that may provide them without charge.

The primary community partners that help the SCSEP program in addressing these support needs is the United Way 211 program –a free, confidential, 24/7 service connecting people to essential local health and human services, and the Office of Healthy Aging's ADRC (Rhode Island Aging and Disability Resource Center) – a similar free service that is specialized to the needs of older Rhode Islanders. Both entities have identified and catalogued the full spectrum of community supports available in Rhode Island and are experts at helping older workers navigate and access these services.

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))

RI SCSEP has been successful for many years in providing work experience, supportive services, and job search assistance to Older Workers, and in assigning productive trainees to community service agencies that meet their needs. This Program has helped senior Rhode Islanders become job-ready and confident to reenter the workforce - while providing employers with trained and devoted individuals. The Rhode Island Department of Labor and Training serves three of Rhode Island's five counties. The distribution of authorizations is based on the Equitable Distribution as provided by U.S. DOL, which identifies each County's percentage of the state's program-eligible population. The Program Year 2025 grant funds 43 authorizations and 20 modified positions across the state, according to the following allocations: Bristol County – 2 slots; Kent County –3 slots; Providence County – 14 slots.

Since 2017, RI SCSEP has been operated by the Rhode Island Department and Labor and Training. SCSEP has been administered by RIDLT through a Labor and Training Administrator overseeing the program in its entirety with a Coordinator of Employment and Training Programs overseeing the day-to-day operations. This change in program oversight has allowed RI SCSEP to focus on building stronger partnerships with Job partners as SCSEP staff are co-located in the Job Centers. Participants are able to access Job Center partner programs like Wagner-Peyser and WIOA through their SCSEP counselor, as well as the Department's comprehensive approach to supportive services. Recently, SCSEP management conducted a comprehensive review of its policies and procedures to better assist its participants. This change has allowed the program to run more effectively as well as provide ample support to the

participants providing them the skills they need to be successful. RI DLT hopes that these changes and efficiencies will allow the RI SCSEP program to achieve higher performance measures than previous years with the overall goal of participants obtaining unsubsidized employment in a shorter time than previous program years. If programmatic adjustments are necessary, the Labor and Training Administrator, alongside the Coordinator of Employment and Training Programs, will collaborate on developing new policies and procedures to align with these changes. Furthermore, comprehensive trainings will be organized for all SCSEP program staff to ensure they are well informed about any necessary adjustments.

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))

Rhode Island embraces a number of different strategies to increase the likelihood of placement into unsubsidized employment. Placements are measured as part of an entered employment percentage to align the SCSEP program with USDOL/WIOA common measures. Strategies include, but are not limited to:

1. Targeting Jobs Effectively:

RI SCSEP has proven successful in placing its participants in unsubsidized employment with community service agencies -- especially with host training sites -- and in other service-oriented industries. The most prevalent occupations for SCSEP participants include jobs in maintenance and custodial work; as office clerks and receptionists; childcare workers; senior center program assistants; food service; and in customer service. The Program focuses on all areas of the state for its SCSEP participants. However, many participants cannot - or prefer not to - have long commutes to and from work; so, all attempts will be made to find local job opportunities to accommodate these needs.

Program managers and staff are in constant communication with community service sites and encourage them to hire their assigned SCSEP participants as funds becomes available. SCSEP staff will continue to reenforce the benefits and values of hiring their SCEP participant. Due to the past placement success and reputation as a reliable source of experienced talent benefits future SCSEP participants. All existing and new community service sites are required to sign a Letter of Agreement that clearly describes the temporary nature of training assignments; and, which emphasizes the site's responsibility for considering qualified participants for jobs.

2. Working with the Job Centers Effectively:

The Program will continue to partner with the American Job Centers to monitor information on job openings and trends that will help identify current and future regional job opportunities. Information will be tracked regarding the fastest growing industries and the occupations and businesses that offer appropriate job opportunities for SCSEP participants, with specific focus on the industries most welcoming to older workers Rhode Island SCSEP will continue to enhance future coordination working with the Rhode Island DLT's employer engagement team to identify previously untapped job market in local areas.

