WIOA COMBINED STATE PLAN

TEXAS WORKFORCE COMMISSION

PROGRAM YEARS 2020-2023

CONTENTS

Texas PYs 2020-2023 1
Overview 3
Options for Submitting a State Plan 3
How State Plan Requirements Are Organized 4
I. WIOA State Plan Type and Executive Summary 5
a. WIOA State Plan Type 5
Combined Plan Partner Program(s) 6
b. Plan Introduction or Executive Summary 7
II. Strategic Elements 9
a. Economic, Workforce, and Workforce Development Activities Analysis 9
b. State Strategic Vision and Goals 34
c. State Strategy 40
III. Operational Planning Elements 51
a. State Strategy Implementation 51
b. State Operating Systems and Policies 73
IV. Coordination with State Plan Programs 119
V. Common Assurances (For All Core Programs) 121
VI. Program-Specific Requirements for Core Programs 122
Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B 123
Program-Specific Requirements for Wagner-Peyser Program (Employment Services) 170
Program-specific Requirements for Adult Education and Family Literacy Act Programs 205
Program-Specific Requirements for Vocational Rehabilitation (Combined or General) 228
VII. Program-Specific Requirements for Combined State Plan Partner Programs 338
Senior Community Service Employment Program (SCSEP) 339
Performance Indicator Appendix 368
All WIOA Core Programs 368
Additional Indicators of Performance 371
Other Appendices 371

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 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 reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better 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 is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. 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.)
- 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]
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

[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.

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 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 plan

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.)

No

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

No

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.))

No

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

No

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

No

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

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

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

Introduction

The Texas Workforce Commission's (TWC) Combined State Plan for the Workforce Innovation and Opportunity Act (WIOA) for Program Years 2016-2019 was submitted to the US Departments of Labor and Education on April 1, 2016 and was approved on October 20, 2016. WIOA §676.145(a)(1) requires states to submit modifications to the Combined State Plan (CSP) at the end of the first two-year period of a four-year plan. The modifications are to "reflect changes in labor market and economic conditions or other factors affecting the implementation of the Combined State Plan." During the interim between full four-year plan submissions, TWC submitted and received approval for multiple plan modification.

This plan submission covers the period of July 1, 2020, through June 30, 2023. The plan is written to represent a workforce system in which all core programs set forth in WIOA are under the purview of TWC. Texas proposes through this Combined State Plan (plan) to implement jointly administered activities concerning the following core programs and two optional programs authorized by WIOA:

- The Adult, Dislocated Worker, and Youth programs
- The Wagner-Peyser Employment Service (ES) program, including the Agricultural Outreach Plan
- The Adult Education and Family Literacy Act program
- The Vocational Rehabilitation programs
- The Senior Community Service Employment Program

The Texas Workforce system is composed of the workforce programs, services, and initiatives administered by eight agencies and 28 Local Workforce Development Boards (Boards), as well as independent school districts, community and technical colleges, and local adult education providers. System partners are responsible for the delivery of 23 programs and services focused on education, workforce education, and workforce training for adults, adults with barriers and youth.

System partners operate in a complex, changing economic environment as they strive to provide employers, current workers, and future workers with services that are comprehensive, timely, and relevant. By 2025, the Texas population is projected to exceed 30.7 million people, with almost 12 million workers being 25-54 years of age. The demographic composition is expected to continue to change, with Hispanics growing to the largest percentage of the population (43.55 percent) and the number of females slightly exceeding that of males.[1]

Growth in middle-skills jobs, those that require more than a high school degree but less than a four-year degree, continues to increase the demand for workers with industry-based certifications. The Texas workforce employed in middle-skill occupations in science, technology, engineering, and math (STEM) fields in projected to increase by 24 percent to nearly 1.5million workers in the next decade. This growth will include significant increases in healthcare, construction, and manufacturing fields.[2] In Texas, future workers will also be needed in the growth industries of computer systems design and related services, as well as service-related industries.[3]

TWC and the local workforce boards are expanding training strategies to increase completions of industry-based certifications that meet employer-defined needs, in part by streamlining new employment hiring and orientation. TWC distributed $2.5 million to the local workforce development boards for the industry-recognized skills certification initiative. Local workforce boards and employers identified the top certifications needed for high-demand jobs in their local area. Certifications were awarded in industries such as manufacturing, healthcare, construction, information technology, and transportation.

Securing industry-recognized certifications is an essential strategy for helping job seekers find and keep meaningful employment post-release from correctional facilities. The Windham School District works closely with industry partners to build a well-trained workforce for industrial and heavy construction industries. Currently, 25 partnerships have been developed with companies. Program expansion efforts include adding training in technical fields, such as telecommunications connections, energy management, computer numerical control machining programming, and piloting self-paced training programs that utilize study guides and materials for selected certifications.

The programs discussed in this plan reflect only a portion of the programs administered by TWC. Through the integrated workforce system in Texas, TWC also administers several other federal programs:

- Choices [the employment program for recipients of Temporary Assistance for Needy Families (TANF)]
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)[4]
- Child Care and Development Block Grant Funds/Child Care Development Funds (CCDBG/CCDF)
- Trade Adjustment Assistance (TAA)
- Reemployment Services and Eligibility Assessment (RESEA)
- Registered Apprenticeship grant programs

TWC also administers state-funded workforce development programs, including:

- Apprenticeship Texas
- Skills Development Fund training (customized training for businesses)
- Self-Sufficiency Fund training
- Jobs and Education for Texans (JET) (grants for community colleges, nonprofit organizations, and school districts that provide opportunities for students to pursue new career and technical education programs in high-growth industries)

Through this highly integrated system, TWC intends to implement enhancements that continue to strengthen the state's workforce development system to put more Texans to work. The plan describes a four-year strategy that spurs skill and credential attainment, employment, retention, and earnings of participants, including those with barriers to employment, resulting in a higher quality workforce, reduced welfare dependency, and increased productivity and competitiveness in the state.

The plan complies with WIOA by aligning its core programs and two optional programs to the state's workforce investment, education, and economic development systems, as discussed in

the unified strategic planning requirements, common performance accountability measures, and requirements governing the one-stop delivery system. As WIOA intended, the plan serves as a map to develop, align, and integrate the entire system across federal education, employment, and training programs. The plan enumerates the state's vision and strategic and operational goals for providing workforce services and continuously improving the quality and performance of its system.

[1] Texas State Data Center, based on the 0.5 migration scenario (http://demographics.texas.gov/, September 2018).

[2] Texas Workforce Investment Council, Defining Middle-STEM Occupations in Texas. (December 2015).

[3] Texas Workforce Commission LMCI Tracer, Texas Fastest Growing Industries (www.tracer2.com/, September 2018).

[4] The SNAP E & T program is administered by the Texas Health and Human Services Commission (HHSC) and is operated by TWC through an interagency agreement. TWC coordinates and collaborates with the 28 Boards and their contracted workforce service providers and community partners.

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.

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.

For the Texas economy to grow and prosper, employers must convey to job seekers the skills their businesses need. Conversely, job seekers must recognize and promote the skills they possess or obtain new or upgraded skills to meet businesses' needs. The state's market-driven workforce development system plays a vital role in this process, acting as a hub for sharing information related to jobs and skills, facilitating connections between businesses and job seekers, and aiding with job search and training needs. Boards and their contractors work collaboratively to ensure that these services and assistance are available to all employers and job seekers, including veterans, individuals with disabilities, older adults, and others.

The Texas economy continues to outpace the national economy. Over the past year, Texas added jobs in 10 of the 11 major industries. Growth continues to drive demand for workers in Texas and across the nation. In some key occupations, local supply has at times struggled to keep up with demand. Texas remains driven by a continued economic shift toward high-skilled jobs in the Professional and Business Services industry. The state's rapid population growth and aging baby-boomer population increases demand for service-sector jobs, primarily Leisure and Hospitality and Education and Health Services. These three industries, in addition to Trade, Transportation, and Utilities, account for over 58 percent of the jobs in Texas.

The following industries in Texas are projected to experience the highest growth during 2016-2026.

Highest Projected Industry Growth 2016-2026

Industry Title	**2016 Emp**	**2026 Emp**	**Change**	**% Change**
Management of Companies and Enterprises	115,959	150,397	34,438	29.7%
Health Care and Social Assistance	1,529,821	1,929,312	399,491	26.1%
Accommodation and Food Services	1,149,208	1,439,342	290,134	25.2%
Construction	681,234	825,580	144,346	21.2%
Professional, Scientific, and Technical Services	678,032	809,527	131,495	19.4%
Administrative and Support and Waste Management and Remediation Services	734,684	861,171	126,487	17.2%
Educational Services	1,239,466	1,442,098	202,632	16.3%
Transportation and Warehousing	499,787	575,171	75,384	15.1%
Wholesale Trade	533,072	609,155	76,083	14.3%
Arts, Entertainment, and Recreation	134,867	154,034	19,167	14.2%
Other Services (except Public Administration)	465,682	531,433	65,751	14.1%
Real Estate and Rental and Leasing	201,210	229,421	28,211	14.0%
Retail Trade	1,310,231	1,490,796	180,565	13.8%

Industry Title	2016 Emp	2026 Emp	Change	% Change
Mining, Quarrying, and Oil and Gas Extraction	211,033	238,888	27,855	13.2%
Finance and Insurance	508,213	572,946	64,733	12.7%
Government, Except Postal Services, State and Local Education and Hospitals	697,288	762,648	65,360	9.4%
Utilities	49,152	53,418	4,266	8.7%
Manufacturing	840,935	908,467	67,532	8.0%
Agriculture, Forestry, Fishing, and Hunting	59,589	63,478	3,889	6.5%
Information	194,246	202,549	8,303	4.3%

Data Source: Texas Industry Projections, Long-Term 2016-2026

Management of Companies and Enterprises continues to grow. This industry sector is expected to top the list with the highest projected percent change for employment while remaining among the three smallest industries in Texas when ranked by 2016 employment. Utilities is the smallest industry sector; however, it is still projected to add 4,266 jobs from 2016-2026, a percent change of 8.7 percent. This growth is likely due to the increased infrastructure needs for Texas' rapidly expanding population.

With an expected increase of 21.2 percent, the Construction industry ranks fourth for the 2016-2026-time frame and is forecast to grow by 144,346 jobs. This growth is also likely due to Texas' expanding population.

The occupations within the Construction industry projected to add the most jobs that pay above the statewide median wage of $36,168 a year are listed below.

Top 10 Projected Occupations in Construction Industry above Median Wage 2016-2026

Occ Code	Occupational Title	2016 Emp	2026 Emp	Change	% Change	Typical Education for Entry
47-1011	Supervisors of Construction and Extraction Workers	50,070	61,182	11,112	22.2%	High School
47-2152	Plumbers, Pipefitters, and Steamfitters	32,573	41,137	8,564	26.3%	High School
47-2111	Electricians	44,269	52,467	8,198	18.5%	High School
47-2031	Carpenters	30,016	36,110	6,094	20.3%	High School
47-2073	Operating Engineers and other Construction Equipment Operators	24,056	29,801	5,745	23.9%	High School

Occ Code	Occupational Title	2016 Emp	2026 Emp	Change	% Change	Typical Education for Entry
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	16,966	21,712	4,746	28.0%	Postsecondary
11-9021	Construction Managers	21,957	26,681	4,724	21.5%	Bachelor's
11-1021	General and Operations Managers	17,485	21,399	3,914	22.4%	Bachelor's
51-4121	Welders, Cutters, Solderers, and Brazers	14,154	17,187	3,033	21.4%	High School
43-9061	Office Clerks, General	27,576	30,581	3,005	10.9%	High School

Data Source: Texas Occupational Projections, Long-Term 2016-2026

The Bureau of Labor Statistics assigns a typical entry-level education to all occupations. The assignment represents the typical education level that most workers will need to enter an occupation and can be useful in the planning of skills development and training.

Seven of the 10 Construction occupations require a typical education of a High School diploma or equivalent. Three of these seven occupations, Carpenters, Electricians, and Plumbers also require on-the-job Apprenticeship training.

Long-term projections data also points to the industries likely to have the largest absolute employment growth over the projected period. These "existing" industries are among the largest by estimated employment size.

The following industries in Texas are projected to experience the largest employment growth in 2016-2026.

Largest two-digit Projected Employment Growth by Industry 2016-2026

Industry Title	2016 Emp	2026 Emp	Change	% Change
Health Care and Social Assistance	1,529,821	1,929,312	399,491	26.1%
Accommodation and Food Services	1,149,208	1,439,342	290,134	25.2%
Educational Services, Public and Private	1,239,466	1,442,098	202,632	16.3%
Retail Trade	1,310,231	1,490,796	180,565	13.8%
Construction	681,234	825,580	144,346	21.2%
Professional, Scientific, and Technical Services	678,032	809,527	131,495	19.4%
Administrative and Support and Waste Management and Remediation Services	734,684	861,171	126,487	17.2%
Wholesale Trade	533,072	609,155	76,083	14.3%

Industry Title	2016 Emp	2026 Emp	Change	% Change
Transportation and Warehousing	499,787	575,171	75,384	15.1%
Manufacturing	840,935	908,467	67,532	8.0%
Other Services (except Public Administration)	465,682	531,433	65,751	14.1%
Government, except Postal Services, State and Local Education and Hospitals	697,288	762,648	65,360	9.4%
Finance and Insurance	508,213	572,946	64,733	12.7%
Management of Companies and Enterprises	115,959	150,397	34,438	29.7%
Real Estate and Rental and Leasing	201,210	229,421	28,211	14.0%
Mining, Quarrying, and Oil and Gas Extraction	211,033	238,888	27,855	13.2%
Arts, Entertainment, and Recreation	134,867	154,034	19,167	14.2%
Information	194,246	202,549	8,303	4.3%
Utilities	49,152	53,418	4,266	8.7%
Agriculture, Forestry, Fishing and Hunting	59,589	63,478	3,889	6.5%

Data Source: Texas Industry Projections, Long-Term 2016-2026

Of these industries, the first four (Health Care and Social Assistance; Accommodation and Food Services; Educational Services, Public and Private; and Retail Trade) are projected to have employment levels remain above one million or more jobs by 2026, and growth within each industry at well over 150,000 jobs.

According to the Current Employment Statistics program (CES), Health Care and Social Assistance industry employment has grown to 1,516,200 positions as of April 2019, averaging a 2.6 percent annual growth over the past five years. Per long-term industry projections, Health Care and Social Assistance employment is expected to grow to approximately 1,929,000 jobs by 2026, posting the strongest percent change of the industries listed in the previous table at 26.1 percent.

Ambulatory Health Care Services, which consists of doctors' and dentists' offices, outpatient care centers, and medical and diagnostic laboratories, continues to be a driving force behind the growth seen in this industry. It comprises 45.7 percent of the Health Care and Social Assistance industry with a projected growth of 33.4 percent.

The demand for health care workers in Texas is expected to continue to increase, as the state has growing populations of senior citizens and young people, both groups of which are primary customers of health care and social assistance. This sector is also faced with training challenges, as employers are demanding more highly educated workers due to market demand and industry expectations. Seven out of the 10 Health Care Occupations adding the most jobs require no more than an associate degree. Additionally, this industry is confronted with high turnover in key occupations, which intensifies worker demand.

Top 10 Largest Projected Health Care Occupations 2016-2026

Occ Code	Occupational Title	2016 Emp	2026 Emp	Change	% Change	Typical Education for Entry
29-1141	Registered Nurses	210,775	261,607	50,832	24.1%	Bachelor's
31-1011	Home Health Aides	72,258	103,141	30,883	42.7%	High School
31-9092	Medical Assistants	58,571	79,526	20,955	35.8%	Postsecondary
31-1014	Nursing Assistants	89,846	107,555	17,709	19.7%	Postsecondary
29-2061	Licensed Practical and Licensed Vocational Nurses	71,428	85,033	13,605	19.0%	Postsecondary
29-2052	Pharmacy Technicians	32,899	39,903	7,004	21.3%	High School
31-9091	Dental Assistants	28,418	34,673	6,255	22.0%	Postsecondary
29-1123	Physical Therapists	16,113	21,138	5,025	31.2%	Doctoral or Professional
29-1069	Physicians and Surgeons, all Other	20,426	24,602	4,176	20.4%	Doctoral or Professional
29-1126	Respiratory Therapists	11,784	15,943	4,159	35.3%	Associate's

Data Source: Texas Occupational Projections, Long-Term 2016-2026

Long-term projections data is helpful in ranking occupations in Texas, without reference to industry both in terms of percentage growth and in absolute growth between 2016 and 2026.

The following occupations are projected to experience the highest growth among all industries in 2016-2026.

Projected Highest Growth Among Occupations 2016-2026 (Percent)

	Occupational Title	2016 Emp	2026 Emp	Change	% Change
29-1071	Physician Assistants	6,698	9,735	3,037	45.3%
29-1171	Nurse Practitioners	9,059	13,031	3,972	43.8%
31-1011	Home Health Aides	72,258	103,141	30,883	42.7%
39-9021	Personal Care Aides	205,219	282,766	77,547	37.8%

	Occupational Title	2016 Emp	2026 Emp	Change	% Change
31-2021	Physical Therapist Assistants	6,845	9,395	2,550	37.3%
15-2031	Operations Research Analysts	10,145	13,816	3,671	36.2%
31-2011	Occupational Therapy Assistants	3,762	5,120	1,358	36.1%
31-9092	Medical Assistants	58,571	79,526	20,955	35.8%
29-1126	Respiratory Therapists	11,784	15,943	4,159	35.3%
29-2032	Diagnostic Medical Sonographers	5,228	7,039	1,811	34.6%
35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	331,749	443,572	111,823	33.7%
15-1122	Information Security Analysts	7,419	9,901	2,482	33.5%
15-1132	Software Developers, Applications	59,379	79,132	19,753	33.3%
31-9011	Massage Therapists	11,356	14,954	3,598	31.7%
29-1123	Physical Therapists	16,113	21,138	5,025	31.2%
31-9097	Phlebotomists	9,234	12,087	2,853	30.9%
13-1161	Market Research Analysts and Marketing Specialists	28,741	37,590	8,849	30.8%
39-2021	Nonfarm Animal Caretakers	17,842	23,237	5,395	30.2%
29-1122	Occupational Therapists	9,847	12,823	2,976	30.2%
11-3031	Financial Managers	28,244	36,657	8,413	29.8%
35-2014	Cooks, Restaurant	101,808	132,026	30,218	29.7%
11-9111	Medical and Health Services Managers	22,732	29,464	6,732	29.6%

	Occupational Title	2016 Emp	2026 Emp	Change	% Change
25-1072	Nursing Instructors and Teachers, Postsecondary	4,717	6,111	1,394	29.6%
43-6013	Medical Secretaries	98,011	126,878	28,867	29.5%
29-2099	Health Technologists and Technicians, All other	9,076	11,635	2,559	28.2%

Data Source: Texas Occupational Projections, Long-Term 2016-2026

NOTE: Occupations in this list must have 2,500 or more employed in 2016.

The Conference Board Help Wanted OnLine (HWOL), an Internet-based data series provides timely monthly measures of labor demand (advertised vacancies) at the national, regional, state, and metropolitan area levels.

The following table shows the hard and soft skills and certifications employers most commonly require for the occupations in the above table.

Common Required Skills for Employment

Hard Skills	Soft Skills	Certifications
Java	Oral and Written Communication	Certification in Cardiopulmonary Resuscitation
Software Development	Creativity	Basic Life Support
Python	Problem Solving	Driver's License
Structured Query Language	Marketing	Certified Medical Assistant
JavaScript	Integrity	Continuing Education

Source: Gartner TalentNeuron – WANTED Analytics

Hard Skills:

- Java—Knowledge of the information and techniques needed to design, implement and maintain Java Application Phases. This includes developing application code for Java programs, conducting software analysis, programming, testing, and debugging.
- Software Development—Knowledge of computer programming and coding, logical thinking and problem solving, database knowledge, algorithms and data structures, software testing, and debugging.
- Python—Knowledge of Core Python Applications, web frameworks, object relational mappers, and multi-process architecture. This can include front-end developer skills, database knowledge, systems administration, and script writing.
- Structured Query Language—Knowledge of information and techniques needed to update data on a database or retrieve data from a database. This includes querying data, controlling access to the database and its objects, and ensuring database integrity.

- Java Script—Knowledge of techniques used to create interactive webpages including dynamically updating web content, controlling multimedia, and animating images.

Soft Skills:

- Oral and Written Communication—The ability to communicate information and ideas in speaking and writing so others will understand.
- Creativity—The ability to generate or recognize ideas, alternatives, or possibilities that may be useful in solving problems, communicating with others, and entertaining ourselves and others.
- Problem Solving—Identifying complex problems and reviewing related information to develop and evaluate options and implement solutions.
- Marketing—The ability to create, communicate, deliver, and exchange offerings that have value for customers, clients, partners, and society at large.
- Integrity—The quality of being honest and having strong moral principles that you refuse to change.

Certifications:

- Cardiopulmonary Resuscitation—Training that provides techniques for responding to and preparing for medical emergencies associated with an unresponsive person who is not breathing or is partially breathing.
- Basic Life Support—Training that provides the type of care that first-responders, health care providers, and public safety professionals deliver to anyone who is experiencing cardiac arrest, respiratory distress, or an obstructed airway.
- Driver's License—A license issued under governmental authority that permits the holder to operate a motor vehicle.
- Certified Medical Assistant—Training that designates a medical assistant who has achieved certification through an accredited board. Training can include human anatomy and physiology, medical terminology, coding and insurance processing and laboratory techniques.
- Continuing Education—Continuing education is a process through which certified individuals stay abreast of evolving knowledge and skills in the profession, to promote the ongoing competency of those certified.

The following occupations in Texas are projected to experience the largest employment growth between 2016 and 2026.

Top 25 Projected Highest Employment Growth 2016-2016

Occ Code	Occupational Title	2016 Emp	2026 Emp	Change	% Change
35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	331,749	443,572	111,823	33.7
39-9021	Personal Care Aides	205,219	282,766	77,547	37.8

Occ Code	Occupational Title	2016 Emp	2026 Emp	Change	% Change
41-2031	Retail Salespersons	388,604	443,537	54,933	14.1
35-3031	Waiters and Waitresses	220,940	272,458	51,518	23.3
29-1141	Registered Nurses	210,775	261,607	50,832	24.1
43-4051	Customer Service Representatives	251,965	287,813	35,848	14.2
53-3032	Heavy and Tractor-Trailer Truck Drivers	185,215	217,493	32,278	17.4
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	174,560	206,437	31,877	18.3
11-1021	General and Operations Managers	168,198	200,014	31,816	18.9
31-1011	Home Health Aides	72,258	103,141	30,883	42.7
35-2014	Cooks, Restaurant	101,808	132,026	30,218	29.7
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	176,944	207,031	30,087	17.0
25-2021	Elementary School Teachers, Except Special Ed.	143,963	173,351	29,388	20.4
43-6013	Medical Secretaries	98,011	126,878	28,867	29.5
47-2061	Construction Laborers	130,425	157,048	26,623	20.4
43-5081	Stock Clerks and Order Fillers	163,073	189,131	26,058	16.0
43-9061	Office Clerks, General	369,945	394,613	24,668	6.7
13-2011	Accountants and Auditors	126,448	150,338	23,890	18.9
41-2011	Cashiers	272,961	296,375	23,414	8.6
25-2031	Secondary School Teachers, Except Special and Career/Technical Education	106,131	127,936	21,805	20.5

Occ Code	Occupational Title	2016 Emp	2026 Emp	Change	% Change
31-9092	Medical Assistants	58,571	79,526	20,955	35.8
35-1012	First-Line Supervisors of Food Preparation and Serving Workers	81,842	102,680	20,838	25.5
49-9071	Maintenance and Repair Workers, General	113,445	133,575	20,130	17.7
41-3099	Sales Representatives, Services, All Other	107,621	127,378	19,757	18.4
15-1132	Software Developers, Applications	59,379	79,132	19,753	33.3

Data Source: Texas Occupational Projections, Long-Term 2016-2026

The table below shows the skills employers most commonly require for the occupations in the above table that are projected to add the most jobs in Texas during the reference period.

Common Required Skills for High Growth Employment

Hard Skills	Soft Skills	Certifications
Freight+	Oral and Written Communication	Class A Commercial Driver's License
Tractor-Trailers	Integrity	Commercial Driver's License
Microsoft Office	Customer-Service Oriented	Driver's License
Bilingual	Team Oriented, Teamwork	Certified Registered Nurse
Java	Owner Operator	HAZMAT

Source: Gartner TalentNeuron-WANTED Analytics

Hard Skills:

- Freight+—Experience and skills in dealing with goods that are carried from one place to another by ship, aircraft, train, or truck or the system of transporting these goods.
- Tractor Trailers—Experience and skills associated with operating trucks with a gross vehicle weight capacity, delivering goods over intercity routes, sometimes spanning several states.
- Microsoft Office—Knowledge of Microsoft Office products such as Word, Excel, and PowerPoint.
- Bilingual—The ability to speak two languages with the facility of a native speaker.
- Java—Knowledge of the information and techniques needed to design, implement, and maintain Java Application Phases. This includes developing application code for Java programs, conducting software analysis, programming, testing, and debugging.

Soft Skills:

- Oral and Written Communication—The ability to communicate information and ideas in speaking and writing so others will understand.
- Integrity—The quality of being honest and having strong moral principles that you refuse to change.
- Customer-Service Oriented—The ability to display positive attitudes and behaviors, which demonstrate an awareness and willingness to respond to customers in order to respond to and meet their needs, requirements and expectations.
- Team Oriented, Teamwork—The process of working collaboratively with a group of people to achieve a goal.
- Owner Operator—Knowledge and skills associated with a commercial carrier providing capacity (trucks and drivers, with or without trailers or chassis) to either commercial or private carriers under a contract for services.

Certifications:

- Class A Commercial Driver's License—Government-issued license that permits the holder to operate any combination of vehicles with a gross combination weight rating of 26,001 pounds or more, provided the gross vehicle weight rating (GVWR) of the vehicle or vehicles towed exceeds 10,000 pounds.
- Commercial Driver's License—A CDL is a professional license permitting the holder of the license to drive those large commercial vehicles and buses on public roadways in Texas and in the United States.
- Driver's License—a license issued under governmental authority that permits the holder to operate a motor vehicle.
- Certified Registered Nurse—A registered nurse (RN) is a nurse who holds a nursing diploma or Associate Degree in Nursing (ADN), has passed the NCLEX-RN exam administered by the National Council of State Boards of Nursing (NCSBN), and has met all the other licensing requirements mandated by his or her state's board of nursing. Employers may require RNs to prove their specialized competency by becoming certified in their specialty area through a nationally recognized certifying body.
- HAZMAT—Hazardous materials (hazmat) removal workers identify and dispose of asbestos, lead, radioactive waste, and other hazardous materials. They also neutralize and clean up materials that are flammable, corrosive, or toxic.

B. WORKFORCE ANALYSIS

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

[4] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of

literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals.

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

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.

IV. SKILL GAPS

Describe apparent 'skill gaps'.

Employment and Unemployment

Texas Total Nonagricultural Employment grew 10.5 percent from April 2014 to April 2019. This outperformed the United States growth rate of 9.2 percent for the same time frame. Construction and Leisure and Hospitality led all other major industries in Texas, with 18.9 and 17.9 percent growth respectively over the five-year period. Texas Mining and Logging employment declined by 15.6 percent, primarily the result of declining oil prices starting in 2015, although that industry has shown 25 consecutive months of year-over-year growth. Information was the only other major industry in Texas to show employment loss over the five-year period, with a decrease of 100 jobs. Private Sector employment expanded at 11.5 percent and was more than double the growth rate of Government employment, which expanded by 5.6 percent.

Texas Nonagricultural Employment by Industry April 2014-April 2019

Industry	**April 2014**	**April 2019**	**Change**	**% Change**
Total Nonagricultural	11,515,300	12,727,600	1,212,300	10.5%
Total Private	9,661,000	10,768,900	1,107,900	11.5%
Goods Producing	1,833,300	1,928,500	95,200	5.2%
Service Providing	9,682,000	10,799,100	1,117,100	11.5%
Mining and Logging	305,100	257,500	-47,600	-15.6%
Construction	644,500	766,500	122,000	18.9%
Manufacturing	883,700	904,500	20,800	2.4%
Retail Trade	1,251,500	1,329,600	78,100	6.2%

Industry	April 2014	April 2019	Change	% Change
Transportation, Warehousing, and Utilities	476,200	567,200	91,000	19.1%
Information	202,100	202,000	-100	0.0%
Financial Activities	695,900	793,400	97,500	14.0%
Professional and Business Services	1,543,100	1,766,900	223,800	14.5%
Educational Services	178,700	213,700	35,000	19.6%
Leisure and Hospitality	1,180,300	1,391,700	211,400	17.9%
Other Services	411,400	445,700	34,300	8.3%
Government	1,854,300	1,958,700	104,400	5.6%

Source: Current Employment Statistics

The Mining and Logging industry comprises a substantially larger share of employment in Texas than at the national level. The industry accounts for 2.0 percent of Texas employment, while accounting for 0.5 percent of all jobs at the national level. Texas has a significantly lower share of Education and Health Services jobs compared to the United States (13.6 percent vs. 16.0 percent). Construction, Manufacturing, and Information represent the industries growing faster at a national level than in Texas. Mining and Logging employment has declined at both state and national levels, at a slightly faster rate in Texas than across the entire United States.

Comparing Texas to US Industry Percent Share and Growth Rates, 2014-2019 (April)

Industry	Texas % Share	US % Share	Texas Growth Rate	US Growth Rate
Total Nonagricultural	100.0%	100.0%	10.5%	9.2%
Total Private	84.6%	85.1%	11.5%	10.4%
Goods Producing	15.2%	13.9%	5.2%	10.3%
Service Providing	84.8%	86.1%	11.5%	9.1%
Mining and Logging	2.0%	0.5%	-15.6%	-15.0%
Construction	6.0%	5.0%	18.9%	23.0%
Manufacturing	7.1%	8.5%	2.4%	5.8%
Wholesale Trade	4.8%	3.9%	10.7%	3.5%
Retail Trade	10.4%	10.4%	6.2%	3.2%
Transportation, Warehousing, and Utilities	4.5%	4.0%	19.1%	18.3%
Information	1.6%	1.9%	0.0%	3.4%
Financial Activities	6.2%	5.7%	14.0%	8.9%
Professional and Business Services	13.9%	14.2%	14.5%	12.7%

Industry	Texas % Share	US % Share	Texas Growth Rate	US Growth Rate
Educational and Health Services	13.6%	16.0%	14.4%	13.2%
Leisure and Hospitality	10.9%	11.1%	17.9%	14.4%
Other Services	3.5%	3.9%	8.3%	6.5%
Government	15.4%	14.9%	5.6%	3.2%

Data Source: Current Employment Statistics

Since peaking during the great recession in March 2010 (at 8.3 percent), the seasonally adjusted unemployment rate for Texas has dropped considerably. Texas, for a variety of economic and demographic reasons, weathered the worst of the recession better than most other states. More recently, the unemployment rate in April 2019 stood at 3.7 percent, tied for the lowest unemployment rate in the history of the series that began in 1976. This was one-tenth of a percentage point higher than the unemployment rate of 3.6 percent for the United States as is shown in the Unemployment Rate chart below. The unemployment rate for Texas has been lower than that of the United States in 104 out of the previous 124 months. The unemployment rate is a relatively simple measure of labor surplus, representing the fraction of the total labor force that is not employed, but looking for work. Because of this, many experts consider the labor force participation rate (LFPR) a better gauge of labor market conditions. The LFPR is the percentage of the total civilian population that is either employed or unemployed (that is, either working or actively seeking work). In April 2019, 64.0 percent of Texas' civilian noninstitutional population participated in the labor force. The United States had a slightly lower—62.8 percent—participation rate during the same period. As can be seen in the Labor Force Participation Rate chart below, participation rates have been declining over time for both Texas and the United States. This decline can be attributed to a variety of factors, including an aging population, an increase in disability, and an increase in young people who are delaying work to pursue higher education.

Texas and United States Labor Unemployment Rates (Seasonally Adjusted):

https://twc.texas.gov/files/partners/texas-united-states-labor-unemployment-rates.jpg

Texas and United State Labor Force Participation Rates (Seasonally Adjusted):

https://twc.texas.gov/files/partners/texas-united-states-labor-force-participation-rates-twc.jpg

Labor Market Trends

The Texas industrial composition has significantly changed over time. Cotton, cattle, and petroleum, all dependent on land resources-dominated Texas economic development until the 1950s. Since then, Manufacturing, Retail, Wholesale, Financial Services, and Construction grew rapidly mirroring and serving the urbanization process. Despite the diversification of the state's economy, Texas remained heavily dependent on oil and gas and any fluctuations in oil prices had a major impact on the state, particularly in the 1970s and 1980s. Since the mid-1980s, the state's economy diversified considerably, making the Texas economy more resilient. The developments in the Barnett and Eagle Ford shale areas as well as the high oil prices from 2007 to 2009 insulated Texas from the full force of the economic downturn. Texas' industry composition continued changing away from the largest employers being Manufacturing and Retail toward Health Care. The dominant industry in Texas is now Health Care and Social

Assistance because of the need created by a growing and aging population. As of 2017, oil and gas continue to dominate the Permian Basin area. Food manufacturing and petrochemical manufacturing continue to dominate the Panhandle and Southeast Texas, respectively. Retail dominates North Central Texas and Rural Capital, each of which surround large metro areas. Because of Texas A&M University, Education Services continues to dominate Brazos Valley. Finally, Capital Area saw a recent change to Professional and Technical Services being the dominant industry since the area has been attracting more and more tech companies over the last few years. Over the past year, Texas added jobs in 10 of the 11 major industries, including Mining and Logging; Construction; Manufacturing; Trade, Transportation, and Utilities; Financial Activities; Professional and Business Services; Education and Health Services; Leisure and Hospitality; Other Services; and Government. Total Nonfarm job growth has expanded in Texas year-over-year for 108 consecutive months as of April 2019.

Texas Nonagricultural Wage and Salary Employment Seasonally Adjusted

Industry Title	April 2019*	March 2019	April 2018	Mar 19 to Apr 19 Absolute Change	Mar 19 to Apr 19 Percent Change	Apr 18 to Apr 19 Absolute Change	Apr 18 to Apr 19 Percent Change
Total Nonagricultural	12,727,600	12,698,700	12,433,400	28,900	0.2	294,200	2.4
Total Private	10,768,900	10,740,200	10,485,900	28,700	0.3	283,000	2.7
Goods Producing	1,928,500	1,919,700	1,848,000	8,800	0.5	80,500	4.4
Mining and Logging	257,500	254,800	241,100	2,700	1.1	16,400	6.8
Construction	766,500	760,700	734,000	5,800	0.8	32,500	4.4
Manufacturing	904,500	904,200	872,900	300	0.0	31,600	3.6
Service Providing	10,799,100	10,779,000	10,585,400	20,100	0.2	213,700	2.0
Trade, Transportation and Utilities	2,510,800	2,510,000	2,475,800	800	0.0	35,000	1.4
Information	202,000	202,100	203,400	-100	0.0	-1,400	-0.7
Financial Activities	793,400	790,000	772,500	3,400	0.4	20,900	2.7
Professional and Business Services	1,766,900	1,758,500	1,721,000	8,400	0.5	45,900	2.7
Education and Health	1,729,900	1,725,600	1,687,600	4,300	0.2	42,300	2.5
Leisure and Hospitality	1,391,700	1,388,500	1,346,200	3,200	0.2	45,500	3.4

Industry Title	April 2019*	March 2019	April 2018	Mar 19 to Apr 19 Absolute Change	Mar 19 to Apr 19 Percent Change	Apr 18 to Apr 19 Absolute Change	Apr 18 to Apr 19 Percent Change
Other Services	445,700	445,800	431,400	-100	0.0	14,300	3.3
Government	1,958,700	1,958,500	1,947,500	200	0.0	11,200	0.6

Data Source: Current Employment Statistics

Except for a 17-month period from October 2015 to February 2017, Texas' annual growth rate has consistently surpassed that of the United States going back to January 2004. For April 2019, the Texas annual growth rate stood 0.6 percentage points higher than that of the United States at 2.4 percent.

Texas Nonagricultural Annual Employment Growth (Seasonally Adjusted):

https://twc.texas.gov/files/partners/texas-nonagricultural-annual-employment-growth.jpg

Data Source: Current Employment Statistics

As Texas employment continues to rise, so do average annual wages. According to the Quarterly Census of Employment and Wages, average annual wages have increased by 12.8 percent over five years ending 2018. As tracked by the Current Employment Statistics program, average hourly earnings increased year over year for all employees in seven of eight measured industries, with the highest percentage increase occurring for Leisure and Hospitality workers, whose earnings increased by $0.79 per hour, over the 12-month period.

Educational and Skill Levels of the Workforce

- Based on data from the Census Bureau's 2017 American Community Survey, 83.6 percent of Texans aged 25 years and older had attained an educational level of high school graduate or higher, compared to 88.0 percent nationwide. The percentage of Texans who had attained a bachelor's degree or higher stood at 29.6 percent, compared to 32.0 percent for the nation.
- Based on Census Bureau data from 2013 to 2017, 9.7 percent of Texans 18-64 years old were classified as having a disability, a figure that was slightly lower than the rate of 10.3 percent for the United States.
- Based on data from the Census Bureau's 2017 American Community Survey, only 5.3 percent of veterans over the age of 24 in Texas had attained less than a high school degree, compared to 16.4 percent of the same age cohort in the state as a whole. Similarly, 71.7 percent of Texas' veterans over the age of 24 had attained at least some college, as compared to 58.5 percent of Texans of that age group as a whole.

See the tables below for additional information on key Texas population characteristics, including education attainment for the general population and for veterans.

Key Texas Population Characteristics:

- In 2017, the Census Bureau estimated the population of Texas to be 28,322,717.
- As of April 2019, the Bureau of Labor Statistics estimated the Texas seasonally adjusted civilian labor force at 14,015,300 persons, second only to California among US states.

- As of April 2019, Texas' seasonally adjusted unemployment rate of 3.7 percent stood 0.1 percentage points higher than the unemployment rate for the United States, 3.6 percent.

Educational Attainment for the Population

Texas Population 18 to 24 Years	%
Less than high school graduate	15.0%
High school graduate (includes equivalency)	33.2%
Some college or associate degree	43.2%
Bachelor's degree or higher	8.6%

Texas Population 25 Years and Older	%
Less than 9th grade	8.1%
ninth to 12th grade, no diploma	8.2%
High school graduate (includes equivalency)	25.1%
Some college, no degree	21.7%
Associates degree	7.3%
Bachelor's degree	19.3%
Graduate or professional degree	10.3%

Source: US Census Bureau, 2017 American Community Survey 1-Year Estimates, Table S1501

Veteran Status by Educational Attainment

Texas Veterans 25 Years and Older	%
Less than high school graduate	5.3%
High school graduate (includes equivalency)	23.0%
Some college or associate degree	40.9%
Bachelor's degree or higher	30.8%

Source: US Census Bureau, 2017 American Community Survey 1-Year Estimates, Table B21003

Based on Census Bureau data from 2017, there were an estimated 647,977 Texans between the ages of 18 and 64 at work with disability, or 5.2 percent of all employed Texans of that age. The estimated number of unemployed Texans with disabilities over this period was 77,170 individuals, which represented 11.7 percent of the total number of unemployed in Texas. Finally, the Census Bureau estimate from this period indicated that 22.2 percent of Texans ages 18 to 64 years old who were not in the labor force had some type of disability, an estimated 897,815 individuals.

Employment Status by Disability Status and Type

	Estimate
Number of Texans, 18-64 years old	17,111,410
In the labor force	13,069,811
Total Employed:	12,410,570
Employed with a disability	647,977
Employed with a hearing difficulty	188,195
Employed with a vision difficulty	166,868
Employed with a cognitive difficulty	185,543
Employed with an ambulatory difficulty	215,986
Employed with a self-care difficulty	43,734
Employed with an independent living difficulty	97,527
Employed with no disability	11,762,593
Total Unemployed:	659,241
Unemployed with a disability	77,170
Unemployed with a hearing difficulty	14,049
Unemployed with a vision difficulty	16,966
Unemployed with a cognitive difficulty	40,234
Unemployed with an ambulatory difficulty	26,345
Unemployed with a self-care difficulty	8,045
Unemployed with an independent living difficulty	18,933
Unemployed with no disability	582,071
Total Not in Labor Force:	4,041,599
Not in labor force, with a disability	897,815
Not in labor force, with a hearing difficulty	133,935
Not in labor force, with a vision difficulty	169,859
Not in labor force, with a cognitive difficulty	423,742
Not in labor force, with an ambulatory difficulty	537,516
Not in labor force, with a self-care difficulty	237,742

	Estimate
Not in labor force, with an independent living difficulty	434,627
Not in labor force, with no disability	3,143,784

Source: US Census Bureau, 2017 American Community Survey 1-Year Estimates, Table B18120

Skills Gaps

TWC does not have enough data to adequately address skills gaps for specific occupations at the state or regional level. However, anecdotal information suggests that the state is facing a shortage of skilled workers in occupations requiring postsecondary training. This includes trade occupations, such as carpenters, plumbers, welders, and electricians, as well as professional occupations such as doctors, accountants, and information technology professionals. Employers have reported difficulties hiring sufficient numbers of trained workers in advanced manufacturing occupations. The Federal Reserve Bank of Dallas has stated, "It is becoming more common that businesses in key industries in Texas are unable to find enough sufficiently trained workers to fill available, middle-skill jobs." Further, Texas CEO magazine noted that "During the past decade, the number of mathematics and statistics degrees awarded in Texas rose less than 15 percent. During this period, the number of computer and math jobs in Texas increased nearly 45 percent. The result is full employment for computer and math talent." As noted earlier, anecdotal information suggests a growing need for additional highly skilled workers with specialized postsecondary training.

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.

For the Texas economy to grow and prosper, employers must convey to job seekers the skills their businesses need. Conversely, job seekers must recognize and promote the skills they possess or obtain new or upgraded skills to meet businesses' needs. The state's market-driven workforce development system plays a vital role in this process, acting as a hub for sharing information related to jobs and skills, facilitating connections between businesses and job seekers, and aiding with job search and training needs. Boards and their contractors work collaboratively to ensure that these services and assistance are available to all employers and job seekers, including veterans, individuals with disabilities, older adults, and others.

TWC and its workforce development partners will continue to collaborate with community and industry partners to expand these opportunities and find new ways to achieve positive results. The development of innovative workforce services to meet the needs of employers and workers is vital to the success of the workforce system.

As businesses expand their operations and new employers emerge during this period of rapid technology advances, there is a growing opportunity to assist with workforce skills development and training. The gap between in-demand skills and available labor force skills must be addressed at all levels. This includes the availability of technical training opportunities as well as efforts to increase the number of skilled craft specialists. Increased development of regional collaborations with employers, Boards, community colleges, and other training providers will be engaged to address this opportunity.

TWC uses long-term projections data to identify industries likely to grow the fastest. Growth assumes, in part, an adequate supply of workers with relevant skills. The Bureau of Labor Statistics (BLS), however, foresees that a combination of slower growth of the civilian noninstitutional population and falling participation rates of youths and prime-age workers will lower national labor force growth to nearly 0.5 percent annually. In Texas, growth is sustained by improving programs for individuals with barriers to employment by identifying transferable skills valued by employers, as well as providing education and training to upscale their skills in high-growth sectors.

The following statewide goals and benchmarks issued by the Office of the Governor are related to the state's workforce development, education, and training activities:

Education—Public Schools

Priority Goal

To ensure that all students in the public education system acquire the knowledge and skills to be responsible and independent Texans by:

- ensuring students graduate from high school and have the skills necessary to pursue any option including attending a university, a two-year institution, or other postsecondary training; serving in the military; or entering the workforce;
- ensuring students learn English, math, science, and social studies skills at the appropriate grade level through graduation; and
- demonstrating exemplary performance in foundation subjects.

Benchmarks

- Percentage of recent high school graduates enrolled at a Texas college or university
- Number of prekindergarten-age students served through the Texas Early Education Model

Education—Higher Education

Priority Goal

To prepare individuals for a changing economy and workforce by:

- providing an affordable, accessible, and quality system of higher education; and
- furthering the development and application of knowledge through teaching, research, and commercialization.

Benchmarks

- Percentage of nursing graduates employed or enrolled in nursing graduate programs in Texas

Health and Human Services

Priority Goal

To promote the health, responsibility, and self-sufficiency of individuals and families by making public assistance available to those most in need through an efficient and effective system while reducing fraud.

Benchmarks

- Percentage of Texans receiving TANF cash assistance
- Percentage of adult welfare participants in job training who enter employment

Economic Development

Priority Goal

To provide an attractive economic climate for current and emerging industries and market Texas as a premier business expansion and tourist destination that fosters economic opportunity, job creation, and capital investment by:

- promoting a favorable business climate and a fair system to fund necessary state services;

- addressing transportation needs;
- maintaining economic competitiveness as a key priority in setting state policy; and
- developing a well-trained, educated, and productive workforce.

Benchmarks

- Number of employees in targeted industry sectors
- Number of new small businesses created
- Number of new nongovernment, nonfarm jobs created
- Texas unemployment rate
- Number of Texans receiving job-training services

Core Program Activities to Implement the State's Strategy

The following activities support WIOA core programs and align with the state's strategies, as previously described.

TWC administrates the development and integration of workforce services in tandem with the Board's oversight and planning efforts. Service delivery is executed through Texas Workforce Solutions, which may contract with one-stop providers to operate a variety of program components. This network gives customers local access to workforce solutions and statewide services at approximately 200 Workforce Solutions Offices, four UI Tele-Centers, and numerous partner locations.

WIOA has reinforced Texas' progress toward integrating services for customers. WIOA §193(a)(3) provides that Boards' contracted workforce service providers and community partners are defined under prior consistent state law.

Sections 302.021 and 302.062 of the Texas Labor Code set forth the job training, employment, and employment-related educational programs and functions consolidated under the authority of TWC. In Texas, prior consistent state law defines the Boards' responsibility to develop, implement, and modify a plan for convening all relevant programs, identified as one-stop required-partner programs, including:

- Workforce Innovation and Opportunity Act (WIOA, formerly Workforce Investment Act (WIA))
- Wagner-Peyser Employment Service (ES)
- Unemployment Insurance (UI) Benefits Information
- Choices, the TANF employment and training program
- Subsidized child care
- Trade Adjustment Assistance (TAA)
- Adult Education and Literacy (AEL) programs
- Vocational Rehabilitation (VR) (WIOA, Title IV) programs

Prior consistent state law further defines the following as required one-stop partner programs. Other than UI compensation, which is administered by TWC, the programs are not under the direct oversight of the Boards; therefore, Boards are required to establish memoranda of understanding (MOUs) with:

- AEL (WIOA, Title II);
- Apprenticeship programs;
- National and Community Services Act Program;
- Non-Certificate Postsecondary Career and Technology Training programs; and
- Senior Community Service Employment Program (SCSEP)
- Supplemental Nutrition Assistance Program, Employment and Training (SNAP E&T)

TWC also recommends that Boards enter MOUs with the following optional partner activities:

- Career and technical education programs authorized under the Carl D. Perkins Act of 2006
- Job counseling, training, and placement services for veterans, 38 USC 41
- Education and vocational training program through Job Corps administered by DOL
- Native American programs authorized under Title I of WIOA
- Employment and training programs administered by Historically Underutilized Business (HUB)
- Employment and training activities carried out under the Community Services Block Grant Act
- Reintegration of offenders programs authorized under the Second Chance Act, 2007
- Migrant and Seasonal Farmworker programs authorized under Title I of WIOA

Additionally, Boards are encouraged to continually expand and enhance their network by forming partnerships outside of the Workforce Solutions Offices. Some agencies and services with which Boards establish additional cooperative relationships include the following:

- Local boards of education
- Local-level vocational education agencies
- Community-based Organizations (CBOs)
- Faith-based Organizations (FBOs)
- Texas Department of Housing and Community Affairs (TDHCA)
- Other appropriate training and employment agencies and services to expand local presence

Pay-for-Performance Contract Strategy

TWC and Boards will maintain, where applicable, performance-based contracts. As in the past, however, TWC and Boards will consider developing, with stakeholder input, a WIOA pay-for-performance contracting strategy applicable to Title I programs, as defined in WIOA §3(47).

The development of a performance-based contract is contingent on the pay-for-performance contract strategy, which establishes specific benchmarks that must be achieved in order for the contractor to receive payment. WIOA calls for the benchmarks to be tied to the prime indicators of performance and adjustments thereof related to economic conditions and the population demographics.

TWC intends for pay-for-performance contract strategies to be implemented in accordance with further guidance regarding WIOA performance requirements. Additionally, DOL's guidance is sought for both state and local areas in developing the broader pay-for-performance contract strategy, including the scope and minimum requirements of the required feasibility study, as presented in the Notice of Proposed Rule Making (NPRM) (document no. 2015-05530).

TWC will continue to allow Boards to use performance-based contracts that are not WIOA pay-for-performance contracts. Furthermore, TWC will maintain the latitude provided for in WIOA to consider the development of a pay-for-performance contract strategy as guidance is issued.

B. The Strengths and Weaknesses of Workforce Development Activities

The strengths of operating an integrated workforce development system are significant. Texas' implementation of WIOA's six core programs supports a service delivery system that meets the needs of employers and works to ensure that relevant training and employment assistance is available for job seekers, including those with disabilities—regardless of the funding source.

However, the potential for funding reductions—particularly for programs with specific eligibility and use criteria—are likely to challenge the system. Boards work individually, together, and with other stakeholders to achieve cost efficiencies and a seamless service delivery system. Models exist that, if replicated or expanded, could significantly enhance participant access to a range of workforce and associated support services. Collaborative efforts aid in providing an adequate supply of workers that meet the skills requirements of available jobs, thus assisting the state's employers with retaining and enhancing a competitive economic advantage.

C. State Workforce Development Capacity

TWC has emerged as a national leader in workforce development activities by fostering a locally determined workforce system—fundamental to putting Texans back to work and spurring the state's economic competitiveness. Texas is experiencing growth in new jobs and the labor market overall, and the need to strategically strengthen the workforce development system championed by TWC remains clear.

TWC aligns workforce development activities by establishing rigorous strategic planning requirements coupled with common performance accountability measures, and requirements governing Texas' one-stop delivery system. TWC coordinates and collaborates with the 28 Boards and their contracted workforce service providers and community partners. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, and job seekers and youth, including individuals with disabilities and other barriers to employment.

Congressional action to reauthorize and reform WIA—now WIOA—allows the Boards to continue to apply and improve upon an integrated strategy for serving the Texas labor market.

Texas has implemented many programmatic changes mandated by WIOA, such as providing Temporary Assistance for Needy Families (TANF) participants with training and placement services by ES staff and using common performance measures across core programs for both adults and youth. WIOA clearly recognizes Texas' integrated workforce system by the inclusion of the permissible alternate entity language.

Recognizing that innovative, progressive services promote a stronger Texas, the Texas Workforce Solutions network has continued its strategy of providing value-added services, which improve customers' opportunities for growth.

Meeting the Needs

TWC is aware of the state's changing demographics and skills gaps and continues to design programs to meet increasingly complex workforce needs. Through the Texas Workforce Solutions network, TWC connects job seekers and other populations with barriers to employment to numerous career and training resources to prepare them to enter or reenter the workforce of high-growth industry sectors. Although the service is targeted, its delivery is uniformly applied.

Leveraging an integrated workforce system, TWC also strives to create a seamless approach that attracts and retains in-demand employers. The agency understands that an employer may not care which funding source or program is covering the service it is receiving. By creating specific Business Service Units (BSUs) at each Board, the workforce system rallies a group of dedicated individuals to meet employer needs and present employers with services in ways that are beneficial and easy to understand. BSUs are Boards' frontline business advocates, often having strong ties to the local business communities. Furthermore, because Boards are predominantly composed of local business leaders, TWC taps a continuous flow of current and relevant information from employers. Board members can shape local policies and procedures to best fit the local marketplace.

Additionally, Workforce Solutions Vocational Rehabilitation Services (TWS-VRS) Business Relations staff help employers fill open positions with qualified job seekers with disabilities, provide training and accommodation assistance, and assess the workplace, job descriptions, and recruitment and application processes to remove barriers. Business Relations staff can also provide disability awareness training to businesses and their employees, and assist with business symposia, expos, and job and career fairs.

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[8] and other populations.[9]

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

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

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

3. PERFORMANCE GOALS

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

4. ASSESSMENT

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

1. Vision

Mission

TWC's mission is to promote and support a workforce system that creates value and offers employers, individuals, and communities the opportunity to achieve and sustain economic prosperity.

Vision

TWC and its Texas Workforce Solutions partners will maximize the power of innovation and partnerships to boost superior business outcomes and realize a competitive advantage for all Texans in the global economy.

2. Goals

TWC's vision is rooted in five strategic goals that take into account the state's economic conditions, workforce, and workforce development activities. The following five goals are intended to address critical populations, including claimants, youth, individuals with barriers to employment, veterans, and individuals with disabilities. Specific actions for achievement are listed under each goal.

1. Support a Workforce System that allows employers and workers to achieve and sustain economic prosperity.

a. Expand workforce training, recruiting and hiring services for employers to ensure that a skilled and ready workforce is available to meet the diverse needs of business.

b. Enhance workforce services and resources to help job seekers access information about in-demand occupations, gain the skills needed by Texas employers, and find and retain employment.

2. Promote employers' access to the talents and abilities of individuals with a disability. Accommodate such workers in the workplace and assist with maintaining and advancing their careers successfully.

    a. Continued integration of the state's vocational rehabilitation services for individuals with disabilities within Texas Workforce Solutions so that local service delivery works in concert with other workforce services, and resources can be shared to better serve the needs of job seekers and workers with disabilities.

    b. Expand the network of employers that recruit, train, and employ the talents and skills of individuals with disabilities through Texas Workforce Solutions business service representatives, Vocational Rehabilitation Services business relations staff and Board partnerships with economic development and industry groups.

3. Prepare individuals for employment by supporting education and training that equips individuals with in-demand skills as identified by employers.

    a. Continue ongoing support of education programs for students in Texas that inform them and prepare them for high-skill, high-demand jobs through identification and allocation of available state and federal programs and resources.

    b. Address the workforce training needs of employers by leveraging Skills Development Fund grants and other available resources to support in-demand job training. Continue to support work-based learning opportunities through internships, mentorships, apprenticeships and job shadowing.

    c. Continue to coordinate and collaborate with the Texas Higher Education Coordinating Board and the Texas Education Agency to support and develop objectives for increasing the percentage of Texans with postsecondary degrees or certifications.

4. Accelerate employment pathways for veterans, service members, and their spouses as they transition to civilian occupations in Texas.

    a. Provide an accelerated pathway and demonstrate new approaches for transitioning military service members to gain acknowledgement of their military training and quickly transition to employment in Texas through ongoing expansion of programs such as Texas Operation Welcome Home, College Credit for Heroes, veterans training, and the Texas Veterans Leadership peer mentorship.

b. Identify gaps in service to Texas veterans and advance strategies to enhance their education and employment opportunities to ensure seamless transition into the Texas workforce for veterans and their spouses.

5. Maintain the highest levels of integrity, accountability, and efficiency in all workforce systems and TWC programs. Through continuous improvements, develop a system that minimizes fraud, waste, and abuse with TWC and all programs it administers.

    a. Monitor and evaluate compliance of local area service delivery for fiscal accountability and program effectiveness.

    b. Make technology and system improvements to leverage current resources and improve oversight and monitoring of programs.

    c. Investigate and resolve findings or questioned costs and track each resolution and recovery of disallowed costs.

The Texas workforce development system's market-driven approach incorporates all potential customers, including employers and job seekers, as well as workforce service providers, economic development entities, universities, community colleges, and training providers. This approach ensures that all workforce system customers are valued, informed contributors to and drivers of the system, thus allowing state and local policymakers to strategically plan for the current and future needs of the state.

Texas Workforce Solutions continuously monitors and analyzes the needs of the state's workforce and businesses to ensure a solid approach that enables job growth, promotes a well-trained workforce, and ensures Texas' ability to compete on a global level.

3. Performance Goals

Table 1. Employment (Second Quarter after Exit)

Program	PY 2020 Proposed/ Expected Level	PY 2020 Negotiated/ Adjusted Level	PY 2021 Proposed/ Expected Level	PY 2021 Negotiated/ Adjusted Level
Adults	76.00%		76.00%	
Dislocated Workers	73.00%		75.00%	
Youth	70.00%		70.00%	
Adult Education	32.70%		32.70%	
Wagner-Peyser	66.90%		66.90%	
Vocational Rehabilitation	Baseline		Baseline	

Table 2. Employment (Fourth Quarter after Exit)

Program	PY 2020 Proposed/ Expected Level	PY 2020 Negotiated/ Adjusted Level	PY 2021 Proposed/ Expected Level	PY 2021 Negotiated/ Adjusted Level
Adults	75.00%		75.00%	

Program	PY 2020 Proposed/ Expected Level	PY 2020 Negotiated/ Adjusted Level	PY 2021 Proposed/ Expected Level	PY 2021 Negotiated/ Adjusted Level
Dislocated Workers	73.00%		75.00%	
Youth	74.00%		74.00%	
Adult Education	30.30%		30.30%	
Wagner-Peyser	68.70%		68.70%	
Vocational Rehabilitation	Baseline		Baseline	

Table 3. Median Earnings (Second Quarter after Exit)

Program	PY 2020 Proposed/ Expected Level	PY 2020 Negotiated/ Adjusted Level	PY 2021 Proposed/ Expected Level	PY 2021 Negotiated/ Adjusted Level
Adults	$5,400		$5,400	
Dislocated Workers	$8,200		$8,200	
Youth	$3,147		$3,147	
Adult Education	$4,854		$4,854	
Wagner-Peyser	$5,525		$5,525	
Vocational Rehabilitation	Baseline		Baseline	

Table 4. Credential Attainment Rate

Program	PY 2020 Proposed/ Expected Level	PY 2020 Negotiated/ Adjusted Level	PY 2021 Proposed/ Expected Level	PY 2021 Negotiated/ Adjusted Level
Adults	69.00%		69.00%	
Dislocated Workers	74.00%		74.00%	
Youth	63.00%		63.00%	
Adult Education	34.10%		34.10%	
Wagner-Peyser	Not Applicable		Not Applicable	
Vocational Rehabilitation	Baseline		Baseline	

Table 5. Measurable Skill Gains

Program	PY 2020 Proposed/ Expected Level	PY 2020 Negotiated/ Adjusted Level	PY 2021 Proposed/ Expected Level	PY 2021 Negotiated/ Adjusted Level
Adults	53.60%		54.60%	
Dislocated Workers	56.20%		57.20%	
Youth	47.30%		48.30%	
Adult Education	44.10%		44.10%	
Wagner-Peyser	Not Applicable		Not Applicable	
Vocational Rehabilitation	12.20%		18.30%	

Table 6. Effectiveness in Serving Employers

Program	PY 2020 Proposed/ Expected Level	PY 2020 Negotiated/ Adjusted Level	PY 2021 Proposed/ Expected Level	PY 2021 Negotiated/ Adjusted Level
Adults	Not Applicable		Not Applicable	
Dislocated Workers	Not Applicable		Not Applicable	
Youth	Not Applicable		Not Applicable	
Adult Education	Not Applicable		Not Applicable	
Wagner-Peyser	Not Applicable		Not Applicable	
Vocational Rehabilitation	Not Applicable		Not Applicable	

NOTE: DOL and ED did not provide states with the Statistical Adjustment Models that WIOA §116 envisioned as a key mechanism for setting targets and in particular to account for differences in the characteristics of those served and the economic conditions. DOL and ED did provide data on other states TWC could use as a guide in data analysis. Additionally, DOL and ED did not set national Government Performance and Results Act targets for the WIOA measures, all of which are required for negotiating targets. Therefore, TWC relied on trend data and general changes in automation and policies and procedures to estimate levels of performance for PY20 and PY21.

4. Assessments

Texas Government Code §2308.101 requires the Texas Workforce Investment Council (TWIC)—the state board—to monitor the state's workforce investment system. As part of that responsibility, TWIC annually reports to the governor and the legislature on the degree to which the system is achieving state and local workforce goals and objectives. In January 2016, TWIC released the Texas Workforce System Strategic Plan for Fiscal Years 2016–2023 (FY'16–'23), available at http://gov.texas.gov/twic/workforce_system.

State statutes require that TWIC evaluate six elements in the workforce system, as follows:

- Workforce agency program performance and alignment
- Formal and Less Formal performance measures
- Implementation of the system strategic plan
- Adult education actions and achievements
- Board activities and alignment
- Workforce development programs that focus on welfare-to-work initiatives

A primary focus of TWIC in FY'20 will be the approval and implementation of an update to the workforce system strategic plan and the continuation of the plan's balanced scorecard approach to support system evaluation. TWIC will continue to produce studies and reports to support the implementation of the system strategic plan and to design and launch system projects to strengthen the three imperatives that form the foundation of the strategic plan: customer services and satisfaction, data-driven program improvement, and continuous improvement and innovation.

TWIC will continue to evaluate programs to identify gaps and duplication that adversely affect the seamless delivery of TWIC services and other programs. Problems, and the results of measures taken by TWIC to address those problems, will be included in the annual report on strategic plan implementation.

Program data and other data from across the workforce system are critical in evaluating the extent to which workforce system programs, services, and products are meeting the needs of customers and stakeholders. The collection of key data, as well as the reporting and analysis of that data—in a consistent and useful manner—is essential in demonstrating outcomes, determining if changes are required or desired, and establishing benchmarks for future performance.

Under the system strategic plan, TWIC will continue to work with system partners to build upon process improvements to implement workforce programs, services, and initiatives designed to achieve the system objectives and goals.

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)

Overview

In December 2018, Texas achieved a record-low unemployment rate of 3.7 percent, tying this rate again in April 2019 and setting new record lows in May (3.5 percent) and again in June (3.4 percent) of 2019. Texas has experienced positive total nonfarm annual job growth for 110 consecutive months dating back to May 2010. Monthly job growth has increased for the last 23 consecutive months, from August 2017 through June 2019. Since WIOA's inception, Texas has continued adding jobs in 10 of the 11 major industries. For this reason, no significant changes are planned that would impact TWC's strategies for the next four years.

Texas operates a complex, integrated workforce system comprising numerous programs, services, and initiatives administered by state agencies and Boards, TWIC, independent school districts, community and technical colleges, and local adult education providers. System partners are responsible for delivering a wide range of workforce education and training programs and related services, as well as education programs that support career preparation and advancement.

The system is interrelated because the programs and agencies serve either a common customer or are charged with achieving similar employment and education outcomes for their targeted customer groups. Therefore, the strategic planning process is designed to identify and focus on systemic issues that affect multiple parts of the system—either programs or agencies—and that address broad, big-picture workforce issues. TWIC and its system partners completed a year-long planning process, culminating with the development of the system strategic plan for fiscal years 2016–2023. Because the system strategic plan focuses on issues that span agencies and programs, it fulfills a unique and complementary role in the workforce system and does not duplicate the purpose or scope of other agency or program plans.

The system plan identifies several priority issues that system partners have addressed, are addressing, and will address during the strategic plan period. In identifying these issues, TWIC examined both program and participant outcomes that are critical to Texas' workforce and competitiveness, in addition to the critical issues and interdependencies that cross agencies. The most recent update of the plan is available at https://gov.texas.gov/organization/twic/workforce_system.

TWC Strategies

The Texas workforce system has matured significantly since 1995, when the Texas legislature merged staff and programs from 10 different state agencies to create TWC. In 1993, the legislature passed Senate Bill (SB) 642—the Workforce and Economic Competitiveness Act—the purpose of which was to transform the state's fragmented workforce development system into an integrated service-delivery network, thus improving the quality and effectiveness of services.

In 1995, Texas' workforce programs began to consolidate into a single, integrated system. That system is known today as Texas Workforce Solutions. It allows coordination of workforce activities among partners at the state and local levels. When House Bill (HB) 1863 took effect in

September 1995, it merged 28 workforce programs across several state agencies into a singular agency, TWC.

In July 1999, TWC became the state entity charged with implementing the federal Workforce Investment Act (WIA) of 1998. In recognition of the work Texas had already done to establish the framework of an integrated workforce system, WIA provided for several "grandfather" provisions allowing Texas to continue certain provisions under prior consistent state law. One of those provisions was specific to the designation of workforce areas. This provision allowed Texas' Boards to continue as long as they performed successfully and maintained sustained fiscal integrity.

In July 2014, when WIOA was enacted, Congress again recognized Texas' workforce system with WIOA maintaining the provisions that allow Texas to continue under prior consistent state law. Absent any new direction from the Texas legislature, Texas will continue to operate under prior consistent state law.

TWC has emerged as a national leader in workforce development activities by fostering a locally driven workforce system, which is fundamental to putting Texans back to work and spurring the state's economic competitiveness. Texas has been experiencing record-low unemployment and exceptional growth in new jobs and the labor market overall. The need to continue strategically strengthening the workforce development system championed by TWC remains clear.

TWC aligns workforce development activities by establishing rigorous strategic planning requirements coupled with common performance accountability measures and requirements governing Texas' one-stop delivery system. TWC coordinates and collaborates with the state's 28 Boards and their contracted workforce service providers and community partners. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, job seekers, and youth, including individuals with disabilities and other barriers to employment.

TWC anticipates the next five years to be an era of service to an expanding Texas workforce whose diversity and skills are rapidly changing in a world in which our employers and industry engage in innovation and technology to advance their competitiveness. Texas employers, workers and job seekers have the opportunity to benefit from the resiliency of the Texas economy, the diversity of Texas industries, and our solid economic foundation keeping our economy strong. The Texas workforce is now at more than 14 million individuals whose skills are world-class and ready to meet the needs of more than 555,000 employers. Through the Governor's Tri-Agency Partnership, our work with the Texas Education Agency (TEA) and the Texas Higher Education Coordinating Board (THECB) and in collaboration with key stakeholders across the state's workforce and educational systems aligns current and future industry needs. The strategies will help equip Texans with the skills, education and training needed to be competitive for the jobs of today and in the future.

Meeting the Needs

Through the Texas Workforce Solutions network, TWC connects job seekers and other populations with barriers to employment to numerous career and training resources to prepare them to enter or reenter the workforce in high-growth industry sectors. Although the service is targeted, its delivery is uniformly applied.

TWC also strives to ensure that the state's integrated workforce system attracts and retains in-demand employers. Each Board has a dedicated Business Service Unit (BSU). BSUs are the

Boards' frontline business advocates, offering a full range of services designed to connect employers with qualified job seekers. BSU team members often have strong ties to the local business communities, which allows them to effectively meet an employer's specific needs and present services in ways that are beneficial and easy to understand. Furthermore, because Boards are predominantly comprised of local business leaders, TWC taps a continues flow of current and relevant information from employers. These interactions allow Board members to shape local policies and procedures to best fit their local marketplace.

Additionally, system partners deliver vocational rehabilitation (VR) programs which play a critical role by enabling individuals with disabilities to prepare for and obtain employment through a variety of services ranging from career counseling to support for postsecondary education. Services are customized to an individual's specific needs and may include assessments, counseling, medical treatment, assistive devices, vocational training for job skills, job search and placement assistance, and other services that will prepare the individual for competitive integrative employment. The VR program also provides services to help businesses hire, train and retain qualified individuals with disabilities.

Targeted Service Populations

Employers

Texas' strong economic foundation is largely a credit to the diversity and stability of its private-sector businesses. The state boasts an estimated 544,000 total employers representing hundreds of public and private industries. The overwhelming majority (97.2 percent) of Texas employers are small businesses employing 100 or fewer workers. However, the largest percentages of jobs (68.7 percent) are with companies that employ 100 or more workers. It is vital that TWC and its workforce partners continue collaborating with local economic development entities to equip Texas employers of all sizes with a highly skilled workforce that will keep jobs in Texas and help companies remain competitive in the global marketplace.

Communities

Texas Workforce Solutions provides locally customized services that address the needs of each region of the state. The Boards are comprised of a cross section of local officials and businesspeople who form partnerships with local entities to deliver integrated services that address each community's unique needs.

The workforce system continues to support local delivery of adult education and literacy (AEL) services to assist individuals who need education and training to obtain the basic skills that will enable them to gain sustainable employment and become self-sufficient.

The workforce system also delivers vocational rehabilitation (VR) services to help individuals with disabilities prepare for, find, or maintain employment, or prepare for educational opportunities. VR also helps employers recruit, retain, and accommodate employees with disabilities.

Job Seekers

Providing employment services and developing innovative strategies to help individuals find employment opportunities in high-growth, high-wage industries are central to TWC's mission. TWC and its workforce partners offer services that lead to hundreds of thousands of job seekers entering employment each year. Services include job search assistance, labor market and career planning information, training and education opportunities, and unemployment benefits to those who lose their jobs through no fault of their own.

Workers

With a workforce of nearly 14 million eligible workers, TWC aims to help Texans achieve and succeed in a quality work environment. The agency provides workforce development and training, apprenticeship programs, and employment support services for members of its labor force. The agency promotes long-term self-sufficiency by enabling parents to work or attend education and training to launch a career pathway, while their children receive quality child care. TWC also investigates wage claims, child labor law violations, and employment discrimination claims to ensure that workers receive fair treatment and proper compensation for their work.

Unemployment Insurance Claimants

TWC strongly encourages Boards to design services that provide early intervention with unemployment insurance (UI) claimants. The longer individuals draw UI, the more likely they are to exhaust their benefits; therefore, Boards promote continued comprehensive claimant services throughout the life of their claim cycle. Boards dedicate staff to claimants and establish claimant protocols that include ongoing one-on-one reemployment services.

Veterans

Veterans are a priority population for TWC. The agency's own workforce is made up of more than 11 percent veterans, compared to an average of about 4.5 percent in most other state agencies. The Texas Veterans Commission recognized TWC's dedication to hiring veterans in September 2015 with the Public Entity (Government Agency) Large Employer of the Year award. TWC promotes the hiring of veterans by others through several initiatives, including services and programs for US armed service members returning from Iraq and Afghanistan.

TWC provides services and programs for US armed service members returning from missions. The Texas Veterans Leadership Program employs peer mentors called Veterans Resource and Referral Specialists to direct returning veterans to resources and services that can help them reenter civilian life and the civilian workforce. Services include job search and employment assistance and identification of education and training resources. Veterans receive preference for jobs posted on TWC's online job matching website, WorkInTexas.com. Veterans can search for jobs, receive priority of service at Texas Workforce Solutions offices and access information on transition assistance and benefits. TWC maintains the Just for Veterans resource on the TWC website that provides information on services specifically for Veterans. Additionally, TWC's College Credit for Heroes initiative assists veterans by awarding college credit for experience gained and training completed during military service.

Individuals with Disabilities

Approximately 12 percent of the Texas population is estimated to have some type of disability. TWC is committed to providing services to this population. The agency promotes competitive employment of individuals with disabilities coupled with the expectation that they can meet the same employment standards and responsibilities as other working-age adults. All working-age individuals with disabilities, including young adults, are offered information regarding employment as an individual with a disability, including the relationship between an individual's earned income and the individual's public benefits.

The VR program helps individuals with disabilities prepare for, find, and keep jobs, and helps students with disabilities plan the jump from school to work. Work-related services are individualized and may include counseling, training, medical treatment, assistive devices, job placement assistance, and other services.

TWC additionally promotes partnerships with employers to overcome barriers to meeting workforce needs through the creative use of technology and innovation. TWC takes steps to ensure that the staff of public schools, vocational service programs, and community-based organizations are trained and supported to assist all individuals with disabilities in achieving competitive employment. TWC also promotes the availability and accessibility of individualized training designed to prepare an individual with a disability for the individual's preferred employment. To this end, individuals with disabilities are given the opportunity to understand and explore options for education and training, including postsecondary, graduate, and postgraduate education, vocational or technical training, or other training, as pathways to employment.

Foster Youth

Foster youth are another priority population. TWC funds transition centers serving both current and former foster youth ages 14-25. The centers address critical life barriers facing youth who have or will soon age out of the foster care system. They provide access to education, employment training and services, life skills classes, mentoring opportunities, and appropriate support services.

Texas Pathways to Reentry

TWC received a grant from DOL to implement a demonstration project to assist ex-offenders released from prison reintegrate into the workforce. The project creates employment opportunities for violent and non-violent offenders, including registered apprenticeship programs in high-demand sectors, such as healthcare, manufacturing, construction and automotive repair. To provide tailored services to eligible program participants, this project will be implementing promising practices from the "Integrated Reentry and Employment Strategies" white paper, by using a resource-allocation and service matching tool. This tool combines results from a validated corrections assessment and a workforce-based job readiness assessment. Participants then proceed into one of three customized career pathways related to the individual's specific education, employment and training needs.

Pathways are:

- Basic Skills Deficient
- High School Diploma or GED
- Existing Credentials or Certifications

The Texas Pathways to Reentry partnership focuses on the right people with criminal records, at the right time, and with the right interventions, can help reduce recidivism and improve the likelihood that individuals will successfully reconnect to the workforce.

Students and Their Parents

Providing today's youth with education, training, and workplace opportunities is essential to the state's future growth and success. To ensure that young people have the skills necessary to meet future workforce needs, Texas must support programs that steer students toward in-demand careers beginning at an early age. TWC supports programs that identify educational and career pathways for students, including vocational and technical training, as well as those that require two-year, four-year, and higher education levels.

In November 2018, TWC launched the "Jobs Y'all: Your Career. Your Story." campaign designed to inspire young Texans to discover and explore the state's in-demand industries and learn

about skills needed to enter the workforce. This online program educates and inspires young Texans to create self-directed career paths, features in-demand industries, and connects participants to career resources.

TWC's Labor Market and Career Information (LMCI) department develops and distributes educational materials and online tools that help parents, educators, and students identify career pathways. TWC has worked closely with the Texas Education Agency (TEA) and the Texas Higher Education Coordinating Board (THECB) to help communities, schools, and students transition to the career-focused initiatives set forth in House Bill 5, passed by the 83rd Texas Legislature, Regular Session, 2013.

TWC approved a new two-year initiative in July 2018, totaling $4,000,000, called "Workforce Career & Technical Education Outreach Specialist Pilot Program" to ensure students and their parents are aware of career resources that will empower students to gain degree certifications, graduate with marketable skills, and minimize student debt in the future.

The pilot program places local Workforce Career Specialists in area middle and high schools (grades 6-12) to provide career guidance and workforce information to students and their parents regarding: 1) high growth, high demand occupations; 2) opportunities and training in middle-skills jobs; 3) apprenticeship training programs; 4) internships; and 5) community and technical colleges.

This program will support the achievement of Texas' goals outlined in the November 2016 Tri-Agency (TWC, TEA, and THECB) Report. A key component of the program includes training for the Workforce Specialists by TWC's LMCI team. The training will cover all of TWC's online labor market tools including Texas Reality Check.

Targeted Economic and Workforce Development Opportunities

TWC's workforce development efforts align with the governor's economic strategies by allocating resources to support opportunities in vital industry clusters. The agency proactively supports science, technology, engineering, and math (STEM) education and training to ensure that the future workforce is equipped with the knowledge and skills that Texas employers demand. TWC is also committed to supporting job growth in Texas' diverse industries. Energy remains a significant industry in Texas, although the annual growth rate for mining and logging has slowed to single digits beginning February 2019, which coincides with a drop in the price per barrel of West Texas Intermediate crude oil. Other industries in the state experiencing employment growth include manufacturing, construction, and education and health services—all of which require a highly skilled workforce.

TWC continues to partner with the Office of the Governor in conducting small business forums throughout the state. These forums present an opportunity for TWC to connect to small business owners and listen to their concerns and ideas. The forums also provide a chance for TWC representatives and Board staff to assist businesses by introducing new programs or explaining updates to existing programs. These forums have proven highly successful and have occurred all over the state.

Furthermore, TWC is a diligent and responsible steward of available public resources. The Unemployment Compensation Trust Fund remains in good condition through an efficient bond strategy that keeps employer taxes predictable and stable. TWC continues to seek ways to effectively leverage state and federal funding options to improve current programs and provide additional services.

To provide needed services, TWC consistently leverages multiple funding sources. Federal funds make up the clear majority (85 percent) of TWC's budget. The remaining 15 percent comes from state sources. TWC receives federal funds from DOLETA, the US Department of Health and Human Services, the US Department of Agriculture, and the ED.

Through prior consistent state law set forth in Texas Labor Code §302.061 and §302.062, TWC sources block grants from multiple funding streams to workforce areas to administer programs such as WIOA, TANF/Choices employment services, SNAP E&T, and subsidized child care under the federal Child Care and Development Fund. Block grants allow Boards to provide integrated services across programs and to also provide integrated case management. Boards are given the autonomy to use the block grants as needed, to determine the number of staff and Workforce Solutions Offices, and make other decisions necessary to best serve their workforce areas. Crafting a cohesive workforce system requires an integration of diverse programs coupled with linkages to facilitate delivery of a full range of services to employers, workers, and job seekers.

Skills Development Fund

Texas is fortunate to have state funding to provide for the Skills Development Fund. As one of the state's premier economic development tools, the fund serves as an incentive to attract new firms to locate in Texas or to help existing companies expand. The Skills Development Fund successfully merges employer needs and local job training opportunities into a winning formula that benefits employers and provides needed skills to workers. Skills grants help incumbent workers upgrade their skills, or help create high-skill, high-wage jobs. The use of these grants for skills development is particularly significant because, unlike formula funding, these funds are not required to serve categorical populations; that is, the funds can be used to target the workers whom employers identify as needing enhanced skills.

Adult Education and Literacy Program

TWC's three-member Commission adopted a program goal for AEL to support increases in employment, higher education transition, skill gains, and secondary completion through demonstrated approaches that integrate system services and leverage community partnerships as part of TWC's Strategic Plan for Adult Education and Literacy for Fiscal Years 2015–2020. To meet this goal, AEL grantees have implemented a diversified service delivery system that delivers both foundational skills and career pathway transitions needed to support and prepare Texans to support their families, careers, and communities.

Under WIOA, Boards engage and are expected to support AEL grant recipients in various activities that promote student success in career and higher education goals. Finding ways to innovate adult education and literacy and leverage education, training, support, and career development resources continues to be critical in fostering student and system success. AEL and its Texas workforce partners share the goal of building a wider and more valuable array of services that better assist their mutual customers in attaining educational goals that support career development and higher education transition and help strengthen families and communities

Vocational Rehabilitation

In accordance with Senate Bill 208, 84th Texas Legislature, Regular Session (2015), the Vocational Rehabilitation (VR) program transferred from the Department of Assistance and Rehabilitative Services (DARS) transferred to TWC. Additionally, two designated state units—the Division for Blind Services and the Division for Rehabilitation Services—were combined into a single designated unit.

Since the transfer of the VR program to TWC, VR has collaborated with other workforce partners to maximize opportunities for individuals with disabilities. Examples include:

- Summer Earn and Learn, which is a collaboration between VR and each of the 28 Boards to provide work-based learning opportunities for students with disabilities;
- Enhanced coordination with TWC's Texas Veterans Leadership Program to improve information sharing and access to services for veterans with disabilities; and
- Collaboration with VR's business relations coordinators (BRCs) and the local Workforce Solutions business services unit (BSU) staff to increase outreach to employers and coordinate provision of information about services that can be provided to them.

Continued Flexibility through Waivers

The Texas workforce system and its customers have benefited from DOLETA's authority to waive certain WIOA provisions. Texas has requested federal waiver opportunities seeking relief from provisions that restrict flexibility and innovation or that make inefficient use of staffing resources. With input from Boards and other stakeholders, Texas has developed waiver requests covering several workforce issues, including:

- increased local control of program delivery;
- improved Board ability to respond quickly to changing needs within the workforce area;
- increased flexibility at the local level to serve business and industry;
- elimination of duplication with streamlined administrative processes to free up money for services; and
- increased accountability at the state, local and service-provider levels

TWC has also sought federal waiver opportunities to ease recovery from natural disaster. On October 11, 2017, DOLETA approved TWC's WIOA waiver requests to help the agency and Boards respond to the aftermath of Hurricane Harvey.

Alignment of Workforce Programs

After four years of WIOA implementation, TWC has not made significant changes to its strategies. The strategies in place continue to prove successful. For this reason, no significant changes are planned that would impact TWC's strategies for the next four years.

Texas is a recognized national leader in strategically integrating numerous, complex workforce programs, services, and initiatives. Integration among partners enables the Texas Workforce System to operate in the most efficient and cost-effective way possible, while remaining flexible, adaptable, and most important, market-based and customer-focused. Nonetheless, TWC and the Boards continue to refine and improve Texas' structure for aligning core and optional programs under WIOA and other available resources to realize the state's vision and achieve its goals.

Improved access and efficiency, along with value-added services, are a few of the many benefits customers receive from the state workforce system. System partners are responsible for the delivery of 27 workforce education and training programs and related services, as well as education programs that support career preparation and advancement, and employer services to support those providing job opportunities. Strategically, the programs and agencies serve either a common customer or are charged with achieving similar employment and education outcomes for their targeted customer groups, including:

- providing services that facilitate the match between employers and job seekers;
- providing employment, training, and retention services for eligible WIOA participants and prioritizing services to recipients of public assistance and other low-income individuals and individuals who are disabled and/or basic skills deficient, to spur financial self-sufficiency;
- developing adult education and family literacy programs that ensure all adults have the basic education skills they need to contribute to their families and communities;
- providing employment, training, and retention services to individuals with barriers to employment, including veterans, individuals with disabilities, trade-affected individuals, older individuals, ex-offenders, homeless individuals, long-term unemployed individuals, and youth;
- encouraging the use of training services that provide portable, transferable credit and credentials;
- providing support services, such as child care, UI, and transportation to enable eligible individuals to work or participate in employment and training activities;
- monitoring and evaluating compliance of local area service delivery for fiscal accountability and program effectiveness; and
- providing technical assistance to local Boards and training providers to ensure the most effective delivery of workforce services.

As frontline partners in the workforce system, the 28 Boards provide programs and services through the network of Workforce Solutions Offices. Boards work together and collaborate with business, economic development, educational, and other entities to provide services funded by WIOA and other state and federal sources.

Elements of the Local Delivery Structure

- Board members and staff operate under prior consistent state law; as such, members and staff are primarily private-sector employers, with some representing local education agencies, labor organizations, community-based organizations, economic development councils, and one-stop partners, such as AEL and VR. Each Board develops a strategic and operational plan, with local plans subject to review by TWC and approval by the governor. Boards designate one-stop partners, identify providers of training services, and monitor system performance against performance accountability measures.
- Board staff conducts the Board's day-to-day administrative operations. Boards operate with a high degree of local flexibility for service delivery design and partner with local training and educational institutions to ensure employment and training opportunities meet area employment needs.
- Workforce Solutions Offices provide a variety of online, in-house, and on-site services, including employer services, job search resources, labor market information, and referrals for customized training. In addition to traditional brick-and-mortar offices, mobile workforce units are a moving extension of the Workforce Solutions Office, offering on-site, rapid response assistance to area employers and communities.

- BSUs address the ever-increasing need for skilled workers in high-demand fields by offering job search assistance, skills training, and other workforce development services. Supported by state and federal funds, most basic services are provided free of charge to employers registered with the state and federal government. Some Boards also provide certain services, including workshops and seminars, at nominal fees. BSUs within an integrated workforce system offer a unique opportunity to ensure that all workforce services are structured to ensure that the business needs are considered when delivering services to job seekers and consumers.
- Texas Association of Workforce Boards (TAWB)—TAWB is a not-for-profit association representing Texas' Boards and more than 750 of the business, education, and community leaders who serve on the Boards. TAWB facilitates communication among the business community, educational providers, and state and federal officials, and provides a forum for members to share best practices.

The Boards are allocated funding from federal, state, and local sources to provide programs and services designed to meet the needs of employers, incumbent workers, and job seekers.

Current Activity

The Boards will develop new local plans under WIOA to align local goals and objectives set forth in the state's plan and describe collaboration strategies with system partners.

To address limited financial resources yet still meet the needs of Texas' employers, Boards:

- leverage additional funding sources;
- develop, analyze, and share labor market information and regional economic studies;
- engage in planning and service delivery across workforce areas and/or with other workforce and community partners;
- incorporate new, and adapt current delivery strategies, such as the use of mobile units and modern technologies that make service more accessible; and
- strive for integrated, effective service delivery by sharing, modifying, and replicating effective training models and processes.

Events and projects provide the opportunity for Boards and system stakeholders to collaborate, innovate, and streamline services to improve workforce service delivery. Continuous improvement efforts by the Boards are facilitated and encouraged through activities such as:

- sharing best practices and other information at TWC's annual conference, workforce forums, and regional and local meetings; and
- maintaining user-friendly, online resources for topics including:
    - integrated workforce processes;
    - performance measures; and
    - program-specific monitoring toolkits, through the ongoing work of the Quality Assurance Network (QAN, a committee of the Texas Workforce Executive Director's Council that coordinates educational and networking activities for all 28 Texas Boards).

State Leadership in Workforce Initiatives

States have proven to be effective laboratories for innovative workforce initiatives. In Texas, TWC and the Boards can best serve the needs of Texas job seekers, employers, and communities. Boards are most familiar with local needs and opportunities through first-hand knowledge of local partners, and baseline community assessments that ensure extensive local one-stops and the system's initiatives deliver the maximum possible value. Texas believes that federal rules, grants, and base funding should emphasize state roles and maximize a state's flexibility to design effective and comprehensive initiatives.

TWC uses the governor's reserve statewide funding and AEFLA state leadership funding, in conjunction with other funding where feasible and appropriate, to encourage innovation at the local level through grants to Boards, institutions of higher education, community-based organizations, and other suitable entities. TWC prioritizes programs that assist specific populations and initiatives: veterans, youth, and STEM programs. TWC undertakes projects that encourage and improve growth industries, the earning capabilities of job seekers facing barriers to employment, and the effectiveness of Texas Workforce Solutions. Detailed information on strategic initiatives can be found in the operational section of the plan.

Concluding Comments

The strengths of operating an integrated workforce development system are significant. Texas' implementation of WIOA's six core programs supports a service delivery system that meets the needs of employers and then works to ensure that relevant training and employment assistance is available for job seekers, including those with disabilities, regardless of the funding source.

However, the potential for funding reductions—particularly for programs with specific eligibility and use criteria—are likely to challenge the system. Boards work individually, together, and with other stakeholders to achieve cost efficiencies and a seamless service delivery system. Models significantly enhance participant access to a range of workforce and associated support services. Collaborative efforts aid in providing an adequate supply of workers that meet the skills requirements of available jobs, thus assisting the state's employers with retaining and enhancing a competitive economic advantage.

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).

TWIC was created by the 73rd Texas Legislature, Regular Session (1993). TWIC's purpose is to promote the development of a highly skilled and well-educated workforce for Texas and to assist the governor and the legislature with strategic planning for and evaluation of the Texas workforce system.

The scope of TWIC's work is "workforce development," which is defined in state statutes that pertain to TWIC as "workforce education and workforce training and services." Workforce education includes articulated career path programs and the constituent courses of those programs that lead to a sub-baccalaureate license, credential, certificate, or degree.

Texas statute assigns TWIC five primary functions in the Texas workforce system, as follows: "1) strategic planning, 2) evaluation and performance measurement, 3) research and continuous improvement, and 4) review of state and local workforce plans and reports to ensure alignment with statewide goals and objectives; and 5) maintain the Texas Skills Standards system."[1]

TWIC also serves as the state workforce investment board (state board) as required under federal workforce law. As the state board, TWIC operated under the Workforce Investment Act of 1998 (WIA) (Public Law 105-220) since Texas' implementation of the Act in 1999. On July 22, 2014, President Barack Obama signed the Workforce Innovation and Opportunity Act of 2014 (WIOA) (Public Law 113-128) into law, thereby establishing new federal workforce law and repealing WIA. TWIC continues to serve as the state board under WIOA.

In some states, prior consistent state law has determined that the state board will be largely responsible for system strategic planning and evaluation and that the state workforce agency will be responsible for program administration.

Because of the significant workforce system reform initiated by the Texas legislature in 1993 and 1995, WIOA contains provisions that allow Texas to retain—or grandfather—major elements of its workforce system that are consistent with WIOA, including TWIC's composition and roles. As a result, the duties assigned to the state board under WIOA are implemented in a manner that is consistent with TWIC's role under state legislation enacted before WIOA. Accordingly, TWIC does not operate programs, nor does it directly manage the flow of state and federal funding to the system's state agencies. Rather, TWIC's focus is strategic; its functions are guided by the duties and responsibilities established for TWIC by the Texas legislature.

Because TWIC is the state board, federal agencies periodically engage it in the federal system oversight role to participate in program reviews. For example, in the past, TWIC has participated in program reviews and site visits conducted by the DOL Region IV Office, the DOL Office of Inspector General, the Rehabilitation Services Administration, the ED Office of Adult and Vocational Education, and the Organization for Economic Cooperation and Development.

One of TWIC's key responsibilities is the development of an overarching strategic plan for the Texas workforce system. The state's workforce system is composed of various programs, services, and initiatives administrated by agencies and Local Workforce Development Boards (Boards), as well as independent school districts, community and technical colleges, and local adult education providers. System partners are responsible for the delivery of more than 23 workforce education and training programs and related services, as well as educational programs that support career preparation and advancement.

TWIC member agencies[1], which are specified in state statute, include the:

- Governor's Office of Economic Development and Tourism
- Texas Education Agency
- Texas Health and Human Services Commission
- Texas Higher Education Coordinating Board

- Texas Workforce Commission

TWIC is required to meet quarterly and at other times deemed necessary by the Chair. All meetings of TWIC and its committees are posted in the *Texas Register* in accordance with the Texas Open Meetings Act. The chair is authorized to appoint subcommittees and technical advisory committees to inform the work of the Council and to assist TWIC in fulfilling its legislative mandates. Current TWIC committees include the Executive Committee and the Apprenticeship and Training Advisory Committee. A recommendation from any committee must be considered by TWIC and is not considered an approved action until TWIC conducts a vote. A recommendation or action must be approved by a majority of the quorum present at the meeting.

TWIC appoints an executive director, who is responsible for the daily operations of TWIC. The executive director establishes administrative and personnel policies and procedures on behalf of TWIC, hires staff to address TWIC's duties and responsibilities, and provides periodic and annual reports to TWIC, the governor, and the legislature. TWIC is responsible for developing and implementing policies that clearly separate its policy-making responsibilities from the management responsibilities of the executive director and staff.

[1] Governor's website/TWIC. Accessed June 13, 2019, at https://gov.texas.gov/organization/twic/purpose.

[2] Ex officio members; Texas Government Code, Chapter 208. Workforce Investment Act.

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.

TWC is the state agency in Texas responsible for the administration of all WIOA core and partner programs. TWC and a statewide network of 28 Boards for regional planning and service delivery, their contracted service providers and community partners, and the TWC unemployment benefits tele-centers comprise Texas Workforce Solutions.

Texas Workforce Solutions provides workforce development services that help workers find and keep good jobs, and help employers hire the skilled workers they need to grow their businesses. Our workforce partners include community colleges, adult basic education providers, local independent school districts, economic development groups, businesses and other state agencies. Collaboration and coordination among all partners play a critical role in the success of the Texas workforce system.