3. Managing Durational Limits Effectively:

The Rhode Island SCSEP Program will continue to provide quality support to each participant who is nearing their SCSEP durational limit (e.g., not employed after 48 months in the program). Rhode Island will continue to conduct awareness and education activities regarding individual durational limit requirements; transitional planning and scheduling; conducting assessments;

preparing and implementing transitional Individual Employment Plans; researching the local job market; and accessing all supportive services available to assist the SCSEP participants. When a participant receives an assessment 12 months before their durational limit date, a transitional Individual Employment plan (IEP) is developed and initiated. A reassessment will be finalized six months before the individual's durational limit date (or sooner, if needed); and his or her transitional IEP will be updated during the reassessment. For participants who have gained good or reasonable job potential, transitional IEP actions may include updating resumes and interviewing skills; increasing job development and training efforts; and/or making rotations to other Host Agencies if requested, to gain additional skills. To foster good employer relations during the transition process, emphasis will be placed on sending qualified and suitable participants to each job interview.

4. Training Participants Effectively:

Participant training is essential for successful program performance. The following training activities are ongoing and will continue to be emphasized:

a. On top of providing quality work experience, the host training sites will be highly encouraged to make essential in-service and on-the-job training available for their assigned SCSEP participants. This has been shown to increase effectiveness in the SCSEP assignment, and better prepare the participants for unsubsidized employment. Training will coincide with each participant's assessment and Individual Employment Plan. Also, digital literacy training and experience will continue to be emphasized and provided at the American Job Centers. SCSEP will continue to collaborate with the local libraries and non-profit agencies that offer free training.

b. Participants will be referred to and encouraged to attend workshops at the American Job Centers in person or virtually and with partner agencies, covering different aspects of the job-seeking process and topics relating to health, consumer information, transportation, social security, and retirement security. Workshops include speakers from community service organizations, government agencies, and the local business community.

c. Participants seeking full time employment who may need to improve their potential for transition into unsubsidized employment with occupational skills training - will be encouraged to attend programs offered through WIOA American Job Centers.

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))

In Bristol County a total of 1,065 older residents are living in poverty accounting for 5.86% percent of the county's older population and 17,089 are living at or above poverty levels, accounting for 94.13% percent of the county's older population. Within Providence County five cities and towns have more than 1,000 older residents living in or near poverty levels, including Providence (5,487), Pawtucket (1,992), Cranston (2531 East Providence (1,315), Woonsocket (1,460) and Warwick (2,176, located in Kent County, is the only other Rhode Island cities or towns with more than 1,000 older residents living in or near poverty levels. The cities of, Providence, Pawtucket and Woonsocket), all located in Providence County, have the greatest share of older residents living in or near poverty levels. Demographic data for all individuals living at the poverty level, which accounts for over three quarters of all those living in or near poverty levels, shows that women, both older and total population, are more likely to be living

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in poverty than men of the same age group. Older women account for 52.49 percent of the older residents living at the poverty level, with older men accounting for 47.6 percent.

Likewise, minority residents 55 and older are more likely to be living in poverty than the non-minority residents 55.

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.

In Rhode Island the SCSEP equitable distribution consists of two (2) slots in Bristol County; three (3) slots in Kent County; and fourteen (14) slots in Providence County.

- Cities located in Bristol County include Barrington, Bristol, and Warren.
- Cities located in Kent County include Coventry, East Greenwich, Warwick, West Greenwich, and West Warwick.
- Cities located in Providence County include Burrillville, Central Falls, Cranston, Cumberland, East Providence, Foster, Glocester, Johnston, Lincoln, North Providence, North Smithfield, Pawtucket, Providence, Scituate, Smithfield, and Woonsocket.

The SCSEP project will take place in each of these three counties and the cities or towns that comprise those counties.

The 14 slots in Providence County are down from previous program years of PY24. This change was due to the increase of minimum wage in RI. On January 1, 2026, Rhode Island's minimum wage increased to $16.00 an hour. Positions in the two remaining counties were reduced slightly from previous years.