Boards are responsible for strategic planning of workforce services for employers and job seekers. The integrated workforce delivery system maximizes funding and productivity while

eliminating duplicate efforts. Through performance-based contracts, TWC monitors and holds the Boards accountable for program performance and provides technical assistance.

TWC continues to cultivate emerging industries, support existing businesses, and enhance the skills development of the Texas workforce, taking advantage of strategic opportunities provided by swift economic change. TWC is dedicated to leading a market-driven workforce system that meets the needs of employers and workers and helps Texans prosper.

Texas has enjoyed efficiencies in providing services to employers, job seekers, and special population groups, including low-income and basic skills deficient individuals, as well as veterans, by colocating core programs. These efficiencies include:

- Providing comprehensive and seamless workforce and support services
- Elimination of duplicative effort and effective management of program funds
- Systemic approach for providing guidance and technical assistance consistently across programs
- Colocating and integrating Texas Workforce Solutions and Vocational Rehabilitation Services (TWS-VRS) business relations staff to help employers fill open positions with qualified job seekers with disabilities, thus enhancing the one-stop service delivery model
- Using labor market information to inform targeted business development, explore industry and economic trends, and research and track emerging and evolving occupations in Texas.

Core Program Activities to Implement the State's Strategy

The following activities support WIOA core programs and align with the state's strategies, as previously described.

TWC administrates the development and integration of workforce services in cooperation with the Board's oversight and planning efforts. Service delivery is provided through Texas Workforce Solutions, which may contract with one-stop providers to operate a variety of program components. This network gives customers local access to workforce solutions and statewide services at approximately 180 Workforce Solutions Offices, four UI tele-centers, and numerous partner locations.

WIOA continues to support Texas' progress toward integrating services for customers. WIOA §193(a)(3) provides that Boards' contracted workforce service providers and community partners are defined under prior consistent state law.

Texas Labor Code §302.21 sets forth the job training, employment, and employment-related educational programs and functions consolidated under the authority of TWC. In Texas, prior consistent state law defines the Boards' responsibility to develop, implement, and modify a plan for convening all relevant programs, identified as one-stop required-partner programs, including:

- WIOA, formerly WIA
- ES
- UI benefits information

- Choices, the TANF employment and training program
- SNAP E&T
- Subsidized child care
- TAA
- AEL programs

The 84th Texas Legislature, Regular Session (2015), amended the Texas Labor Code by adding Title 4, Subtitle 4, which transferred the following programs to TWC:

- VR (WIOA, Title IV) programs
- Business Enterprises of Texas
- Grant for Independent Living Services for Older Individuals Who Are Blind
- The Criss Cole Rehabilitation Center

Prior consistent state law further defines the following as required one-stop partner programs. Other than UI compensation, which is administered by TWC, the programs are not under the direct oversight of the Boards; therefore, Boards are required to establish memoranda of understanding (MOUs) with:

- Adult Education and Literacy (WIOA, Title II);
- Apprenticeship programs;
- National and Community Services Act Programs;
- Non-Certificate Postsecondary Career and Technology Training programs; and
- Senior Community Services Employment Program

TWC also recommends that Boards establish MOUs with the following optional partner activities:

- Career and technical education programs authorized under the Carl D. Perkins Act of 2006
- Job counseling, training and placement services for veterans, 38 USC 41
- Education and vocational training program through Job Corps administered by DOL
- Native American programs authorized under Title I of WIOA
- HUB administered employment and training programs
- Employment and training activities carried out under the Community Services Block Grant Act
- Reintegration of offenders programs authorized under the Second Chance Act, 2007
- Migrant and Seasonal Farmworker programs authorized under Title I of WIOA

Additionally, Boards are encouraged to continually expand and enhance their network by forming partnerships outside of the Workforce Solutions Offices. Some agencies and services with which Boards have establish additional cooperative relationships include:

- Local boards of education
- Local-level vocational education agencies
- Community-based Organizations (CBOs)
- Faith-based Organizations (FBOs)
- Texas Department of Housing and Community Affairs (TDHCA)
- Other appropriate training and employment agencies and services to expand local presence

Texas state law requires TWC and HHSC to jointly develop a MOU establishing guidelines for a coordinated interagency case management plan. Additionally, TWC requires in the contracts between TWC and the Boards that the Boards, in cooperation with HHSC local offices, develop and implement a coordinated interagency case management plan.

Pay-for-Performance Contract Strategy

WIOA provides TWC and Boards the ability to implement a pay-for-performance contracting strategy in addition to established performance-based contracts for service providers. pay-for-performance contracts require established performance benchmarks tied to the six primary indicators of performance in WIOA. Contractors must achieve these benchmarks to receive payment. TWC will further refine pay-for-performance contracting as additional guidance regarding WIOA performance requirements becomes available.

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.

Apprenticeship

Apprenticeship training is designed to prepare and train individuals for careers in the skilled trades and crafts. Apprenticeship combines on-the-job training supervised by experience journey workers with job-related classroom instruction in which workers learn the practical and theoretical aspects of a highly-skilled occupation.

The purpose of TWC's apprenticeship training program is to stimulate and assist industry in developing and improving apprenticeship and other training programs designed to provide skilled workers needed to compete in a global economy. As authorized in the Texas Education Code, Chapter 133, TWC provides funding to local education agencies (LEAs) and apprenticeship committees to support the costs of job-related classroom instruction in registered apprenticeship training programs. The LEA and the apprenticeship committee serve as the funding link between the registered apprenticeship training program and TWC. To

qualify for funding, apprenticeship training programs and apprentices must be registered with the DOL's Office of Apprenticeship.

Apprenticeship training programs have demonstrated that employers that invest in training have lower employee turnover, increased employee productivity, better employee problem-solving skills, and improved employee relations. As a result, both the employer and employee are equally committed to the program's success.

For the biennium beginning September 1, 2019, TWC was appropriated a 41 percent increase over current biennium funding to support the Apprenticeship training program. Combined with WIOA statewide-discretionary funding TWC is projecting a 21 percent increase in participation during the FY'20-'21 biennium. With these additional funds, TWC can help address demand for apprenticeship jobs across Texas.

Job Corps

Job Corps program is a no-cost education and vocational training program administered by the DOL. Authorized under Title I of WIOA as a required partner in the one-stop systems, Job Corps programs assist eligible youth, age 16 to 24 to connect to the labor force by providing them with intensive social, academic, career and technical education, and service-learning opportunities. Located in primarily residential centers, Job Corps programs facilitate participants obtaining secondary school diplomas or recognized postsecondary credentials leading to successful careers, in in-demand industry sectors or occupations or the Armed Forces. Program goals include: economic self-sufficiency and opportunities for advancement; or enrollment in postsecondary education, including an apprenticeship program; and support responsible citizenship. There are 131 Job Corps centers located throughout the United States, each offering educational training and a variety of vocational training programs. In Texas, Job Corps programs are coordinated out of Region 4, Dallas office with programs operating in El Paso, San Marcos, Laredo, and McKinney, Texas.

Other required partners administer the Indian and Native American Programs, which support employment and training activities for Indian, Alaska Native, and Native Hawaiian individuals; Migrant and Seasonal Farmworker program, which provides funding to help migrant and seasonal farmworkers and their families achieve economic self-sufficiency by offering supportive services to them while they work in agriculture or by helping them to acquire new skills for jobs offering better pay; and, the YouthBuild program, which provides low-income youth the opportunity to learn construction skills through building affordable housing for homeless and low-income individuals in their neighborhoods and other community assets such as schools, playgrounds, and community centers.

Child Care and Early Learning

In August 2019, TWC's Child Care Services department was promoted to division status within the Agency. The Child Care and Early Learning Division provides child care subsidy assistance to eligible low-income families with children under age 13, allowing parents to work, attend school, or participate in training. In addition to assisting families, Child Care and Early Learning helps child care providers improve the quality of services for all children in Texas through resources and assistance.

The Texas Rising Star quality rating and improvement system strengthened its certification standards and professional development requirements in FY'19 to better help families identify quality early learning programs based on a 2-star, 3-star, or 4-star recognition levels. Texas Rising Star encourages providers to exceed minimum licensing requirements and improve

quality services in order to achieve a higher star level recognition and receive higher rates for serving children participating in the child care subsidy assistance program. In 2019, a workgroup with members representing state agencies, Boards, child care providers, and other stakeholders assembled to review the Texas Rising Star guidelines and assessments. The group will offer recommendations for enhancements to the program in early 2020.

In FY'19, TWC awarded TEA $10 million in child care funds to support planning grants to build partnerships between school districts and early learning programs to expand pre-K service capacity. Through this grant, early learning programs achieving a 4-star certification level under TWC's Texas Rising Star program have an opportunity to partner with local independent school districts and charter schools to expand quality prekindergarten services to children three to four years old.

TWC also partners with TEA and the Children's Learning Institute (CLI) on the Texas School Ready! (TSR!) project to provide training and mentoring to teachers in child care, Head Start, and prekindergarten settings serving preschool children.

TWC provides funds to TEA for the Professional Development Partnerships for the Early Childhood Education (ECE) program, which is designed to determine a pathway for articulation between two- and four-year colleges and universities for preservice early childhood teachers. TWC also partnered with the Office of the Governor and TEA to sponsor the Texas Early Childhood Learning Summit in Houston to support professional development for early learning educators in public schools and child care early learning programs.

TWC provides funds to the Texas Early Childhood Professional Development System to support the Texas Workforce Registry (TWR)—a web-based application for early childhood education (ECE) professionals who work with children birth to age 8. The funding is used to house the education, employment history, and training hours of ECE professionals. The funds are also used to support the use of the TWR by TRS certified providers or child care providers applying for and working with a TRS mentor to achieve TRS certification. In 2019, TWC committed funds to expand this system statewide.

Through a competitive procurement process, TWC awarded funds to Texas Association for the Education of Young Children to provide financial assistance to child care providers and caregivers to complete a Child Development Associate (CDA) credential or enroll in college-credit courses in early childhood development. Since 2011, the Texas T.E.A.C.H. program has awarded 1,634 CDA scholarships and 1,154 associate degree scholarships to ECE professionals employed with Texas child care programs.

Texas received an increase of approximately $230 million - $240 million per year in CCDF funding in FY'18 and '19. With this increase, TWC was able to increase the number of children served, increase provider reimbursement rates, and invest in child care quality improvement initiatives. In 2019, Texas served over 50 percent more children than in 2017 (138,461 and 91,989, respectively). Provider rates were increased by 2 percent in base reimbursement rates for all providers in FY'19 and additional rate increases were implemented in FY'20 to improve access to quality child care for low-income families. Additional TWC investments in quality implemented in FY'19 include enhancements for quality and school-readiness; professional development opportunities that focus on building up a well-qualified workforce of early learning teachers; and research to expand our understanding of the child care industry in Texas, as well as opportunities to share that information with providers, parents, and other stakeholders. Child care initiatives provided with the increased CCFD funding include a Cost of Quality study, Child Care Business Training, and the following collaborative matching grants:

Infant Toddler Specialist Network, Family Child Care Networks, Child Care Staff Retention, and Addressing Challenging Behaviors.

Foster Youth

TWC recognizes that helping foster youth and those aging out of foster care transition to independent living requires more than addressing the need for shelter, food, and safety. Intensive and coordinated efforts are required from public agencies and community organizations, professionals, community leaders, and concerned volunteers to support youth in becoming engaged, responsible, and economically self-sufficient adults.

TWC along with Texas Department of Family and Protective Services (DFPS) regional offices and local Boards have jointly developed and entered into agreements addressing the unique challenges facing current and former foster youth transitioning to a successful adulthood, including improving employment outcomes for these youths. Through an MOU, DFPS and the Boards collaborate to: further the objectives of the DFPS Preparation for Adult Living (PAL) program; ensure services are prioritized and targeted to meet the needs of current and former foster youth; and refer, as appropriate, foster youth who need housing to short-term housing.

DFPS staff, caregivers, and PAL contractors refer youth age 16 and older to local Texas Workforce Solutions Offices for job search and readiness assistance, career exploration, and employment and training services. Each Board has a designated point of contact for staff and youth to access assistance and services. Youth are encouraged to use the TWC online job matching system, WorkInTexas.com, to search for jobs, create a resume, and submit applications for employment.

The Labor Market & Career Information (LMCI) Division of TWC supports a website, "Texas Career Check," to facilitate career and education exploration available to youth in and formerly in Foster Care. The website provides information on occupation trends, occupational information, military occupations, school information, programs of study and a high school graduation plan, as well as an online interest profiler to help youth determine what they like and do not like. (https://texascareercheck.com/)

Texas Family Code §264.121 directs that workforce services be prioritized and targeted to meet the unique needs of foster youth and former foster youth.

Boards must ensure that:

- Eligible foster youth receive priority over all other equally qualified individuals, except veterans and eligible spouses, in the receipt of federal and state-funded services; and
- Workforce services are prioritized and targeted for youth transitioning out of the foster care system and for former foster youth.

<u>Priority of Service for Support Services</u>

To ensure that eligible foster youth receive priority over all other equally qualified individuals, except veterans and eligible spouses, in the receipt of workforce services, they also must have access to needed support services (for example, child care and transportation).

Temporary Assistance for Needy Families

Both state and federal welfare reform legislation emphasize personal responsibility, time-limited cash assistance benefits, and the goal of work instead of public assistance. To support

these mandates, TWC and the Boards developed a service delivery model with the goal of employment at the earliest opportunity for applicants and recipients of cash assistance. TWC, through a collaborative partnership with HHSC has implemented interagency initiatives to address welfare reform.

The Choices program is Texas' Temporary Assistance for Needy Families (TANF) employment and training program, which assists applicants, recipients, nonrecipient parents, and former recipients of TANF cash assistance to transition from welfare to work through participation in work-related activities, including job search and job readiness classes, basic skills training, education, vocational training, and support services. Workforce Solutions Offices provide these services that are designed to lead to employment. Choices services are an important part of this process because they serve both employers and job seekers and provide job-matching tools that all Workforce Solutions Office staff can use.

Choices staff meets with TANF recipients to introduce them to Choices services, conduct an in-depth assessment, and develop a Family Employment Plan. Participation for most recipients includes job readiness activities and job search activities as a means of testing the labor market and locating employment at the earliest opportunity. Job readiness activities include the following:

- Self-esteem building
- Job search skills
- Labor Market Information
- Employment goal setting
- Resume writing
- Interviewing techniques
- General Workplace expectations
- Job retention skills

Noncustodial Parent Choices

The Non-Custodial Parent Choices (NCP Choices) program is a collaborative effort of the Texas Workforce Commission (TWC), the Office of the Attorney General (OAG) of Texas, Local Workforce Development Boards (Boards), Workforce Solutions Office staff, and family court judges. The program targets low income unemployed, or underemployed Non-Custodial Parents (NCPs) who are behind on their child support payments, or who have had a child support obligation established.

Mirrored after TWC's Choices employment and training program for TANF recipients, the goal of the NCP Choices program is to help NCPs overcome substantial barriers to employment and career advancement while becoming economically self-sufficient and making consistent child support payments.

The success of the NCP Choices program is largely attributable to four core elements:

1. Court-ordered program participation. Failure to participate leads to "swift and certain consequences," up to, and including, jail time;

2. Presence of Workforce Solutions Office staff at the court to meet with NCPs immediately after being ordered into the program;

3. Intensive case management by Workforce Solutions Office staff, including weekly in- person contact until NCPs enter employment, and monthly verification of continued employment; and

4. Close communication with program partners regarding NCPs' participation and progress in the program.

Even though this is one of the hardest-to-serve populations, the NCP Choices program has seen positive employment, job retention, and child support results. The following program information was collected between August 2005 and April 2019:

- over 40,000 NCPs served
- 46.33 percent of participating NCPs entered employment during state FY '18
- 72.47 percent of participating NCPs entering employment retained employment for at least six months during state FY '18

Additionally:

- custodial parents are 21 percent less likely to receive TANF benefits; and
- more than $6 million in child support was collected during state FY '18, some of which was used to repay TANF, Medicaid, foster care, and child support collections programs.

TWC also encourages collaboration and coenrollment with other programs when appropriate to ensure the NCP receives a range of services.

Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

The Supplemental Nutrition Assistance Program (SNAP) Education and Training (E&T) program helps SNAP E&T participants gain skills, training, or work experience to increase their ability to obtain regular employment that leads to economic self-sufficiency. Administrative authority of the SNAP E&T Program in Texas transferred from The Texas Workforce Commission (TWC) to the Texas Health and Human Services Commission (HHSC) effective April 1, 2018. HHSC and TWC have partnered through an Interagency Cooperation Agreement to provide SNAP E&T services.

TWC coordinates and collaborates with 28 Local Workforce Development Boards and their contracted workforce service providers and community partners to provide SNAP E&T services. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, job seekers, and youth, including individuals with disabilities and other barriers to employment.

HHSC local-level staff:

- determines eligibility for SNAP benefits statewide;
- determines work registration or exemption status for SNAP E&T services; and
- refers SNAP recipients to Workforce Solutions Office for SNAP E&T services.

TWC rules (40 TAC §813.12) and 7 CFR §273(a) require SNAP recipients to meet work requirements unless they are exempt because of age or disability or another specific reason. Federal regulations at 7 CFR §273.7(c)(5) require each component of the state's SNAP E&T

program to be delivered through its statewide Workforce Solutions Offices. The components of the SNAP E&T program include supervised job search, job search training, workfare, work experience or training, educational programs, self-employment programs, and job retention.

On December 20, 2018, Congress reauthorized SNAP as part of the Agriculture Improvement Act of 2018 (P.L. 115-334). The law contains various provisions that affect SNAP eligibility, benefits, and program administration, including changes mandated by the law and those that provide additional flexibility for State agencies. All provisions of the Act related to SNAP are effective as of the date of enactment, unless otherwise stated.

Individuals with Limited English Proficiency

Individuals with limited English proficiency (LEP), individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, are a large and growing population of job seekers in Texas. TWC continues to develop policy guidance, technical assistance, and language assistance to ensure meaningful access to workforce services for all customers. TWC integrates English literacy with civics education, workforce preparation activities, secondary education, and occupational skills training. This approach stresses contextualized learning to transition participants to postsecondary education, further skills training, or lead to employment.

Texas employers must continue to compete in the global marketplace and maintaining a skilled workforce is one of their prime concerns. Supporting the employment and training goals of the LEP workforce is clearly a core mission for Boards, training providers, and adult education programs. TWC working with multiple partners developed the LEP Guide for Workforce Professionals. Boards, Workforce Solutions Office staff, and education and training professionals can use this tool to enhance service delivery to LEP customers. The guide is available online at https://twc.texas.gov/files/partners/lep-guide-workforce-professionals-twc.pdf.

Homeless Individuals

TWC strives to make services available to individuals with barriers to employment, including homeless populations, as identified by WIOA §171(b)(4). As part of this effort, TWC serves on the Interagency Council for the Homeless, a group charged with collaborating and planning the provision of services to the homeless and those at risk of becoming homeless. TWC also partners with grantees of DOLETA's Homeless Veterans' Reintegration Program (HVRP) to offer job search and placement services, occupational training and counseling, and other vital assistance.

Additionally, Boards are charged with establishing collaborative partnerships with housing authorities and sponsors of local housing programs to address unmet housing needs of Choices recipients. Workforce Solutions Office staff performs initial and ongoing assessments to determine the employability needs of individuals; assessments must report unmet housing needs and whether those needs are a barrier to full participation in the workforce and progression to self-sufficiency.

Ex-Offenders

TWC is a member of the State Reentry Task Force, led by the Texas Department of Criminal Justice (TDCJ). The task force consists of 29 individuals representing a cross-section of Texas agencies, organizations, and communities. The Reentry Task Force maintains working groups to address specific barriers to successful reentry. The Employment Working Group identifies strategies to eliminate barriers to employment in a post release environment as well as coordination of resources, job training and assistance.

TDCJ has implemented a new program called Website for Work that helps connect individuals on parole supervision with employers looking for skilled applicants. Website for Work is a web-based application managed by a dedicated employment specialist to connect unemployed or underemployed ex-offenders who have specific skills and certifications that meet the employer's needs. The Website for Work program serves the entire state of Texas and employers that hire an ex-offender within a year of his or her release from prison qualify for the federal Work Opportunity Tax Credit (WOTC). Additionally, TWC offers fidelity bonding through the local Workforce Solutions Offices. Fidelity bonding for employment is offered and marketed for certain at-risk job seekers, including individuals in the ex-offender population.

In July 2019, TWC received a $1.225 million discretionary grant from DOL to conduct a demonstration project using evidence-based and evidence-informed interventions, new interventions that theory or research suggests are promising, or a combination of both to improve employment outcomes of adults. The grant targets adults ages 25 or older who were formerly incarcerated in the adult criminal justice system and released within two years of the date of enrollment or are currently under supervision. The project must provide services in high-crime, high-poverty communities. The primary goal of the program is helping the target population to secure and retain suitable self-supporting employment. Participants will be assessed to determine criminogenic risks, needs, and barriers to employment. Workforce Solutions case managers will use the assessment information to develop an overall career path and service delivery strategy. Services will be structured to address the specific barriers identified during the assessment process.

Reemployment Service and Eligibility Assessment (RESEA)

The Reemployment Service and Eligibility Assessment (RESEA) program is a federal grant program designed to allow states to provide intensive reemployment assistance to individuals who are receiving unemployment benefits and are determined likely to exhaust their benefits before becoming employed.

The RESEA program focuses on the following strategies:

- Conducting in-person reemployment and eligibility assessments
- Providing customized reemployment services that are tailored to each claimant's needs

The goal of RESEA is to provide claimants with a wide array of resources that support reemployment as quickly as possible and to connect claimants to reemployment services, including co-enrollment in WIOA dislocated worker program or other program services, as appropriate. Required RESEA activities include developing an individual reemployment plan, providing labor market information customized to individual claimants needs, providing information and access to services available through Workforce Solutions Offices, and assessing continued unemployment benefit eligibility.

The program uses statistical modeling to rank unemployment benefit claimants based on their likelihood to exhaust all unemployment benefits. This process includes a statistical evaluation of numerous work and related factors, including but not limited to length of workforce attachment, occupational field, wage, and location.

TWC's RESEA program is Texas' version of the federal Worker Profiling and Reemployment Services (WPRS) initiative. Given the alignment of these two programs and the plan development and reporting requirements, it could be more efficient to align the planning

requirements for this initiative with the WIOA plan, eliminating the administrative burden of developing and maintaining multiple plans.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

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

The Texas workforce system is a complex structure comprised of numerous programs, services, and initiatives administered by state agencies and Boards, TWIC, independent school districts, community and technical colleges, and local adult education providers. System partners are responsible for the delivery of a wide range of workforce education and training programs and related services, as well as education programs that support career preparation and advancement.

The workforce system is interconnected by the programs and agencies that either serve common customers or are charged with achieving similar employment and educational outcomes for their targeted customer groups. Crucial to the system planning process and alignment with federal and state statutes, the Texas workforce system builds upon the system's core elements, goals, and objectives to meet the vision and mission of the system, including the core programs under WIOA:

- The Adult, Dislocated Worker, and Youth formula grant programs administered by the DOL under Title I of WIOA;
- The Adult Education and Family Literacy (AEFLA) program administered by the ED under Title II of WIOA;
- The Wagner Peyser Act ES program administered by DOL under Title III WIOA; and
- Vocational Rehabilitation (VR) program administered by ED under Title IV of WIOA

Improved access and efficiency, along with value-added support services, are a few of the many benefits customers receive from the state workforce system. System partners are responsible for the delivery of various workforce education and training programs and related services, as well as education programs that support career preparation and advancement, including:

- Providing services that facilitate the match between employers and employees
- Providing employment, training, and retention services for eligible WIOA participants and prioritizing services to recipients of public assistance, other low-income individuals, and individuals who are disabled and/or basic skills deficient to spur financial self-sufficiency
- Developing adult education and family literacy programs that ensure all adults have the basic education skills they need to contribute to their families and communities
- Providing employment, training, and retention services to individuals with barriers to employment, including veterans, individuals with disabilities, trade-affected individuals, older individuals, ex-offenders, homeless individuals, long-term unemployed individuals, and youth

- Encouraging the use of training services that provide portable, transferable credit and credentials
- Providing support services, such as child care, UI benefits, and transportation to enable eligible individuals to work or participate in education and training activities;
- Monitoring and evaluating compliance of local area service delivery for fiscal accountability and program protection
- Providing technical assistance to local Boards and training providers to ensure the most effective delivery of workforce services

TWC, the 28 Boards, their contracted service providers, and community partners continue to work toward full integration of core programs. The strategy of alignment, coordination, and integration of education, employment, and training programs is close to being fully realized.

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.

Texas businesses receive value-added assistance through an integrated workforce system. Businesses have access to pools of job seekers at all levels of education and experience, allowing potential employers to tailor new hires to the requirements of the job and build a better workforce. Close ties to the local labor market enable Boards to conduct outreach by working with businesses to provide opportunities for work experience and on-the-job training (OJT) and allow low-skilled workers to build skill sets relevant to the current market. Additionally, Boards are well positioned to work with other community partners, such as economic development organizations, to expand opportunities to all customers.

Dedicated Business Services Units (BSUs) along with Vocational Rehabilitation Services (VRS) provide businesses access to customized service options that address their specific business needs. BSUs and VRS offer a range of services designed to help employers with hiring and training needs to maximize their competitiveness, including:

- applicant recruitment, screening and referral;
- listing and maintaining job orders through WorkinTexas.com
- assistance with and participating in job fairs;
- information resources (e.g., labor market and business statistics, employment and labor law, UI benefits);
- testing and prescreening job candidates;
- basic employment skills training and referral to education and training providers;

- customized training -- including training through the state-funded Skills Development Fund -- and OJT skills training;
- assist with and information on the Work Opportunity Tax Credit (WOTC); and
- rapid response and downsizing assistance in the event of closings or mass layoffs.

Continued efforts to affect system-wide improvement includes the expansion of employers' access to grants through the Skills Development Fund. Programs receiving grants through this program build skill competencies to meet current and future demand in high-growth industry sectors. In crafting solutions for Texas employers, community-based organizations (CBOs) and technical colleges partner with TWC and local employers to provide job training when a specific need is identified. Training enables incumbent employees to advance their skills and/or creates new jobs with the partnering business. TWC works with the employer and training provider to ensure that the program meets specific performance measures and benefits both the employer and trainee.

During state fiscal year 2019, TWC:

- awarded 38 Skills Development Fund grants totaling $16,518,131;
- serve 72 Texas businesses;
- supported the creation of 3,568 new jobs;
- upgraded the skills of 9,115 workers in existing jobs;
- awarded six Skills for Transition grants totaling $775,000 -- these grants serve transitioning military personnel who are within one year of service separation; and
- awarded five Dual Credit grants totaling $936,228

TWC closely measures performance to evaluate the Boards' effectiveness in meeting the needs of employers. These measures include:

- assisting employers in filling vacancies; and
- expediting the return of UI claimants to work, thereby protecting the state's unemployment trust fund as well as containing the UI tax rates of employers.

TWC's Office of the Commissioner Representing Employers also reaches out to businesses by sponsoring Texas Business Conferences, an annual series of 12 to 15 employer seminars around the state. The seminars present practical, up-to-date information for operating a successful business and managing employees. Topics include: Texas employment law and the basics of hiring, employee policy handbooks, handling unemployment claims, independent contractors, and federal and Texas wage and hour laws.

TWC's Skills for Small Business and Skills for Veterans initiatives provide further training opportunities for both employers and employees. Other activities include TWC's partnership with the Office of the Governor's Economic and Tourism division to host the Governor's Small Business Forums, and with the Texas A&M Engineering Extension Service (TEEX) to provide geographic mapping technology, SitesOnTexas.com. This website assists employers in planning for business expansion, job retention, and workforce training.

Through the Texas Industry Partnership, TWC has dedicated WIOA funds to address skill gaps and ensure a talent pipeline to address regional industry needs, through collaborations between

Boards and private employers or corporate foundations (partners). Collaborations must engage in allowable WIOA activities that support workforce development for six designated industry clusters: advanced technologies and manufacturing, aerospace and defense; biotechnology and life sciences; information technology; petroleum refining and chemical products; and energy.

The intent of the Texas Industry Partnership program (TIP) is to support Boards in strengthening partnerships with communities, leverage available state and local resources, and foster collaboration with partners to promote occupational job training in Texas.

TWC promotes partnerships with employers to overcome barriers in meeting workforce needs with the creative use of technology and innovation. TWC takes steps to ensure that the staff of public schools, vocational service programs, and CBOs are trained and supported to assist all individuals with disabilities in achieving integrated, competitive employment. TWC also promotes the availability and accessibility of individualized training designed to prepare an individual with a disability for the individual's preferred employment. To this end, individuals with disabilities are given the opportunity to understand and explore options for education and training, including postsecondary, graduate and postgraduate education, vocational or technical training, or other training, as pathways to employment.

TWC's VR services collaborates with Boards to develop and implement a coordinated, team-based approach to serving employers. This strategy includes other state and federal partners, such as the DOL's Office of Federal Contract Compliance Programs and the Veterans Administration, which conduct ongoing outreach with federal contractors to increase awareness, recruitment, hiring, and retention of qualified individuals with disabilities, including veterans.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

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

In March 2016, Governor Abbott established the Tri-Agency Workforce Initiative and tasked the commissioners of TEA, THECB, and TWC to work together on charges centered on developing strong links between education and industry, with the goal of helping Texans grow in economic prosperity. The commissioners built a proactive, ongoing partnership along with other stakeholders to align the educational goals of Texas with the state's higher education plan of 60x30TX, which aims for 60 percent of 25- to 34-year-olds to hold either a certificate or degree by 2030, with the goal of growing the state's workforce, industry, and the economy.

TWC will incorporate the State's 60x30TX strategy as one of the building blocks for engaging the state's community colleges and area career and technical education schools as partners in the workforce development system to create a job-driven education and training system. The goal of this system is to have at least 60 percent of Texans ages 25-34 possess a certificate or degree by 2030 through initiatives that include increasing postsecondary educational success over the next five years.

TWC promotes and recognizes community college engagement through our annual Partnership Awards. Each year, the Community College Engagement Award is issued to two community college partners (one large, one small) for their level of engagement in TWC programs that include Skills Development Fund and Self Sufficiency Fund grants, apprenticeship, WIOA grants, Summer Merit (STEM) projects, Skills for Small Business contract, Wagner-Peyser 7(b) grants, dual credit projects, AEL projects, veteran-focused Skills for Transition, employment services,

Jobs and Education for Texas (JET) grants, and curriculum development or sharing (Fast Start). This nonmonetary award is presented annually at the Texas Workforce Conference. It highlights the important work of community colleges and other entities integral to preparing a skilled workforce. The colleges and organizations selected for recognition will have demonstrated innovation in meeting the needs of local employers.

Since the acquisition of the state's AEL program, TWC has encouraged the examination of new approaches to engage the state's education and training providers, thereby encouraging adults in areas of literacy and numeracy while also preparing them for sustainable employment and financial self-sufficiency.

As part of its partner engagement with educational institutions, TWC is involved in a unique collaboration with the Texas Education Agency (TEA) and the Texas Higher Education Coordinating Board (THECB) that assesses the curriculum requirements for public schools as well as legislation promoting early college high schools. TWC shares relevant labor market and career information to assist with decisions on directing resources toward a curriculum that will meet the occupational needs of the state. Support of early childhood education and professional development, along with English as a Second Language (ESL) and other AEL programs, are critical collaborations. The partnership between THECB, TWC, and participating public universities through the College Credit for Heroes (CCH) program has enabled veterans to receive college credit for the experience and training received while serving in the armed forces. Additionally, THECB and TWC are working together to implement the Texas Fast Start program to promote rapid delivery of workforce education and development. This program focuses resources on meeting the needs identified by employers and other interested parties for additional fast-track, affordable certification programs in high-growth target industries.

Other significant engagements with educational institutions include Texas State Technical College (TSTC), the Texas Engineering Extension Service (TEEX), and community colleges. TWC administers the state's Skills Development Fund (SDF), Texas' premier job-training program providing local customized training opportunities for Texas businesses and workers to increase skill levels and wages of the Texas workforce. Collaborations with Texas community and technical colleges and TEEX support job training programs among training and education providers. Through this collaboration, employers that need to find skilled workers or upgrade the skills of their current workforce are provided customized training solutions.

In FY'19, TWC awarded SDF grants to community colleges in partnership with more than 72 businesses that supported the creation of some 3,568 new jobs and the elevation of skills of more than 9,115 incumbent workers through skills training. The SDF has continued to expand and now supports certain dual-credit programs offered by school districts in partnership with public junior colleges, public state colleges, and/or public technical institutions, which accelerates a student's ability to obtain a degree. Grants awarded support the purchase of training equipment used in dual-credit programs.

Boards annually publish invitations to community colleges, area career and technical education schools, and other training providers, encouraging submission of applications for consideration as an eligible training provider.

Business partners contribute to the success of the SDF grant program through in-kind support which includes, providing trainees' wages during training, the use of training space and equipment, funding a portion of course costs as necessary, the provision of complementary courses that are not part of the SDF grant, and salaries for staff who are assisting with the grant. These in-kind contributions totaled over $19.2 million in FY'18.

TWC strongly supports partnerships that increase opportunities for adult learners to transition to postsecondary credentials, including registered apprenticeship certification and industry-recognized certificates and licenses and certifications that are portable and stackable. Current initiatives strategically position the statewide system for innovation in new directions related to full system integration and postsecondary education outcomes, as measured by high school equivalency, college and career readiness, enrollment in nonremedial, for-credit courses in postsecondary educational institutions, and occupational and industry skill standards and certification widely used and recognized by business and industry. These initiatives include:

- Integration of services to support alignment of AEL activities with other core programs in the workforce system and linkages to employers and CBOs through workforce events, ongoing technical assistance efforts, and sharing of best practices developed across the state
- Continued development of content and models for integrated education and training career pathways, and other postsecondary transition models and workplace projects, including Registered Apprenticeships with employers; and TWC Accelerate Texas' is designed to build capacity and expand deployment of career pathway programs, which support robust employment, higher education transition, skills gains, and secondary completion through demonstrated approaches that integrate system services and leverage community partnerships

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

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

Eligible Training Providers (ETP) and Career Schools and Colleges (CSC) are part of the TWC education and training system. Because of this, TWC works closely with these programs to create a job-driven education and training system that is performance and results driven.

ETPs are job training programs certified by TWC to provide WIOA–funded training services. WIOA requires Boards to target high-growth, high-demand, and emerging occupations within their workforce areas. To be approved for the statewide ETP List, training must align with an occupation included on the state's target occupations list. ETPs are also required to submit annual student performance data.

CSC's are privately owned institutions that offer classroom or online training in which students are taught the skills needed to perform a particular job. TWC regulates career schools in Texas and provide information and technical assistance to schools, students, and the public. Regulatory functions include licensing schools, approval of programs of instruction, approval of key school staff, site inspections, investigation of student complaints and unlicensed schools, administration of the Tuition Trust Account to assist students of closed schools and coordinating with other approval and regulatory agencies.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

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

Federal Perkins funding, administered by the Texas Education Agency (TEA), offers opportunities for AEL programs to leverage these federal resources for programs providing workforce training. AEL grant recipients can use Perkins-funded career and technical training program resources, such as technical instructors, equipment, and classrooms, to help support elements of workforce training programs for adult learners in the AEL program. The technical trainers teaching high school students skills in HVAC, computer repair, and more, also served as the workforce instructors for the AEL's integrated education and training program. TWC has promoted this model at various statewide meetings, most recently at the first statewide Ability to Benefit/Perkins Funding meeting for adult education programs held early summer of 2019.

Additionally, many community colleges in Texas are working to provide, or have provided, Ability to Benefit (ATB) alternatives under federal law and ED guidance. Establishing clear, and often enhanced coalitions within college departments (registration, financial aid, assessment, advising, academic disciplines, and continuing education), workforce training and integration with AEL, Boards and other partner providers, are necessary to implement the model. TWC has funded ATB expansion initiatives to help community colleges build capacity to implement this model.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

TWC continues to encourage the state's education and training providers to identify and leverage deliverable services beyond those provided solely through the workforce system's funding. Among these practices, local adult education programs form partnerships joining educational, workforce development, and other human services agencies to collaboratively develop AEL services.

TWC strongly supports partnerships that increase opportunities for adult learners to transition to postsecondary credentials, including Registered Apprenticeship certification and industry-recognized certificates and licenses that are portable and stackable. Current initiatives strategically position the statewide system for innovation in new directions related to full system integration and postsecondary education outcomes. These outcomes can be measured by high school equivalency, college and career readiness, enrollment in nonremedial, for-credit courses in postsecondary educational institutions, and occupational and industry skill standards and certifications widely used and recognized by business and industry. These initiatives include:

- Integration of services to support alignment of AEL activities with other core programs in the workforce system, bringing employers and CBOs together through workforce events, ongoing technical assistance efforts, and sharing of best practices developed across the state
- Continued development of content and models for integrated education and training career pathways, and other postsecondary transition models and workplace projects, including apprenticeships with employers
- Continued capacity-building for the Accelerate Texas Model. Accelerate Texas is designed to expand deployment of successful career pathway programs that lead to increased employment, higher education transition, skill gains, and secondary education

completion through demonstrated approaches that integrate system services and leverage community partnerships

- Continued support for college integration models that decrease the burden of student debt, such as with Ability to Benefit models that enable adult students who lack a high school diploma to enroll in a career pathways program and become eligible for a Pell grant. In 2019, TWC's initiative, the Texas Peer Network, hosted the first Ability to Benefit program in Texas, inviting AEL providers to share best practice and learn more about this model which has been partially restored by the ED

TWC recently received a DOL grant award of $5.4 million to support statewide apprenticeship expansion efforts from July 2019 – June 2022. Funds will increase, expand, and integrate Registered Apprenticeship Programs (RAPs) with new industries and diversify apprentices. This new opportunity will continue Texas' efforts to expand the number of apprentices in registered programs, support and encourage RAP diversification, and integrate RAPs into state workforce development strategies. Part of TWC's plan is to encourage community and technical colleges, as eligible grantees, to use allotment funding to address workforce development needs in the communities they serve. This will support RAPs and build staffing and knowledge capacity to imbed RAPs in more areas of the state.

In 2016, DOL awarded an Apprenticeship Expansion grant to TWC to develop new RAPs and conduct an outreach campaign to expand Registered Apprenticeships in traditional and nontraditional industries and occupations. These goals aligned with the Tri-Agency (TWC, TEA, and THECB) recommendations to expand apprenticeship opportunities for all Texans! New RAPs have been developed in Texas increasing career pathways for Texas citizens into high-paying, high-skilled jobs resulting in nationally recognized certificates.

All Integrated Education and Training (IET) efforts require students to attain a recognized postsecondary credential and the workforce training must be aligned with in-demand occupations. To support local workforce needs of employers and the area, TWC AEL is working with a Fortune 500 company on the development of an industry-recognized credential customized for adult education within the advanced manufacturing cluster.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

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

TWC's market-driven approach engages all potential customers, including economic development entities. TWC's Office of Employer Initiatives (OEI) and its network of regional Texas Workforce Solutions partners hold listening events throughout Texas to hear about the achievements and challenges each region had identified. Through these meetings, new initiatives are launched, and new industry-aligned strategies are formed. OEI also partners with the TEA and THECB in regional meetings with employers, higher education and public education leaders, economic development and local workforce professionals, and other key community leaders to discuss regional economic priorities, employer workforce needs, and the career planning and preparation needed for Texas students to be ready for success in college or a career.

OEI manages several services that support business-focused workforce needs, including:

Skills Development Fund – a grant program that partners Texas public community and technical colleges, or the TEEX with businesses, business consortiums and trade unions to provide customized industry focused training.

Recruit Texas – provides intensive, rapid response and support services to employers expanding in or relocating operations in Texas. The program focuses on:

- Developing customized workforce training programs
- Fast-track curriculum development
- Workforce training related support services for employers
- Instructor certification necessary to provide workforce training
- Acquiring training equipment necessary for instructor certification and employment

Skills for Small Business – provides grants for small businesses (fewer than 100 employees) for tuition and fees associated with training for new employees and incumbent employees.

Self-Sufficiency Fund – provides grants for non-profit COBs, public community colleges, technical colleges, or state extension services to train adult TANF and/or SNAP recipients in industry-recognized certification programs that lead to permanent full-time employment opportunities.

High-Demand Job Training (HDJT) – provides grants to Boards that collaborate with Economic Development Corporations to leverage sales tax dollars to provide high-demand occupational job training in their local workforce areas. In FY'18, TWC awarded $1,267,288.52 in HDJT program grants with an average award of $74,542.48 to assist 17 communities supporting colleges, ISDs, and private training companies with their training needs and support the training needs of 1,632 trainees. TWC has dedicated $1 million available for grants to Boards collaborating with their EDCs to provide high-demand job occupational job training in local workforce areas.

Texas Industry Partnership (TIP) Program – enables Boards working with local industry partners that use their private funds for high-demand job training within the six industry clusters, (Advanced Technologies and Manufacturing, Aerospace and Defense, Biotechnology and Life Sciences, Information Technology, Petroleum Refining and Chemical Products, and Energy), to collaborate and match their private contributions to jointly support the provision of such training. Projects for each Board may vary from equipment only purchases to tuition reimbursement and also include workforce studies of the local board regions. In FY'18, TWC awarded $565.835 in TIP grants with an average award of $62,870.56. These grants assisted 9 communities supporting colleges, ISDs, and private training companies with their training needs and support the training needs of 2,085 trainees.

TWC dedicated $1 million to support collaborations between Boards and industry partners to provide high-demand occupational job training through August 2019.

Jobs and Education for Texans (JET) Grant Program – allocates $10 million each biennium to defray start-up costs associated with the development of career and technical education programs to public community, state and technical colleges, and ISDs. Applicants can apply for JET grants to purchase and install equipment necessary for the development of career and technical education courses or programs that lead to a license, certificate or postsecondary degree in a high-demand occupation.

In FY'19, TWC awarded 27 JET grants (12 to colleges and 15 to ISDs) with an average award of $211,708. The equipment provided through these funds will be used to train students for jobs in high-demand occupations.

Additionally, TWC helps coordinate presentations and resources that support the Texas Economic Development Corporation (TxEDC) and the Governor's Office of Economic Development and Tourism (EDT). These two highly focused organizations serve as the gateway for bringing jobs to Texas. TxEDC and EDT offer many services to facilitate corporate relocation and expansion, including valuable incentives, financing options, and resources to streamline business site search.

B. STATE OPERATING SYSTEMS AND POLICIES

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

See III.b.1-9.

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF–

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

WIOA emphasizes the importance of labor market and system performance information in driving strategic and operational decision-making in the workforce system. TWC has long recognized the importance of using data to drive decision-making and has made availability and evaluation of data a key part of its strategic development and oversight processes and consumer education efforts.

State Operating Systems

State operating systems are primarily divided into three categories:

- LMCI Exploration
- Participant Eligibility, Service Tracking, and Case Management
- System Oversight

Labor Market Information and Career Exploration Systems

TWC's LMCI Department provides information about general and specific trends within the labor market in Texas regarding different industries, occupations, employment levels, and wages. This information is critical to the strategic planning processes of TWC and the local Boards to improving the way Texans make career and educational decisions by providing useful and reliable information about careers, educational training options, and jobs. The department's products range from online career information to a variety of specialized economic development and regional planning tools.

Texas LMI (TexasLMI.com) is an interactive website hosted by TWC that disseminates Texas labor-market statistics. On TexasLMI.com, users will find a suite of easy-to-use labor-market

research tools that provide time-series labor-market data, inquiry capabilities for labor force, employment/unemployment estimates, industry and occupational projections, and occupational wage data.

TexasWages.com is an online application that lets users explore occupational wages by workforce area and by metropolitan statistical area. Long-term employment projections data was also added to the tool to provide an enhanced user experience. By using TexasWages.com, a customer can find hourly or annual wages for the mean, median, entry and experience levels for over 800 detailed occupations. Users can view and compare the different wages across all the sub-state areas in Texas to make informed decisions or carry out research.

To gain insight into a region's labor supply and demand, the LMCI Department designed the Texas Labor Analysis (TLA) tool. This application is an online suite of labor analysis tools that lets users create in-depth statewide or regional reports for aggregated or single regions. Users can choose any of five separate applications in Labor Analysis including Gap Analysis, Demand, Supply, Regional Occupational Profile, or Top Statistics.

Gap Analysis enables users to compare the various sources of potential labor market supply (such as graduates from educational programs and registered job seekers) and labor market demand (such as job openings and projected employment). Users can customize the report by region or by occupations and can view the statistics on a map that indicates the spread of the supply-demand relationship by workforce regions in Texas.

The Demand module in TLA allows users to discover real-time demand for occupations based on current Help Wanted Online postings. With it, customers can perform a regional demand analysis using projected and latest employment numbers, and salaries. Reports can be generated on Industry, Occupation, and the relationship between the two.

On the supply side, users can estimate the formal supply of skilled workforce by viewing an area's education and workforce training programs. The Supply application can display the number of enrollments and graduates for different programs of study offered by various schools across Texas.

Regional Occupational Profiles compares different workforce regions of Texas on some key employment indicators like wages, employment projections, and trend of online job postings. This tool gives users more insight into occupational wage and employment numbers by offering metrics such as wage differentials and location quotient data.

Top Statistics is a quick way to find the top 25 occupations by region. The data can be viewed by highest employment, job openings, highest wage, or highest projected employment.

Changes in the education system brought about by legislation provide TWC the opportunity to help students transition from the classroom to career readiness. TWC supports school counselors, school districts, students, and parents by providing LMCI to assist them with student career-planning and preparation. Additionally, the agency provides information and supports efforts to prepare students for occupational training at the presecondary, secondary, postsecondary, and college and university levels.

A few of the nationally recognized consumer education and career pathway exploration tools offered by TWC include the following:

- Reality Check (http://www.texasrealitycheck.com) TexasRealityCheck.com is one of the more frequently used resources in the LMCI tool box and features a widely used iPhone

application. The website allows students to make lifestyle choices, create a budget, and then view the occupations and preferred education levels that support those choices.

- Texas Career Check (https://texascareercheck.com) Texas Career Check offers information on hundreds of job tiles, pay information, and future projected jobs. Users can explore the career side or education side to assist with career planning.
- Texas Consumer Resource on Education and Workforce Statistics (Texas CREWS) - Texas CREWS (http://www.txcrews.org) Texas CREWS is a dashboard tool that provides information about Texas' public two-year and four-year postsecondary institutions; evaluates programs/institutions on the basis of resulting wages and student loan levels; and enables parents and students to make informed decisions about college and thereby obtain the best return on their educational investment.

The Texas CREWS platform is like what TWC uses to capture and provide access to eligible training provider data, which is needed to deepen consumer education, as required by WIOA.

Participant Eligibility, Service Tracking, and Case Management Systems

TWC provides the main automated systems used by the local Boards and other grantees for job matching, data collection, and case management, including adult education and vocational rehabilitation, as well as child care assistance. Additionally, the Boards and other grantees use a financial reporting system developed by TWC.

WorkInTexas.com Replacement - WorkInTexas.com is the free job-matching website TWC administers for Texas' workforce system. It provides:

- extensive job matching options based on skills and experience;
- links to labor market and career development information; and
- free, 24-hour-a-day access.

WorkInTexas.com went into production in May 2004. At that time, it was cutting-edge and one of only a handful of online job connection systems. To determine the effectiveness of the current system, TWC formed a task force comprised of Local Workforce Development Board (Board) Private Sector Members, Board Executive Directors and a representative from the State Agency Coordinating Council for Human Resources (HR) Directors. After extensive evaluation, the task force determined the system was now outdated and needed to be replaced.

In the summer of 2019, TWC launched the new WorkInTexas.com. The new system improved job matching to better meet the hiring and job searching needs of employers and job seekers. Job-seeker functions include resume upload, resume versioning, resume builder, and Career Pathways. All customers of the system have access to labor analytics and supply and demand tools to enhance job searches. Other improvements include a user-friendly mobile design, modern communications capabilities and increased access to jobs and workforce talent. The improved site also enables Texas Workforce Solutions to significantly enhance service delivery, offering employers and job seekers another reason to connect with their local workforce development boards.

The two-year long project included the opportunity for job-seekers and employers to provide valuable input to help craft requirements for the new website. This helped to create a system that will increase employer access to talent, improve candidate matches to job descriptions, and incorporate local and regional labor market information to support informed business decisions.

Employers can post jobs, search résumés, recruit candidates, get labor market information, and receive a variety of other services available through a network of statewide Workforce Solutions Offices. Individuals seeking a new job, different job, or an additional job can post their résumé, search job listings (including Texas state agency jobs), obtain employer contact information to apply for jobs, get information about the job market, and receive a variety of other services also available through Workforce Solutions Offices.

The Workforce Information System of Texas (TWIST) - TWIST is the integrated intake, eligibility, case management, and reporting system for employment and training services. It was designed as a central repository for customer information. TWIST ultimately decreases duplication within and across the Texas workforce system while streamlining the provision of services to customers. It enables Workforce Solutions Office staff to enter intake information for customers only once for multiple employment and training programs and to retrieve it statewide. TWIST also includes interfaces with other automated systems—WorkInTexas.com, the UI benefits system, and HHSC's system.

Child Care Attendance Automation - Child Care Attendance Automation (CCAA) allows parents to record attendance using a swipe card at a point-of-service device located at the authorized child care facility. Parents also can use an interactive voice response system using the authorized child care provider's phone. Attendance recorded through CCAA is transferred to TWIST on a weekly basis, and TWIST is used to process payments to providers based on the CCAA attendance records.

Texas Educating Adults Management System (TEAMS) - TEAMS is Texas' state-of-the-art, web-enabled system that maintains student-level data, including demographic, assessment, and outcome data, as well as class, site, program, and provider information. TEAMS users can analyze class, site, or program information using standard reports generated at the user level. TEAMS provides a wide range of information about adult education, including snapshots of student and program performance, personnel qualifications, and staff development activities.

ReHabWorks - ReHabWorks is a web-based case management system. It is the portal through which field staff enters information from and about the consumer to manage the VR process. Functionalities include collecting required information for preparing state/federal reports, guiding processes and forms, and reporting requirements.

Cash Draw and Expenditure Reporting - TWC's online Cash Draw and Expenditure Reporting (CDER) system is a web application used by Boards to draw funds from their program allocations. All financial transactions are handled through this online system, and Boards are no longer required to submit paper documents or Excel spreadsheets. CDER has significantly decreased manual processing and greatly improved the reporting of data to all parties.

Quarterly Wage Records - TWC makes extensive use of quarterly wage records, both for required and ad hoc reporting. TWC uses Texas wage records and those obtained from other states through the Wage Record Interchange System (WRIS) for required WIOA, Wagner-Peyser, and Trade Adjustment Assistance (TAA) reporting. A fuller discussion of the use of quarterly wage records is contained in the Program Data section of this plan.

System Oversight Systems

TWC provides access to performance and management information reports to Boards and grantees. Currently, TWC does not have a single consolidated data warehouse and reporting system. Instead, TWC has a variety of systems that provide summary and customer-specific data to support management and oversight functions. Some of these systems are part of the

underlying case management systems (TEAMS and WorkInTexas.com, for example, each have a set of reports that can be run). TWC also has several systems created exclusively for reporting purposes that allow standard reports and ad hoc queries to be run. Because Boards and other grantees are generally able to access these systems, TWC can ensure a high degree of transparency in the Texas workforce system.

The systems can produce data on hundreds of subpopulations for most performance measures, which allows for a deeply granular evaluation of performance and management information. This level of detail also allows TWC to perform highly complex evaluations of performance data for forecasting, target setting, and general determinations of effectiveness.

B. DATA-COLLECTION AND REPORTING PROCESSES USED FOR ALL PROGRAMS AND ACTIVITIES, INCLUDING THOSE PRESENT IN ONE-STOP CENTERS

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.[10]

[10] For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

TWC provides Boards, other grantees, and state staff with guidance regarding data collection and reporting. This includes both common and program-specific guides that outline data entry deadlines and requirements for recording data on Eligibility Determination, Service Dates and Details, Outcome Tracking (for those elements not tied to wage records), and Case Management. TWC's Workforce Development Division provides technical assistance to Boards and grantees to help ensure they timely and accurately enter data as required into the appropriate systems. TWC's Subrecipient Monitoring Department conducts data validation and other Board and grantee reviews to support system and data integrity.

TWC's Division of Operational Insight (DOI) is responsible for producing, analyzing, and reporting performance data. DOI provides timely, accurate, and understandable information and analyses relevant to the performance, accountability, and integrity of the Texas workforce system. DOI's reporting ensures that TWC, Board and grantee management have the information necessary to make policy decisions that will help the system meet or exceed performance expectations, thus offering the opportunity for Texas businesses, residents, and communities to achieve and sustain economic prosperity.

Most WIOA performance measures, are based on quarterly Exiter cohorts and quarterly wage record filing. Despite this, TWC's quarterly performance data may change on a monthly basis. To compensate for this, DOI produces performance data on a monthly basis for the governor's office, Texas Legislature, agency management, Boards, and other grantees. Texas employers report quarterly wage data electronically. Therefore, performance for a given quarter of Exiters can be meaningfully run much earlier than the federal deadlines provide for, and TWC does so in order to improve TWC's ability to identify and respond to potential performance issues more quickly.

In addition to producing performance data each month, DOI coordinates with TWC's operational divisions to develop "Explanations of Variance" when performance is not between 95 percent and 105 percent of target (whether high or low). TWC also holds open, posted meetings each quarter with the Commission to discuss system performance. These meetings are broadcast on the Internet to allow Boards, grantees, other stakeholders, and the public to listen to the

discussions and understand the system's current areas of strength and weakness, as well as proposals to support continuous improvement.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (E.G., CO-ENROLLMENT POLICIES AND UNIVERSAL INTAKE PROCESSES WHERE APPROPRIATE). IN ADDITION, PROVIDE THE STATE'S GUIDELINES FOR STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM

State Policies

TWC is governed by a three-member Commission appointed by the governor. The three full-time Commissioners represent employers, labor and the public. Together they serve as the rule making authority for TWC, oversee agency functions, and develop agency policy.

Twenty days after adoption by the Commissioners, TWC rules, which guide agency operations and its programs, are codified in the Texas Administrative Code, Title 40, Part 20. Policies that support the implementation of TWC strategies and programs related to WIOA are available on the agency's website, including:

- Texas Workforce Commission Rules, available at https://twc.texas.gov/agency/texas-workforce-commission-rules
- The *WIOA Guidelines for Adults, Dislocated Workers, and Youth* provides Boards with the criteria and documentation sources for establishing WIOA Title I program eligibility for adults, dislocated workers, and youth. This policy guide is based on WIOA final rules for Titles I-IV, publicly available in late June 2016. The WIOA final rules pertaining to Titles I and III, published in the *Federal Register* on August 19, 2016, effective October 18, 2016. As future updates become available, the policy guide will be updated. Available at https://twc.texas.gov/files/partners/wioa-guidelines-twc.pdf
- The *WIOA Guide to Texas Workforce System Operations* provides information on the methods by which WIOA reinforces the partnerships and strategies necessary for Workforce Solutions Offices to provide job seekers and workers with the high-quality career, training, and support services they need to find and keep good jobs. These strategies also help businesses find skilled workers and access other human resources assistance, including education and training, to meet their workforce needs. This guide describes the roles of TWC, Boards, chief elected officials, and local workforce partner programs. Boards are required to ensure that all state policies provided in this document are adhered to and followed according to established timelines. Available at https://twc.texas.gov/files/partners/wioa-operations-guide-twc.pdf
- Operational guidance and active workforce policy provided to local Boards in the form of Workforce Development (WD) Letters, Adult Education and Literacy (AEL) Letters, Technical Assistance (TA) Bulletins, and comprehensive guides. These guidance documents are based on Commission-approved policies. Available at https://twc.texas.gov/agency/workforce-policy-guidance
- TWC maintains a repository of major publications including the agency's strategic plans and annual reports, publications for employers and job seekers, and program information. Available at https://twc.texas.gov/agency/reports-plans-publications
- Various reports, policy guides, and customer information related to VR services are maintained by TWC. Available at https://twc.texas.gov/programs/vocational-

rehabilitation-program-overview and https://twc.texas.gov/partners/vocational-rehabilitation-division-publications

Core Program Activities to Implement the State's Strategy

Partnership with Texas Workforce Solutions and Designated Providers

The following activities support WIOA core programs and align with the state's strategies, as previously described.

TWC administers the development and integration of workforce services in coordination with the Board's oversight and planning efforts. Service delivery is executed through Texas Workforce Solutions, which may contract with Workforce Solutions Offices (our one-stop providers) to operate a variety of program components. This network gives customers local access to workforce solutions and statewide services at approximately 180 Workforce Solutions Offices, four UI tele-centers, and numerous partner locations.

WIOA has strengthened Texas' progress toward integrating services for customers. WIOA §193(a)(3) provides that Boards' contracted workforce service providers and community partners are defined under prior consistent state law.

Section 302.021 of the Texas Labor Code set forth the job training, employment, and employment-related educational programs and functions consolidated under the authority of TWC. In Texas, prior consistent state law defines the Boards' responsibility to develop, implement, and modify a plan for convening all relevant programs, identified as one-stop required-partner programs, including:

- WIOA, formerly WIA
- ES
- UI benefits information
- Choices, the TANF employment and training program
- SNAP E&T
- Subsidized child care
- TAA
- AEL programs
- VR programs
- Business Enterprises of Texas
- Grant for Independent Living Services for Older Individuals Who Are Blind
- The Criss Cole Rehabilitation Center

Prior consistent state law further defines the following as required one-stop partner programs. Other than UI compensation, which is administered by TWC, the programs are not under the direct oversight of the Boards; therefore, Boards are required to establish memoranda of understanding (MOUs) with:

- AEL (WIOA, Title II);

- Apprenticeship programs;
- National and Community Services Act Program;
- Non-Certificate Postsecondary Career and Technology Training programs; and
- SCSEP

TWC also recommends that Boards enter into MOUs with the following optional partner activities:

- 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 USC 2301 et seq.)
- Job counseling, training, and placement services for veterans, 38 USC 41
- Education and vocational training programs through Job Corps, administered by DOL
- Native American programs authorized under Title I of WIOA
- US Department of Housing and Urban Development-administered employment and training programs
- Employment and training activities carried out under the Community Services Block Grant Act
- Reintegration of Offenders programs authorized under the Second Chance Act, 2007
- Migrant and Seasonal Farmworker programs authorized under WIOA §167

Additionally, Boards may partner with other entities that are not considered required workforce partners or optional workforce partners. These entities are state or local organizations that do not carry out a workforce development program and may include local social service agencies, housing authorities, and others.

TWC also requires Boards to jointly develop and adopt an MOU with HHS. Although HHS is a federal optional one-stop partner, the MOU fulfills state law regarding the coordinated interagency case management of recipients of financial assistance in employment and training activities and support services, Texas Human Resources, Code §31.0128.

Pay-for-Performance Contracts

TWC and Boards will maintain, where applicable, performance-based contracts. However, TWC and Boards will consider developing, with stakeholder input, a WIOA pay-for-performance contracting strategy applicable to Title I programs, as defined in WIOA §3(47).

The development of a performance-based contract is contingent on the pay-for-performance contract strategy, which establishes specific benchmarks that must be achieved for the contractor to receive payment. WIOA calls for the benchmarks to be tied to the prime indicators of performance and adjustments thereof related to economic conditions and the population demographics.

TWC will maintain the latitude provided for in WIOA to consider the development of a pay-for-performance contract strategy as guidance is issued.

Determination of Funds Provided for Infrastructure Costs

TWC provides policy and procedural guidance to boards regarding the requirements for funding infrastructure costs in the Guide to Texas Workforce System Operations, Section D Infrastructure Funding. This Guide, updated in February 2020, states that Boards, with the agreement of CEOs, develop and enter into MOUs with statutorily required one-stop partners for operation and funding of a one-stop delivery system in the local area. Boards may also enter MOUs with other optional partners, as described by WIOA. Among several required provisions, the MOU must include a final plan, or an interim plan if needed, on how the infrastructure costs of the one-stop centers will be funded.

Within each MOU, each Board and its workforce partners must establish an IFA that describes how the Board and partner programs will fund the infrastructure costs of the Workforce Solutions Offices that are part of the local workforce development area (workforce area) (WIOA §121(c)(1) and 20 CFR §678.500(b)(2)(i)). If a Board and its required workforce partners are unable to reach consensus on the terms of the IFAs for the program year, then the Board must notify the Texas Workforce Commission (TWC) of an impasse no later than March 15 (20 CFR §678.510(c)) of the program year immediately preceding the program year for which the IFA must be negotiated. TWC will, in turn, notify the state agency responsible for administering the partner's program. If TWC cannot help the Board resolve the issue, TWC will notify the governor, the Texas Workforce Investment Council, the Secretary of Labor, and the head of any other federal agency with responsibility for overseeing a workforce partner's program.

Boards and workforce partners must fund infrastructure costs through either the Local Funding Mechanism (LFM) or the State Funding Mechanism (SFM). The LFM provides Boards, CEOs, and workforce partners with the flexibility to design and agree locally on the methods to fund infrastructure costs. However, if a Board fails to reach consensus with all of the required workforce partners operating in its workforce area with regard to the amount each partner will contribute to the local workforce system's infrastructure costs, the statute replaces local flexibility for determining how to fund infrastructure costs with the SFM. Under the SFM, TWC (on behalf of the governor) is charged with allocating infrastructure costs and determining each partner's proportionate share of costs for Boards that did not reach consensus on the LFM. The LFM and SFM apply only to the funding of infrastructure costs.

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.

TWC is governed by a three-member Commission appointed by the Governor. The agency executive director is accountable to the Commission and is responsible for the daily operations of the agency. The executive director is assisted by a deputy executive director who has oversight responsibility for agency's administrative support divisions. The agency is organized into 15 distinct program and administrative support divisions. The program areas facilitate workforce services delivery through twenty-eight local Boards. A description of the agency divisions is provided below.

External Relations Division

TWC's External Relations Division includes Communications, Governmental Relations, LMCI, and Conference Planning and Media Services. External Relations serves as the primary point of contact with legislative offices as well as the media. Additionally, the division provides planning

logistics and implementation support to TWC for conferences, seminars, events and multimedia services statewide.

LMCI improves the way Texans make career and educational decisions by providing useful and reliable information about careers, educational training options, and jobs. LMCI's products range from TexasRealityCheck.com, a website that allows students to make lifestyle choices, create a budget, and view the occupations and preferred education levels that support those choices, to a variety of specialized economic development and regional planning tools.

Regulatory Integrity Division

The Regulatory Integrity Division supports TWC operations in its administration and enforcement of all regulatory statutes within its jurisdiction, including assisting other divisions in resolving regulatory issues; recommend legal actions, as necessary; enforcing provisions of the Texas Labor Code, Texas Education Code, and other applicable statutes through the appropriate statutory remedies; preventing, detecting, and eliminating program fraud, waste, and abuse; and assisting all TWC employees with ethics questions. A division priority is the prevention, detection, and elimination of fraud and abuse in the UI program.

Information Technology Division

The Information Technology Division is responsible for applications and information systems that support TWC's critical business operations. Staff works closely with TWC business areas and other stakeholders to create and maintain automated applications that best serve evolving business needs. The division also supports the infrastructure, either directly or through contract, required for TWC systems, including data center operations, networks, personal computers, email, desktop software tools, database administration, scanner operation, telephony, help desk services, system access/provisioning, and print/mail services. IT is also responsible for IT project management, information security, IT accessibility compliance, and the planning, maintenance, and testing of an ongoing disaster recovery program.

Unemployment Insurance and Regulation Division

The Unemployment Insurance and Regulation Division includes UI support services, call center operations, and appellate services. The TWC Tax Department and Unemployment Benefits Services are managed by this division. The division assists employers and claimants with eligibility requirements, benefit extensions and deadlines, and appeal procedures. Unemployment Benefits Services, funded through employer taxes, provides temporary income to workers who have lost their jobs through no fault of their own. TWC collects unemployment taxes from liable employers and pays unemployment benefits to qualified claimants. TWC has a formal appeal procedure to address claim issues and employers' tax liability, contribution, or reimbursement disputes.

Workforce Development Division

The Workforce Development Division provides oversight, coordination, guidance, planning, technical assistance, and implementation of employment and training activities, with a focus on meeting the needs of employers throughout Texas. The division currently administers programs such as WIOA Adult, Dislocated Worker, and Youth; Adult Education and Literacy; Wagner-Peyser Employment Service; Choices (Temporary Assistance for Needy Families (TANF) Employment and Training; Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T); Apprenticeship; Skills Development Fund; Texas Veterans Leadership Program; and Career Schools and Colleges.

Civil Rights Division

The Civil Rights Division (CRD) enforces the state's Equal Employment Opportunity (EEO) and Fair Housing laws through education, conciliation, mediation, and investigation. The division investigates complaints of employment and housing discrimination; conducts personnel policy reviews and EEO compliance monitoring for state agencies and institutions of higher education; and provides training and technical assistance to public and private entities to reduce employment and housing discrimination throughout the state. The CRD enters into Annual Work-sharing Agreements with the US Equal Employment Opportunity Commission (EEOC) and the US Department of Housing and Urban Development (HUD), its federal partners, that review CRD's cases to ensure compliance with applicable federal EEO and Fair Housing statutes.

CRD was formerly the Texas Commission on Human Rights (TCHR), and was governed by its own set of commissioners, who established policies for the division and supervised the director in administering the division's activities. TCHR served as the state's established authority on EEO and Fair Housing, also known as a fair employment practice agency and Fair Housing initiative program. The 2015 Texas Legislature streamlined oversight of the division by eliminating its separate seven-member board and placing it under TWC. Currently, the division answers to TWC's Executive Director and its three Commissioners.

Business Operations Division

The Business Operations Division comprises Procurement and Contract Services, Infrastructure Services, Human Resources, Training and Development, Risk and Security Management, and Document Services. Business Operations provides day-to-day leadership, management, and vision by planning, directing, and coordinating administrative functions and operations to support the business needs of TWC.

Vocational Rehabilitation Division

The Vocational Rehabilitation (VR) Division of TWC provides services to individuals with disabilities to assist them with obtaining, maintaining, or advancing in employment. The VR program serves adults, youth, and students with disabilities. Services may include evaluations, counseling and guidance, training and education assistance, assistive technology, and employment services, as well as referrals to the Business Enterprises of Texas Program and Criss Cole Rehabilitation Center. Students with disabilities may receive pre-employment transition services that will assist them with the transition to postsecondary education or employment.

In addition, the VR program assists businesses seeking to recruit, hire, and accommodate employees with disabilities. Services include assistance accommodating employees with disabilities, disability awareness training, recruitment and job-matching assistance, and coordination of employer job fairs.

Finance Division

The Finance Division provides financial services that promote highly effective financial management controls, helps agency management achieve the efficient use of financial resources and ensures accurate financial information is available in a timely manner. Functions include:

- Budget management
- Revenue and trust management
- Encumbrances

- Financial reporting
- Financial systems support
- Financial technical assistance
- General ledger accounting
- Payables
- Payroll
- Reconciliation
- Travel

Office of Internal Audit

The Office of Internal Audit (OIA) aims to enhance and protect organizational value by providing risk-based and objective assurance, advice, and insight to the Commission and agency management. The office assists TWC in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes. TWC's Internal Audit function is mandated by the Internal Auditing Act, Texas Government Code, Chapter 2102.

Office of General Counsel

The Office of General Counsel (OGC) provides the Commission and agency staff with the highest quality of customer service and sound legal counsel to minimize legal risk and costs, reduce litigation exposure, and ensure legal compliance, and to do so efficiently, expeditiously, reliably, and professionally.

The office supports the Commission and agency staff by providing legal services to foster sound decision-making in all areas of operation. These services include advice and client support for legal issues relating to litigation, contracts, policymaking, governance, programs, performance, administrative functions, and services provided by or through the Commission, the Boards and contractors, as well as agency operations. The Open Records Section coordinates compliance with the Public Information Act and requests for access to TWC information under subpoenas and governmental requests for information.

Office of Employer Initiatives

The Office of Employer Initiatives is responsible for providing leadership and direction within the Texas workforce system to engage employers, business organizations, educational institutions, and economic developers in the ongoing development of a customer-focused, market-driven workforce system. The office develops cluster-based strategies and industry partnerships and implements innovative industry-led programs for business recruitment, retention, and growth. This office receives no funding under WIOA.

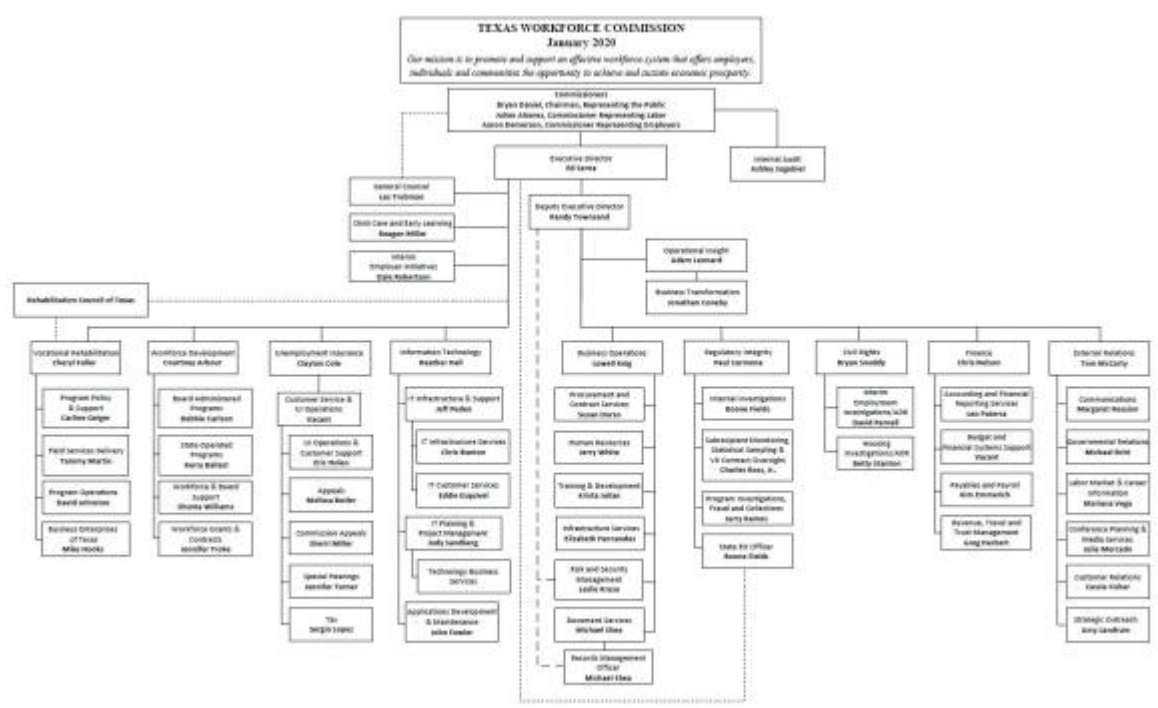
Division of Operational Insight

The Division of Operational Insight (DOI) is responsible for evaluating operational, programmatic, and outcome data to generate operational insights that TWC and its partners can use to improve quality throughput and efficiency to better meet the needs of employers and workers in Texas. The office aims to deliver timely, relevant, consistent, and actionable

information to allow early and informed decision-making and to help transform TWC into an evidenced-based learning organization.

Child Care and Early Learning

The Child Care and Early Learning Division oversees the subsidized child care services program for eligible, low-income families, which promotes long-term self-sufficiency by enabling parents to work or attend workforce training or education activities. It also educates parents about the availability of quality child care, which enhances children's early learning. In addition to assisting families, it also helps child care providers improve the quality of services for all children in Texas by providing resources and assistance.



TWC Organizational Chart January 2020

B. STATE BOARD

Provide a description of the State Board, including—

Membership

TWIC is composed of 19 members. The governor appoints 14 members representing business, organized labor, education, and CBOs. The remaining members are ex officio representatives from TWIC's five-member state agencies. Appointed members serve six-year staggered terms, of which one-third of the members' terms expire each odd-numbered year. Ex officio members serve as long as they are the presiding officer of the member agency they represent. Texas Government Code, §2308.052 specifies that TWIC's membership composition must have:

- five governor-appointed members who represent business and industry, including business members serving on Boards;

- five governor-appointed members who represent organized labor, with input from recognized labor organizations;
- three governor-appointed members who represent education, including local public education, public postsecondary education, and vocational education;
- one governor-appointed member who represents CBOs, and who is not a provider of services; and
- five ex officio members who represent statutory agency members, as follows:
    - Director of the Economic Development and Tourism Division in the Office of the Governor
    - Commissioner of the Texas Education Agency
    - Executive Commissioner of the Texas Health and Human Services Commission
    - Commissioner of the Texas Higher Education Coordinating Board
    - Executive Director of the Texas Workforce Commission

I. MEMBERSHIP ROSTER

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

Current TWIC members, by member category, include:

Business and Industry

- Mark Dunn, Chair (Lufkin)
- Thomas Halbouty (Southlake)
- Gina Aguirre Adams (Jones Creek)
- Wayne Oswald (Houston)
- Jerry Romero (El Paso)

Organized Labor

- Jesse Gatewood (Corpus Christi)
- Lindsey Geeslin (Waco)
- John Martin (San Antonio)
- Paul Puente (Houston)
- Brandon Willis (Beaumont)

Education

- Michael Hinojosa (Dallas)
- Richard Rhodes (Austin)

Community-Based Organization

- Richard Rhodes (Austin)

State Agency Ex-Officio

- Adriana Cruz (Economic Development and Tourism, Office of the Governor)
- Harrison Keller (Texas Higher Education Coordinating Board)
- Ed Serna (Texas Workforce Commission)
- Courtney Phillips (Texas Health and Human Services Commission)
- Mike Morath (Texas Education Agency)

A current membership roster is available on TWIC's website at:
https://gov.texas.gov/organization/twic/members

II. BOARD ACTIVITIES

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

Strategic Planning

Section 2308.104 of the Texas Government Code mandates TWIC to develop a "single strategic plan that establishes the framework for budgeting and operation of the workforce development system." The plan must include goals, objectives, and performance measures for the workforce system that involve programs of all state agencies that administer workforce programs. As such, the plan acts out the mission and vision for the Texas workforce system.

State statute also directs TWIC to "develop and implement immediate and long-range strategies to address problems identified within the workforce system."

The system strategic plan is intended to guide system partners in implementing workforce programs, services, and initiatives while avoiding the duplication of partner agencies' strategic plans. The system plan is strategic in that it is designed to focus on the outcomes that will make the most significant progress in achieving the mission and vision of the system. The strategic plan is supported by research conducted by TWIC and an annual evaluation of how well the plan and programs are working. These activities—strategic planning and implementation, system and performance evaluation, and research to support system and program improvement—constitute most of the work that TWIC does.

During the planning and development process, three strategic imperatives emerged as the key foundational elements that represent a best-in-class workforce system. These three imperatives serve as cornerstones upon which the capacity of the Texas workforce system is built on to identify and respond to changing market conditions and needs of workforce system customers. These imperatives are core competencies that must be embedded in all system elements to achieve the plan's mission and vision. Therefore, a key tenet of this plan is that all workforce system partners have core competencies in and a commitment to customer service and satisfaction, data-driven program improvement, and continuous improvement and innovation, as discussed below.

Customer Service and Satisfaction

Accurately assessing customer satisfaction with the workforce system and transforming customer feedback into productive policies are essential to best meet the needs of workforce system customers. While the system strategic plan focuses on a demand-driven system and emphasizes the needs of employers, customer service and satisfaction must be factored into system-level planning. Employers, current and future workers, and system program and service providers are key customers of the Texas workforce system.

To be truly effective, the Texas workforce system must identify and anticipate employers' needs to require employee skills that will fit the dynamic, global economic framework in which Texas employers operate. Ensuring a work-ready and competent workforce that meets the needs of Texas' employers is a core competency of the Texas workforce system.

The Texas workforce system must be able to meet the needs of both current and future Texas workers—wherever they are in their careers. Customers must be assured that wherever they enter the workforce system, there will be a pathway *through* the system by instituting a "no closed door" culture that ensures success for customers of the Texas workforce system programs and services. All points of entry provide access to all the programs and services.

The Texas workforce system must promote and enable successful collaboration across system partners for the overarching mission of improving outcomes for Texas employers and the current and future workforce. It is the responsibility of all system partners to serve Texans collaboratively, and facilitating this collaboration is an integral part of this plan.

Data-Driven Program Improvement

Data from programs and other areas of the workforce system are critical in evaluating the extent to which workforce system programs, services, and products are meeting the needs of customers and stakeholders. The collection of key data, as well as the reporting and analysis of that data—in a consistent and useful manner—are essential in demonstrating outcomes, determining whether changes are required or desired, and establishing benchmarks for future performance. To achieve these data-related organizational competencies relative to the performance measures in this plan, partner agencies may need to build or modify their existing data systems. By receiving information from updated data systems, the Texas workforce system will be able to measure what matters most and build the collection and analysis capabilities that are missing.

Information and statistical data serve a vital communication purpose, not only within the Texas workforce system but also for key stakeholders and others that participate in this process. Systems that improve the flow of data, information, and analysis that support effective decision-making are essential to achieve effective and efficient programs, services, and outcomes. Although this is a challenging task, it is essential to the performance of the Texas workforce system.

Continuous Improvement and Innovation

The Texas workforce system engages with a dynamic, competitive, and global marketplace. To achieve the mission and vision for the workforce system that is articulated in this plan, a commitment to continuous improvement and innovation is essential to ensure an adaptive and best practice–oriented workforce system. Actions that are essential to continuous improvement and innovation include the following:

- Research and assess best-in-class practices throughout industry and workforce systems nationally and internationally

- Incorporate promising practices from outside the Texas workforce system
- Analyze program and system performance and move quickly to correct the course, when appropriate, as indicated by empirical data and information
- Streamline data, information, communications, and decision-making capabilities to ensure that improvement and innovation become embedded into all system elements by ensuring that core competencies are developed and nurtured throughout the system

Crucial to the strategic planning process and to align with federal and state statute, the Texas workforce system strategic plan builds upon the system's core elements and contains system goals that TWIC and its planning partners use to create actionable objectives to meet the mission and vision of the system. Four goals and their system objectives and partner strategies have been identified through the processes discussed above.

Table 1 Texas Workforce System Goals and System Objectives

Goal	System Objective
Focus on employers	Increase business and industry involvement and expand licensure and industry certification.
Engage in partnerships	Expand partnerships with system partners and stakeholders to promote collaboration and enhanced participant outcomes.
Align system elements	Improve and enhance services, programs, and policies to facilitate effective and efficient transitions. Develop and implement policies and processes to ensure portable and transferrable credit and credentials.
Improve and integrate programs	Use enhanced or alternative program and service delivery methods.

The Texas workforce system strategic plan calls attention to issues and opportunities that have cross-partner implications and holds significant strategic value to the overall success of the system's ability to meet its mission and vision. During the plan's development, planners included ways for system partners, stakeholders, and TWIC to identify and assess high-priority, high-impact issues to improve outcomes for the workforce system and its customers.

TWIC and other stakeholders identified the following issues that cross the programs or services administered by multiple agencies (cross-partner issues) to be considered as part of the strategic planning process. The 12 cross-partner issues and opportunities were derived from the 39 planning issues and opportunities previously identified by TWIC and its system partners during preplanning listening sessions and consultations:

- Facilitate effective and efficient transitions and enhance transition services
- Increase employment outcomes
- Expand partnerships with system stakeholders and promote collaboration
- Incorporate and/or expand options for dual credit and/or licensure and certification
- Increase business and industry involvement
- Align programs and services

- Share the most recent data and information
- Implement beneficial practices and reduce duplication
- Recruit and/or provide professional development
- Ensure portable and transferrable options
- Address skills shortages
- Institutionalize alternative service delivery methods

Evaluation

Each year TWIC reports on the progress in achieving the objectives of the strategic plan and on the performance of workforce programs related to key metrics. The Texas Government Code specifies that TWIC will prepare an annual report for submission to the governor and the legislature on the extent to which the system is achieving workforce goals and objectives. The report also evaluates partner-agency alignment under the strategic plan for the Texas workforce system. Approved by the governor in 2015, the Texas workforce system strategic plan focuses on high-level system objectives that require multi-partner collaboration for programs, initiatives, and outcomes. Reporting elements are designed to provide a system-wide view of achievements for partner agencies and other system stakeholders, and to meet statutory requirements for reporting to the governor and legislature.

As part of the evaluation framework for the FY'16-'23 strategic plan, five balanced scorecards were developed to complement the strategic plan's structure. The scorecards incorporate narrative and graphics to illustrate the achievements of the Texas workforce system. The components of the balanced scorecards display the actions of partner agencies and their delivery agents, including Boards, independent school districts, community and technical colleges, and local adult education providers. These system partners are responsible for programs and services focused on education, workforce education, and workforce training services. Four of the five scorecards focus on the four goals laid out in the strategic plan and partner agencies' implementation of strategies to achieve the following related metrics: focus on employers; engage in partnerships; align system elements; and improve and integrate programs. The fifth scorecard focuses on the following system performance metrics (formal measures): educational achievement, entered employment, retained employment, and customers served. Data from the eight partner agencies are collected and aggregated to determine system performance for a short period as well as for longer periods. Aggregating data from an extended period is possible because TWIC has worked with its system partners since 2004 to standardize definitions and methods across all workforce programs.

To achieve a high degree of consistency when aggregating data across programs, TWIC requested that federal definitions be adopted for the formal measures where relevant and that program periods similar to federal periods be used. After renegotiation in 2009, definitions and program periods continued to differ slightly from those used during the previous strategic plan period.

TWIC worked with partner agencies to review and update the formal measure definitions and methods and to further align them with WIOA requirements. Both entered employment and employment retention are essentially consistent across partner agencies and, where required, the program periods for reporting were adjusted based on federal guidance.

Research

TWIC supports system planning, implementation of the system strategic plan, and evaluation through research products and news updates that are distributed to members, system partners, and workforce stakeholders. Available on TWIC's website, research products include the strategic plan for the workforce system, evaluation reports, resource publications, reports on critical and emerging issues, and recommendations to the governor.

Examples of recent research include the publications listed below.

Industry-Based Certifications for Middle-Skill STEM Occupations in Texas

This report presents the results of TWIC's system initiative to identify third-party, industry-based certifications that are of value to Texas employers and that can positively affect employment outcomes in middle-skill STEM occupations. The list of certifications contained in this report can be used as a resource to help workforce system partners achieve objectives related to increasing certification outcomes for education and training participants.

Vocational Rehabilitation Services: A Texas Primer

This report provides information about the VR program in Texas, focusing on VR services authorized under WIOA. The report presents information about the VR program structure in Texas, funding, program delivery, relevant legislation, and program participants.

Work-Based Learning in Career and Technical Education Programs in Texas

This report provides a foundation for understanding work-based learning in secondary and postsecondary education in Texas. Programs from the secondary and postsecondary sectors are profiled and presented as best practices to illustrate potential options for and benefits of work-based learning. Lessons learned from these practices may provide valuable information, not only for educational institutions, but also for other workforce system programs.

Understanding the Need for Adult Education in Texas

This report is an update to *Identifying the Current and Future Population in Need of Adult Education* published in March 2010. Between April 2018 and September 2018, TWIC worked with the Office of the State Demographer to conduct analyses of the current population in need of adult education services, a detailed estimate of the future need for services based on growth projections for the Texas population, and the geographic dispersion of need in Texas by workforce areas.

People with Disabilities: A Texas Profile

This report details the demographic characteristics of the population of individuals with disabilities in Texas. Detailed demographic analyses may be used in program planning and improvement efforts by Boards, state agencies, community and technical colleges, policy analysts, and other workforce system stakeholders.

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

A. ASSESSMENT OF CORE PROGRAMS

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

TWC has a strong commitment to the use of performance data to evaluate programs and partners. TWC was an early implementer of the Common Measures and in 2005 extended them beyond Wagner-Peyser and WIA to cover other federal and even state-funded workforce system programs. TWC realized that using the same measures and definitions across programs helped improve program evaluations and removed potential barriers to integration of services by creating common definitions of success.

TWC actively monitors the system through monthly, and in some cases, weekly performance reports. Program staff reviews these reports and communicates with system partners as appropriate to provide technical assistance and obtain information on best practices to share with other partners. TWC's Commissioners hold open, posted, performance and financial briefings on a quarterly basis. TWC has continued these effective practices under WIOA.

One of the key ways that TWC evaluates programs and partners is by comparing performance to targets. TWC has adopted a system by which performance is compared against performance targets to establish a "Percent of Target" for each measure, and depending on where the Percent of Target falls within a given range, performance is rated as "Meeting" the target (MP) or as being either "Positive Performance" (+P) or "Negative Performance" (-P), as follows:

	Where "High is Good" (e.g., Number Served, % Reemployed within 10 Weeks etc.)	Where "Low is Good" (e.g., Avg Cost, Weeks to Reemploy, etc.)
Positive Performance (+P)	more than 105% of Target	less than 95% of Target
Meeting Performance (MP)	95-105% of Target	95-105% of Target
Negative Performance (-P)	less than 95% of Target	more than 105% of Target

For WIOA measures, however, we have modified this system to align more closely with federal standards:

	WIOA Statutory Measures
Positive Performance (+P)	more than 110% of Target
Meeting Performance (MP)	90-110% of Target
Negative Performance (-P)	less than 90% of Target

This makes target-setting a key part of the evaluation and accountability system. TWC's DOI uses a variety of different models to help set performance targets based upon assumed case mixes and economic conditions. These methods continuously evolve based on input from partners through the negotiation process and additional research. There is no question that this dialog between TWC and its partners represents an important component of continuous improvement.

WIOA, like WIA before it, requires working towards continuous improvement. However, continuous improvement does not simply mean that the system needs to do better on all things every year. Continuous improvement is not as simple as always setting targets a little bit higher than the prior year's results. The system is better served by setting targets in the areas of great

strength at a "maintenance" level to concentrate on improving in areas of lesser strength. In an environment of fewer resources or greater demand for similar resources, simply maintaining performance can represent improvement—improvement in efficiency.

The fact that we operate in a dynamic system makes the development of effective statistical models to guide target setting so important. WIOA provides that the Secretaries of Labor and Education will develop a set of statistical models to help set performance targets for the WIOA measures. As presented at DOL's Spring 2019 WIOA Performance Meetings in Chicago and Dallas, TWC has embraced use of the federal Statistical Models and modified them to help ensure accountability among local workforce Boards and hope to do something similar when the Department of Education releases their Statistical Models – using them to help evaluate performance achieved by grantees and our VR regions.

The statute provides a set of performance measures to evaluate the six core programs and system partners, The workforce system in 2019 is very different than it was when the WIOA measures were initially developed. WIOA places great emphasis on the importance of the career pathways that a person might follow over a period of many years, while the performance measures and the joint performance reporting constructs are based on the notion of a person losing employment and coming to the one-stop system for a relatively short, finite period, after which they find a job and leave so that his or her outcomes can be measured. The statutory measures do not recognize that post-exit enrollment in education is sometimes an appropriate outcome for non-Youth such as those who are transitioning out of the military and using their GI Bill benefits to attend school. Additionally, the statutory measures do not address the question of whether exiters are able to retain employment even though that is a key concern for TWC customers.

Therefore, while TWC applies the statutorily prescribed performance measures to assess performance across the six core programs, TWC also applies state-prescribed performance measures and—with input from local Boards, grantees, and other partners—will continually develop and test other measures that may provide a more meaningful way of communicating strengths and identifying areas of improvement. For example, TWC developed a set of WIOA-based measures that that focus on either employment or enrollment in education post-exit, regardless of the program, and a retention-like measure that focuses on those employed or enrolled in quarter 2 post-exit, and to see whether they remain employed or enrolled in quarters 3 and 4, post-exit. TWC also plans to return to working on a set of performance measures that focus more on the employment connection made between a worker and employer.

While TWC's current reports provide some historic trend data to identify improvements over time, they are limited. As part of the Business Insight Generator (BIG) system, TWC will be developing new ways to view, interact with, and evaluate data to identify the quality, effectiveness, and improvement in programs operated by the state, our Boards, and other grantees. One of the ways we'll do this is by coding the federal Statistical Adjustment Models into the BIG to allow users to not only see absolute levels of performance over time but whether those levels were "reasonable" given the models' prediction of the levels of performance that should have been achieved for each cohort, based on the characteristics of those served and the local economic conditions during which they were served.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

TWC's experience with integrated Common Measures has demonstrated its value in promoting one-stop partner responsibility for the success of its services while boosting participant accessibility and transparency within the Texas Workforce System. Therefore, TWC applies the same measures and methodologies to other one-stop partner-programs that it does the core programs, in addition to any program-specific measures that are required by either federal or state regulations or identified by TWC as appropriate for a given program. For example, the U.S. Department of Health and Human Services' regulations (45 C.F.R §264.30, *et seq.*) allow recipients of assistance to engage in a variety of activities that count toward the TANF Work Participation measure. TWC, as permitted, established an alternate measure that focused on recipients meeting work participation requirements exclusively through paid employment (other than for in-school teens working toward a diploma).

Regardless of whether a program is a core program or a partner program, or whether a measure is required by WIOA or state law or was created in partnership with Boards or other grantees, TWC applies performance measures and performs evaluations at the customer-level first and then aggregate results by program or population or partner. As discussed further in the Program Data section of this plan, TWC needs to be able to freely apply data from all sources to customer records to ensure that program results are not artificially boosted or limited because one program has access to critical data that others do not. This is particularly important in those instances where a customer is enrolled in both a core and non-core (perhaps state-funded) program; that customer's results should be reflected the same way at both the system-level and in the results for each program that helped the customer achieve those results.

We have previously described how we develop and apply performance measures as well as set targets and evaluate performance levels achieved to ensure the Texas Workforce System is meeting the needs of employers, job seekers, and communities in Texas. Those efforts are informed by continuous evaluation of system data and engagement with our Boards, grantees, and stakeholders to account for their goals.

C. PREVIOUS ASSESSMENT RESULTS

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

TWC met or exceeded its Program Year 2018 (PY 2018) performance targets negotiated with DOL for WIOA Title I and Title III Wagner-Peyser programs with one exception. This suggests that TWC's strong working relationship with Boards continues to promote a high-quality system. The missed performance target, WIOA Dislocated Worker Employed Q2 Post-Exit, TWC achieved 72.1 percent vs a target of 81.1 percent (88.9 percent of target). In evaluating the reason for not meeting this performance target, TWC determined that the cause was likely related to the Gulf Coast Workforce Board significantly increasing enrollment in the Dislocated Worker Program Hurricane Harvey rather than through a National Dislocated Worker Grant and those served being largely dissimilar to the typical WIOA Dislocated Worker Participant.

TWC's performance outcomes in Title II were not as strong as TWC had hoped. For PY 2018, the Office of Career, Technical, and Adult Education (OCTAE) implemented only the Measurable Skill Gains performance measure, and TWC did not achieve 90 percent of the negotiated target. Even if we adjust the negotiated target to account for differences in the case mix (i.e., the proportion of the students in each ABE and ESL level), TWC's performance is still well below the 90 percent of target threshold. In analyzing the data more closely, TWC determined that performance levels for those who remained engaged in the program was high. Over 80 percent of PY 2018 students who received a post-test, showed a gain.