3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

As of Program Year 2025 Quarter 2, RI SCSEP equitable distribution data indicates that of the 43 authorized slots (unmodified) Kent County is under-enrolled by 3 slots; Bristol County is under-enrolled by 2 slots; and Providence County is under-enrolled by 2 slots. RI minimum wage as of January 2026 is $16.00 per hour. Over the next year minimum wage will increase to a minimum wage of $17.00 an hour. The state's slots for enrollment are based on participants receiving minimum wage. Many of our SCSEP participants and community service sites are within Providence County, which is why our other counties struggle to fill their slots. RI SCSEP constantly pursues employment for participants to then enroll new individuals in the counties that are most underserved. RI SCSEP employment strategy will include continued efforts to engage local businesses, churches, and agencies/centers that are willing to hire older individuals at a pay that allows for self-sufficiency. We will continue to find community service sites in the underserved communities and bring the resources to them. We recognize the importance of maintaining equitable distribution among the counties we serve and will remain hardworking and diligent with training individuals for unsubsidized employment to allow for continued enrollment in the counties.

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.

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RI SCSEP strives to provide equitable access to the program in accordance with the percentages of program-eligible residents' three counties. When there are changes to the ratios, authorizations will be redistributed among the three counties based on the new equitable distribution -- increasing positions where needed and decreasing training slots in over-served counties. However, current participants will not be impacted by any reallocations. RI SCSEP will work with the RI National Grantee to ensure equitable distribution of slots in all counties of Rhode Island to minimize over-serving or underserving locations. If the scenario arises that positions must be transferred to address over-serving or underserving locations, RI SCSEP will ensure to adhere to CFR 641.365 by communicating with the National Grantee, USDOL, and the Federal Project Officer. RI SCSEP will ensure all participants and host agencies are kept informed of the changes.

B. EQUITABLY SERVES RURAL AND URBAN AREAS.

Bristol County, Kent County and Providence County are considered urban areas. Within those counties, and according to the SCSEP final rule where rural is defined as "areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile", there do not exist any communities that are considered rural communities. Nevertheless, the SCSEP program conducts targeted outreach and pursues partnerships with communal locations in the informally defined 'rural' areas of the state. Again, training authorizations will follow the equitable distribution percentage for each County.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

In selecting eligible individuals for participation in the SCSEP, priority is given to individuals who have one or more of the following characteristics as defined in the Older Americans Act section 518(b) (1)-(2) and by the Jobs for Veterans Act: covered persons in accordance with the Jobs for Veterans Act; 65 years of age or older; have a disability; have limited English proficiency or low literacy skills; reside in a rural area; have low employment prospects; have failed to find employment after using services provided through the One-Stop delivery system; formally incarcerated individuals; or are homeless or are at risk of homelessness.

To support job coaches in prioritizing participants with significant barriers to employment, RI DLT utilizes a multifaceted approach to reach the hardest to serve. RI DLT assesses and reassesses participants via a face-to-face interview, or a Virtual interview facilitated by the case manager. The assessment covers previous employment history and transferable skills; strengths and barriers; interests and hobbies; educational level; and previous training. RI DLT also uses its relationships with Senior Centers; Churches and Faith Based Organizations; Homeless Shelters; Veteran's Organizations; Community Food Banks a to help recruit these individuals. Within all enrollment priorities those with poor employment prospects are given preference. These are individuals who are unable to obtain employment without the assistance of SCSEP or other employment and training programs. Those included in this category are individuals who have limited or no work histories; are basic skills deficient; have limited English language proficiency; are displaced homemakers; are disabled; are homeless. The Program views the distribution of priority individuals across the State as being in line with the equitable distribution of program-eligible individuals across the three counties.

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5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

RI has one SCSEP Grantee who serves three Counties per the SCSEP equitable distribution as provided by the U.S. Department of Labor, which identifies each county's percentage of the state's program-eligible population. According to state Labor Market Information data, out of a Rhode Island civilian labor force of approximately 916,988 (those aged 16 and older) who were either working or actively seeking employment, 39.6%, or 363,239 , were aged 55 and older. When delineated by county the numbers are as follows: Bristol County 18156(1.97%); Kent County 60,394 (6.5%); Newport County 33,824 (3.6%); Washington County 50,388 (5.49%) and Providence County 191,347 (20.86%). 97.2% of Rhode Islanders aged 55 and older have had their poverty levels determined. Of those individuals, 8.94% are below the poverty level.

6. THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

US Census Bureau estimates in 2024 total population for the State of RI at 1,112,308 . Of Rhode Island's 916,988 working age (16+) residents, approximately 363,239 (39.6%) were aged 55 and older in 2022. Delineated by county, the 16+ populations (and corresponding distributions) of those over age 55 are as follows: Bristol County 42,544 (42.67%); Kent County 143,473 (42.09%); Newport County 73,034 (46.3%); Washington County 112,516 (44.7%) and Providence County 541,114 (35.36%). This population distribution generally corresponds to the percentage of program-eligible Rhode Islanders in each county. Specifically, the three counties are allocated positions and funding based on the Equitable Distribution ratios that are in effect for each grant year (as identified by the U.S. Department of Labor). The ratios for the PY 2025 grant year are Bristol County 11.6%, Kent County 20.9%, and Providence County 67.44%.

B. HAVE THE GREATEST ECONOMIC NEED

According to 2016-2020 American Community Survey 5-Year estimates; of the 293,824 Rhode Island residents aged 55 and older, roughly 10% (29,263) live at or below the federal poverty level. Of those 29,263 Rhode Islanders aged 55 and older are estimated to be living below the federal poverty level; 24.6% (7,198) reside in the city of Providence alone; 8.03% (2,351) reside in Pawtucket, 7.99% (2,339) reside in Cranston, and 5.88% (1,721) reside in Woonsocket. These are the top five communities in Rhode Island of older residents facing economic hardship; with each remaining community accounting for less than 5% of the statewide total.

Data for the most recently completed Program Year 2025 indicates that of the total participants served by the state SCSEP program; 94% were below the poverty level and 94% were receiving public assistance.

C. ARE MINORITIES

In RI, minority residents 55 and older are more likely to be living in poverty than the non-minority residents 55 or older, minority being defined as not white non-Hispanic. There are 9,069 minority residents 55 and older living in poverty. Residents of Black African American decent account for 1,986, residents of Asian descent account for 1,304, residents of American Indian descent account for 179, Native Hawaiian and other Pacific Island descent account for 55, and the largest segment of the defined non-minority populous in the census identified as Some Other Race which accounts for 5,545 residents. Combined, this accounts for 20.75 percent of Rhode Island's older minority population (43,711) for whom poverty status has been determined.

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There are 21,187 non-minority residents 55 and older living in poverty. They account for 2.89 percent of Rhode Island's older non-minority population (273,664) for whom poverty status has been determined. However, older minority residents numbering 9,069 account for 29.97 percent of the 30,256 older RI residents living in poverty and older non-minority residents numbering 21,187 account for 70.03 percent of the older RI residents living in poverty. RI SCSEP active participants are comprised of 53% minorities which is nearly double the ratio of minority versus non-minorities in RI.

D. ARE LIMITED ENGLISH PROFICIENT

One of the fastest-growing segments of the Rhode Island labor force, adult English language learners face several barriers to employment. According to 2024 US Census data, nearly one quarter of Rhode Islanders spoke a language other than English at home, and 14.8% of the total state population was foreign born. RI SCSEP currently serves 17% limited English proficient participants and has consistently met need for eligible SCSEP participants in RI. The RI Department of Labor and Training is currently focusing on increasing linguistic competency in staffing levels, particularly those staff who are serving the community at local Job Centers. In the coming years, these efforts will continue. Additional emphasis on multi-lingual staff and translation services will continue to assure that the needs of Limited English Proficient communities are addressed.

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

Greatest social need means the need caused by non-economic factors, which include Physical and mental disabilities; language barriers; and cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, which restricts the ability of an individual to perform normal daily tasks or threatens the capacity of the individual to live independently. (42 U.S.C. 3002(24)). According to the U.S. Census Bureau, of the 73,817individuals aged 18-64 living below poverty, 25.3% have disabilities, while 74.69% do not. However, of the 69,796 individuals aged 18-64 with disabilities, 26.76% live below poverty, while 7.23% of the 585931 18-64 years old without disabilities live below poverty. Additionally, individuals with disabilities aged 18-64 have an unemployment rate 15.01 percent where those without disabilities have an unemployment rate of 84.99 percent. As mentioned above, English proficiency is also a barrier to employment, however with the small geographic area involved with the state of RI, geographic isolation is not a major barrier. 6.62% of all Rhode Islanders aged 18-64 have a disability and RI SCSEP participants are comprised of 6.0% disabled enrollees. Job Coaches, along with the Employer Engagement team, will outreach and build strong relationships to community base organizations that serve those with the greatest social needs. RI will continue to receive referrals by community base organizations. Allowing the support necessary to help the participant increase their chances of finding employment.