Poor performance appears to have been due to lower performance in the ABE program than the ESL program. ABE performance came in at an average of 80.16 percent of target while ESL performance was an average of 98.88 percent of target. This is not surprising given that TABE 11/12 was fully introduced in PY 2018. TABE 11/12 has proven to be more challenging in a variety of areas. The test is considerably more difficult to administer given it often takes over 6 hours to complete. This creates logistical challenges for grantees and students, and it can be hard to motivate students to sit through such an arduous test (or to take the test over two or three evenings) which doesn't result in a credential or other tangible benefit. Due to the challenges of administering the TABE 11/12 test, TWC approved the CASAS test battery for both AEL providers and Local Workforce Development Boards. Implementation began July 1, 2019. TWC has been providing substantial local training and technical assistance and hopes the test will support increased MSG gains in exchange for administrative efficiency and shorter testing times. If anything, the new TABE serves as a motivator to want to focus on HSE testing. While only appropriate for students who have been studying at the higher levels of literacy/numeracy, the HSE test has the benefit of paying off with a recognized credential (when achieved).

While OCTAE has not yet implemented exit-based outcome measures, Texas still had state accountability measures to meet for last year and met the measures related to employment and credential achievement. One area of achievement particularly gratifying is that AEL exiters retain employment at levels almost identical to those achieved in TWC's other workforce programs.

The US Department of Education's Rehabilitation Services Administration (RSA) placed all WIOA measures in "baseline status" for PY'16 through PY'19. TWC again applied a set of WIOA-based outcome measures for the VR program in Texas and met the targets set by the Legislature and Governor. In addition, TWC continues to use the "Successful Closure Rate" as a valuable leading indicator which provides an early view of how Employment in Q2 Post-Exit is likely going to look when the data matures.

D. EVALUATION

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

TWC's Division of Operational Insight (DOI) was created to improve and leverage that data to advance the overall efficiency and effectiveness of the system. DOI has primary responsibility for conducting and coordinating evaluations of the Texas workforce system.

Although TWC uses a variety of statistical techniques to conduct evaluations, it uses primarily quasi-experimental evaluation techniques rather than random assignment trials. While less

academic in approach than random assignment trials, quasi-experimental evaluation balances evaluation rigor with the ability to implement process changes or new initiatives quickly.

Additionally, TWC uses a blend of Six Sigma, Lean, and Theory of Constraints to develop "Rapid Process Improvement" (RPI) to evaluate system processes, identify opportunities for improvement, and test the results of implemented changes. RPI is part of the core of TWC's approach for continuous improvement.

TWC works with local Boards, other partners, and academic researchers on system evaluations and has participated in numerous federal studies such as the Workforce Investment Act Gold Standard Study. TWC will look for opportunities to cooperate with the Secretaries of Labor and Education on studies that complement and enhance the research priorities of TWC and its Boards and partners. In addition, TWC believes that the webinars and regional calls that DOL and ED hold provide an excellent avenue for coordinating such work and sharing results between the states and the departments. TWC anticipates being particularly active within the Clearinghouse for Labor Evaluation and Research (CLEAR) community and sharing results and best practices with other community members.

Most recently, TWC applied and was accepted to participate in a new National Reporting System for Adult Education (NRS) Evaluation Learning Community. This 15-month project will bring together research and evaluation experts from many states to develop and conduct high-value evaluation projects for adult education and literacy (AEL). Because TWC has integrated all operational evaluation resources inside DOI, TWC will be able to leverage what it learns through the project to areas beyond AEL.

TWC's BIG data warehousing system will support advanced reporting, analytics, and high-quality evaluations that will meet moderate and high causal evidence as described on the CLEAR website. The system will streamline standard reporting to improve efficiency and will provide more resources for analysis and evaluation work. The system also will allow TWC to better connect data relating to participants, services, and outcomes across programs, which will facilitate monitoring at the highest level (systemwide) as well as the program level (WIOA Titles I-IV and beyond), the characteristic level (that is, subpopulations across all programs), or a combination thereof (individuals in a program who meet specific conditions). TWC's recently approved Workforce Data Quality Initiative grant application will accelerate system development and bring the system's capabilities online much sooner than would have been possible without the funding.

Over the past several years, many of TWC's analytic resources have been heavily focused on WIOA implementation activities, such as conducting an updated and developing Participant Individual Record Layout (PIRL) and RSA-911 logic and testing as well as supporting the implementation and rollout of TWC's new WorkInTexas.com labor exchange system. Over the next four to five years, TWC plans to replace or significantly modify nearly all enterprise-level information technology (IT) systems. These systems must provide high-quality data that can support the levels of evaluation that WIOA requires. TWC will expend significant effort on ensuring that its IT modernization pays off both in the short run by serving customers and in the long run by yielding information about which efforts work under which conditions.

Continuous improvement and "doing more with less" are constant refrains in government, and now, statistical technique, computing power, and high-quality data can deliver on these goals. TWC is already using machine learning and artificial intelligence to detect and prevent fraud in its systems and looks forward to applying these techniques to service delivery.

Once the BIG data system is fully implemented, TWC will apply market basket analysis to identify common customer groups much the way business marketing does when analyzing consumer purchasing patterns. However, our approach will reach farther than the identification of common customer groups—we intend to evaluate each group to determine whether service-based differences exist between high- and low-achieving customers in each group and then evaluate those services for effectiveness. Our assumption is that although most services have value, the value varies by individual and to the degree that services are provided in conjunction with other services or are provided through other means.

Through this approach, TWC hopes to implement a system that better uses data to determine appropriate service delivery strategies unique to each individual customer. This approach is not intended to remove local flexibility or to disregard staff experience, but rather to support staff by providing better evidence-based options, based on the more precise data obtained through market basket analysis, to help plan an approach likely to lead to customer success. This approach will also help bring new staff up to speed more quickly.

TWC's evidence-based data analysis and evaluation provide a more efficient way to serve employers. We are working to identify employers that might benefit from outreach and education regarding short-term unemployment insurance (UI) compensation as a way to help the employer retain its skilled labor force during a period of temporary financial difficulty.

TWC also has invested heavily in providing professional development to teachers in the AEL program. DOI will be working with TWC's AEL program staff to determine whether TWC can measure the effectiveness of professional development by looking at student engagement and outcomes before and after teachers participate in professional development.

TWC will conduct several evaluation projects for the VR program. The VR program operates several specialized programs that serve specific groups of customers. DOI is working with the VR Division to evaluate some of the specialized programs, including the following:

- Project Search - a program that uses a rotation of internships to improve competitive employment in an integrated setting for youth who have intellectual disabilities
- Project Hire - a program that helps individuals with severe developmental disabilities to complete postsecondary education
- Criss Cole Rehabilitation Center - a residential VR training facility that serves adults who are legally blind by helping them learn alternative techniques to prepare for, find, and retain employment and/or attend postsecondary education, and/or live independently in the community

TWC recognizes the value of collaborating with evaluators outside the agency and even outside the state's workforce system. The agency works with academic researchers, such as the Ray Marshall Center at the University of Texas and the Texas Policy Lab at Rice University, to evaluate the intersection between workforce preparation through education and labor market outcomes through Texas' Education Research Centers (ERCs), which combine and make available K-12, postsecondary education (at public colleges and the university), and workforce wage and employment data. The Texas Legislature established the ERCs through legislation, which required development of the ERC system, and the system to focus its research to assist Texas' elected officials, policymakers, and other stakeholders improve education in Texas.

Most recently, a Texas delegation, which included TWC staff, engaged with Results for America to identify and incorporate strategies for improving outcomes for job seekers and employers by

using evidence-based, results driven solutions. This initiative explored strategies for incorporating evidence-based approaches into how the state awards grant funds.

DOI is exploring ways to leverage the national WIOA regression models to help with program evaluation. The regression models can show the effect of numerous factors on program performance. TWC envisions building on the models to test the effect of various services.

Finally, DOI uses its analytic resources to help prevent waste, fraud, and abuse in the UI system by developing the predictive analytics models used by UI's benefit payment control and investigative staff. TWC is active within the national UI integrity sphere and supports other states' efforts to promote integrity in their systems by sharing best practices and contributing to the UI Integrity Center's Suspicious Actor Repository.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

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

A. FOR TITLE I PROGRAMS

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

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

TWC's three-member Commission adopted Fiscal Year 2020 WIOA Block Grant Allocations on April 30, 2019, pursuant to Texas Labor Code §§301.001, 302.002, and 302.065. These sections establish TWC to operate an integrated workforce development system in the state, in particular through the consolidation of job training, employment, and employment-support services (including subsidized child care), to achieve an efficient and effective delivery of services and to allocate funds to workforce areas for the purpose of meeting or exceeding statewide performance targets, as set forth in the General Appropriations Act and as consistent with federal and state program requirements.

Specifically, Texas Labor Code §302.062(a) prescribes that TWC shall provide funding to the workforce areas, in which Boards have been certified and local plans approved by the governor, through a block grant process.

The funds appropriated to TWC under House Bill (HB) 1, the General Appropriations Act, 86th Texas Legislature, Regular Session (2019), for the FY'20–'21 biennium, are included in the block grant allocations to all workforce areas throughout the state (including those allocations adopted for WIOA Title I and Title II programs). These block grant allocations, which consist of state and federal program funds for workforce training and employment and support services, are awarded in concert with the requirements of associated state and federal statutes, program regulations and rules, and TWC contract provisions and requirements.

Pertinent informational references to TWC rules provisions are made throughout the block grant allocations package, clarifying:

- how allocations were computed;
- what allocation factors were used;
- the sources of the allocation factor data;

- why these allocations are largely based on estimated federal amounts, and may need to be subsequently amended (because federal FY '20 appropriations have not yet been enacted); and
- various other details regarding relevant assumptions, explanations, and associated information.

The TWC executive director is ordered to administer these block grant allocations in the most efficient and economical manner and within all guidelines prescribed by HB 1, General Appropriations Act, 86th Legislature, Regular Session (2019), the Texas Labor Code, and TWC rules.

For Title I Programs

Within-state allocations of formula-funded WIOA Title I will be made pursuant to statutory provisions for Youth Activities under §128(b), and Adult Employment and Training Activities and Dislocated Worker Employment and Training Activities under §133(b) and pursuant to conforming to TWC General Administration rule §800.63. Youth Activities funds not reserved for statewide workforce investment activities (as authorized under WIOA §128(a)(1)) will be made available as Within-State Allocations for Youth Activities to workforce areas based on:

- One third of the funds allocated on the basis of the relative number of unemployed individuals in areas of substantial unemployment (as defined in WIOA §127(b)(2)(B) and §132(b)(1)(B)(v)(III)) residing within each workforce area, compared to the total number of unemployed individuals within all areas of substantial unemployment in the state[1];
- One third of the funds allocated on the basis of the relative excess number of unemployed individuals (as defined in WIOA §127(b)(2)(D) and §132(b)(1)(B)(v)(VI)) residing within each workforce area, compared to the total excess number of unemployed individuals within the state[2]; and
- One third of the funds allocated based on the relative number of disadvantaged youth (as defined in WIOA §127(b)(2)(C)) residing within each workforce area, compared to the total number of disadvantaged youth within the state.[3]

Within-State Allocations to workforce areas (as provided in WIOA §128(b)(2)(A)(ii), §133(b)(2)(A)(ii), and §133(b)(B)(iii)) shall meet minimum percentages for Youth Activities, Adult Employment and Training Activities, and Dislocated Worker Employment and Training Activities (for FY'06 or a subsequent year) that are no less than 90 percent of the average allocation percentage among the workforce areas in the state for the two preceding fiscal years.

In accordance with the requirements of Texas Labor Code §302.062(d), block grant-allocated funds for workforce training and employment services and associated support services shall be allocated by the Commission among the workforce areas in the state that are no less than 90 percent or more than 125 percent of the proportion during the two preceding fiscal years.

Of the amount allocated from the Within-State Allocation for a fiscal year, not more than 10 percent of the amount may be used by the Board involved for the administrative costs of carrying out local workforce investment activities (as provided in WIOA §128(b)(4) and §133(b)).

[1] Period and Source of the Data: the higher of the 12-month period ending June of the prior year or the prior calendar year, TWC LMCI Department

[2] Period and Source of the Data: 12-month period ending June of the prior year, TWC LMCI Department

[3] Period and Source of the Data: US DOLETA, Training and Employment Guidance Letter (TEGL) No. 21-12, March 26, 2013, Table 6

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

Adult Employment and Training Activities funds not reserved for statewide activities (as provided in WIOA §128(a)(1) and §133(a)(1)) will be made available as Within-State Allocations for Adult Employment and Training Activities to workforce areas based on:

- One third of the funds allocated on the basis of the relative number of unemployed individuals in areas of substantial unemployment (as defined in WIOA §127(b)(2)(B) and §132(b)(1)(B)(v)(III)) residing within each workforce area, compared to the total number of unemployed individuals within all such areas of substantial unemployment in the state;[1]
- One third of the funds allocated on the basis of the relative excess number of unemployed individuals (as defined in WIOA §127(b)(2)(D) and §132(b)(1)(B)(v)(VI)) residing within each workforce area, compared to the total excess number of unemployed individuals within the state[2]; and (Period and Source of the Data: the higher of 12-month period ending June of the prior fiscal year or the prior calendar year, TWC LMCI Department); and
- One third of the funds allocated on the basis of the relative number of disadvantaged adults (as defined in WIOA §132(b)(1)(B)(v)(IV)) residing within each workforce area, compared to the total number of disadvantaged adults within the state.[3]

Within-State Allocations to workforce areas (as provided in WIOA §128(b)(2)(A)(ii), §133(b)(2)(A)(ii), and §133(b)(B)(iii)) shall meet minimum percentages for Youth Activities, Adult Employment and Training Activities, and Dislocated Worker Employment and Training Activities (for FY'06 or a subsequent year) that are no less than 90 percent of the average allocation percentage among the workforce areas in the state for the two preceding fiscal years.

In accordance with the requirements of Texas Labor Code §302.062(d), block grant-allocated funds for workforce training and employment services and associated support services shall be allocated by the Commission among the workforce areas in the state that are no less than 90 percent or more than 125 percent of the proportion during the two preceding fiscal years.

Of the amount allocated from the Within-State Allocation for a fiscal year, not more than 10 percent of the amount may be used by the Board involved for the administrative costs of carrying out local workforce investment activities (as provided in WIOA §128(b)(4) and §133(b)).

[1] Period and Source of the Data: 12-month period ending June of the prior year, TWC LMCI Department

[2] Period and Source of the Data: the higher of 12-month period ending June of the prior fiscal year or the prior calendar year, TWC LMCI Department

[3] Period and Source of the Data: DOLETA, TEGL No. 21-12, March 26, 2013, Table 6

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

Dislocated Worker Employment and Training funds not reserved for statewide activities (as provided in WIOA §128(a)(1) and §133(a)(1)) or statewide rapid response activities (as described in WIOA §132 (b)(2)(B)) will be made available as Within-State Allocations for Dislocated Worker Employment and Training Activities to workforce areas on the basis of:

- 20.00 percent (Program Year 2015 (PY'15) factor weight) of the funds on the basis of the relative number of insured unemployed individuals (i.e., average monthly total number of unemployed individuals who are covered by state and federal unemployment insurance program) residing within each workforce area, compared to the total number of insured unemployed individuals within the state (Period and Source of the Data: prior calendar year, TWC's Claimant Characteristics Report);
- 19.67 percent (PY'15 factor weight) of the funds based on the relative average number of unemployed individuals residing within each workforce area, compared to the average number of unemployed individuals within the state (Period and Source of the Data: prior calendar year, Monthly Local Area Unemployment Statistics, LAUS Estimates Report, TWC LMCI Department);
- 10.33 percent (PY'15 factor weight) of the funds on the basis of the relative number of workers residing within each workforce area who are included on Texas plant closure and layoff notices issued under authority of the Worker Adjustment Retraining Notification Act (WARN), compared to the number of such workers within the state (Period and Source of the Data: prior calendar year, TWC Workforce Development Division);
- 20.00 percent (PY'15 factor weight) of the funds on the basis of the relative proportion of the state's declining industries (for the four calendar quarters ending the prior September, compared to the four quarters ending September of two years earlier), for any industry group reflecting statewide decline, for any workforce area, and also showing a decline in those respective industry groups (six-digit NAICS industry classification), aggregated by workforce area (Period and Source of the Data: period of data as described, TWC LMCI Department);
- 19.67 percent (PY'15 factor weight) of the funds on the basis of the relative proportion of individuals in Farmer-Rancher Economic Hardship (i.e., total population of farm and ranch employees who are not covered by UI) residing within the workforce area, compared to the total number of individuals within the state in Farmer-Rancher Economic Hardship (Period and Source of the Data: prior calendar year, Texas State Data Center); and
- 10.33 percent (PY'15 factor weight) of the funds on the basis of the relative proportion of individuals in Long-Term Unemployment (i.e., the average monthly number of individuals, residing within each workforce area who have been unemployed for 14 weeks or longer) residing within the workforce area, compared to the total number of

individuals within the state in Long-Term Unemployment (Period and Source of the Data: prior calendar year, TWC's Claimant Characteristics Report).

Within-State Allocations to workforce areas (as provided in WIOA §128(b)(2)(A)(ii), §133(b)(2)(A)(ii), and §133(b)(B)(iii)) shall meet minimum percentages for Youth Activities, Adult Employment and Training Activities, and Dislocated Worker Employment and Training Activities (for FY'16 or a subsequent year) that are no less than 90 percent of the average allocation percentage among the workforce areas in the state for the two preceding fiscal years.

In accordance with the requirements of Texas Labor Code §302.062(d), block grant-allocated funds for workforce training and employment services and associated support services shall be allocated by the Commission among the workforce areas in the state that are no less than 90 percent or more than 125 percent of the proportion during the two preceding fiscal years.

Of the amount allocated from the Within-State Allocation for a fiscal year, not more than 10 percent of the amount may be used by the Board involved for the administrative costs of carrying out local workforce investment activities (as provided in WIOA §128(b)(4) and §133(b)).

B. FOR TITLE II

I. DESCRIBE HOW THE ELIGIBLE AGENCY WILL AWARD MULTI-YEAR GRANTS OR CONTRACTS ON A COMPETITIVE BASIS TO ELIGIBLE PROVIDERS IN THE STATE, INCLUDING HOW ELIGIBLE AGENCIES WILL ESTABLISH THAT ELIGIBLE PROVIDERS ARE ORGANIZATIONS OF DEMONSTRATED EFFECTIVENESS

AEL under WIOA Title II §211 provides the basis and methodology for the awarding of state grants for AEL activities, in §243 the basis and methodology for the allotment of funds for integrated English literacy and civics education (IEL/CE), and in §225 for the use of funds for corrections. In accordance with this basis and methodology, and pursuant to TWC General Administration rule §800.68 as outlined below, AEL allocations are made available to each workforce area.

- ED allocates AEL State Grant funds based on their relative proportion of the nation's total number of individuals at least 18 years of age without a secondary school diploma and who are not enrolled in school. TWC allocates these funds (together with associated state general revenue matching funds) on the same basis to workforce areas across the state. TWC obtains from the Texas State Data Center the most recent data available for this allocation factor each year, as directed by the Texas Labor Code and TWC rules. Allocation factors for TWC block grants must be aggregated to the 28 workforce areas throughout the state, the most effective approach is to obtain allocation factor data values/estimates by county and then to aggregate to workforce areas.

- Pursuant to TWC rule §800.68(b) and (c), federal funds constituting the state award of the Adult Education and Family Literacy Act (AEFLA) grants (excluding amounts received for IEL/CE) and associated state general revenue matching funds shall be allocated to workforce areas based on the relative proportion of individuals residing within each workforce area who are at least 18 years of age, do not have a secondary school diploma or its recognized equivalent, and are not enrolled in secondary school, during the most recent period for which statistics are available.

- Federal funds encompassing the state award of AEFLA State Grants (excluding amounts received for IEL/CE) and associated state General Revenue matching funds for the

pertinent program year/fiscal year are allocated using statistics provided by the Texas State Data Center. The allocation factor data consists of the most recent estimates available by the US Bureau of the Census' American Community Survey (ACS) three-year Public Use Microdata Sample (PUMS), applied to Texas State Data Center county population estimates (aggregated to workforce area populations). This data set is consistent with that used by ED in determining AEFLA state grants.

- At least 82.5 percent of the federal funds encompassing the state award of AEFLA state grants (excluding amounts received for IEL/CE) and associated state General Revenue matching funds for the pertinent program year/fiscal year are allocated based on the relative proportion of individuals residing within each workforce area who are at least 18 years of age, do not have a secondary school diploma or its recognized equivalent, and are not enrolled in secondary school, during the most recent period for which statistics are available; an equal base amount; and the application of a hold-harmless procedure.
- Pursuant to TWC rule §800.68(d), AEFLA federal funds received for IEL/CE are allocated to workforce areas based on the same methodology and data factors provided in WIOA §243(b). The federal funds constituting the state allotment of amounts for EL/Civics for the pertinent program year/fiscal year are allocated based on:(A) the relative proportion of:(1) 65 percent of the average number of legal permanent residents during the most recent 10-year period, available from US Citizenship and Immigration Services data, and(2) 35 percent of the average number of legal permanent residents during the most recent three-year period, available from US Citizenship and Immigration Services data.(B) an equal base amount; and(C) application of a hold-harmless procedure.
- Pursuant to TWC rule §800.68(e), TANF federal funds associated with the AEL program will be allocated by the Commission to workforce areas according to a need-based formula. 100 percent of the TANF funds will be based on: (A) the relative proportion of the unduplicated number of TANF adult recipients residing within the workforce area with educational attainment of less than a secondary diploma during the most recently completed calendar year; (B) an equal base amount; and (C) the application of a hold-harmless procedure.

Title II Adult Education and Literacy Statewide Competition and Awards

In fall 2017, Texas conducted a statewide competition of services, under RFP 320-18-01, to fund contracts through June 30, 2020, with options for up to three one-year renewals. Thirty-six AEL grant recipients were awarded grants. The grant period is for two years (that is, 24 months) with an option for TWC to renew the grant for an additional one-year period, as many as three times. The start date for the original two-year period (24-month period) was July 1, 2018. If TWC determines at the end of the initial two-year term that the grantee is not performing or that the outcomes are not being achieved, TWC can allow the grant to expire. If the grantee is struggling, and TWC has an enhanced technical assistance plan in place to support the grantee, TWC can authorize the grant for another year to reassess at the end of that year whether to continue to fund the grant.

In its Request for Proposals (RFP), Texas incorporated and specifically indicated the considerations specified in WIOA §231(e) as grant award requirements required of eligible providers. These considerations were scored as narrative questions in the RFP, and offerors were required to provide narrative detail to demonstrate how they will meet each consideration.

In October 2019, Department of Education's Office of Career, Technical, and Adult Education (OCTAE) conducted a review of this statewide competition to ensure that processes for the award of Title II funds to eligible providers adhered to WIOA requirements. In its final report, OCTAE noted that the next statewide competition shall be held no later than Program Year 2023.

A competitive Request for Proposals (RFP) process will be used by TWC. All eligible providers follow the same competitive procedures. The RFP will provide instructions for preparation of proposals, a deadline for submitting a notice of intent to apply and a deadline for receipt of the proposals, review criteria, assurances, and other legal, fiscal, and program requirements; and plans for cooperative arrangements the eligible provider will develop with other agencies, institutions, or organizations for the delivery of AEL services.

Grantees will respond to questions in the proposal that include requirements as outlined in WIOA §232(1)-(7). The review of proposals will include rating responses to questions aligned to the 13 considerations in WIOA §231(e)(1)-(13).

Title II Adult Education and Literacy Determining Demonstrated Effectiveness

Through the AEL competition, eligible providers will be required to demonstrate past effectiveness by providing performance data on documented factors 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 application for funds. Prior TWC AEL grant recipients will be required to provide performance data required under section 116 of WIOA to demonstrate past effectiveness as evidenced by data from the Texas Educating Adults Management System (TEAMS) student data management system to demonstrate the extent to which they met state-negotiated performance measures for all state and federal performance measures.

Eligible providers that have not been previously funded under Title II of WIOA must provide performance data to demonstrate its past effectiveness in serving basic skills deficient-eligible individuals including those with low levels of literacy in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the application for funds and demonstrate the extent to which they objectively evaluate performance criteria in achieving outcomes listed under section 116 of WIOA.

Eligible providers must also provide information regarding outcomes for participants related to employment, attainment of a secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

Proposal review criteria for all proposals will include evaluation and scoring based on a standard of demonstrated effectiveness. TWC shall determine each applicant's eligibility to apply for AEFLA funds, based on whether it has demonstrated effectiveness in providing AEL services, as required under 34 CFR §463.24 and in guidance outlined in OCTAE's Technical Assistance Guide, "Determining Applicant Eligibility When Conducting a State Competition for Adult Education and Family Literacy Act Fund."

In the next statewide competition for AEFLA funds, TWC will ensure any applications reviewed are first screened for eligibility, including eligibility based on the provider's demonstrated effectiveness in serving eligible individuals and the outcomes of participants.

II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS TO ALL ELIGIBLE PROVIDERS TO APPLY AND COMPETE FOR FUNDS AND HOW THE ELIGIBLE

AGENCY WILL ENSURE THAT IT IS USING THE SAME GRANT OR CONTRACT ANNOUNCEMENT AND APPLICATION PROCEDURE FOR ALL ELIGIBLE PROVIDERS

Texas aligned AEL and workforce development systems in 2013. The alignment required statewide deployment of models to develop the skills needed to transition to and complete postsecondary education programs and obtain and advance in employment. Successful models have included IET, career pathways, distance learning, and college and workforce preparation activities. Texas also aligned service-delivery options for individuals with disabilities and other special needs. AEL statewide service-delivery contracts are compliant with WIOA requirements under performance, workforce system, and rehabilitative services alignment and programmatic integration.

In fall 2017, Texas conducted the second statewide competition of services to fund contracts from July 1, 2018, through June 30, 2020, with options for up to three one-year renewals. Thirty-six AEL grant recipients were awarded grants.

In its Request for Proposals (RFP), Texas incorporated and specifically indicated the considerations specified in WIOA §231(e) as grant award requirements of eligible providers. These considerations were scored as narrative questions in the RFP, and offerors were required to provide narrative detail to demonstrate how they will meet each consideration.

AEFLA §232 requires that eligible providers desiring a grant or contract submit an application containing required information and assurances, including a description of:

- how funds awarded will be spent; and
- any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of AEL services.

Contracts awarded to AEL grant recipients were limited to two years, with the option of three one-year renewals at the discretion of TWC's Commission, taking into account performance and other factors. Renewals for years three, four, and five are not automatic, and are based on meeting or exceeding performance and expenditure benchmarks, or other factors as determined by the Commission. At the completion of the five-year maximum contract term, TWC will conduct a new competitive statewide procurement. All contracts, including those that have been in effect for less than the maximum five-year contract term, must be competitively procured during subsequent statewide procurements.

Of the funding Texas receives to administer AEL services, 82.5 percent must be used to provide AEL services as stipulated in AEFLA §231. Of the 82.5 percent, up to 10 percent is allowed for corrections education and education for other institutionalized adults.

Federal AEL funds may be used for programs for out-of-school individuals who are at least 16 years of age and:

- function at less than a secondary school completion level;
- lack a secondary school credential; or
- are unable to speak, read, or write in English.

State AEL funds are for programs for out-of-school individuals who are beyond compulsory school-attendance age and:

- function at less than a secondary school completion level;

- lack a secondary school credential; or
- are unable to speak, read, or write in English.

Eligible providers for a grant or contract under TWC include, but are not limited to, the following:

- Local education agency;
- Community-based organization or faith-based organization;
- Volunteer literacy organization;
- Institution of higher education;
- Public or private nonprofit agency;
- Library;
- Public housing authority;
- Nonprofit institution that can provide literacy services to eligible individuals;
- Consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above; and
- A partnership between an employer and any of the entities described above.

TWC uses an RFP competitive process under which all proposals for funding are treated in the same manner in terms of review and evaluation during the RFP process including the same announcements, proposal materials, and review and award process for each RFP the state issues. TWC ensures all eligible providers have direct and equitable access to AEL funding opportunities. All offerors eligible under Section 231 of WIOA submit proposals directly to TWC. They are not required to apply through another agency or agencies in a multi-tiered process. Notice of availability of awards are distributed via email distribution lists of current providers, Literacy Texas, the state's nonprofit literacy council network, Texas community and technical college systems, Boards, as well as public posting on the AEL website, the Texas Electronic State Business Daily, and the Texas Comptroller's website, which houses announcements and details of all open procurement in Texas. The RFP processes are designed so that direct application to TWC is clear, customary, and nonnegotiable.

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.

TWC's VR Division serves as the Designated State Unit (DSU) for the VR program as required under § 721(a)(2)(B)(ii) of the Rehabilitation Act of 1973, as amended. (Title IV). As such, the VR Division is responsible for the distribution and expenditure of VR funds for the delivery of services to eligible students and adults with disabilities, and to potentially eligible students with disabilities.

Funds are distributed to local VR offices in each of the six TWC VR regions based on projected expenditures to serve customers in the region for the fiscal year. Projections are based on several factors, including expenditures and customers served in the prior year and anticipated for the subsequent year, as well as the implementation of statewide initiatives and new or revised service delivery strategies.

Services to VR customers may be provided, arranged or purchased by VR staff. Services must be necessary to assist the customer with achieving his or her employment goal and based upon the Individualized Plan for Employment developed jointly by the VR counselor and the customer.

Pursuant to 34 CFR §76.50(b), VR funds may not be sub-granted because neither the Rehabilitation Act nor its implementing program regulations specifically permit sub-granting under the VR program. As a result, community rehabilitation programs and other providers with whom TWC VR contracts for the provision of VR services are considered vendors or contractors not subgrantees.

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.

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

TWC operates a collection of different IT systems to capture participant information, services, and outcomes. Many of these systems were legacy systems that were transferred to TWC as programs were moved to the agency. However, these systems were all built on now outdated technology and were designed to support the predecessors to the WIOA core programs. Modifying those systems to meet WIOA's requirements has proven excessively challenging, therefore, TWC is preparing to procure replacement systems to support all WIOA core and partner programs that the agency is responsible for, except for Wagner-Peyser and JVSG, which are supported through TWC's recently replaced WorkInTexas.com system.

The Texas workforce system has been on the leading edge of performance measurement, evaluation, and accountability within the national workforce structure for nearly two decades. TWC implemented a set of systemwide performance measures that successfully improved employer engagement and effectiveness serving employers. TWC embraced the Common Measures and applied them to all state and federally funded employment and training programs using common Periods of Participation and integrated reporting. TWC also obtained a performance measure waiver that gave TWC flexibility in selecting performance measures to contract with Boards so that the system could break down program siloes and focus on integrated services. TWC participated in the redeveloped the Workforce Investment Streamlined Performance Reporting System (WISPR) for DOL to simplify the system and add additional functionality. Texas became the first state to file a WISPR. TWC mentored other states interested in integrated reporting with or without the WISPR.

TWC has undertaken a new enterprise data warehousing project to support data integration, reporting, and evaluation work. This project was recently given additional support in the form of a Workforce Development Quality Initiative grant. Customer data from TWC's case management systems, as well as other data such as UI wage records, will be extracted and combined to produce customer-centric, rather than program-centric, records to be used in reporting. The envisioned platform will allow integration of customer records across all six core programs as well as a variety of other partner programs to provide a holistic view of each customer, their services, and their outcomes. The system will also support longitudinal tracking past the post-exit performance accountability period to help us get evaluate longer term impacts of services.

The enterprise data warehouse project, called the "Business Insight Generator" (BIG), will support oversight, consumer education, and decision-making at all levels of the workforce system. This model will allow TWC to develop advanced statistical models that can help identify who most needs services and help prescribe the types of services that may be most effective for a given customer based on what we learn from having served similarly situated customers in the past.

In addition to reporting requirements under WIOA §116(d), TWC will be actively monitoring and evaluating the Texas workforce system under WIOA §116(e). Evaluation efforts will include applying both federal- and state-prescribed performance measures, in addition to continually developing and testing other measures. Consistent with WIOA §116(i), TWC will be using data obtained from other states to implement this part of TWC's Combined State Plan.

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

TWC was appropriated over $64 million during the FY '20-'21 biennium to replace legacy workforce systems.

UI Systems Replacement Project

TWC, through a competitive procurement process, is seeking to acquire a turnkey modifiable off-the-shelf (MOTS) technology solution to replace its existing UI legacy systems including benefits, tax, and appeals applications. The procurement will include services to implement the MOTS, make essential modifications required for Texas, migrate relevant data, and provide a shared maintain and operations solution after the MOTS is put into production. TWC has engaged a third-party vendor to perform independent verification and validation (IV&V) activities for the duration of the project.

The new system will support the entire UI program and its customers by:

- Focusing on re-employment first with the objective of getting Texans back to work quickly and efficiently;
- Enhancing self-service options;
- Automating manual, paper-based processes to increase workflow efficiencies & reduce operational costs;
- Providing integrated workflow for resource assignments and managing/monitoring of assigned work;

- Providing automated data population, cascading of data between input screens, and drop-down menus to improve productivity and reduce data entry errors;
- Facilitate electronic communication within TWC as well as among TWC, its customers and employers;
- Providing TWC staff with timely access to information necessary for performance measurement and quality management;
- Providing immediate access to data and customizable dashboards to support decision-making;
- Implementing a unified case management system with workflow that interfaces with UI data to store claims, determinations, claimant and employer data, and appeals information; and
- Providing a scalable platform with a flexible architecture to support process improvements and system integration requirements.

Workforce Case Management Replacement

TWC needs an integrated system, based on a common platform, to streamline case management activities for staff and Workforce Boards to provide case management processes. This project will replace The Workforce Information System of Texas (TWIST) excluding child care, Texas Educating Adults Management System (TEAMS), Texas Review, Oversight, and Coaching System (TxROCS), and ReHabWorks. It will provide TWC and partners with innovative technology and tools. TWC engaged a third-party vendor to perform IV&V activities for the duration of this project.

The new Workforce Case Management system will advance Commission goals by:

- Increasing staff access to systems services;
- Integrating and aligning TWC systems and services, and;
- Equipping TWC staff, Boards and their partners, and AEL providers with innovative technology and tools.

This adds value to our customers by:

- Delivering excellent customer service and customer experiences with TWC;
- Delivering excellent customer outcomes.

TWC anticipates this project will:

- Reduce TWC staff turnover;
- Reduce improper payments;
- Assure that TWC meets or exceeds the agency's EIR Accessibility requirements; and
- Streamline mission critical case management services and activities for staff and Workforce Boards, that will address complicated integration and/or lack of integration between TWC's multiple stand-along systems and platforms of varying ages.

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

In 2019, TWC implemented a new labor exchange system, is preparing to procure a next generation case management system to support WIOA core and partner programs and continues to work to refine the enterprise data warehouse. The project is being developed and managed as a Workforce Solutions project. TWC is actively working to upgrade legacy solution systems to provide state leadership with accurate data and a proven method for analyzing business needs to support and improve data driven decision-making.

The project requirements will include interfaces between systems to ensure data integration and to facilitate the coordination of services as well as communications across the programs.

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

As noted, TWC's new BIG data warehouse project is being developed to produce reports required under WIOA section 116(d)(2).

Enterprise Data Warehouse, Phase 2

This project continues work on the Enterprise Data Warehousing initiative. This phase of the project will work towards simplifying and organizing large amounts of data into a useful format for TWC staff, partners and customers, thus improving decision making using meaningful and timely data.

The enterprise data warehousing project advances Commission goals by:

- Allowing TWC to provide statistical information regarding outcomes and effectiveness of workforce services provided to job seekers and employers; and,
- Meeting the data utility mandates listed in the 2018-2022 State Strategic Plan for Information Resources Management including data management and governance, open data and data analytics.

This adds value to our customers by:

- Improving reporting accuracy and speed of report generation;
- Enabling more sophisticated and comprehensive data analysis;
- Increasing the scope and availability of relationally connected data that will enable reporting capabilities and outcome inferences that are not currently possible;
- Enable cross-functional dashboards that identify program relationships and impacts that cannot easily be identified or monitored with today's system;
- Creating a single historical reporting system-of-record;
- Reducing the risk of statutory non-compliance regarding required data reporting;
- Eliminating manual processes to run/store reports;
- Reducing data preparation time, allowing staff to focus on better coding and analysis.

Enterprise Data Warehouse, Phase 3

Building on the efforts of Phase 2, this project addresses the business need to evaluate, report on and provide statistical information on the outcomes and effectiveness of services provided to job seekers and employers. Phase 3 provides complex reporting and analysis of large and diverse data sets and includes importing new data sets and adding analytical functionality for internal and external consumption.

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.

TWC continues to work with local partners in developing performance reporting measures that provide information about how services impact customer outcomes. As TWC improves its suite of automated systems, partners gain the ability to capture a more complete set of customer data that supports categorical workforce programs and stores the associated data in a central repository.

TWC's vision for its next generation integrated performance reporting system involves incorporating customer data from all federal and state-funded employment and training programs coupled with a customer-focused data model that will support aggregating data into any combination of programs and characteristics. This will allow the system to meet program reporting requirements as well as permit other views of the data. Key to its effectiveness and ability to support transparency and accountability, the system will need to be able to report a customer's outcomes the same way for every program or aggregation of data, while ensuring the security and confidentiality of customer data. For example, if a customer who received services from WIOA Adult and SNAP E&T and was identified as employed in the second quarter after Exit through data obtained from another state, TWC will report that success in both WIOA Adult and SNAP E&T performance measures to ensure that stakeholders and elected officials have a complete and accurate view of each program's contribution to successful employment outcomes.

Evaluating participants' outcomes is important in helping to ensure accountability. Additionally, TWC evaluates current and historic data to understand what factors influence performance in order to be able to determine whether results achieved were reasonable, to predict what levels of performance is likely to be achieved in the future, and to identify what actions the system should take when serving specific customers to achieve effective outcomes. These efforts will support continuous improvement and set the foundation for developing means to measure the return on investment.

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.)

Wage records remain the best, most objective source of information for determining employment-related outcomes. Measures that use wage records are also far more efficient and less costly than those that depend on administrative data. For example, TWC can match to UI wage records to verify program-specific, customer-level data furnished by providers of training services. Additionally, TWC encourages the Secretary of Labor to consider—in consultation with

the Workforce Information Advisory Council, federal agencies, and states—developing standardized definitions for the data elements composing wage records as well as improved processes and systems for the collection and reporting of such records.

TWC currently makes extensive use of quarterly UI wage records as part of its common data systems both for required and ad hoc reporting and makes the data available to the Boards, other state agencies, and various researchers either directly or by performing matches to seed records provided by external entities.

While TWC and the local Boards generally operate Texas Workforce Solutions as an integrated system that focuses on customer outcomes rather than program outcomes, there is often interest in program-specific outcomes. TWC is committed to providing consistent, reliable, and comparable performance data to partners, stakeholders, and the public. Therefore, TWC calculates performance at the customer-level across programs and then aggregates the results by sublevel, such as by program or for customers with given characteristics.

However, WIOA §116(i)(2) provides that the Secretary of Labor shall provide access to wage data from other states to the extent that this data is necessary to carry out the state plan or the annual report prescribed by WIOA §116(d), and WIOA §116(e) requires the state in coordination with the Boards to conduct ongoing evaluations of activities carried out by the state. Therefore, as noted, TWC intends to use data obtained through the new State Wage Interchange System (SWIS) to evaluate system and program performance through a variety of federal and state-developed performance measures, as well as to evaluate system and program impact and return on investment.

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.

TWC administers and enforces many state and federal laws covering various workforce-related privacy issues. These laws are intended to set high standards for performance and customer satisfaction. TWC's compliance includes legislation that addresses §444 of the General Education Provisions Act: family educational and privacy rights, and other applicable federal laws.

TWC maintains an internal control structure and written policies that provide safeguards to protect personally identifiable information (PII) from an education record, and other information that is readily or easily exchanged in the open market or considered to be sensitive. Confidentiality is specifically maintained for student-identifying information received by TWC from career schools or colleges, or any other school, business entity, or educational institution that TWC reviews. Violating the confidentiality of this information is a Class-A misdemeanor offense.

TWC's compliance is facilitated by such resources as the Texas Educating Adults Management System (TEAMS), the data management system for federally-funded Adult Education and Literacy programs in Texas. TEAMS' access is limited to people who work for an adult education and literacy grant recipient or subrecipient and have satisfactorily completed Family Education Rights and Privacy Act (FERPA) training provided by TWC.

In addition, TWC electronically publishes its guidelines to protect the security and confidentiality of customers' PII to which Boards and other TWC grantees must adhere. These guidelines and other guidance include the following:

- TWC Information Security Standards and Guidelines
- TWC Privacy Manual for Safeguarding Sensitive Personally Identifiable Information
- Employment Service Guide
- WD Letter 02-18, issued March 23, 2018, and entitled "Handling and Protection of Personally Identifiable Information and Other Sensitive Information," and subsequent updates
- WD Letter 11-16, issued June 15, 2016, and entitled "Access and Data Security for Workplace Applications," and subsequent updates
- WD Letter 14-08, issued March 19, 2008, and entitled "Modifications to Unemployment Insurance Benefits System Access," and subsequent updates

7. PRIORITY OF SERVICE FOR VETERANS

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

Texas is home to 1.7 million veterans, the second largest veteran population in the nation. TWC is using the newest workforce development strategies and initiatives to expand services for veterans and spouses of veterans.

Priority of Service for Veterans

Texas Workforce Solutions has always provided priority of service for veterans and eligible spouses in all DOL-funded programs. Additionally, the Texas legislature mandated priority of service for veterans and eligible spouses in all state-funded workforce services.

TWC's Subrecipient Monitoring department maintains a risk assessment methodology for monitoring local Board activities, and priority of service for veterans and eligible spouses is included in the items that are applied to this methodology. Monitoring activities generally include on-site visits, interviews with staff, and regular reviews of local Board policies related specifically to priority of service for veterans and eligible spouses.

The Jobs for Veterans Act ensures the priority of service of covered veterans and eligible spouses for the receipt of employment, training, and placement services provided under WIOA. A veteran must still meet each program's eligibility criteria to receive services under the respective employment and training program.

Texas Workforce Solutions staff ensures the requirements for priority of service apply to all workforce service programs funded in whole or in part by the DOLETA or state funds. Specifically, Texas Workforce Solutions staff apply priority of service to the following two categories of qualified job training programs: Universal access programs (e.g., Wagner-Peyser–funded services) that deliver services as a whole and that do not target specific groups, and programs with eligibility criteria (e.g., Workforce Innovation and Opportunity Act–funded services).

Veterans and eligible spouses are:

- identified at the point of entry;
- informed of their entitlement to priority of service;
- informed of the full array of employment, training, and placement services available; and
- informed of any applicable eligibility requirements for those programs and services.

Priority of service for WIOA and other programs with statutory priorities is then applied in the following order:

- Veterans and eligible spouses who meet the mandatory priorities or spending requirement or limitation must receive the highest priority for the program or service;
- Non-veterans within the program's mandatory priority or spending requirement or limitation must receive priority for the program or service over veterans and eligible spouses outside the program-specific mandatory priority or spending requirement or limitation; and
- Veterans and eligible spouses outside the program-specific mandatory priority or spending requirement or limitation must receive priority for the program or service over non-veterans outside the program-specific mandatory priority or spending requirement or limitation.

In Texas, the Jobs for Veterans State Grant (JVSG) program is administered by the Texas Veterans Commission (TVC). Disabled Veteran Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVERs) are integrated with each Board's service provider staff and Wagner Peyser Employment Service staff in each of its Workforce Solutions Offices. TWC, TVC, and the 28 Boards work collaboratively to coordinate and deliver employment and other supportive services to all veteran job seekers and their families.

Texas' automated labor exchange, WorkInTexas.com, has several features specifically tailored to serve veterans and eligible spouses, including the following:

- A two-day hold on all newly created job orders—these jobs are available only to veterans and eligible spouses for the first two days they are open to ensure veterans get the first opportunity to review and apply.
- Employers may designate job orders for Veteran Applicants Only.
- WorkInTexas.com provides information to the veteran and eligible spouses when he or she registers online that explains every veteran's entitlement to priority of service and also provides additional information related to available workforce services and programs.
- WorkInTexas.com sends email or mail notifications to veterans and eligible spouses who have completed online registration that reiterates their entitlement to priority of service for all workforce programs and services.
- WorkInTexas.com provides certain features that are tailored to veterans and eligible spouses, such as:
    - Icons that identify veteran job seekers to employers; and

- Job search options for veterans and eligible spouses, including search options that provide listings for Veteran Only job orders and federal contractor job orders.

WorkInTexas.com uses a hands-off software-based process to gather job orders from the National Labor Exchange (USNLX.com) and other large job boards, such as Monster and Career Builder, and adds them to Texas' automated labor exchange. This imported job data provides veterans and eligible spouses with as many quality job opportunities as possible through the state labor exchange.

In addition, Senate Bill 389, 84th Texas Legislature, Regular Session (2015), requires state agencies to include relevant Military Occupational Specialty (MOS) codes on all job orders added to WorkInTexas.com. The State Auditor's Office (SAO), in conjunction with TVC, developed a State Classification-to-MOS crosswalk that is maintained and accessed by state agencies from the SAO website. The Military Crosswalk, is attached to each occupational category on the SAO's website so that state agencies can easily look up state classification titles, identify related MOS codes, and include those MOS codes on job orders.

Significant Barriers to Employment

A veteran or eligible spouse is determined to have a significant barrier to employment if he or she meets at least one of the following:

1. Special disabled or disabled veteran, as defined in 38 USC §4211(1) and (3); are individuals who:

- are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans' Affairs;
- have a disability claim pending with the US Department of Veterans Affairs; or
- were discharged or released from active duty because of a service-connected disability;

2. Homeless, as defined in 42 USC §11302(a) and (b) of the McKinney-Vento Homeless Assistance Act, as amended

3. Recently separated service member, as defined in 38 USC §4211(6), who in the previous 12 months has been unemployed for 27 weeks or more

4. Offender, as defined by WIOA §3(38), who is currently incarcerated or who has been released from incarceration

5. Veteran lacking a high school diploma or equivalent certificate

6. Low income, as defined in WIOA §3(36)

A veteran or eligible spouse identified as having significant barriers to employment is immediately referred to DVOP staff. When DVOP staff is not available, Workforce Solutions Office staff provide or arrange for services to be provided.

Wagner Peyser Employment Services staff, WIOA staff, or other Workforce Solutions Office staff provide services to veterans and eligible spouses who have been determined:

- to have significant barriers to employment, but for whom no DVOP staff is available to provide services; or

- to not have significant barriers to employment.

Boards screen individuals seeking services with the Significant Barriers to Employment Triage Tool, whether in person or via telephone, to determine if they are veterans or eligible spouses and determine if they are eligible for services from DVOP staff.

The following active duty service members or Transitioning Service Personnel are eligible for DVOP services:

- Transitioning members of the US Armed Forces who have been identified as being in need of individualized career services
- Members of the US Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units
- Service members who have not met Career Readiness Standards and who can provide a Form DD-2958 signed by their commander
- Transitioning service members ages 18-24
- Active duty service members being involuntarily separated through a service reduction-in-force

When screening individuals to determine their veteran status, Workforce Solutions Office staff:

- determine the purpose of the visit or telephone call;
- explains that the purpose of the triage tool is to determine which staff are best suited to assist them;
- ensure that the individual identifies whether he or she is a veteran, eligible spouse, transitioning service member, or spouse or other family caregiver; and
- ensure that veterans and eligible spouses confirm whether any of the significant barriers to employment criteria apply.

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

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

Achieving excellence in accessibility is based on three core principles:

- ensuring that all customers can effectively use workforce products and services;
- creating a workspace accessible for individuals with disabilities; and
- complying with all federal and state legal requirements.

Electronic and Information and Resources

TWC puts these core principles into practice by making its websites and other electronic and information resources (EIR) accessible and its content user friendly for individuals with disabilities, including members of the public and TWC employees, pursuant to Title 1, Texas Administrative Code, Chapters 206 and 213. WorkInTexas.com, TWC's public online job matching system, is tested for compliance upon all updates to the system using the most updated Job Access With Speech (JAWS) software.

Additionally, TWC employs an EIR accessibility coordinator to serve as a contact for EIR accessibility concerns. The coordinator both monitors agency-wide compliance with accessibility policy and facilitates correction of noncompliant EIR. To these ends, the coordinator partners with accessibility-designated liaisons in each business area. An accessibility liaison functions as the primary contact for the business area's compliance with EIR accessibility requirements. The liaison also assists in staff development, addressing the needs of individuals with disabilities, as well as in sharing TWC's accessibility goals and requirements.

Other agency efforts to achieve excellence in accessibility include:

- providing staff regular classroom training sessions on a range of accessibility topics;
- developing and maintaining an inventory of all agency EIR;
- consulting on accessibility purchases and facilitating the exception request process;
- working with business areas to develop and implement remediation plans for noncompliant websites, applications, and products, and consulting as needed during remediation;
- developing intranet pages with accessibility resources for employees; and
- meeting regularly with accessibility liaisons.

Accessibility at Workforce Solutions Offices and TWC-Owned Buildings

The TWC Equal Opportunity (EO) Compliance Department functions within the Regulatory Integrity Division. The EO Compliance Department monitors recipients of WIOA Title I financial assistance to determine compliance with the nondiscrimination and equal opportunity provisions of WIOA §188. Both programmatic and physical accessibility are addressed during an EO compliance review.

As recipients of WIOA funding, Boards are required to conduct local EO monitoring of all programs and facilities within their Local Workforce Development Area (LWDA). Boards are then monitored for compliance annually by TWC through either a desk or on-site review, as referenced in the Nondiscrimination Plan (NDP) maintained on file with DOL's Civil Rights Center (DOL-CRC). All 28 Boards are scheduled for an EO review annually. Dates for EO monitoring reviews generally align with those of TWC's annual Board monitoring review.

In determining which sites are selected for on-site physical accessibility reviews, the EO Coordinator will conduct a risk assessment based on the following criteria:

- the location was not previously reviewed by TWC staff based on historical review data.
- the location was not reviewed by TWC staff during the tenure of the current Board EO Officer.; and/or

- the location reflected numerous deficiencies in the previous EO review, thus warranting a follow-up review by TWC.

An EO accessibility checklist that aligns with the Texas Accessibility Standards is used by both the local EO Officer staff and TWC staff when conducting physical accessibility reviews. The checklist outlines all compliance requirements within the following four priorities:

- accessible approach and entrance
- access to goods and services
- access to public toilet rooms
- access to other items such as water fountains and public telephones

TWC's Equal Opportunity Coordinator provides training during the Quality Assurance Network's quarterly meetings and through other Equal Opportunity training as requested by the local EO Officers that addresses all facets of WIOA Section 188 compliance, including physical accessibility compliance and accessibility best practices.

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.

TWC puts principles into practice by making its websites and other electronic and information resources (EIR) accessible and its content user-friendly for individuals with Limited-English Proficiency (LEP). WorkInTexas.com, TWC's public online job matching system, is available in English and Spanish. TWC's website also has information in Spanish regarding unemployment insurance, unemployment benefits, labor law, employment discrimination, housing discrimination, and TWC press releases.

TWC requires that Boards ensure that all individuals with LEP have equal opportunity and access to all federally funded workforce services, including those funded under WIOA, TANF, Choices, and SNAP E&T.

Boards must review WIOA's nondiscrimination and equal opportunity regulations that prohibit discrimination, and specifically the requirements to:

- provide information in languages other than English, and ensure access to persons with LEP to WIOA services on an equal basis with those proficient in English; and
- ensure that communications with individuals with disabilities are as effective as communications with individuals without disabilities.

Boards must comply with the following four requirements to ensure meaningful language access:

- A thorough assessment of language needs, including:
    - an analysis of the language needs of each Board's local workforce development area;

    - the identification of the language needs of each LEP individual;
    - the identification of situations in which the individual will need language services;
    - a statement of resource needs; and
    - recommendations for how to make these resources available

- A comprehensive written policy to ensure meaningful communication with LEP individuals. This includes notices to LEP individuals of their rights to free language assistance; staff training; monitoring; and translation of written materials. The guidance warns that the use of family, friends, and/or minor children as interpreters can raise Title VI liability issues.
- Training staff to implement the language access policy. Boards must ensure that service providers and those entities to which a referral is made have the requisite training and knowledge.
- Vigilant monitoring to ensure that LEP individuals can access services.

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

Planning and Coordination

WIOA places a strong emphasis on planning across multiple workforce partner programs to ensure alignment in service delivery. One important goal is to develop effective partnerships across programs and community-based providers to provide individuals with the employment, education, and training services they need. Effective partnering is pivotal to maximize resources and to align services with career pathways and sector strategies. It is vital that WIOA required and optional workforce partners and programs work together to ensure a customer-centered approach to service delivery.

The Texas workforce system brings together workforce development, employment and training, and educational services in a seamless customer-focused service-delivery network that enhances access to all program services and improved long-term employment outcomes for individuals receiving assistance. Workforce partners administer separately funded programs as a set of integrated streamlined services to customers.

The vision for the Texas workforce system is to align a wide range of publicly and privately funded education, employment, and training programs, while also providing high-quality customer service to all job seekers, workers and businesses.

Texas workforce system's six core programs include:

- Title I Adult program;
- Title I Dislocated Worker program;
- Title I Youth program;

- Title II AEFLA program;
- Employment Services program, authorized under the Wagner-Peyser Act, as amended by Title III of WIOA; and
- The VR program, authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV of WIOA.

The Texas workforce system includes other required partners and optional workforce partners identified in prior consistent state law. Through Workforce Solutions Offices, these workforce partner programs and their direct service providers ensure that businesses and job seekers – a shared client base across multiple programs – have access to information and services that lead to positive educational and employment outcomes.

As required in WIOA §121(e)(1), each local workforce delivery system must provide the following:

- Career services, as defined in WIOA §134(c)(2) and in Appendix A of the TWC Guide to Texas Workforce System Operations
- Access to training services, as described in WIOA §134(c)(3)
- Access to local employment and training activities, as described in WIOA §134(d)
- Access to all programs and activities provided by required workforce partners and any optional workforce partners
- Access to the data, information, and analysis described in the Wagner-Peyser Act §15(a), to include all job search, job placement, recruitment, and other labor-exchange services authorized under the Wagner-Peyser Act

WIOA §193(a)(3) allows states to define their required partners under prior consistent state law. Texas Labor Code §302.021 and §302.062 establish the job training, employment and employment-related educational programs and functions consolidated under the authority of the TWC. In Texas, prior consistent state law under Texas Government Code §2308.304 and §2308.312 defines the responsibility of each Board to develop, implement and modify a plan for convening all relevant programs, identified as Workforce Solutions Office-required partner programs.

The required workforce partners in Texas include:

- WIOA Adult, Dislocated Worker, and Youth programs
- Wagner-Peyser ES program
- AEL program
- VR program
- UI program
- TAA program
- Choices, the TANF employment and training program
- SNAP E&T program

- Subsidized Child Care programs
- Apprenticeship programs (Texas Education Code Chapter 133), if they have been certified by DOL's Office of Apprenticeship Training and meet the state criteria established in Chapter 133 to receive state funding for the support of the apprenticeship training programs
- Veteran Employment and Training programs – Local Veterans Employment Representatives Program and the Disabled Veterans Outreach program
- SCSEP Program

Other entities that carry out a workforce development program may serve as optional workforce partners. These may include, but are not limited to, the following:

- 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 USC 2301 et seq.)
- Job Counseling, Training and Placement Service for Veterans, as authorized under Title 38 USC Chapter 41
- Education and Vocational Training program through Job Corps and administered by the DOL
- Native American programs authorized under WIOA Title I
- US Department of Housing and Urban Development-administered employment and training programs
- Employment and Training activities carried out under the Community Services Block Grant Act
- Reintegration of Offenders program authorized under the Second Chance Act of 2007
- Migrant and Seasonal Farmworker programs under the National Farmworkers Jobs Program authorized under WIOA §167

Additionally, Boards may partner with other entities that are not considered required workforce partners or optional workforce partners. These entities are state or local organizations that do not carry out a workforce development program and may include local social service agencies, housing authorities, and others.

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 represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information	Yes

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

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

A map identifying each Board area is available at https://twc.texas.gov/partners/workforce-development-boards-websites. The twenty-eight Boards include:

1 – Panhandle

2 – South Plains

3 – North Texas

4 – North Central Texas

5 – Tarrant County

6 – Greater Dallas

7 – Northeast Texas

8 – East Texas

9 – West Central Texas

10 – Borderplex

11 – Permian Basin

12 – Concho Valley

13 – Heart of Texas

14 – Capital Area

15 – Rural Capital Area

16 – Brazos Valley

17 – Deep East Texas

18 – Southeast Texas

19 – Golden Crescent

20 – Alamo

21 – South Texas

22 – Coastal Bend

23 – Lower Rio Grande Valley

24 – Cameron

25 – Texoma

26 – Central Texas

27 – Middle Rio Grande

28 – Gulf Coast

The Commission recognizes Texas' current workforce areas as their own independent regions.

B. DESCRIBE THE PROCESS USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR "PERFORMED SUCCESSFULLY" AND "SUSTAINED FISCAL INTEGRITY" IN ACCORDANCE WITH 106(B)(2) AND (3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN IDENTIFYING THE REGIONS

Background

In 1993, the Texas legislature passed Senate Bill 642, the Workforce and Economic Competitiveness Act (Act), transforming the state's fragmented workforce development system into an integrated service delivery network and improving the quality and effectiveness of services. At the time of the Act, Texas had 35 Service Delivery Areas set forth under the federal Job Training Partnership Act of 1982.

The 1993 Act required TWIC to recommend designation of workforce areas in the state, the first step in establishing a system for delivering a slate of integrated services, from workforce training to the TANF and SNAP E&T programs, community services, and the basic labor exchange system.

In 1998, Congress passed WIA. Recognizing that Texas previously established the framework of an integrated workforce system, WIA provided for several grandfather provisions, which allowed Texas to continue certain provisions under prior consistent state law. One of these provisions was specific to the designation of workforce areas. This provision allowed Texas' Boards to continue if they performed successfully and maintained sustained fiscal integrity.

The Act also required that the local elected officials reach agreement on the designation for a workforce area. After much analysis and deliberation, including significant public input, and the recognition that even contiguous areas often have very diverse needs, 28 workforce areas—governed by Boards—were identified and designated by the governor. The realignment from 35 to 28 workforce areas supported Texas' vision of an integrated and streamlined workforce system, a precursor to the purposes of WIOA.

Local Area Designation

WIOA §189(i)(1) allows states that have enacted, not later than December 31, 1997, a state law providing for the designation of service delivery areas for the delivery of workforce investment activities, to use such areas as local areas under Title I of WIOA. Prior consistent state law at Texas Government Code §2308.252 provides for the designation of local workforce areas in

Texas. Therefore, the provisions of WIOA §106 related to local area designation do not apply in Texas.

Compliant with WIOA §108, each Board develops and submits to the governor a comprehensive four-year local plan in partnership with the chief elected official (CEO). Texas Government Code §2308.304(b) also requires each Board to develop a local plan with goals and objectives that are consistent with statewide goals, objectives, and performance standards. State and federal law require TWIC to review local plans and modifications and make recommendations to the governor for approval.

Regions

WIOA requires states to identify regions in the state. WIOA's intent regarding regional identification is for locals to engage in regional efforts that result in the analysis of the regional labor market, establishment of regional service strategies, development and implementation of sector initiatives for in-demand industry sectors or occupations for the region, and the coordination of services with regional economic development needs. TWC continues to comply with these WIOA requirements.

Long before a federal requirement existed, Boards across Texas had a demonstrated history of collaboration beyond the designated workforce areas. These regional collaborative efforts have resulted in workforce system leaders partnering to align workforce policies and services with regional economies and supporting service delivery strategies tailored to these needs. A few examples of regional collaboration include:

- The Cameron County, Coastal Bend, and South Texas Boards collaborate regionally on the Future of the Region South Texas group, the efforts of which extend beyond the workforce and include the region's local governments, infrastructure, health care system, education, and economic development.
- Five Boards—Alamo, Coastal Bend, Golden Crescent, Middle Rio Grande, and South Texas—work collaboratively to support the needs of the oil and gas industry in the Eagle Ford Shale area.
- The Capital Area Board has participated in the Accelerating Connections to Employment (ACE) National Evaluation study, funded by DOL's Workforce Innovation Fund. ACE is driven by a consortium of nine workforce investment boards, ten community colleges, and employer partners across four states, tasked with reducing poverty by linking education, training, and workforce services to create skill-building opportunities and career pathways for low-skilled, low-income individuals.
- The Capital Area, Alamo, Central Texas, Greater Dallas, Heart of Texas, North Central Texas, Rural Capital Area, and Tarrant County Boards are members of the I 35 Initiatives Consortium. The consortium was founded in 2010 to establish a multiregional coordinated strategy for meeting the recruitment and skill training needs of businesses in the life sciences cluster, with an emphasis on health care and bioscience. The consortium represents 46 percent of the Texas' residents located in the 51 counties that span from San Antonio to Dallas-Fort Worth.
- Additionally, the Greater Dallas, North Central Texas, and Tarrant County Boards have created the Dallas/Fort Worth Regional Workforce Leadership Council (RWLC), the driving force for a cooperative approach to promoting the region's strongest industries

and supporting the region's key clusters. RWLC works to meet industries' needs through the collaboration of the Boards with chambers of commerce and business leaders.

- The Rural Workforce Network (RWN) Consortium Biotechnology/Life Sciences-Medical Targeted Industries Project was designed to further build capacity to meet the skills readiness and skills training needs of employers and job seekers in the RWN region, through an understanding of employers' needs, assessments of job seekers' skills, and the creation and credentialing of a work-ready workforce. Five Boards—Concho Valley, West Central Texas, Permian Basin, North Texas, and South Plains—four employers, and nine public colleges participated in this project.
- As many Texas Boards share labor sheds with adjacent states, these Boards find it beneficial to establish partnerships with out-of-state partners to create a regional response to workforce and economic challenges. The Texoma Board partners with the Southern Oklahoma Workforce Board, Southeastern Oklahoma State University, and several other key organizations in Oklahoma to form the Texoma Regional Consortium, which covers a 13-county region along the Texas and Oklahoma borders. The Texoma Regional Consortium addresses needs of local business and industry in both Texas and Oklahoma through participating in strategic planning to identify key regional strategic themes, develop regional labor market analysis, sponsor regional job fairs, and participate in other joint ventures to address workforce and economic challenges.
- Multiple Boards across the state have partnered with each other to respond to disasters, such as Hurricane Harvey, leveraging resources to help support those most in need.

Development and implementation of the above regional collaborations were based on analysis of labor markets, industry needs, and the needs of economic development entities. These efforts have enhanced and continue to enhance both the capacity and performance of the Texas workforce system. The Boards continue to meet WIOA expectations.

In Texas, local leadership—CEOs, Boards, and Board staff—have long championed regional planning, particularly in developing opportunities in in-demand industry sectors and occupations. The benefits from regionalism include collaborative planning, pooling and leveraging of resources, capacity building, and ensuring that services can be delivered in the best possible way—regionalism is essential to the Boards' mission.

To ensure Boards are meeting the WIOA criteria for "performed successfully" and "sustained fiscal integrity" TWC requires Boards to submit data on designated performance measures. Performance measure data is reported monthly and maintained on TWC's website maintained by the Division of Operational Insight (available at https://intra.twc.texas.gov/intranet/plan/html/index.html) Additionally, to ensure sound fiscal management, TWC conducts routine monitoring visits that verify fiscal integrity and assist Boards in addressing any identified issues. Board grant and financial monitoring information is available at https://twc.texas.gov/agency/texas-workforce-commission-financial-grant-information.

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

Units of local government or grant recipients that request but are not granted designation or re-designation (in accordance with TWIC rules §901.1) as a local workforce development area, may appeal in accordance with the state's written policy and procedure described in TWIC rule §901.2 (40 TAC Part 22).

Appeals must be delivered to the Texas Workforce Investment Council (TWIC) no later than 30 days after the date the designation or redesignation was made. The appeal must include the specific reasons for the appeal. The appeal must also include any new information the requestor/Board would like to have considered as part of the appeal process. When the appeal is received, the notice of the appeal will be published in the Texas Register, including a statement inviting input and the deadline to submit input. At TWIC's discretion, they may also schedule a public meeting to allow for oral comments to be heard. TWIC may consider the appeal or may designate a committee to do so and make a report to TWIC. All relevant information may be reviewed in addition to the information submitted with the appeal and the information obtained during the public comment period. Finally, TWIC will make a recommendation to the Governor within 120 days of the date of receipt of the appeal request.

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

TWC is required to establish a process for a required workforce partner to appeal a determination:

- regarding the portion of funds to be provided under the state funding mechanism or SFM, and
- on the basis that the determination is inconsistent with the requirements of the SFM.

The appeal process established by TWC must provide prompt resolution of the appeal in order to ensure the funds are distributed in a timely manner, consistent with WIOA §182(e) – Prompt allocation of funds.

The appeals process established by the Texas governor specifies that a one-stop partner may appeal a governor's determination regarding the one-stop partner's portion of funds for one-stop infrastructure costs.

40 TAC §901.2 – Appeal of Decision on Designation or Redesignation.

- The appeal of a designation or redesignation of a workforce area must be delivered to TWIC no later than 30 days after the date the designation or redesignation was made.
- The appeal must be submitted to TWIC in writing or electronically on the TWIC website (or TWC website). The appeal must be signed and submitted by the chief executive officer of the one-stop partner submitting the appeal. The appeal must specify the circumstances and details of the appeal.
- The notice of appeal, once received, shall be published in the Texas Register with a statement inviting input, specifying the deadline for submitting written input. The council, at its discretion, may also schedule a public meeting at which oral comments on the appeal will be accepted.
- The appeal may be considered by TWIC or may designate a committee to do so and make a report to TWIC. In considering an appeal, all relevant information may be reviewed in addition to the information submitted with the appeal and the information obtained during the public comment process.
- After considering an appeal, TWIC will make a recommendation to the Governor within 120 days of the date of receipt of the appeal request.

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

State Policies

The state makes information on state-imposed requirements—such as guidance for the statewide workforce development system, including policy for the use of state funds for workforce investment activities—available to the public.

The following materials are readily accessible through the TWC website:

- WIOA Guidelines - overview, implementation, guidance, service, and stakeholder input https://twc.texas.gov/files/jobseekers/wioa-guidelines-twc.pdf
- Current TWC rules, as codified in 40 TAC, Part 20, as well as information on past rule amendments https://twc.texas.gov/agency/texas-workforce-commission-rules
- All active workforce policy issued through guides,
- Workforce Development (WD) Letters, Adult Education and Literacy (AEL) Letters, and Technical Assistance (TA) Bulletins https://twc.texas.gov/agency/laws-rules-policy/workforce-policy-and-guidance
- Reports, plans, and publications: Agency strategic plans and annual reports, publications for employers and job seekers, and program plans and reports http://www.twc.state.tx.us/partners/reports-plans-publications

The following VR materials are readily accessible through the Texas Workforce Commission website:

- New or modified manuals, guides, and publications https://twc.texas.gov/programs/vocational-rehabilitation-program-overview
- Current TWC rules, as codified in 40 TAC, Part 20 https://twc.texas.gov/agency/texas-workforce-commission-rules

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS

In August 2019, the Commission approved a portion of the governor's reserve and state leadership funds for several statewide initiatives to address WIOA's focus on workforce integration, quality improvement, capacity building, professional development, internships, externships, and more. The initiatives apply across the following programs and services.

Veterans Initiatives

Hiring Red, White & You! (HRWY)—TWC hosts an annual statewide job fair in November to connect Texas veterans and their spouses with Texas employers that value the experience, discipline, and other exceptional qualities inherent in a military background. The 2018 HRWY event drew more than 12,300 job seekers and more than 2,100 employers. Since its 2012

inception, HRWY has connected more than 84,153 job seekers, including 40,575 active-duty military and transitioning service members, veterans, and spouses, to 14,420 employers, with more than 2,000 same-day hires.

College Credit for Heroes—The program maximizes college credits awarded to veterans and service members for their military experience by developing streamlined degree paths and workforce certifications to expedite transition into the Texas workforce. The College Credit for Heroes (CCH) online portal allows veterans and active-duty service members to request evaluations of credit to be used at colleges and universities throughout Texas. From its launch in 2012 through PY'18, the portal received approximately 43,000 requests for evaluation. (On August 31, 2019, the portal was closed in recognition that a majority of colleges and universities have developed local evaluation and credit-award programs. TWC now maintains a web-based list of participating CCH institutions and assists in connecting veterans and transitioning service members to the schools of their choice.)

Veterans Workforce Outreach Initiative—TWC conducted a competitive procurement to solicit applications for the provision of services to hard-to-serve veterans who have one or more barriers to employment, such as homelessness; a history of substance abuse; physical, mental, or learning disabilities; post-traumatic stress disorder; ex-offender status; or recent discharge from military duty. One grantee, American GI Forum, was awarded WIOA statewide funds and then implemented the program in San Antonio, Houston, the Dallas/Fort Worth metro area, and El Paso, Texas.

The Veterans Workforce Outreach Initiative is designed to:

- outreach hard-to-serve veterans who are not currently being served through Workforce Solutions Offices;
- address employment barriers faced by hard-to-serve veterans; and
- reintegrate hard-to-serve veterans into meaningful employment.

Under the guidance of a case manager, employment challenges are addressed, and resources accessed to help veterans overcome challenges to employment. Veterans benefit from a range of services, which may include:

- assessments;
- job development and job placement;
- individual case management services, including guidance, encouragement, and resources; and
- support services such as:
    - transportation;
    - rent and utility assistance;
    - mental health assistance, including clinical counseling;
    - wheelchairs, crutches, and medical beds;
    - food assistance; and
    - financial assistance.

For the grant period March 1, 2018, through February 28, 2019, the project provided 816 veterans with assessment and case management services, with 258 of those being placed into employment. The current grant runs from March 1, 2019, through February 28, 2020.

We Hire Vets—Texas is home to more than 555,000 employers, many of whom have experienced firsthand that veterans are hardworking, motivated, and disciplined team members who will bolster an employer's business. The We Hire Vets employer recognition program recognizes Texas employers for their commitment to hiring veterans.

Through this program, employers whose workforce is composed of at least 10 percent military veterans are eligible to receive a We Hire Vets employer recognition decal to display on the employer's storefront as well as an electronic decal to display on the employer's website.

Employing veterans creates a dedicated workforce with employees who know how to lead, build teams, and accept and meet challenges. Recognition of employers with veteran-friendly hiring practices is an important aspect of the Texas Operation Welcome Home initiative that assists recently separated veterans with employment and training opportunities.

Through We Hire Vets, Texas is ensuring that it remains a veteran-friendly state. The program allows employers to apply for the recognition or be nominated by a local workforce development board or Texas Veterans Commission (TVC) partner.

We Hire Vets is a component of TWC's Texas Operation Welcome Home initiative, which was created under Governor Abbott's charge to identify gaps in services to Texas service members who are transitioning into civilian life. Texas Operation Welcome Home also includes a Skills for Transition program that helps separating service members who plan to remain in Texas, a Texas Transition Alliance to recommend and help employ best practices in providing workforce opportunities for veterans, and a Military Family Support program.

Veterans Network—Veterans face many barriers to employment when returning to their communities after military service. Texas veterans have access to a wide array of services in different communities to help them overcome or address barriers; however, veterans may not be aware of all the services for which they are eligible or where to go for those services. Additionally, service providers may not be aware of other services a veteran may have already received or what referrals have been made.

TWC is developing regional networks composed of organizations whose missions include providing services and support to veterans (for example, Veterans Service Organizations, other CBOs, Boards, TVC, and other entities) and create opportunities to share referral and service information that will allow for coordination of services over large areas of the state, regardless of the community in which a veteran seeks services.

A shared automated veteran service coordination referral system that captures services received, referrals made, and services available through a single network, regardless of the veteran's location, can increase a veteran's opportunity to receive all services needed to transition successfully into civilian life. In addition, a shared veteran service coordination referral system among veteran service providers reduces the impediments to comprehensive and coordinated service provision, thereby reducing barriers to employment.

Jobs Y'all

In November 2018, TWC launched the "Jobs Y'all: Your Career. Your Story." campaign designed to inspire young Texans to discover and explore the state's in-demand industries and learn about skills needed to enter the workforce. This online program educates and inspires young

Texans to create self-directed career paths, features in-demand industries, and connects participants to career resources. The website introduces users to eight industries, a career explorer app, and other online resources, as follows:

- Featured industries:
    - Aerospace and Defense
    - Advanced Technology and Manufacturing
    - Biotechnology
    - Life Sciences and Healthcare
    - Construction
    - Energy
    - Information and Computer Technology
    - Petroleum Refining and Chemical Products
    - Transportation and Logistics
- Career Explorer, search by industry, occupation, and/or geography to learn about job projections and average wages
- Web-based resources include the following:
    - Texas Career Check
    - Texas Reality Check
    - Texas Internship Challenge

<u>Youth Initiatives</u>

Youth Career Fairs—Local Texas Workforce Solutions Offices host youth career exploration and job fairs to provide youth area specific opportunities and resources. Youth are encouraged to contact their local Workforce Solutions Office for youth specific events and opportunities.

*Teacher Externships*TWC supports externships for middle school and high school teachers to allow them to learn firsthand about the skills required for in-demand occupations. These externships allow teachers to better understand in-demand careers in their local community and convey to students the array of opportunities available to them. More than 2,500 teachers have participated since 2015.

Camp Code for Girls—This camp offers hands-on coding experience for middle school girls. Participants learn innovative concepts and engage in challenging experiences in learning, problem solving, and analytical skills. Those activities simultaneously foster an interest in STEM-related careers, with a focus on computer science. In 2018, more than 1,000 girls received scholarships for camp attendance across the state.

Foster Youth—TWC provides grants to 18 Foster Youth Transition Centers that provide a comprehensive array of services and referrals to help transitioning foster youth overcome barriers. TWC hosted its first annual Foster Youth conference to support local delivery of integrated services for foster youth, to share perspectives and information from state and local

partners on their critical work and resources for foster youth, and to provide opportunities to build the network of partnerships among state and local organizations that serve foster youth.

Governor's Challenge Camp—The Governor's Science and Technology Champions' Academy provides a STEM-related one-week residential summer camp for students in grades 9–12.

Governor's Summer Merit Program—The goal of the Governor's Summer Merit Program is to inspire Texas youth to pursue STEM-related careers. The program provides grants to Texas universities and community colleges to host summer youth camps that help prepare students ages 14 to 21 for future high-skill, high-demand jobs. The camps introduce students to careers available in advanced technologies and manufacturing, aerospace and defense, biotechnology and life sciences, information and computer technology, and energy.

Several camps specifically target and encourage young women and minorities to pursue education and careers in STEM fields.

For summer 2018, TWC awarded 13 grants totaling $992,526, which provided scholarships for 1,047 students to attend the camps.

Some students had opportunities to take field trips that gave them access to high-tech equipment, such as 3-D printers and electron telescopes, while others visited science and engineering facilities and had the opportunity to meet and speak with industry professionals.

Texas Science Careers Consortium (Texas Science and Engineering Fair)—This science and engineering fair is a competition for state middle school and high school science fair winners to showcase their research projects in STEM fields.

Other Selected Initiatives

Small Business Initiatives—TWC provides training and information to all Texans interested in entrepreneurship and starting or expanding a business or small business, including those run by veterans, minorities, and women.

High Demand Job Training Program—TWC supports collaborations between Boards and economic development corporations (EDCs) to provide high-demand occupational job training in local workforce areas. This program supports Boards partnering with local EDCs that use their local economic development sales taxes for high-demand job training. Boards collaborate with local EDCs and match their local economic development sales tax funds to jointly support the provision of such training.

Building and Construction Trades—Texas companies are creating significant opportunities for workers in high-demand construction and building trade occupations, including carpenters, plumbers, pipefitters, welders, masons, and electricians. Grants support workforce development training for Texas adults by preparing them for employment in high-demand occupations in the building and construction trades.

Innovative Academies—Funds support innovative partnerships between schools, employers, and colleges that provide new opportunities for students to acquire skills, certifications, and credentials in high-demand occupations in key industry clusters while allowing the students to earn college credit that results in an associate degree or an articulated agreement toward a bachelor's degree.

Rapid Response Services

TWC and Workforce Solutions Office staff provide rapid response assistance to help workers who lose their jobs because of mass layoffs, plant closures, or natural disasters. These services include immediate, on-site assistance with re-employment services and UI information, as well as group stress and financial management seminars. In some cases, mobile units are dispatched to offer these services.

Texas' layoff aversion strategies focus on a proactive—rather than reactive—approach to assisting at-risk companies before they reach the actual layoff stage. Identifying at-risk companies and developing a customized plan to address each company's unique set of circumstances requires a coordinated effort among all community partners, including state agencies, Boards, economic development agencies, public and private entities, and so forth.

Effective layoff aversion strategies and activities help employers develop the skilled workforce necessary to adapt to the changing economy, stay in business, and retain employees.

Successful layoff aversion strategies and activities engage the full range of programs and resources of the Boards and Board partnerships. Rapid Response partnerships can directly provide or facilitate the provision of an array of benefits to address the challenges presented by specific circumstances. An effective layoff aversion strategy:

- retains jobs;
- retains critical industries in the region;
- improves coordination among state agencies, Boards, and economic development and other public- and private-sector partnerships; and
- creates new labor-management partnerships.

Through their connections with local businesses and Rapid Response activities, Boards are in a unique position to assist companies in averting layoffs by implementing effective strategies. Examples of layoff aversion strategies implemented to address at-risk companies and workers may include, but are not limited to:

- helping employers manage reductions in force, including identification of companies at risk of layoffs, assessments of needs and options for at-risk companies, and providing services to address and support their needs;
- developing, funding, and managing incumbent worker training programs or other worker upskilling approaches as part of a layoff aversion strategy or activity;
- connecting companies with state programs designed to prevent layoffs or to quickly re-employ dislocated workers; employer loan programs for employee skill upgrading; and other federal, state, and local resources necessary to address their business needs;
- connecting businesses and workers to short-term, on-the-job, or customized training programs and apprenticeships before or after layoff to help facilitate rapid reemployment;
- activating the Rapid Response team and services after receiving a Worker Adjustment and Retraining Notification (WARN) or other notification; and
- responding to information received from other sources about possible closures.

While WIOA allows for broad flexibility for using Rapid Response funds for layoff aversion activities intended to minimize the negative impacts of dislocation on workers, employers, and

communities, Boards are encouraged to conduct Rapid Response activities to support creative approaches and strategies.

Additionally, Rapid Response funds may be used to provide guidance and/or financial assistance in order to establish community transition teams to help affected communities support dislocated workers and meet the basic needs of their families. Such assistance may include, but is not limited to, providing heat, shelter, food, clothing, and other necessities and services that are beyond the resources and ability of the Boards to provide.

The Shared Work Unemployment Benefit Program provides an alternative to layoffs by affording employers an opportunity to manage business cycles and seasonal adjustments without losing trained employees. The program allows for the payment of UI benefits to employees to supplement wages lost because of reduced hours. TWC is identifying early warning indicators within its BIG data warehouse system that will identify employers that might benefit from rapid response activities and specific short-time compensation services.

Child Care

Early Childhood Education Partnerships—TWC's Child Care Services program provides child care subsidy assistance to eligible low-income families with children under age 13, allowing parents to work, attend school, or participate in training. Child Care Services is tightly integrated within the workforce. When a parent who is receiving child care subsidies loses his or her job, he or she has up to three months to find work and retain child care assistance. During their three-month job search period, the family continues to receive child care assistance at the same level. Additionally, Child Care Services staff refers parents who have lost employment to workforce services to assist them with becoming reemployed quickly. The integration of Child Care services and workforce services helps smooth employment transitions for low-income parents, supporting greater economic stability for families.

Employment Services

Small Business Initiative (Office of the Governor)—The purpose of the Interagency Cooperation Contract is to provide training, information conveyance, and recognition to small businesses, including, but not limited to, those run by veterans, minorities, and women. The intent is to provide businesses with information (based on local and state level input) regarding available workforce-related services, workforce training programs, contracting opportunities, best practices and methodologies, exporting products and services, available governmental services, and any other areas relevant to small business inception and growth.

Veterans Apprenticeship (Registered Apprenticeship Training Program for Veterans and/or Service members)

The Registered Apprenticeship Training Program for Veterans and/or Service members is a program that:

- accelerates participants into or through a DOL Registered Apprenticeship training program in Texas; or
- accelerates participants into or through a DOL Pre-Apprenticeship training program that leads to enrollment of participants into an Apprenticeship Training Program during the grant period.

Registered Apprenticeship Program

The purpose of the apprenticeship training funds is to supplement the costs of the job-related classroom instruction for eligible DOL Office of Apprenticeship-registered apprenticeship training programs. TWC currently provides funding for the Apprenticeship Training Program through an application process. Funding is generally state general revenue (GR) funds; however, other funding has been leveraged to supplement the program to include WIOA, SNAP E&T, and TANF NCP funds.

TWC recently received a DOL grant award of $5.4 million to support statewide apprenticeship expansion efforts from July 2019–June 2022. Funds will increase and expand, integrate registered apprenticeship programs (RAPs) with new industries and diversify apprenticeship opportunities. This new funding opportunity will continue Texas' efforts to expand the number of apprentices in registered programs, support and encourage RAP diversification, and integrate RAPs into state workforce development strategies. Part of TWC's plan is to encourage community and technical colleges, as eligible grantees, to use allotment funding to address workforce development needs in the communities they serve. This will support RAPs and build staffing and knowledge capacity to imbed RAPs in more areas of the state.

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

When businesses close plants or lay off workers due to natural disasters, Workforce Solutions Offices can provide immediate on-site services to assist workers facing job loss, contingent on the gravity of the conditions. Activities are coordinated with various agencies, including the Federal Emergency Management System (FEMA), the Texas Division of Emergency Management, Office of the Governor, Disaster Preparedness, and others. Managed rapid response services provide early intervention assistance designed to transition workers to their next employment opportunity as appropriately and as soon as possible.

Hurricane Harvey struck the Texas Gulf Coast on August 25, 2017. Storm surge, widespread catastrophic flooding, and destructive winds devastated coastal communities, the city of Houston, and surrounding areas in southeastern Texas.

The Federal Emergency Management Agency (FEMA), through Disaster Declaration 4332 and associated amendments, declared 50 Texas counties federal disaster areas. FEMA approved eight local workforce development areas to receive federal public and individual assistance. FEMA approved nine additional counties in seven workforce areas that sustained little or no storm damage to receive federal public assistance to help manage the influx of hurricane evacuees.

Federal, state, and local governments moved quickly to implement programs and policies that address the workforce system needs of the affected communities.

DOL granted the State of Texas $35 million in National Dislocated Worker Grant (NDWG) funds to assist in the cleanup and rebuilding in 42 of the counties directly affected by Hurricane Harvey. DOL's quick response to the state's needs has allowed an unprecedented speed in the delivery of workforce services. Since the grant began, more than 3,300 Texans have been supported through jobs, training, career services and supportive services including childcare, transportation, and other needs.

As of August 2019, 822 temporary jobs had been created providing continuing disaster clean up services and humanitarian aid, exceeding the temporary job goal of 550 by 160.4 percent. The

number of individuals participating in occupational, vocational or work-based training is also exceeding the goal of 3,069 by 110 percent or 3,365 participants.

TWC received two additional grants from DOL to assist with the needs of individuals impacted by Hurricane Harvey with an emphasis on assisting specific underserved populations. The first award for $300,000 was designed to serve women, with an emphasis on low-income women and women with dependent children. Two Boards, Coastal Bend and Gulf Coast, are providing 30 women with construction training and other supportive services to ensure they can return to employment successfully.

The second grant award for $1.25 million will fund work-readiness services and assistance for individuals with disabilities. Gulf Coast Workforce board is providing workforce education and paid work experience to 80 individuals with intellectual and developmental disabilities who have been affected by Hurricane Harvey through a partnership with the University of Houston Downtown and the Housing, Entrepreneurship and Readiness Training (HEART) Program. HEART promotes structured independence for individuals which developmental disabilities by providing innovative education, training, housing and employment programs.

Additional program and policy guidance for these grants has been captured in the Hurricane Harvey: Program Operations and Technical Assistance Guide. Included in the operational guidance are specific questions and responses related to the implementation of these grants to support Boards' rapid implementation.

TWC also requested that the DOL Employment and Training Administration (DOLETA) waive certain WIOA requirements to allow the flexibility needed to provide workforce areas with resources to help workers, job seekers, employers, and youth recover from one of the costliest natural disasters in US history. A summary of the approved waivers is included in this plan under part 1 of Section C, State Strategy.

Additionally, TWC administers Disaster Unemployment Assistance (DUA), which provides unemployment benefits for individuals who lost their jobs or self-employment, or who are no longer working as a direct result of a major disaster. A disaster assistance period must be declared, and individuals who apply must be ineligible for regular unemployment benefits. Assistance may also include offering unemployed individuals new, temporary public service jobs.

D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.

Rapid Response

Rapid response services focus on assistance to area employers, workers, and the community in managing reductions in force. To ensure that Texas is poised to meet the needs of local employers, rapid response services are funded through the Boards' WIOA Adult, Dislocated Worker, and Youth formula programs. The funding stream allows for a prompt rebound from

layoffs, as funds are readily and locally available. Texas has also reserved rapid response funds at the state level for Boards that demonstrate a need for additional assistance.

The rapid response system first pursues strategies to avert layoffs, while maintaining capacity to return workers to productive employment as quickly as possible—if the layoff is unavoidable. TWC and Boards use multiple employment and training resources to craft layoff aversion solutions. Past solutions have supported development of incumbent worker programs, which help address employer training needs and avert or mitigate a layoff. Training usually focuses on skills attainment activities.

The second objective of rapid response is reemployment on or before the affected worker's last day of work. Upon notification of layoff, transition efforts are implemented to help dislocated workers engage in employment or training services that facilitate a quick return to work. Layoff notices, including those submitted in compliance with the WARN Act and Trade Act petitions, are received at the state level and forwarded to Boards by the next business day.

Boards and providers are also responsible for outreach to employers. Board or Workforce Solutions Office staff may use feasibility studies to assess the needs of and options for at-risk companies, as well as offer employment and training activities to address risk factors. Following the initial contact with the employer and worker representatives, an employee information orientation may be conducted on-site and on company time. The orientation typically offers an overview of available services and additional activities that may be conducted onsite. Additional activities include workshops or seminars on the psychology of job loss/stress management, debt/financial management and, specifically, negotiations for debt-payment arrangements, job search skills, and labor market information. The orientation may also provide information on UI and, if appropriate, the Trade Adjustment Assistance (TAA) program.

Workforce Solutions Office staff may establish an on-site career transition center when a layoff involves large numbers of employees from a single employer, and the center is acceptable to company management and labor representatives. Staff will consider such factors as convenience, distance from the employer to the closest Workforce Solutions Office, work schedules of the employees, and time off permitted by the employer to attend the activities.

Workforce areas are also encouraged to engage rapid response staff in the BSUs. Rapid response staff attached to the BSU has access to team resources helpful in matching worker skill sets with company hiring requirements. TWC and the Boards set the stage to assist businesses with future staffing needs by maintaining a positive relationship throughout the layoff process. To this end, the outreach effort highlights both the services available to at-risk employers and those services available once business improves and staff needs rebound.

Trade Adjustment Assistance

Individuals who have lost their jobs due to increased imports or shifts in productions to foreign markets may be eligible for federally funded TAA. Workforce Solutions Offices provide all workforce services, including TAA services, in an integrated environment using common data systems.

TAA is likewise integrated into early intervention services (i.e., rapid response) carried out under WIOA. When Workforce Solutions Office staff becomes aware of potential dislocations, consideration is always given to whether the dislocation has potential trade implications; if so, assistance is provided to the company, workers, or affected unions to promote TAA petition submission. Additionally, when a petition is independently submitted by one of these groups,

the TAA state coordinator conveys the petition to the responsible Board partner to ensure that a rapid response effort is activated to assist the company and workforce with transition services.

In compliance with Title 20, CFR Part 618, the State of Texas houses merit staff in Workforce Solutions Offices across the state to offer TAA case management. Merit staff is positioned in locations where TAA certification and service provision activity indicates the greatest need. Where TAA merit staff is not present, WIOA or ES staff provides TAA case management to assist the customer in preparing for and obtaining suitable reemployment as quickly as possible.

Suitable employment is defined as work of an equal skill level or higher and paying at least 80 percent of the worker's average weekly wage. Staff may initiate an assessment of the worker's transferable skills, knowledge, and abilities and assist in researching both the labor markets within the commuting area and, if the worker is willing to relocate, other labor markets where relocation might be acceptable. Additionally, Texas Workforce Solutions will provide employment and job search assistance services designed to properly equip the TAA customer to conduct and conclude a successful job search campaign.

In the absence of suitable and available employment, Texas Workforce Solutions and the TAA customer may undertake additional assessment activity to determine if TAA training is appropriate. Using vocational exploration resources such as mySkills myFuture, CareerOneStop.org, and TWC labor market information, the TAA customer can identify specific occupational goals. Assessment instruments such as Accuplacer, Compass, Test of Adult Basic Education (TABE), Test of English as a Foreign Language (TOEFL), and other training provider-specific assessment tools allow the customer and Workforce Solutions office staff to determine the viability of proposed training. All training activity supported under TAA must meet the approval criteria set forth in 20 CFR §617.22(a).

During State Fiscal Year 2019 (FY'19), the Texas workforce system provided the following TAA services and outcomes:

- 2,293 workers were determined potentially TAA eligible and outreached for service provision;
- 349 workers applied for TAA services or benefits;
- 1,006 workers participated in TAA-supported training services; and
- 65 workers participated in vocational and remedial training programs, either integrated or conducted concurrently at the same school.

The following TAA performance results were attained in FY'19

- 870 workers (72.3 percent) entered employment;
- 92 percent of workers entering employment retained employment over the following three quarters;
- Workers securing employment regained 98 percent of pre-layoff wage levels, based on a six-month follow-up; and
- 149 workers participated in basic skills enhancement during TAA-supported training.

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.

Allotments under WIOA enable the state to assist Boards in providing workforce investment activities for adults and dislocated workers.

Workforce development and adult education and training are key services available to prepare job seekers for success in jobs that employers need filled. By improving the skills, education, and literacy levels of individual adults and dislocated workers, these services improve their subsequent employment, job retention, and earnings.

Alternative Training Models

Texas uses several alternative training programs as part of its workforce development strategy. These programs involve TWC collaborating with Boards, companies, and education training providers to improve training, as well as awarding a competitive grant program for training programs. These are discussed in other sections of the plan; however, a few deserve highlighting because of their success in advancing high-quality on-the-job training and incumbent worker training for both the participant and the employer.

The Skills Development Fund is Texas' premier job-training program providing training opportunities for Texas businesses and workers. Funding for the program is administered by TWC. Success is achieved through collaboration among businesses, public community and technical colleges, Boards, and economic development partners.

The Skills Development Fund program assists businesses and trade unions by financing the design and implementation of customized job-training projects. This fund merges business needs and local customized training opportunities into a winning formula to increase the skills levels and wages of the Texas workforce.