F. FORMERLY INCARCERATED INDIVIDUALS, AS DEFINED IN TEGL 17-20

According to data provided by the Rhode Island Department of Corrections, 16,377 Rhode Islanders on average were on probation or parole as of Calendar Year 2024, meaning 1 of every 55 adult residents in Rhode Island is on probation or parole. In Calendar Year 2024, the most recent year for which data was available; there were 2,174 Release events in Rhode Island due to completion of the individuals' sentence, of whom 1,894 were Male and 280 were Female. Note: Rhode Island's Department of Corrections data tracks sentence completion and release as 'events' rather than by unique individual; as there may be individuals who completed more than one sentence and were therefore released more than once in the calendar year. Staff at the American Job Centers outreach and build strong relationships to community base

organizations that serve formerly incarcerated individuals. DLT currently works closely with the RI Department of Corrections to work with individuals who are still currently serving time. Rhode Island Title IB staff currently offer services on site in the correctional facilities and communicate closely with the SCSEP staff. SCSEP staff is able to identify potential participants prior to them being released, which allows job coaches to prepare them for their training for when they enter back into the community. RI will continue to receive referrals by community base organizations. Allowing the support necessary to help the participant increase their chances of finding employment.

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))

If positions are needed to be redistributed, RIDLT will ensure clear communication and coordination with Host Agencies, participants, the Federal Project Officer, the National SCSEP grantee, and USDOL. Any positions that require movement will be coordinated with and approved by the Grant Officer. RIDLT will work with participants, host agencies, and the National SCSEP grantee to ensure a seamless transition as to not disrupt participant wages or interfere with the participants individual employment plan.

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PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	83.50%		84.00%	
Employment (Fourth Quarter After Exit)	82.00%		82.50%	
Median Earnings (Second Quarter After Exit)	$8,300.00		$8,400.00	
Credential Attainment Rate	61.00%		62.00%	
Measurable Skill Gains	50.00%		51.00%	
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	86.5%		87.0%	
Employment (Fourth Quarter After Exit)	85.0%		85.5%	
Median Earnings (Second Quarter After Exit)	$9,900.00		$10,000.00	
Credential Attainment Rate	72.0%		72.5%	
Measurable Skill Gains	45.5%		46.0%	
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

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ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	73.5%		74.0%	
Employment (Fourth Quarter After Exit)	71.5%		72.0%	
Median Earnings (Second Quarter After Exit)	$4,100.00		$4,200.00	
Credential Attainment Rate	60.0%		60.5%	
Measurable Skill Gains	41.0%		41.5%	
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	66.0%			66.5%
Employment (Fourth Quarter After Exit)	69.0%			69.0%
Median Earnings (Second Quarter After Exit)	$8,400.00			$8,500.00
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

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ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	42.0%		42.5%	
Employment (Fourth Quarter After Exit)	43.5%		44.0%	
Median Earnings (Second Quarter After Exit)	$6,800.00		$6,800.00	
Credential Attainment Rate	18.5%		18.7%	
Measurable Skill Gains	46.0%		48.0%	
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	48.6%		49.6%	
Employment (Fourth Quarter After Exit)	46.1%		47.1%	
Median Earnings (Second Quarter After Exit)	$3,950.00		$4,050.00	
Credential Attainment Rate	35.8%		36.8%	
Measurable Skill Gains	30.5%		32.5%	
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

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ADDITIONAL INDICATORS OF PERFORMANCE

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Additional Indicators of Performance
N/A

OTHER APPENDICES

State WIOA Policies and Planning: https://gwb.ri.gov/policies-reports-plans

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