The Skills for Small Business program receives financing out of the Skills Development Fund. The Skills for Small Business program is dedicated to supporting the backbone of Texas' economy—small employers. Businesses with fewer than 100 employees can apply to TWC for training offered by their local community or technical college, or the Texas Engineering Extension Service (TEEX). The program trains newly hired employees, with the intent of helping to fill positions for work that employers currently cannot fill and that often pay better than most jobs. TWC works with the college to fund the specific courses selected by businesses for their employees.

The Skills for Veterans initiative also receives financing out the Skills Development Fund, in order to specifically address the training needs of post-9/11 veterans returning home and entering the Texas workforce. Skills for Veterans train veterans for jobs in high-demand by Texas employers. Employers that hire post-9/11 era veterans, including those who served in Operation Iraqi Freedom/Operation New Dawn or Operation Enduring Freedom, may be eligible to participate in this training opportunity, offered by their local community or technical college, or TEEX.

The Self-Sufficiency Fund program assists businesses and trade unions by financing the development and implementation of customized job-training projects for new and current workers. Self-Sufficiency Fund grants offer businesses customized training solutions that

support workforce hiring efforts and skills upgrading for current workers. The purpose of the Self-Sufficiency Fund is to provide training for targeted employment opportunities, primarily for adult TANF recipients as well as those individuals at risk of becoming dependent on public assistance.

2. REGISTERED APPRENTICESHIP

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

Apprenticeships are industry-driven, high-quality career pathways during which employers can develop and prepare their future workforce.

Registered Apprenticeship programs (RAPs) are automatically approved for the statewide Eligible Training Provider List (ETPL). RAP sponsors make a request through the state's ETP Unit or Office of Apprenticeship and provide minimal information to TWC for inclusion on the ETPL.

Once included on the statewide ETPL, RAPs are available for any WIOA participant in Texas. Boards use their WIOA formula funds to fund Individual Training Accounts (ITAs) for the instructional portion of these programs. Additionally, Boards are encouraged to consider funding the work component of RAPs through on-the-job training. Promoting informed consumer choice, Boards provide access to the full statewide ETPL, ensuring that program participants approved for training can choose the best program for their needs.

TWC received $5.4 million in expansion grant funding and is using the funding to increase, expand, and integrate the RAP model into new occupations and new populations, further increasing RAP opportunities for which Boards can use their local formula funds.

TWC's Commissioners and Office of Apprenticeship promote the apprenticeship model to Boards, employers, and industry groups throughout the year, including at TWC's annual *ApprenticeshipTexas* conference.

Boards use allocated WIOA formula funds to train individuals based on training eligibility, need, skills, and interest. Work-based training is a priority for the state and Boards. The "earn while you learn" model helps participants gain a hands-on education while earning a salary. Many Boards promote pre-apprenticeship programs—such as Austin's MC3 building trades program, or Houston's Trio Electric training program—to their younger community not only as a step toward apprenticeship programs but as a step toward financial security.

The apprenticeship program serves employers and job seekers by training workers for well-paying jobs with promising futures. Texas law and rule support only DOL-registered apprenticeship training programs, which pay part of the cost of job-related classroom instruction. TWC coordinates the state's apprenticeship training program, applying approximately $1.6 million in WIOA statewide-discretionary funds to supplement state general revenue appropriations. The Texas legislature has authorized approximately $2.8 million in general revenue each year of the current biennium. Of the total ApprenticeshipTexas Grant, 49 percent was awarded to seven Boards. In FY'19, 6,449 apprentices participated in the apprenticeship training program, exceeding the Legislative Budget Board (LBB) performance measure of 6,111.

In April 2018, TWC adopted program rule changes to align with changes enacted by House Bill (HB) 2790, 85th Texas Legislature, Regular Session (2017), relating to funding for certain apprenticeship training programs. HB 2790 expanded the list of eligible applicants to include

sponsors that apply through an apprenticeship committee. Before the enactment of HB 2790, grant funds were appropriated to local education agencies, which acted as fiscal agents for registered apprenticeship training programs. With the passage of HB 2790, a registered apprenticeship training program's apprenticeship committee may now apply for grant funding directly, without partnering with a public-school district or a state postsecondary institution.

Beginning in FY'20 TWC's new apprenticeship training performance measure will be increased from 6,111 to 6,650 individuals served/trained per year as established with the approval of the TWC's Legislative Appropriation Request of an additional $1.3 million in FY'20 and FY'21. With these additional funds, TWC can help address demand for apprenticeship opportunities across Texas.

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 application process for training providers largely remains the same as that of WIA; however, WIOA established additional requirements, specifically to provide more information and criteria for initial and continued eligibility to receive funds. These requirements ensure both the quality of the training programs and the opportunity for customer-informed choice regarding the available programs.

The Boards will continue to solicit training and education providers to submit applications for eligibility to receive WIOA funds for educational programs. Programs must support statewide targeted occupations and lead to a recognized credential, measurable skill gain, or employment. TWC will solicit Registered Apprenticeship sponsors at least annually for inclusion on the statewide ETPL. This solicitation serves to ensure the continuation of a robust list of training providers throughout the state and in rural areas, including distance-learning options.

Starting January 1, 2016, all training providers must submit information and criteria as established under WIOA §122(d) through (g). Training providers use TWC's Eligible Training Provider System (ETPS) to provide all required information for initial eligibility for each program of study directly to local Boards. ETPS doubles as TWC's program certification system and the Statewide Eligible Training Providers List (ETPL), as required by WIOA §122 (a)(3). Boards then review and certify the provider and program if minimum requirements are met, as established by the governor or higher standards as determined by Board policy. Following local approval, Boards submit training provider and program information to TWC for final review before addition to the statewide ETPL. The Statewide ETPL is published on the agency's website. Eligible Training Providers are required to submit student-level data directly to TWC annually, in July. Continued eligibility determinations take place on a biennial basis.

Initial Eligibility Criteria

Prior to inclusion on the statewide ETPL, except for RAPs, a training provider must submit general information through the ETPS to its local Board, determined by the primary campus location. The required general information includes:

- data required by ETA-9171;
- contact information; and
- other information useful for the statewide ETPL, such as

- a description of each training program offered by the provider;
- presence of onsite child care for campus(es);
- alternate hours for trainings; and
- campus accessibility.

In addition to general information, a provider must submit to the Board evidence of each program's partnership with a business. The Board must ensure that each program aligns with an in-demand or targeted occupation in the state and is appropriately licensed or exempt in accordance with the Texas Education Code.

Following Board review, providers must submit student-level information, including Social Security numbers (SSNs) and credential outcomes where applicable, for all students connected to the trainings during the most recently reported ETP Performance Year (PY). TWC uses SSN data to gather WIOA performance indicator–related data for programs beyond the credential rate information provided by the training providers. During initial eligibility determination, TWC may review existing programs for a provider, or exempt from student reporting for new programs, those which have not been delivered to any students at the time of application.

Continued Eligibility Criteria

Continued eligibility is determined by using the provider-submitted information from the most recent annual reporting period. The annual reporting information provided by ETPs includes information on alternate hours of trainings (for employed individuals) and accessibility-related features of campuses and programs. TWC is enhancing the ETP system to further align with WIOA requirements. When these enhancements are rolled out (Summer 2021), providers will have open-text fields to enter detailed information on these features of the programs and campuses. This information is included on the statewide ETPL. Texas maintains a robust system of training providers and programs, including hundreds of online training programs available to students anywhere in the state, including in rural areas. TWC will revise its ETP guidance for Local Workforce Development Boards to include information on accessibility for individuals with barriers to employment, including individuals with disabilities. This guidance will be available at https://twc.texas.gov/agency/laws-rules-policy/workforce-policy-and-guidance.

Continued eligibility for the statewide ETPL requires that programs, except RAPs:

- submit evidence of a partnership with a business;
- are aligned with an in-demand or targeted occupation in the state;
- are appropriately licensed, or exempt from licensure, in accordance with the Texas Education Code; and
- on or before the required reporting deadline, submit annual reports that:
    - provide TWC with data needed to determine performance outcomes related to WIOA employment and credential performance indicators;
    - identify whether a program leads to a recognized postsecondary credential; and
    - indicate the overall quality of provider programs.

Annual Reporting

All providers, except RAPs, shall be required to report information, including performance outcomes, on each program included on the statewide ETPL.

Annual reports require providers to submit, or verify, the following information:

- General provider, location, and program information (including contacts)
- Compliance with WIOA provisions and regulations
- Acknowledgment of TWC's Family Educational Rights and Privacy Act (FERPA) authority
- Student-level data for all students participating in programs during the previous PY
- Other information that TWC may determine to be necessary or useful for the statewide ETPL

Such information is required to be submitted no later than TWC's deadline each year, usually the end of July. Providers requiring assistance with completing these reports are encouraged to reach out to TWC for direct assistance before the reporting deadline. Reporting extensions may be granted on a case-by-case basis to providers/programs when requested before the reporting deadline. TWC will consider requests related to circumstances beyond the provider's control, such as:

- natural disasters;
- national emergencies; and
- unexpected personnel or technology issues (provided these occurred within 30 days or fewer from reporting deadline).

Providers failing to report information on a timely basis (that is, on or before the deadline or extended deadline), will have affected programs removed from the ETPL as described in the *Removal from ETPL* section.

TWC accepts schools in compliance with the Texas Education Agency (TEA) and Texas Higher Education Coordinating Board (THECB) as eligible for the ETPL once they submit information required by WIOA. Additionally, proprietary schools in Texas must be licensed (or exempted from such licensure) by TWC's Career Schools and Colleges (CSC) Department. This licensure includes annual student performance reporting. TWC collaborates with TEA and THECB in a Tri-Agency Workforce Initiative known as 60X30TX. As part of this project, integrated reporting on all Texas schools and student outcomes is made available publicly at the following address: http://www.txhigheredaccountability.org/acctpublic/.

Performance Targets

Beginning November 26, 2018, TWC removed minimum performance standards for programs from eligibility standards but continues to collect this information during required annual reporting. Once sufficient baseline data are gathered, the data will be analyzed and evaluated for purposes of proposing new state performance standards. TWC continues to require providers, except RAPs, to submit performance outcomes annually. Program outcomes are included on the statewide ETPL for all programs, in aggregate form. (Any program with five or fewer student records to report in a single year, will not have data published in order to protect the individual's information.)

Removal from ETPL

Training providers may request voluntary removal of training programs from the ETPS at any time they no longer offer or wish to maintain training programs on the ETPS. Providers, including RAP sponsors, that violate WIOA Title I provisions or WIOA regulations (including 29 CFR part 38), or are found to have intentionally supplied inaccurate or false information, shall be removed from the statewide ETPL at such time as the violation is discovered. For such substantial violations, removal will result in ineligibility for the ETPL for a minimum of two years. Providers that fail to provide required annual performance and other information for programs, shall have such programs, except RAPs, removed from the statewide ETPL.

Providers may appeal involuntary removal decisions to the Board or TWC, as appropriate, in accordance with TWC's existing appeals process as set forth in the Chapter 823 Integrity of the Texas Workforce Commission rules (20 Texas Administrative Code). Providers may appeal Board decisions to TWC. TWC decisions are final.

Registered Apprenticeship Programs

Apprenticeship programs that are registered with the DOL Office of Apprenticeship are automatically eligible for inclusion on the ETPL. RAPs are given an opportunity to request inclusion on the ETPL directly to TWC. RAP sponsors must provide basic program information, which includes general descriptions of the sponsor and training sites, contact information, program details, and general cost information. These data are used by Boards to inform participants of training expectations prior to referral. RAPs are not required to provide performance or outcome data to TWC. To ensure a robust system of consumer choice, RAP sponsors may choose to provide such data. Data submission will not delay, nor otherwise affect, RAP inclusion on the statewide ETPL.

Except where WIOA violations occur, RAPs will remain on the ETPL for as long as the program is registered with DOL or until they request to be removed.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDED BY THE ADULT FORMULA PROGRAM

Priority for individualized career services and training services are provided on a priority basis, regardless of funding levels, to:

- public assistance recipients;
- other low-income adults; and
- individuals who are basic skills deficient.

The individuals who receive these services are prioritized accordingly:

1. Eligible veterans and eligible spouses (as defined in WD Letter 25-15[1]) who also are recipients of public assistance, low-income, and/or basic-skills deficient
2. Foster youth and former foster youth, up to age 23, who also are recipients of public assistance, low-income, and/or basic skills deficient
3. All other individuals who are recipients of public assistance, low-income, and/or basic skills deficient
4. All other eligible veterans and eligible spouses

5. All other foster youth and former foster youth, up to age 23
6. All other individuals, including Boards' local priority groups

TWC ensures that local Board policies are in place to ensure priority for the populations described above. In addition, TWC allows Boards the flexibility to create a policy that includes a process that also gives priority to other individuals, as long as priority for those individuals come after the first five groups described above.

For example, Boards may establish local priority groups for older workers (age 40 or older) or employed individuals whose income is below the Board's self-sufficiency level, but these local priority groups do not replace the statutory priority given to individuals who are recipients of public assistance, low-income, or basic skills deficient. The Board's local priority groups must fall within Group 6, "All other individuals, including local Boards' local priority groups" as listed above.

[1] WD Letter 25-15 issued October 26, 2015, titled "Applying Priority of Service and Identifying and Documenting Eligible Veterans and Transitioning Service Members."

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

TWC established a policy that allows Boards the flexibility to transfer up to 100 percent of funds between WIOA adult and dislocated worker allocations consistent with WIOA provisions. The policy states Boards that are under a Technical Assistance Plan or Corrective Action Plan for an adult or dislocated worker program may be subject to limitations on the amounts they can transfer.

C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

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

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS OR CONTRACTS.[11]

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

<u>State-Developed Criteria in Award of Grants or Contracts for Youth Workforce Investment Activities</u>

TWC allocates youth formula funds to Boards, that in turn contract with service providers to deliver services to youth in their respective workforce areas. Boards are required to meet all federal and state programmatic requirements.

Boards will ensure that:

- contracts include clearly defined goals, outputs, and measurable outcomes which directly relate to program objectives;

- contracts include clearly defined sanctions or penalties for noncompliance with contract terms and conditions; and
- the contractor has implemented a formal program using a risk assessment methodology to monitor compliance with financial and performance requirements under the contract, including a determination of whether performance objectives have been achieved.

Board Assessment of Providers' Performance Accountability Measures

TWC maintains a rigorous performance and accountability system, holding Boards accountable for their performance as it pertains to the youth program as it does with other workforce programs, and Boards have rigorous standards in place for their contracted service providers. Boards ensure that all 14 program elements—to include financial literacy and services that provide labor market and employment information about in-demand industry sectors or occupations available in workforce areas—are available to youth participants.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

A segment of out-of-school youth are unemployed and may also be enrolled in public assistance programs or detained by the juvenile or criminal justice systems. In addition, many out-of-school youths are dropouts, which may present a significant employment barrier.

Youth who are no longer in the public school system and are seeking to enter the labor market for the first time are inexperienced. As such, Boards design services that:

- acknowledge the problems and characteristics of inexperienced job seekers;
- outreach and engage with the growing out-of-school youth population;
- obtain and use information concerning the conditions of employment affecting youth and labor laws restricting their employment;
- develop and maintain effective relationships with schools, colleges, and other training providers; and
- develop employment opportunities with career potential for youth.

Texas operates an integrated workforce system that relies on collaboration and coordination amongst partners. This collaboration and coordination is necessary when developing strategies to achieve improved outcomes for out-of-school youth, as this population will often seek assistive services from public or private CBOs. As such, partner programs build on existing partnerships—and develop new partnerships as needed—with community-based providers such as child welfare agencies, social service organizations, group homes, probation or parole officers, and local schools to find and engage at-risk youth before they become disconnected.

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED,

INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT. [12]

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

Texas shares the purposes of WIOA, including fostering integrated systems, coordinated services, career pathways, and multiple forms of engagement with businesses to benefit all customers, particularly youth. TWC recognize that career and personal success is a result of lifelong learning and continued growth in skill and abilities.

Boards develop a strategic and operational plan for implementing WIOA youth programs consistent with the governor's vision of strengthening the academic and future workplace outcomes for youth facing challenges and barriers to success. Boards design activities consistent with the specific eligibility criteria for two groups described in the WIOA Title I youth formula-funded program: in-school youth (ISY) and out-of-school youth (OSY).

Boards are encouraged to conduct thorough analysis of local gaps in youth-serving programs, and then identify the most appropriate education or training, or employment activities, to undertake. Certain services of WIOA youth programs are required, as proposed by regulation §681.460 of WIOA §129(c)(2), including the following:

- Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to a high school diploma or its recognized equivalent or postsecondary credential
- Alternative secondary school services or dropout recovery services
- Paid and unpaid work experiences that have academic and occupational education as a component, such as summer and non-seasonal employment, pre-apprenticeship programs, internships and job shadowing, and on-the-job training, in the private for-profit or nonprofit sectors
- Occupational skills training, which includes priority consideration for training programs that lead to recognized postsecondary credentials in in-demand industries or occupations in the local area
- Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation
- Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors
- Support services, such as linkages to community services, assistance with transportation, child and dependent care, assistance with housing, needs-related payments, assistance with educational testing, reasonable accommodations for youth with disabilities, referrals to health care, and assistance with uniforms or other appropriate work attire and tools
- Adult mentoring for at least 12 months
- Follow-up services for not less than 12 months after completing participation
- Comprehensive guidance and counseling, such as drug and alcohol abuse, as well as referrals to counseling, as appropriate
- Financial literacy education

- Entrepreneurial skills training
- Services providing labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services
- Activities that help youth prepare for and transition to postsecondary education and training

Boards ensure that all 14 program elements—including financial literacy and services that provide labor market and employment information about in-demand industry sectors or occupations available in workforce areas—are available to youth participants.

Every individual meeting criteria for ISY or OSY eligibility may participate in the above services, if formally enrolled in the program and appropriate for the participant's assessment and individual service strategy. Continuous performance assessment, technical assistance, and monitoring are fundamental to the Boards' compliance with the design framework service of local youth programs, as proposed in regulation §681.420.

Outreach specialists dedicated to the Migrant and Seasonal Farmworker (MSFW) community collaborate with Boards to inform youth in this targeted population of educational, training, and employment services. Concurrently, local youth-serving agencies facilitate counseling of MSFW youth on programs to complete their secondary education and prepare for economically sustaining employment.

Boards recognize that successful implementation of WIOA's purposes rests on youth programs that reconnect OSY to education and jobs. The OSY population consists in large part of high school dropouts who are likely to face significant barriers to employment. WIOA increased the minimum OSY expenditure rate for youth formula-funded programs to 75 percent. However, DOL approved TWC's waiver request to reduce the minimum OSY expenditure rate to 60 percent.

Youths who are no longer in the public-school system and are seeking to enter the labor market may face extraordinary barriers. Boards design services that:

- acknowledge the challenges and characteristics of inexperienced job seekers;
- obtain and use information concerning the conditions of employment affecting youth and labor laws restricting their employment;
- develop and maintain effective relationships with schools, colleges, and other training providers; and
- develop employment opportunities for youth with career potential.

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.

TWC provides Boards the flexibility to define the "additional assistance to complete an educational program, or to obtain or retain employment" criterion, as set forth in WIOA. The state policy is as follows:

"The Board must establish definitions and eligibility documentation requirements for the 'requires additional assistance to complete an educational program, or to obtain or retain employment' criterion of ISY and OSY eligibility."

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE "NOT ATTENDING SCHOOL" OR "ATTENDING SCHOOL," INDICATE THAT IS THE CASE AND PROVIDE THE STATE POLICY FOR DETERMINING WHETHER A YOUTH IS ATTENDING OR NOT ATTENDING SCHOOL.

Texas law does not explicitly define the terms "attending school" and "not attending school."

For the purpose of determining in-school youth and out-of-school youth eligibility under WIOA, TWC has established that a youth is "attending school" if the youth is:

- enrolled in a school that leads to the attainment of a state-recognized high school diploma, including a public school, charter school, or private school; disciplinary alternative education program; or
- homeschooled;
- attending high school equivalency programs;
- a high school graduate who has registered for postsecondary classes, even if not yet attending postsecondary classes;
- attending postsecondary classes; or
- in between postsecondary school semesters and has registered for classes for a future semester or has paid all or part of the tuition for a future semester.

TWC has established that a youth is "not attending school" if the youth:

- has at least 10 consecutive days of unexcused absences and on the date of eligibility determination has not returned to school;
- is not attending postsecondary school on the date of eligibility determination;
- has not registered for postsecondary school classes on the date of the eligibility determination; or
- is enrolled only in non-credit-bearing postsecondary classes

The following programs are not considered "in school" under WIOA:

- Adult education provided under Title II of WIOA
- YouthBuild programs
- Job Corps programs
- High School Equivalency programs not funded by the public K-12 system
- Dropout reengagement programs not funded by the public K-12 system

Alternative Education—A disciplinary alternative education program is established in conformance with Texas Education Code §37.008. Alternative education is an educational and self-discipline alternative instructional program, adopted by local policy, for students in elementary through high school grades who are removed from their regular classes for mandatory or discretionary disciplinary reasons. Juvenile justice alternative education programs were created to serve the educational needs of juvenile offenders and at-risk youth who are expelled from the regular classroom or the school district disciplinary alternative education program. (Texas Education Code, Chapter 37)

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL'S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

Texas uses the basic skills deficient definition contained in WIOA Section 3(5)(B), as follows:

An individual who meets either of the following criteria satisfies the basic skills deficient requirement for WIOA youth services is a youth who:

- has English reading, writing, or computing skills at or below the 8th-grade level on a generally accepted standardized test; or
- is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

D. SINGLE-AREA STATE REQUIREMENTS

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).)

N/A -- this section does not apply to Texas.

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

N/A -- this section does not apply to Texas.

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

N/A -- this section does not apply to Texas.

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.

N/A -- this section does not apply to Texas.

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.

N/A -- this section does not apply to Texas.

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.

N/A -- this section does not apply to Texas.

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, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; 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 SECRETARY MAY REQUIRE THAT STATES PROVIDE THE MOST RECENT DATA AVAILABLE ABOUT THE OUTCOMES OF THE EXISTING WAIVER IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

WAIVER REQUEST 1

Out-of-School Youth Expenditure Requirement

1. The statutory and/or regulatory requirements the State would like to waive

TWC is seeking a waiver of the requirement under WIOA §129(a)(4) and 20 CFR 681.410 that the state and local workforce areas spend not less than 75 percent of youth funds to provide services to out-of-school youth (OSY).

2. Actions the State has taken to remove state or local barriers

There are no state or local statutory or regulatory barriers that would impede implementation of the requested waiver.

3. State strategic goal(s) and Department of Labor priorities (e.g. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver

This request is for a waiver to allow the state and all workforce areas in Texas the flexibility to direct up to 50 percent of youth funds to deliver workforce and educational services to ISY, while continuing to serve OSY as a priority population. Additionally, TWC is seeking flexibility to calculate OSY expenditures on a collective statewide basis, for all WIOA funds directed toward youth service delivery, instead of siloed calculations associated with formula funding allocated to Boards and the governor's reserve funding. This strategy will allow Boards and the state to more effectively serve youth in need of workforce and educational services.

On September 20, 2018, DOLETA granted this same waiver request to TWC, reducing the OSY expenditure requirement from 75 percent to not less than 50 percent of youth funds. DOLETA authorized the waiver for WIOA program years 2018 and 2019 (July 1, 2018, through June 30, 2020).

While the provision of services to OSY is vital, the requirement to expend 75 percent of youth statewide and formula funds on OSY prohibits states and workforce areas from using discretion when serving youth based on state and local demographics, resources, economies, employment outlooks, and other labor market factors. The requirement also weakens Title I's ability to design and deliver meaningful career pathway programs to all youth, regardless of school status. The 75 percent OSY expenditure requirement limits state and local ability to carry out such initiatives that provide necessary educational and training experiences for students and

that meet employer's workforce education and skills needs. Additionally, granting the wavier would allow much needed flexibility to focus on ISY before they become OSY.

Employer engagement is an essential component of successful youth outcomes. One way that Texas is working to increase employer engagement is by actively encouraging employers to offer students paid internships through the Texas Internship Challenge—a partnership between TWC, TEA, and Texas Higher Education Coordinating Board. This initiative challenges employers to offer paid internships and make it easy for students to search and apply for them. Several employers in high-demand industries have already committed to and are actively involved in this initiative. TWC will continue to encourage more employers to make internships available to students.

Consistent with WIOA's increased emphasis on credential attainment, this flexibility would allow the state and Boards to provide work-based learning opportunities, such as work experience, for ISY as specified at WIOA §129(c)(2)(C) and 20 CFR §681.600. Providing more work-based learning opportunities to ISY would allow Texas to continue strengthening its commitment to developing activities that enhance the choices available to eligible youth and encourage them to complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter into unsubsidized employment that leads to economic self-sufficiency in accordance with WIOA §129(b)(2).

Boards throughout the state host youth career exploration and job fairs to help students identify local resources and connect them to employment opportunities in their area. The 75 percent OSY expenditure requirement restricts Boards' ability to direct adequate resources to these and similar crucial youth outreach activities, which ultimately limits local opportunities to reach ISY.

Additionally, Texas is the nation's second most populous state and the second largest geographically, which means much of the state's population lives in rural areas, which are difficult to outreach and serve. According to the US Census Bureau report, "Life Off the Highway: A Snapshot of Rural America," 15 percent of Texans live in rural areas compared to 4.9 percent of Californians. California's population exceeds Texas' by more than 10 million people, yet more than twice as many Texans (4.2 million) than Californians (1.9 million) live in rural areas. Boards in rural communities have expressed the challenges they face in identifying and serving OSY in those areas. Further, given the economic and employment challenges experienced by many rural communities, ISY residing in rural communities need the assistance offered by the Texas workforce system and would benefit from job fairs, hiring events, paid and unpaid work experiences, and other services and activities in their workforce areas.

Reducing the OSY expenditure requirement to 50 percent and permitting flexibility to calculate OSY expenditures on a collective statewide basis, instead of per workforce area, would allow TWC and Boards to continue serving the OSY population while also increasing their ability to meet the needs of ISY throughout the state in alignment with WIOA's intent by supporting career pathways and the preparation of young people for in-demand careers in the workforce, regardless of a youth's school status. Under this waiver, Boards would continue to serve OSY as a priority population and track OSY services, expenditures, and performance metrics.

Approval of this waiver request would allow TWC to meet the following state goals:

- **Serve youth regardless of school status:** Allow Boards flexibility to increase spending on providing education and training to ISY would not only increase the workforce opportunities available to all youth, but also help prevent at-risk ISY from dropping out of school or not pursuing additional education and training that would lead to meaningful work and economic self-sufficiency.

- **Serve ISY in rural communities:** Help ISY living in rural workforce areas overcome the unique economic and employment challenges facing rural—and often remote—Texas communities.
- **Serve youth according to local and statewide need:** Provide local- and state-level flexibility to serve OSY and ISY in a way that best meets each workforce area's needs according to population, resources, economy, employment outlook, and other labor market factors.
- **Continue serving out-of-school youth as a priority population:** TWC and Boards will continue to give priority of service to OSY and achieve any OSY expenditure target authorized by DOLETA through this waiver request.

This waiver request aligns with DOL's policy priorities in that it:

- focuses on ensuring that eligible youth achieve secondary and postsecondary educational success;
- increases youths' access to and opportunities for the education, training, employment, and support services that they need;
- aligns with WIOA's intent by supporting career pathways and the preparation of young people for in-demand careers; and
- ensures that ISY do not fall into an at-risk category because of expenditure restrictions.

4. Projected programmatic outcomes resulting from implementation of the waiver

Approval of this waiver would permit Boards the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and economic and employment conditions of each workforce area. Increasing outreach to ISY while maintaining a focus on serving OSY will help develop a larger pool of young people qualified and prepared to meet the current and future needs of employers in their workforce areas and throughout the state.

TWC expects that the ability to serve more ISY could have a variety of positive effects for program participants, including:

- increased high school graduation rates;
- an increase in the number of ISYs enrolling in postsecondary education;
- an increase in the number of ISYs enrolling in occupational training programs, including pre-apprenticeship and apprenticeship programs for both traditional and non-traditional apprenticeship occupations; and
- an increase in the number of ISYs completing postsecondary education.

5. Individuals, groups, or populations benefiting from the waiver

- At-risk ISY statewide who face barriers to education, training, and employment
- OSY because they will continue to be served as a priority population in accordance with WIOA
- Boards through increased flexibility to develop unique solutions to better serve youth according to local conditions and needs

6. How the State plans to monitor waiver implementation, including collection of waiver outcome information

Upon DOL's approval of this waiver request, TWC will communicate the waiver allowance to Boards and workforce system partner programs. TWC will monitor progress under this waiver by reviewing monthly performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system. TWC will report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

7. Assurance of State's posting of the request for public comment and notification to affected Local Workforce Development Boards

TWC included this waiver request as part of the agency's 2021-2024 WIOA Combined State Plan when the plan was presented for public comment from November 26 to December 26, 2019. Before posting the plan for public comment, TWC notified all Boards and sought their input regarding this waiver request.

No public comments were received during the 30-day comment period.

WAIVER REQUEST 2

Youth Individual Training Accounts

1. The statutory and/or regulatory requirements the State would like to waive

TWC is seeking a waiver of the requirement under WIOA rule at 20 CFR §681.550, which limits the use of individual training accounts (ITAs) for youth participants to out-of-school youth (OSY) ages 16 to 24. TWC is seeking a waiver of this rule to extend the use of ITAs to in-school youth (ISY).

2. Actions the State has taken to remove state or local barriers

There are no state or local statutory or regulatory barriers that would impede implementation of the requested waiver.

3. State strategic goal(s) and Department of Labor priorities (e.g. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver

This request is for a statewide waiver to grant ISY ages 14–21 the same participant choice options that OSY have by allowing workforce area staff to use ITAs when appropriate to provide education and training to ISY.

On October 11, 2017, in response to Hurricane Harvey, the DOLETA granted TWC this same waiver request. Then, on September 20, 2018, DOLETA authorized TWC's subsequent request for general use of the waiver for WIOA PY'18-'19 (July 1, 2018, through June 30, 2020). Of the ISY receiving training services, 58 percent in PY '18 and 31 percent in PY '19 were funded through ITAs.

Boards are using or have used ITAs to fund training for ISYs enrolled in several programs, including:

- Welding and welding technology

- Nursing, including CNA, LVN, and RN
- Non-destructive testing specialist
- Registered apprenticeship programs including plumbing, pipefitting, and steamfitting
- Pre-apprenticeship programs including plumbing and electrical
- HVAC
- Business management

Many Boards that are not already using this waiver flexibility to serve ISYs intend to do so and have been working toward implementation.

Boards view this waiver as an excellent opportunity to promote apprenticeship programs and utilization of pre-apprenticeship standards, with a focus on non-traditional industries and occupations. This waiver can also better assist ISY in Texas by providing training that will result in training certificates for better employment opportunities, which will allow youth participants to continue furthering their education and become self-sufficient.

Once a youth enrolls in a WIOA program as an ISY, that youth maintains ISY status until exiting the program. Excluding ISY from receiving ITAs undermines WIOA's goals to expand program options, increase program flexibility, and enhance customer choice. DOL states in the preamble to the WIOA Final Rule that ISY age 18 or older may access ITAs through the adult program. This is problematic in that it excludes ISY from entering ITA-funded educational and training programs that may be critical to ISY who drop out or are at risk of dropping out of school. Youth caught in this gap are susceptible to leaving the workforce program and not achieving the education, training, and certifications that develop the skills employers require and that lead to economic self-sufficiency.

This waiver would permit Boards to provide certain ISY with ITAs. Such flexibility would allow workforce area staff the necessary flexibility to use Youth formula funds when appropriate to meet the individual training and employment needs of certain at-risk ISY participants. Boards would be required to track performance for ISYs using ITAs.

This waiver is intended to benefit ISY ages 14–21. While the waiver would mostly be used for ISY ages 16–21, some ISY ages 14–15 may benefit if they are participating in dual-credit education and training programs.

Approval of this waiver request would allow TWC to meet the following state goals:

- **Increase in-school youths' access to educational and training programs:** Allowing Boards flexibility to use ITAs to provide education and training for ISY would increase the workforce opportunities available to youth and help at-risk ISY to pursue education and training that would lead to meaningful work and economic self-sufficiency.

This waiver request aligns with DOL's policy priorities in that it:

- increases youths' access to and opportunities for the education, training, employment, and support services that they need;
- ensures that at-risk ISY do not fall into a regulatory gap that could prevent them from receiving the education and training necessary to securing meaningful work and economic self-sufficiency; and

- supports WIOA's goals to expand program options, increase program flexibility, and enhance customer choice.

4. Projected programmatic outcomes resulting from implementation of the waiver

Disrupting a youth participant's access to education and training services increases the probability that the youth will not complete the program. The approval of this waiver would allow Boards to provide seamless service continuity to ISY who drop out of school or are at risk of dropping out of school. Through this waiver, ISY who drop out of school would not need to exit the youth program and then wait 90 days to re-enroll as an OSY.

By eliminating the 90-day period between ISY exit and OSY or adult enrollment, TWC expects this waiver to increase the number of at-risk ISY who enroll in and complete education and training programs.

5. Individuals, groups, or populations benefiting from the waiver

ISY who drop out of school or are at risk of dropping out of school.

6. How the State plans to monitor waiver implementation, including collection of waiver outcome information

Upon DOL's approval of this waiver request, TWC will communicate the waiver allowance to Boards and workforce system partner programs. TWC will monitor progress under this waiver by reviewing monthly performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system. TWC will report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

7. Assurance of State's posting of the request for public comment and notification to affected Local Workforce Development Boards

TWC included this waiver request as part of the agency's 2021-2024 WIOA Combined State Plan when the plan was presented for public comment from November 26 to December 26, 2019. Before posting the plan for public comment, TWC notified all Boards and sought their input regarding this waiver request.

No public comments were received during the 30-day comment period.

WAIVER REQUEST 3

Local Performance Accountability Flexibility

1. The statutory and/or regulatory requirements the State would like to waive

TWC is seeking a limited waiver from WIOA §116(c) pertaining to local performance accountability measures for Subtitle B.

2. Actions the State has taken to remove state or local barriers

There are no state or local statutory or regulatory barriers that would impede implementation of the requested waiver.

3. State strategic goal(s) and Department of Labor priorities (e.g. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver

TWC requests a waiver from WIOA §116(c) to allow greater flexibility when contracting performance measures with the Boards to allow TWC to promote further integration of services within Workforce Solutions Offices.

Specifically, TWC is requesting the flexibility to modify Board performance measures. Under this proposed waiver, TWC will continue to track and report the core indicators of performance at both state and Board levels as required by WIOA §116; however, the waiver will give TWC the flexibility to select among the statutory Title I measures and develop other measures to use in its Board contracts. TWC is interested in developing Board-contracted measures that support integration and that may be leading indicators for the statutorily prescribed measures to make them more useful to the Boards.

Prior to WIOA, under the Workforce Investment Act (WIA), TWC had a similar waiver that provided this flexibility in selecting and developing local performance accountability measures. This waiver was in place for more than 10 years and allowed TWC to use a set of more integrated outcome measures that were aligned with the old WIA common measures but that were applicable to all participants, regardless of program. Through the Local Accountability Flexibility Waiver, TWC improved program integration and streamlined the agency's performance accountability model.

However, WIOA implementation resulted in the loss of that historic waiver and reintroduced a focus on "siloed" program outcomes rather than purely customer-focused considerations into the Texas workforce system. WIOA's requirement to contract separate indicators of performance by program to the Boards unnecessarily siloes service delivery and may rebuild a barrier to integration that TWC was able to mostly remove under the prior waiver.

While this proposed waiver would provide TWC flexibility in selecting Board performance measures, WIOA §116(g) will continue to provide sanctions for a Board's failure to meet any of the WIOA performance measures. Although the approval of this waiver would provide TWC with additional flexibility in determining which measures to formally contract to the Boards, accountability will not be impacted, as TWC would still apply the sanction provisions of WIOA §116(g) to those measures that are formally contracted.

Approval of this waiver request would allow TWC to meet the following state goals:

- **Increase integration of services to customers:** Boards are responsible for implementing many federal and state workforce development programs, allowing them the opportunity to integrate service delivery; however, programs are partially driven by how performance is measured. Programs with different measures of success require different means of management. Rather than focusing on employers' needs and finding job seekers to fill those needs, staff must focus on the specific outcome expectations of the program that funds the services that the customer receives.
- **Better alignment in performance accountability at the state, local, and service provider levels:** Because Boards are responsible for numerous workforce development programs, coenrollment of customers in multiple programs is becoming increasingly commonplace. Therefore, TWC believes that the most effective way to evaluate Boards and to promote accountability is to use integrated performance measures.

- **Greater flexibility to Boards in designing and implementing one-stop services:** By eliminating program-specific measures and applying integrated performance measures across all programs, TWC will promote service-delivery designs that are based on the needs of its customers, including employers, rather than siloed program requirements.

This waiver request aligns with DOL's policy priorities in that it:

- supports employer engagement by promoting service-delivery designs that are based on employer needs;
- improves job and career results by identifying employers' needs and connecting employers with job seekers to meet those needs;
- promotes more integrated case management across multiple programs, as WIOA envisions; and
- maintains and enhances state and local performance accountability.

4. Projected programmatic outcomes resulting from implementation of the waiver

The approval of this waiver would result in the continued administrative relief that would remove barriers to coenrollment and promote more integrated case management across multiple programs, as WIOA envisions. TWC strongly supports the concept that programs with similar outcome objectives should be measured in a similar fashion.

TWC has developed a set of systemwide performance measures for the Texas legislature and the governor to evaluate the Texas workforce system. Texas' new measures will be system measures applied across all programs. For example, there will be a systemwide measure based on an unduplicated list of exiters from all workforce programs (using the federal "soft exit" methodology). These measures will make no distinction between customers served by Employment Service; WIOA Adult, Dislocated Worker, and Youth; TANF; SNAP; other various state-level programs; or a combination of programs.

Approval of this waiver would continue to allow the streamlining of administrative processes, resulting in maximized resources focused on employment outcomes.

5. Individuals, groups, or populations benefiting from the waiver

- Employers
- Job seekers
- Incumbent workers
- Workforce area staff

6. How the State plans to monitor waiver implementation, including collection of waiver outcome information

Upon DOL's approval of this waiver request, TWC will communicate the waiver allowance to Boards and workforce system partner programs. TWC will monitor progress under this waiver by reviewing monthly performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system. TWC will report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

7. Assurance of State's posting of the request for public comment and notification to affected Local Workforce Development Boards

TWC included this waiver request as part of the agency's 2021-2024 WIOA Combined State Plan when the plan was presented for public comment from November 26 to December 26, 2019. Before posting the plan for public comment, TWC notified all Boards and sought their input regarding this waiver request.

No public comments were received during the 30-day comment period.

WAIVER REQUEST 4

Reallocation Waiver

1. The statutory and/or regulatory requirements the State would like to waive

TWC is seeking a waiver from the provisions of WIOA §128(c)(3) and §133(c), regarding reallocation among local areas. This waiver would provide flexibility to TWC in redistributing funds among workforce areas.

2. Actions the State has taken to remove state or local barriers

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

Since DOL first approved this waiver request on November 17, 2010, under WIA and then under WIOA in 2016 and again on September 20, 2018, this waiver has provided TWC the flexibility to redistribute recaptured funds to workforce areas where the greatest potential may be realized, thus ensuring more effective and more efficient use of federal funds. TWC will continue to apply this strategy and monitor outcome success.

In June 2006, TWC adopted rules to integrate the agency's deobligation and reallocation policies for all Board-administered funds, thus establishing consistent procedures to apply to all workforce funds administered by the Boards, in support of a fully integrated system.

- Deobligations must pass a multilevel review process:
    - Expenditures are reviewed monthly (performance is also considered).
    - If expenditures are trending low, staff provides technical assistance to the Boards.
    - Boards are given an opportunity to get expenditures back on track.
    - When it becomes clear that Boards will not be able to meet the expenditure benchmark, discussion regarding the possible deobligation occurs and we receive concurrence from the Board executive directors that they will not be able to use the funds.
    - The Commission takes final action in a public meeting.
- Reallocations also must pass a multilevel review process:
    - Expenditures are reviewed monthly (performance is also considered).

- If expenditures are trending high, staff provides technical assistance to the Boards:
    - Boards are given an opportunity to explain why expenditures appear to be high.
    - Boards may identify that the numbers of participants to be served is higher than anticipated and additional funds are needed.
    - Staff verifies through the performance reports that the number of participants is consistent with the Board's explanation of need.
- The Commission takes final action in a public meeting. Final action is taken in a public Commission meeting.

This process has worked well for several years with all Board-administered funds. This same process for reallocation would be used for WIOA funds upon approval of the waiver.

3. State strategic goal(s) and Department of Labor priorities (e.g. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver

TWC requests to continue this waiver of the WIOA statutes relating to the redistribution of recaptured local funds and proposes to base the redistribution of WIOA funds on TWC's allocation rules (40 TAC §§800.51-800.75). TWC ensures that financial reporting will be consistent with current DOLETA requirements and that federal funds will be effectively managed for maximum service provision and program performance.

Approval of this waiver request would allow TWC to continue meeting the following state goals:

- **Redistribution of recaptured funds to workforce areas based on factors established by TWC to ensure that funds are redistributed to workforce areas with the greatest need:** TWC will determine the amounts to be redistributed to workforce areas based on factors such as:
    - requested amount;
    - demonstrated need for and ability to use additional funds to serve low-income individuals, public assistance recipients, dislocated workers, and unemployment insurance claimants;
    - demonstrated capacity to expend the formula funds;
    - a Board's established plan for working with at least one of the governor's industry clusters, as specified in the Board's plan; and
    - performance in the current and prior program years.
- **Facilitation of maximum expenditure of recaptured federal funds:** TWC seeks to redistribute workforce funds to workforce areas that have achieved not only targeted expenditure levels but also established performance targets. Redistributing funds based solely on whether a workforce area achieves its expenditure target does not address performance issues, such as whether the workforce area met employers' needs for a highly skilled and job-ready workforce.

- **Improvement of administrative efficiencies:** Approval of this waiver will serve to minimize administrative processes and costs of contracting by using similar redistribution procedures that support workforce system integration.

4. Projected programmatic outcomes resulting from implementation of the waiver

The statutory reallocation requirements can be fulfilled; however, the amount of funds available for reallocation may be so small that it is cost prohibitive. By using TWC's allocation rules for the redistribution of funds, TWC can ensure that federal funds will be more effectively and efficiently managed for maximum service provision and program performance. Approval of this waiver may not result in significantly higher performance outcomes, but it will provide the opportunity for recaptured funds to be redistributed to workforce areas where the greatest potential impact may be realized. This waiver will streamline administrative practices, allowing for greater efficiency in meeting the workforce development needs of employers and job seekers. Furthermore, it will enhance the quality of services in those workforce areas that have demonstrated consistent performance outcomes. Approval of this waiver will result in a reduction of unnecessary administrative processes.

5. Individuals, groups, or populations benefiting from the waiver

Workforce areas that provide quality services will have access to additional resources to meet the employers' needs, job seekers, and incumbent workers. Additionally, the waiver will allow TWC to continue to promote the cost benefits of improved administrative efficiencies, encouraging the increased leveraging of resources within the workforce areas. As a result, TWC will increase services such as enhanced education, employment, and training opportunities for disadvantaged populations and individuals with multiple barriers to employment.

6. How the State plans to monitor waiver implementation, including collection of waiver outcome information

Upon DOL's approval of this waiver request, TWC will communicate the waiver allowance to Boards and workforce system partner programs. TWC will monitor progress under this waiver by reviewing monthly performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system. TWC will report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

7. Assurance of State's posting of the request for public comment and notification to affected Local Workforce Development Boards

TWC included this waiver request as part of the agency's 2021-2024 WIOA Combined State Plan when the plan was presented for public comment from November 26 to December 26, 2019. Before posting the plan for public comment, TWC notified all Boards and sought their input regarding this waiver request.

No public comments were received during the 30-day comment period.

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 delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	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 equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	76.0%	76.0%	76.0%	76.0%
Employment (Fourth Quarter After Exit)	75.0%	75.0%	75.0%	75.0%
Median Earnings (Second Quarter After Exit)	$5,400	$5,400	$5,400	$5,400
Credential Attainment Rate	69.0%	69.0%	69.0%	69.0%
Measurable Skill Gains	53.6%	58.0%	54.6%	58.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);

- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	73.0%	74.0%	75.0%	74.0%
Employment (Fourth Quarter After Exit)	73.0%	75.0%	75.0%	75.0%
Median Earnings (Second Quarter After Exit)	$8,200	$8,200	$8,200	$8,200
Credential Attainment Rate	74.0%	74.0%	74.0%	74.0%
Measurable Skill Gains	56.2%	58.0%	57.2%	58.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the

Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	70.0%	70.0%	70.0%	70.0%
Employment (Fourth Quarter After Exit)	74.0%	74.0%	74.0%	74.0%
Median Earnings (Second Quarter After Exit)	$3,147	$3,147	$3,147	$3,147
Credential Attainment Rate	63.0%	63.0%	63.0%	63.0%
Measurable Skill Gains	47.3%	50.0%	48.3%	50.0%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

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 HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

TWC appreciates DOL's decision to provide states with increased flexibility in the administration of ES activities funded under the Wagner-Peyser Act. The flexibility created by the final rule removes unnecessary restrictions, thereby allowing TWC to manage the administration of the ES program in the most efficient and effective manner possible. TWC agrees that having the flexibility at the state level to use a staffing model that best fits our needs is beneficial to all customers of the Texas Workforce system, whether the staffing model consists of state staff members who comply with federal criteria for merit personnel systems, local area staff, contracted services staff, other alternatives, or all of these options. TWC is considering the options available in the final rule in order to make policy decisions that will generate results in employment service delivery.

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

Wagner-Peyser-funded Employment Service (ES) staff receives professional development training at new employee orientation, in biannual and annual continuing education classes, and on an as-needed basis to ensure that ES staff is prepared and able to provide high-quality services to both job seekers and employers. ES staff receives training on how to conduct a job search, provide quality customer service, and use the automated state labor exchange, WorkInTexas.com. Performance is monitored closely. As needs arise, Boards also may respond with staff development activities, such as classroom instruction, webinars, and one-on-one training.

TWC implemented the "Texas Model" for the delivery of ES services, which restructured the oversight and responsibility for ES state merit staff. Under the Texas Model, Boards and their Workforce Solutions Offices have full responsibility for day-to-day guidance of state ES staff. TWC still maintains administrative responsibility, but Workforce Solutions Office managers share responsibility for directing daily work assignments, assigning individual performance goals, coordinating hiring, initiating disciplinary action, and evaluating staff performance.

Placing responsibility for ES staff with Workforce Solutions Offices supports an integrated workforce system. Many of the services provided by ES and WIOA are similar. The Texas Model gives Boards and their contractors the opportunity and flexibility to design integrated services, regardless of the program from which they are funded. All direction and guidance given to ES employees must be consistent with the provisions of state and federal laws, rules, and regulations governing the administration and delivery of the ES program. TWC provides technical support and quality assurance to Boards and contracted service providers through local Integrated Service Area Managers (ISAMs). ISAMs serve as the TWC supervisors for Texas Model staff. ISAMs coordinate all Texas Model staff-related actions with Boards and their contractors.

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

Wagner-Peyser-funded ES staff receives professional development training at new employee orientation, in biannual and annual continuing education classes, and on an as-needed basis to ensure that ES staff is prepared and able to provide high-quality services to both job seekers and employers. ES staff receives training on how to conduct a job search, provide quality customer service, and how to use the automated state labor exchange, WorkInTexas.com. Performance is monitored closely. As needs arise, Boards also may respond with staff development activities, such as classroom instruction, webinars, and one-on-one training.

Unemployment claimants and employers are priority customers at Workforce Solutions Offices. Staff must promptly assist claimants and employers wishing to use Workforce Solutions Office resources to transmit materials to TWC for claims and appeals adjudication purposes. Customers must also be given access to space and telecommunications equipment necessary to participate in unemployment compensation hearings. Additionally, staff supports customers with dedicated resources—computers, telephones, and printed materials about claim filing and claimants' rights and responsibilities. Occasionally, staff members encounter situations in which they must speak with a claims specialist on behalf of a claimant. Each Board has a dedicated phone number specifically for staff to use in these situations. These dedicated phone numbers are available only to Workforce Solutions Office staff to assist unemployment benefits claimants in special circumstances.

TWC's Employment Service (ES) Guide:

- provides information on recognizing potential unemployment benefits eligibility issues;
- provides procedures for referring issues to UI staff for adjudication;
- outlines claimants' responsibility to be able and available to accept suitable work; and
- establishes work search requirements that claimants must meet.

As part of the work test requirement, staff must enter services into the WorkInTexas.com job matching system, which transmits job contact outcomes to the Unemployment Benefits System (UBS). The ES Guide lists the specific outcomes that are automatically reviewed by UBS and specifies other potential issues that require manual communication with UI staff.

TWC uses the Potential Unemployment Benefits Eligibility Issue reporting form, which lists examples of issues that could affect a claim and serves as a vehicle for reporting these potential issues. The ES Guide and the Reemployment Services and Eligibility Assessment (RESEA)

Program Guide also outline activities staff must complete when assisting unemployment benefits customers.

In addition to the ES Guide, TWC provides training on unemployment claim investigations and eligibility issues as part of the UI Starter Kit. This tool kit has information on the Workforce and UI partnership, including services ES staff should provide to unemployment claimants, the claimant's responsibilities, and the process for identifying and reporting potential issues.

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

Unemployment claimants are priority customers at Workforce Solutions Offices. Staff promptly assists claimants wishing to use Workforce Solutions Office resources to transmit claim-related materials to TWC for claims and appeals adjudication purposes. Claimants are also given access to space and telecommunications equipment necessary to participate in unemployment benefits hearings. Additionally, staff supports customers with dedicated resources—computers, telephones, and printed materials—to help customers with unemployment-claim filing and claimants' rights and responsibilities.

Occasionally, staff members encounter situations that require that they speak with a claims specialist on behalf of a claimant with urgent and/or time sensitive claim-related issues. Each Board has a dedicated phone number specifically for staff to use in these situations. These dedicated phone numbers are available only to Workforce Solutions Office staff to assist unemployment benefits claimants in special circumstances.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

Wagner-Peyser-funded ES staff in the Workforce Solutions Offices serves all customers. However, TWC has made unemployment claimants a priority population and, in so doing, staff is charged with providing claimants with a wide array of resources and employment services that support reemployment as quickly as possible.

Among those services is the RESEA program, which incorporates the DOLETA-approved statistical model based on the nationally recognized Worker Profiling and Reemployment Services (WPRS) system. This statistical model is used to analyze claimant characteristics, as well as Board-level economic indicators, to assess the likelihood of a claimant exhausting unemployment benefits. Each week, TWC identifies claimants who are most likely to exhaust their unemployment benefits and who have received their first payment of unemployment benefits. Claimants who have likely-to-exhaust scores that are at or above the Board's cutoff score are outreached for services and provided appropriate reemployment services. At a minimum, claimants outreached under RESEA must receive four services; among those services must be RESEA orientation, the provision of customized labor market information tailored to the claimant's individual needs, and one-on-one meetings to develop a reemployment plan and complete an unemployment benefits eligibility assessment.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

Texas benefits from the joint-administration of the unemployment compensation program and workforce services by TWC, which allows efficient coordination between programs. Computer linkages coordinate and provide services between WorkInTexas.com and UBS. These links ensure that unemployment claimants who are required to register have done so and that claimants comply with their work search requirements.

TWC also administers the work test requirement through the link between WorkInTexas.com and UBS. This linkage confirms that proper notification is provided when unemployment claimants fail to register for work or to comply with their work search requirements, including negative referral results or failure to report for an orientation or to employment. Unemployment claimants who fail the work test are held ineligible for benefits until they meet their requirement. TWC's rules regarding unemployment claimants' work search requirements set a minimum weekly search effort, although each Board may raise or lower the number depending upon the local labor market.

Although DOLETA defines "long-term unemployed" as someone who has been jobless for 27 weeks or longer, TWC works to assist and place individuals in jobs before they reach that point. TWC has developed a performance measure that tracks a Board's success in placing job seekers in employment within 10 weeks of their initial monetary eligibility. Boards achieve this measure by providing quality job postings and job development activities coupled with increased outreach to participants to ensure better job applications and quality job referrals.

TWC uses the RESEA program to help claimants find new employment as quickly as possible. As mentioned above, all claimants who are outreached are required to attend an orientation and receive staff assistance in developing an individualized employment plan. Claimants are offered other staff-assisted services as well, including job referrals and job development activities to help in the work search. By contacting their Workforce Solutions Offices or searching TWC's Training and Education web page, claimants also can find educational opportunities, occupational or vocational training, and other resources to help develop their skills.[1]

[1] https://twc.texas.gov/jobseekers/training-education

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

TWC's joint-administration of the UI program and workforce services allows for efficient communication and coordination between programs. WorkInTexas.com and UBS are linked through interfaces, which improves program coordination and the provision of services between programs. Computer system linkages ensure that unemployment claimants who are required to register have done so and that unemployment claimants comply with their work search requirements.

TWC also administers the UI work test requirement through the link between WorkInTexas.com and UBS. This linkage confirms that proper notification is provided when unemployment claimants fail to register for work or to comply with their work search requirements, including negative referral results or failure to report to an outreach request or to employment. Unemployment claimants who fail the UI work test are ineligible for benefits until they meet that requirement. TWC's rules regarding claimants' work search requirements set a minimum

weekly search effort while allowing each Board to raise or lower the number depending upon the local labor market.

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

Texas promotes effective and efficient coordination between the UI program and workforce services through collaborative program administration and computer system linkages that share information and allow staff to coordinate activities and provide services to unemployment claimants. These program and system links ensure that claimants who are required to register in WorkInTexas.com have done so and that claimants comply with their work search requirements.

TWC's link between WorkInTexas.com and UBS also provides a seamless method for administering the UI work test requirement. This linkage confirms that proper notification is provided when unemployment claimants fail to register for work or to comply with their work search requirements, including negative referral results, failure to respond to outreach requests, or failure to report to employment. Unemployment claimants who fail the UI work test are ineligible for benefits until they meet that requirement.

Although DOLETA defines "long-term unemployed" as someone who has been jobless for 27 weeks or longer, TWC strives to assist and place individuals in jobs before they reach that stage. Boards achieve this by providing high-quality job-posting and job-development activities coupled with increased outreach to participants to ensure better applications and quality referrals.

TWC uses the RESEA program to help claimants find new employment as quickly as possible. As priority customers, unemployment claimants are promptly assisted through outreach, orientations, and staff-assisted services that include developing individualized reemployment plans, providing job referrals, working with employers to provide job development activities, and job placements. By contacting their Workforce Solutions Offices or searching TWC's Training and Education web page, claimants can also find educational opportunities, occupational or vocational training, and other resources to help develop their skills.[1]

[1] https://twc.texas.gov/jobseekers/training-education

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

TWC promotes full integration of its workforce system across all programs, which benefits unemployment claimants by making a wide range of publicly or privately funded education, employment, and training programs readily available and easily accessible. By working with staff in their Workforce Solutions Offices or searching TWC's Training and Education web page to explore career and training opportunities, claimants can find educational opportunities, occupational or vocational training, and other resources to help develop their skills.

TWC also helps claimants by helping them, when appropriate, develop a reemployment plan—with education and training goals when appropriate—that includes referrals to appropriate programs and resources as well as application assistance for entry into these programs. Boards also prioritize services for claimants, ensuring prompt assistance through outreach,

orientations, and staff-assisted services that include developing individualized reemployment plans and evaluating labor market information to ensure that the claimant is seeking employment or training in a career field that offers potential for economic growth and financial prosperity.

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.

In Texas, one of every seven working Texans (14 percent) is in an agriculture-related job. The average age of Texas farmers and ranchers is 58 years. Moreover, Texas has more farm operations owned by women and minorities than any other state. The needs of migrant and seasonal farmworkers (MSFWs) are best understood by considering Texas' agricultural industry.

The economic impact of Texas agriculture on the national economy is significant. Texas is in third place with respect to national agricultural production, behind California and Iowa. Texas leads the nation in the number of farms and ranches, with 241,500 covering nearly 130 million acres, and it leads the nation in value of farm real estate. Additionally, Texas leads the nation in the production of cattle, cotton, hay, sheep, goats, wool, and mohair.

Rural lands, including privately owned forest, comprise 144 million acres, which is 86 percent of the state's land area. Twelve percent of Texas' population lives in rural areas, and 98.5 percent of Texas farms and ranches are family farms, partnerships, or family-held corporations.

According to the National Agricultural Statistics Service, US Department of Agriculture; the Texas Department of Agriculture; and the Center for North American Studies, Texas A&M AgriLife Extension Service, the top 10 sources of cash receipts from the sale of US-produced farm commodities are cattle and calves, broilers, dairy products, cotton, greenhouse and nursery, corn, chicken eggs, grain sorghum, wheat, and hay. The food and fiber sector totals more than $100 billion annually, and cash receipts, including timber, average $24.1 billion annually. Additionally, during 2018, Texas sold $7.66 billion in agricultural exports to foreign countries.

National Rank	Commodity	Value in Millions of Dollars
1	Cotton	$2,900
2	Beef	$976
3	Other plant products	$1,500
3	Cattle and Livestock Products	$277

National Rank	Commodity	Value in Millions of Dollars
3	Hides and skins	$149
3	Pecans	$87
4	Cottonseed, Sunflower seed, and their products	$110
5	Rice	$101
5	Milk and milk products	$326
6	Broiler meat	$216
8	Feeds and fodders	$47
8	Fresh fruits	$43
9	Grain products	$288
10	Wheat	$176
11	Other poultry products (eggs, etc.)	$79
12	Corn	$309
12	Fresh vegetables	$45
14	Pork	$50

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

Texas Agricultural Regions

Texas ranked fourth nationally in the value of agricultural exports in 2018 and 12th in fresh vegetable production, accounting for 2 percent of US vegetable production. Texas' fresh vegetable production was valued at $276 million in terms of cash receipts in 2018. The leading counties for vegetable acres harvested were Hidalgo, Starr, and Cameron. Other important counties include Frio, Uvalde, Duval, Webb, Hale, Yoakum, and Zavala. Texas ranked eighth in fruit production and fourth in tree-nut production, with combined fruit and nut production valued at $218 million.

Land preparation, planting, irrigating, and harvesting are ongoing activities. Therefore, agricultural employment occurs at numerous locations and is year-round. Usually, employment for farmworkers begins in the Lower Rio Grande Valley region, served by the Lower Rio Grande Valley and Cameron County Boards, and the Winter Garden and South/Central region, served by the Middle Rio Grande Board. Employment of migrant farmworkers moves northward to the Texas Panhandle as the agricultural season progresses. Workers who follow this crop pattern may migrate to other states as well.

Review of Previous Year's Agricultural Activity in Texas

For the Program Year 2018 (PY'18) Agricultural Outreach Plan (Plan), TWC used the most recent available data. Although Texas regions support a wide variety of agricultural activities, data are not collected by a single entity using consistent time frames and methods. Data are limited for agricultural activities such as producing wheat, grain, and other labor-extensive crops and for intensive-labor production such as cotton ginning. Furthermore, available data sources do not collect production or forecast data based on a federal program year; for the purposes of this plan, calendar years are used when no other data are available. TWC is working with agricultural associations and other sources to improve the data available for planning.

Table 1 summarizes the agronomic crop production statistics for each of Texas' primary growing regions for Calendar Years 2017-2018 (CY'17-'18). Regional production statistics for horticultural crops are also unavailable currently. For agronomic crops, the vast acreages of grain and row crops in the high plains and rolling plains make up most of the 10.7 million acres planted in the plains region. The eastern region of the state accounted for the bulk of the rest of agronomic crop production in Texas. Agronomic crops are typically less labor intensive because more capital machinery is used in planting and harvesting as compared to most horticultural crops.

All data are from National Agricultural Statistics Service, USDA, and Center for North American Studies, Texas A&M AgriLife Extension Service.

Table 1

Region	Area Planted (in acres) in 2017	Area Planted (in acres) in 2018	Area Harvested (in acres) in 2017	Area Harvested (in acres) in 2018	Main Crops
Lower Rio Grande Valley	577,700	556,100	546,900	422,330	corn, cotton, sorghum, sugar cane
Winter Garden and South Central	1,377,300	1,171,200	971,720	697,500	corn, cotton, sorghum, wheat
Plains	10,535,900	10,708,400	7,092,390	5,254,020	corn, cotton, peanuts, sorghum, wheat
Far West	531,500	377,700	373,300	47,200	cotton, wheat
Eastern	3,652,000	3,643,300	3,083,130	2,991,100	corn, cotton, rice, sorghum, soybean, wheat
State Totals	**16,674,400**	**16,456,700**	**12,067,440**	**9,412,150**	

Source: Data is from the National Agricultural Statistics Service, USDA.

Review of the Previous Year's Agricultural Worker Activity in Texas

The Lower Rio Grande Valley has the most labor-intensive production, accounting for most of the horticultural crops in Texas, followed by the Winter Garden and South/Central regions. However, horticultural crops are grown throughout the state. Table 2 provides data on Texas

vegetable production and average monthly labor, with crop information for CY'16 and CY'17. Fruit and vegetable production is typically the most labor intensive.

Table 2

Crop	Calendar Year 2016 Acreage	Calendar Year 2016 Labor	Calendar Year 2016 Number of Months	Calendar Year 2017 Acreage	Calendar Year 2017 Labor	Calendar Year 2017 Number of Months
Citrus (1,000 Boxes)	6,150	3,653	8	6,680	3,955	8
Onions	9,000	1,299	4	4,000	577	4
Cucumbers[2]	1,925	1,684	5	1,760	1,540	5
Cantaloupes[2]	1,590	1,127	2	1,190	191	2
Watermelons[1&2]	30,200	933	6	30,200	1,127	6
Cabbage[2]	6,045	618	5	5,545	566	5
Tomatoes[1]	900	675	7	900	675	7
Spinach, Fresh	2,205	529	4	5,425	1,302	4
Squash	1,900	577	6	1,700	516	6
Peaches (Tons)	4,400	110	3	2,700	68	3
Carrots[1]	1,200	49	3	1,200	49	3
Sweet Corn[1]	4,200	126	4	4,200	126	4
Pecans (1,000 Pounds)	39,000	117	3	37,000	111	3
Honeydews[1]	600	67	2	600	67	2
Potatoes	19,600	288	4	21,500	316	4
Sweet Potatoes[1]	600	13	3	600	13	3
Chili Peppers	3,000	1,125	5	3,100	1,163	5
Bell Peppers[1]	95	160	6	95	160	6
Pumpkins	4.000	149	4	4,500	168	4
Total Acreage	87,060	12,622	N/A	86,515	12,690	N/A

[1] Production acreage is based on production data from the previous year.

[2] Acreage is estimated based on the 2015 yield per acre.

Projected Level of Agricultural Activity in Texas for the Coming Year

As seen nationally, some areas that historically have had high concentrations of agricultural work have experienced industry reduction relative to other types of work, such as employment in the oil and gas, construction, and retail industries. With that industry reduction, there has been a shift in the labor market. While some workers and their families who have long

performed agricultural work are now being employed in nonagricultural industries, other workers are struggling to identify transferable skills that will allow them to obtain nonagricultural jobs. A good example is the Eagle Ford Shale boom in the Winter Garden region (in South Texas, north of Laredo and southwest of San Antonio) and the Cline Shale in West Texas. Although **e**mployers in the oil and gas industry have a relatively large demand for qualified employees, they find few qualified applicants, in part because the local migrant and seasonal farm worker (MSFW) population lacks the relevant transferable skills and training. The industrial shift has created a challenge for agricultural employers as well. Texas is designated as an agricultural supply state, yet many agricultural employers will have fewer laborers to meet demand. With other employment options available that may be less physically taxing, and fewer immigration controls in place, more workers seek nonagricultural jobs. The state's major citrus growers' associations have said that the labor shortage is one of their most critical issues.

Projected Migrant and Seasonal Farm Workers (MSFW) in Texas

According to data from the National Agricultural Statistics Service, USDA, and Texas A&M AgriLife Extension Service, TWC estimates that 289,600 MSFWs will be active in Texas in the coming year. Although it is possible that jobs may be lost because of natural disasters and other adverse events, the number of MSFWs that reside in Texas is anticipated to rise. Currently, there are more than 9,876 active agricultural employers in Texas, based on the North American Industry Classification System codes reported for each employer's UI tax accounts.

Table 3

Agricultural Employers	**PY'17[2]**	**PY'18**
Number of Job Postings[1]	2,410	1,081
Number of Job Openings	14,309	6,325
Number of Job Openings Filled	2,604	853
Percentage of Job Openings Filled	18.1%	13.5%

[1] Number of job postings does not accurately reflect the number of employers because employers may file multiple postings within a year. Each posting may contain multiple job openings.

[2] PY'17 and PY'18 data represent the July 1–June 30 period.

Table 4

Agricultural Employers (H-2A Only)	**PY'17[1]**	**PY'18[1]**
H-2A Job Orders Received	517	524
H-2A Job Orders Certified	408	428

[1]PY'17 and PY'18 data represent the October 1–September 30 period.

Several economic, natural, or other factors affect agricultural production in Texas. The list below does not assign these factors an order of importance, as more than one issue may exist at any time:

- The cost of fuel

- Secondary sources of income related to energy production
- Varied weather patterns. Dry years interspersed with wet years has a critical effect on agricultural production. Because of the size of Texas—268,820 square miles (171,891,725 acres)—weather varies dramatically by geography
- The amount of snowfall in midwestern states can have a negative effect on agricultural production in Texas in relation to the water allotment for irrigation methods along the Rio Grande River.
- Tax policy as it relates to succession from generation to generation. The high average age of farmers—58 years of age—is part of this issue.
- Environmental policies enforced by the Environmental Protection Agency and the Texas Commission on Environmental Quality
- The policy requirements for the agricultural industry established by the Food Safety Modernization Act
- Immigration law and enforcement, particularly as it affects the availability of labor for fruit and vegetable production, but also in other agricultural sectors
- Invasive species coming from other parts of the US or from other countries, which can negatively affect the agricultural production
- The changing nature of US agriculture's domestic policy to a more crop-insurance-based program
- The conversion of agricultural land to developed land for housing and commercial uses
- Water availability affected by weather, the increased need for urban water, and issues related to the 1944 US-Mexico Water Treaty ("Treaty Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande")
- Uncertainty of trade agreements with Mexico and the global economic impact of tariffs that affect agricultural imports and exports

Economic Impact of Imported Fresh Produce from Mexico

Produce imports from Mexico are a major source of economic activity in the Lower Rio Grande Valley. The United States imported $12.9 billion of produce and products from Mexico during 2017, including fresh, frozen, and processed fruits; vegetables; and nuts. About 98 percent of these imports entered the United States by land ports between Mexico and Texas, New Mexico, Arizona, and California. When considering only fresh fruits and vegetables, which comprise nearly 90 percent of the total, imports totaled $11.7 billion.

Based upon a forecasting approach that includes ongoing trends and input from industry, it is estimated that US produce that is imported from Mexico via truck will increase nearly 35 percent, as shown below in Figure 1. Most of this growth will occur through Texas ports, with imports expected to grow in Texas by 44 percent. By 2025, it is projected that imports to Texas will account for slightly more than half of US produce imports from Mexico. This growth in imports has implications throughout the border economy, and for the Texas economy especially.

The prognosis of continued expected growth in US imports of fresh produce in general and especially in Texas is based on several factors. One important factor is that US interest rates are

beginning to rise, causing the dollar to appreciate, which will spur even more imports. Another important factor is the expanded use of Mexican Federal Highway 40 between Mazatlán and Reynosa for shipments of produce. Further, an expanded infrastructure of trade-services providers in the Lower Rio Grande Valley area has been built to accommodate recent and expected increases in imports, illustrating industry's belief that increased shipments through Texas are likely to continue.

Figure 1: Texas Agricultural Economics Forecast

https://www.twc.texas.gov/files/partners/texas-agricultural-economics-forecast-twc.jpg

http://cnas.tamu.edu/Index/Mexican%20FFV%20Imports%20through%20US%20Land%20Borders%202025%20March%202018.pdf

Estimated Economic Impact

The economic impact of produce imports on agricultural and farmworker activity in the state is compelling. In 2017, direct economic activity attributed to the produce import industry was $401.1 million, requiring an additional $448.5 million in economic activity from supporting industries, resulting in a total economic impact of $849.6 million. By 2025, this economic effect is expected to grow to $577.5 million in direct activity and $645.7 million in supporting activity for a total of $1.2 billion in economic activity throughout the Texas economy. Truck transportation is anticipated to lead direct output at $169.4 million, to be followed by warehousing ($132.1 million); sorting, grading, and packing ($123.6 million); customs brokering ($91.5 million); and miscellaneous border services ($61.0 million).

During 2017, 7,836 jobs were required across Texas to support import operations. Sorting, grading, and packing required 2,021 jobs; customs broker services, 1,069 jobs; warehousing, 1,028 jobs; truck transportation, 779 jobs; and miscellaneous border services, 347 jobs. Another 2,592 jobs were required in supporting sectors. By 2025, 11,281 jobs will be required throughout the Texas economy to support these imports. Sorting, grading, and packing will require 2,910 jobs, followed by customs broker services (1,538 jobs); warehousing (1,479 jobs); truck transportation (1,121 jobs); and miscellaneous border services (500 jobs). Another 6,643 jobs will be required in supporting sectors by 2025.

Table 4. Summary of Economic Activity from US Produce Imports from Mexico over Land Borders, 2017 and 2025 Forecast with Industry Input

Economic Activity Indicators	2017	2025F
Total Truckloads	235,288	338,716
Direct Economic Output	**In Millions**	**In Millions**
Truck Transportation	$11.76	$169.4
Warehousing	$91.8	$132.1
Sorting, Grading and Packing	$85.8	$123.6
Customs Brokering	$63.5	$91.5
Miscellaneous Border Services	$42.5	$61.0
Total Direct Economic Output	$401.1	$577.5

Economic Activity Indicators	2017	2025F
Total Supporting Economic Output	$448.5	$645.7
Total Economic Output	$849.6	$1,223.2
Total Jobs Supporting Produce Imports	7,836	11,281

Source: Agricultural Marketing Service, USDA and Center for North American Studies, Department of Agricultural Economics, Texas A&M University/Texas A&M AgriLife Extension Service/Texas A&M AgriLife Research

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

MSFW Characteristics

MSFWs are a unique and very important segment of society and of the US economy. The most recent statewide data from PY'16, below, shows the approximate number of MSFWs by farmworker category:

Farmworkers	**PY'16[1]Total Available for Service**
Migrant	5,500
Seasonal	3,520
Year-round	4,520
Total MSFWs	8,344

Characteristics of MSFWs include the following:

- Education: the educational level among MSFWs tends to be low.
- Language: general lack of ability to speak and read English and sometimes lack of ability to read Spanish.
- Economic Status: the income level of MSFWs frequently falls well below the poverty level.
- Citizenship: large percentages of MSFWs are citizens of Mexico or of a Central American country or are of Mexican or Central American ancestry.

Problems and issues facing MSFWs with barriers to employment include the following:

- The mobility of migratory workers, which often means that they do not remain in one location long enough to receive social services

- Most MSFWs have limited English proficiency; therefore, they are unable to communicate effectively with social services counselors and other individuals involved in delivering much-needed services.
- The limited vocational skills of many MSFWs
- Public transportation is not available in most rural communities
- Limited access to medical services, including available medical services during off-work hours (agricultural-seasonal cycle), and limited access to medical coverage

Board staff and Workforce Solutions Office staff are developing and sharing strategies to meet the following needs:

- Low skills in education/literacy/computers—Workforce Solutions Office staff is trained to identify signs and behaviors that indicate a job seeker with education, literacy, and language barriers. Staff provides one-on-one assistance to those needing individual service.
- Workers lack transportation to the work sites—Board and Workforce Solutions Office staff work with local community- and faith-based organizations and other entities to provide temporary transportation services during peak production seasons.
- Child care for field workers—Workforce Solutions Office staff work with local community- and faith-based organizations and other entities to provide temporary child care during peak production seasons.
- Limited knowledge of social and workforce services—Workforce Solutions Office staff shares information with MSFWs regarding the public services of various entities in the local community.
- Lack of trust in government/social service agencies and changes in local service delivery systems—Social service organizations sponsor fairs where Workforce Solutions Office staff provides information regarding local services available to farmworkers and their families. Fairs include attractions such as entertainment, door prizes, and refreshments donated by participating and sponsoring entities. Other sponsored events include employer job fairs, all of which encourage trust and social capital between MSFWs and outreach staff.

Other resources for overcoming employment barriers are as follows:

- Spanish-language brochures covering the range of services available are provided by Workforce Solutions Offices designated as MSFW significant and bilingual offices. Highlighted services include adult education and literacy programs, which provide English language, math, reading, and writing instruction designed to help individuals succeed in the workplace, earn a high school equivalency diploma, and/or enter postsecondary education or career training.
- Workforce Border Alliance—Boards throughout the Texas border region collaborate with each other to overcome MSFW literacy and language barriers. This collaboration has resulted in creative and effective progress toward meeting the employment and public assistance needs of MSFWs.

- Regional Community Partnership Network Groups—MSFW significant and monolingual Workforce Solutions Offices plan to establish community network groups to strengthen the community resources available to MSFWs
- Community partnerships—Board and Workforce Solutions Office staff simultaneously engage in developing partnerships with educational, housing, and support services, and other community assistance.
- Access to computer information and long-distance telephone services—Boards provide computers in public locations (usually county courthouses or libraries) and encourage community- and faith-based organizations to refer farmworkers to these resources. MSFWs can also call Workforce Solutions Offices toll-free to inquire about or access services.
- Electronic service resources—Boards provide up-to-date information to agribusiness, rural areas, and colonias through online systems such as TWC's website and WorkInTexas.com. These systems ensure easy access to information and user-friendly data and allow communication through public access automation points.

4. OUTREACH ACTIVITIES

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

See e.4.A.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES

Outreach Activities

When MSFWs are unable to go to the Workforce Solutions Offices, the MSFW outreach program takes the full range of employment services directly to MSFWs where they live and work. The MSFW outreach program provides the framework necessary for Workforce Solutions Office staff to locate, contact, and enhance the employability of MSFWs in Texas. Outreach specialists may provide other assistance at the point of contact or at the Workforce Solutions Office. If needed services are not available through the Workforce Solutions Office, outreach specialists then make referrals to other agencies and organizations that provide appropriate assistance.

TWC and Workforce Solutions Offices' goals are to ensure that MSFWs are offered employment services, benefits, and protections, including counseling, testing and job training referral services that are qualitatively equivalent and proportionate to services provided to non-MSFWs. Outreach specialists help with work registration and job leads, information about the complaint system, and the submission of complaints and referrals for support services. Outreach specialists in certain Workforce Solutions Offices have iPads and laptops and thus are equipped to provide live job searches and job posting referrals.

Year-round outreach activities are conducted in MSFW-significant Workforce Solutions Offices. Workforce Solutions Office staff that is responsible for outreach gains familiarity with the labor

market and needs of local MSFWs. To be most effective, outreach specialists must understand the issues unique to MSFWs and be able to speak English and Spanish.

Outreach specialists are responsible for the following preliminary job-placement functions:

- Contact MSFWs to explain the services available at Workforce Solutions Offices
- Solicit jobs, training opportunities, and employment-related services for MSFWs
- Notify MSFWs of job openings and of their rights and benefits under state and federal employment-related laws
- Provide information on the employment service complaint system, including sexual harassment
- Assist MSFWs in filing work registrations, completing applications, preparing worker complaints, and arranging appointments and transportation
- Provide information about services available through electronic means and how to access this information;
- Identify qualified MSFWs seeking employment, according to guidelines of the federal regulations at 20 CFR Parts 651, 653, and 658. The initial and follow-up outreach contacts are made to assist MSFWs in becoming employed or improving their employability;

Outreach specialists also perform the following partnership activities:

- Contact agricultural and nonagricultural employers, program operators, community- and faith-based organizations, and education and training providers on behalf of MSFWs
- Present information to school students about migrant education programs in the state
- Outreach with local public and private community agencies and MSFW organizations to establish community referral networks
- Provide advocacy group presentations
- Coordinate with other office partners in serving MSFWs
- Distribute MSFW-assistance brochures
- Perform joint outreach and recruitment missions with National Farmworker Jobs Program (NFJP)
- Attend staff training conducted by the US Equal Employment Opportunity Commission and DOLETA, Wage and Hour Division
- Present and participate in meetings at the Texas A&M University, Colonias Program Center for Housing and Urban Development Community Centers (this includes the Promotora program)

Outreach specialists perform the following job placement activities:

- Provide agricultural and nonagricultural employers with information, services, and assistance related to labor issues and needs
- Accept job postings while performing outreach activities in the field

- Refer MSFWs to the nearest Workforce Solutions Office and one-stop centers to receive services
- Refer qualified MSFWs from the MSFW Outreach Log and from previous contacts through follow-up activities, when there is a job or jobs available for referral
- Select qualified MSFWs from the MSFW Outreach Log and offer a job development plan to enhance the MSFWs' applications with additional and/or transferable occupational skills, and matching options for nonagricultural jobs, when there are no job openings available for referral of MSFWs to suitable employment

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE AND EMPLOYMENT-RELATED LAW COMPLAINT SYSTEM ("COMPLAINT SYSTEM" DESCRIBED AT 20 CFR 658 SUBPART E), INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWS IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

To ensure that Outreach staff and Workforce Solutions Office staff receive technical assistance and professional development to improve services to MSFWs, training and technical assistance is provided and includes the following areas:

- MSFW equity performance indicators—proper identification and coding of MSFW customers
- Setting up local benchmark or baseline targets for Equity Indicators and Minimum Service Levels
- Strategies in strengthening collaboration with Workforce Solutions partners
- Workforce Solutions Office coordination and intake procedures
- Data collection requirements for reportable ES services
- MSFW carryover applicants (WorkInTexas.com active file) and the impact on Equity performance measures
- Staff training conducted by the US Equal Employment Opportunity Commission, Office of the Attorney General, Human Trafficking section; by Texas Rio Grande Legal Aid, Inc., which provides legal services to farmworkers; and by DOLETA Wage and Hour Division
- Training on the Employment Service and Employment-Related Law Complaint System
- Agricultural employer seminars throughout the local workforce development areas
- Yearly staff training conducted by the State Monitor Advocate (SMA)
- Employment Service Guide, which includes provisions pertinent to MSFW in general and specifically to the National Job Registry for H-2A Temporary Agricultural Job Posting requirements

- Migrant and Seasonal Farmworker Program: Service Delivery, Outreach and Reporting
- Complaint procedures related to MSFWs to include informal resolution
- Program integration strategies for MSFW
- Agricultural Recruitment System procedures and consequences
- Establishing local community partnerships (for example, bringing community groups together, formalizing the traditional migrant subcommittee groups, and forming coalition meeting groups)
- Identifying opportunities to coenroll and integrate program design with Motivation Education and Training, Inc. (MET), WIOA §167, and National Farm Worker Jobs Program Grantee with other center services
- TWC efforts to develop local, regional, and state planning strategies in the agricultural industry with emphasis on supply and demand areas of the state for workers
- Coordinate agricultural business forums. The intended focus of these forums would be relative to pertinent issues that affect both agricultural employers and workers to include laws that affect the agricultural industry sector.
- Coordinate a pre-harvest forum for MSFWs through the migrant education, workforce, community, and farmworker organizations
- Facilitate and coordinate the engagement of the agricultural industry into the workforce investment system, assist in the creation of jobs within the agricultural industry (permanent year-round) and determine the viable need for a skilled workforce to increase wage gain earners
- Develop strategies to increase opportunities for the MSFW summer youth program to implement goals and objectives that include a tracking system, coenrollment, and coordination with MET's youth program

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 Texas workforce system supports the delivery of core services within local communities to assist individuals who need education and training to obtain the basic skills that will enable them to find sustained employment and become self-sufficient. Workforce Solutions Office staff receives professional development to ensure that each staff member knows about core programs whose purpose is to provide high-quality services to both job seekers and employers. This includes core programs such as UI assistance for MSFWs returning from other parts of Texas or the nation.

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

To ensure that Board and Workforce Solutions Office outreach staffs receive technical assistance and professional development to improve services to MSFWs, training and technical assistance is provided to include the following areas:

- MSFW equity performance indicators—proper identification and coding of MSFW customers
- Establishing local benchmark or baseline targets for Equity Indicators and Minimum Service Levels performance measures
- Strategies for strengthening collaboration with Texas Workforce Solutions partners and other organizations serving MSFWs in the area
- Summary of farmworker rights; OSHA's Water, Rest, and Shade initiatives; migrant education programs; and other support service programs throughout Texas and the nation
- Workforce Solutions Office coordination and intake procedures
- MSFW carryover applicants (active file in WorkInTexas.com) and the impact on Equity performance measures
- MSFW Program: service delivery, outreach, and reporting
- WD Letter 41-10, National Electronic Job Registry for H-2A Temporary Agricultural Job Posting
- Complaint procedures related to MSFWs to include informal resolution
- Program integration strategies for MSFWs
- Agricultural Recruitment System (ARS) procedures and consequences
- Establishing community partnerships (for example, bringing community groups together to formalize the traditional migrant subcommittee groups and coalition meeting groups)
- Identifying opportunities to coenroll and integrate program design with MET, Workforce Innovation and Opportunity Act (WIOA) §167, NFJP grantee with other Workforce Solutions Office services
- Initiatives to develop local, regional, and state planning strategies for workers in the agricultural industry, with emphasis on supply and demand areas of the state
- Coordinate agricultural business forums and compliance seminars. The intent of these forums would relate to pertinent issues that affect agricultural employers and workers, including laws that affect the agricultural industry sector.
- Texas workforce system and MET participation in joint outreach and recruitment efforts designed to identify additional clients and immediately expand the range of available services for MSFWs
- Coordinate a preharvest forum for MSFWs through the migrant education, workforce, community, and farmworker organizations
- Facilitate and coordinate the engagement of the agricultural industry into the workforce investment system, assist in the creation of jobs within the agricultural industry (permanent year-round), and determine the need for a skilled workforce to increase wage gain earners

- Develop strategies to increase opportunities for the MSFW summer youth program to implement goals and objectives that include a tracking system, coenrollment, and coordination with MET's youth program

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

The State's Strategy

TWC will continue to coordinate efforts with the US Department of Labor's National Farmworker Jobs Program (NFJP) grantees and other agencies and groups.

TWC entered a statewide memorandum of understanding (MOU) with the NFJP grantee in Texas, MET, Inc., effective January 31, 2014, which has been extended through February 28, 2023. As the DOLETA designated grantee, MET operates NFJP in Texas. This MOU assists in establishing and demonstrating effective outreach coordination coupled with increasing registration activities by MET staff and ES staff. TWC and MET are revising the MOU to reflect WIOA language and support and improve coordination, joint outreach responsibilities, core programs, and performance accountability measures.

TWC and the NFJP grantee in Texas maintain an effective working relationship by coordinating outreach efforts with Boards and community service providers.

Referral and placement of the MSFW customer remains a challenge for states' workforce system. The capacity to share responsibility for this constituency and efficiently coordinate available resources can leverage local areas' mutual effectiveness as well as improve the customer service experience. Texas encourages coenrollment of MSFW customers in services provided by TWC, Boards, and the NFJP grantee in Texas. The SMA examines coenrollment activity during an annual review of each MSFW-significant Workforce Solutions Office.

The advantages of TWC's statewide MOU with the NFJP grantee in Texas include the following:

- A streamlined information exchange process, which improves the currency and accuracy of shared information
- Coordinated activity among organizations, including immediate services
- Planned participation in joint outreach and recruitment efforts designed to increase customer identification and expand services for MSFWs
- Increased staff awareness about emerging issues within the MSFW community
- A vehicle for periodic review and assessment of the quality of services

TWC and the Workforce Solutions network continue to increase coenrollments with its NFJP partner. This collaborative effort has help to expand the opportunities available for MSFW customers.

TWC's SMA meets quarterly with the NFJP grantee in Texas to discuss improving the coordination and administration of the employment and training services offered to MSFWs. Additionally, the SMA meets regularly with the local MET staff during the MSFW monitoring reviews at the local level to discuss new and improved shared responsibility.

This streamlined approach allows new and improved client programs to receive immediate intervention and fully integrate all programs with the Boards and contract managers. It also allows TWC to:

- provide Board oversight to fully implement WIOA-required changes with our NFJP partner; and
- provide technical assistance and training on the Employment Service and Employment-Related Law Complaint System to local Workforce Solutions Office staff.

Outreach Plan for MSFW in Texas

Outreach efforts to the MSFW population will be coordinated between TWC outreach staff and the state's NFJP grantee staff to the fullest extent possible. Coordination efforts will include, but are not limited to, providing required information on the partner's programs and/or services during outreach, conducting joint outreach, and reporting outreach activities and contact to the other party. Outreach plans will be shared and compared to identify efforts that could be combined and to identify areas where outreach and/or service delivery is inadequate.

Strategies will be developed to ensure that service delivery collaboration exists for MSFWs in areas where no TWC MSFW outreach staff members are present. This may include the use of technology and other outreach protocols, as well as collaborative partnerships with other state, regional, or local social service agencies.

The state's NFJP grantee responsibilities are as follows:

- Encourage direct service providers throughout the state to enter into a WIOA-based MOU with the local Workforce Solutions Office. These MOUs should describe the specific types and levels of shared responsibilities, participant processes, and joint outreach and case management strategies.
- Ensure that all NFJP participants are registered in WorkInTexas.com and, when needed, registered in The Workforce Information System of Texas (TWIST) for reporting purposes as needed for their career development.
- Work with the TWC MSFW outreach staff in the development of joint outreach strategies, coordination of participant data files, and coenrollment processes; the conduct of joint WIOA-related professional development for NFJP partner and TWC outreach staff; and the exploration of ways to better serve out-of-school MSFW youth.
- Ensure that data for federal reporting is shared in a timely fashion.

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

Services for Farmworkers and Agricultural Employers

To meet agricultural employers' needs, Texas Workforce Solutions will continue to improve the agricultural referral process by performing the tasks that include, but are not limited to, the following:

- Integrating services for farmworkers and agricultural employers and workers
- Identifying workers who are job-ready when arriving at the work site
- Providing employers with industry information, farmworkers' rights, and support services
- Engaging agricultural employers to determine short- and long-term employment and training needs
- Serving agricultural employers by creating local and regional economic employment opportunities for MSFWs
- Developing strategies to:
    - facilitate and coordinate the engagement of the agricultural industry into the workforce investment system;
    - assist in the creation of jobs within the agricultural industry (permanent year-round); and
    - determine the viable need for a skilled workforce to increase wage gain earners
- Assisting employers in analyzing state and local peak production seasons and recruiting an adequate labor supply
- Collaborating and coordinating with the Texas Department of Agriculture, Rural Development, to increase viability and sustainability in agricultural areas of state

TWC has created communication resources to support Texas Workforce Solutions partners in providing meaningful service to agricultural employers and farmworkers. These communication resources are intended to help find solutions to their employment and training needs. TWC provides these resources by means of the following:

- Electronic service
- Media and printed information
- Organizational coordination

Additionally, TWC's Foreign Labor Certification (FLC) unit, Office of the Monitor Advocate (MA) and Boards partner with agricultural associations to provide educational seminars for employers and to distribute information on various employment topics. TWC may assist in locating resources and speakers for these educational events.

Additionally, FLC also updates and publishes the Texas Directory of Farm and Ranch Associations. This publication lists contact information for state organizations with agricultural business interests. This directory and other resources are included on TWC's Agricultural Services web page,[1] which links to numerous agriculture-related reports.

Agricultural employer and farmworker services are based on each Board's service delivery plan. Each plan details the programs that the Board provides through the Workforce Solutions Offices under its direction. Additionally, Boards have established Business Services Units (BSUs) to

reach out to employers. The goal of BSUs is to understand the needs of their business communities, including agricultural employers, by collaborating with MSFW outreach workers, community partners, chambers of commerce, and industry associations.

BSUs are charged with helping businesses recruit qualified farmworkers and helping job seekers find employment suited to their skills. The Boards address the following issues:

- Lack of transportation to work sites—Board and Workforce Solutions Office staffs work with community- and faith-based organizations and other entities to provide temporary transportation services during peak agricultural seasons.
- Limited knowledge of state and federal employment laws and regulations—Workforce Solutions Office staff hosts forums to educate employers and agricultural crew leaders on state and federal laws and regulations.
- Lack of efficient use of local human resources—Workforce Solutions Office staff facilitates communication between growers, such as cooperatives, about farmworkers' specific needs. One resource is the AgriLife county extension agent.
- Lack of skilled workers—Workforce Solutions Office staff coordinates short-term training on local crops and farming (for example, forklift certification, food safety, and how to obtain a commercial driver's license (CDL)).
- Lack of facilities and/or staff to screen and interview potential farmworkers—Workforce Solutions Office staff provides space in the Workforce Solutions Office for agricultural employers to interview workers. Workforce Solutions Office staff also provides intake and referral activities at the growers' locations.
- Limited administration of farm labor contractors—Workforce Solutions Office staff provides forms and instructions for completing crew leader registration, ensures that farm labor contractors' registration cards are current, and maintains crew leader logs in the offices.
- Limited or inadequate housing—The Agricultural Recruitment System (ARS) requires employers to provide no-cost housing to workers who cannot reasonably return to their place of residence after work each day. This is one of the challenges employers face when using ARS, especially in providing housing options suitable for families. TWC participates in MET's Regional Farmworker Housing Summit. (MET is the housing grant coordinator for the NFJP grantee under the WIOA §167 housing grant for Texas.) This regional summit illustrates the valuable collaboration undertaken with housing authority municipalities and nonprofits throughout Texas.

[1] https://twc.texas.gov/businesses/agricultural-services

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS

TWC partners with agricultural associations to provide educational seminars for employers and distributes information on various employment topics, such as the ES and Employment-Related Law Complaint System. TWC may assist in locating resources and speakers for these educational events. Through these seminars and other interactions with agricultural employers, TWC strives to expand and improve services.

In collaboration with other TWC areas, these special units are a resource to help Boards implement strategies that increase coordination among federal and state agencies and private organizations. FLC and MA continue their efforts to encourage the use of the Agricultural Recruitment System (ARS) to link employers that need agricultural labor in Texas with the areas of the state that can potentially supply MSFWs. TWC continues to encourage Boards to think of new and innovative ways to serve agricultural employers and engage communities in rural development.

Workforce Solutions Offices and the Office of the Monitor Advocate continue to market the ES and Employment-Related Law Complaint System at community-agency partnership meetings in areas of Texas that have significant MSFW populations, at training sessions and conferences conducted by the Human Trafficking Task Force, and at meetings and training sessions held by legal advocacy, state, and federal agencies, and community- and faith-based organizations.

Outreach specialists assist with work registration and job leads and ensure that information about the ES and Employment-Related Law Complaint System, farmworker rights brochure, and submitting complaints and referrals for support services is available. Outreach specialists in certain Workforce Solutions Offices have iPads and laptops and thus are equipped to provide live job searches and job posting referrals.

Year-round outreach activities are conducted in MSFW-significant Workforce Solutions Offices. Workforce Solutions Office staff responsible for outreach maintains familiarity with the labor market information and the needs of local MSFWs. To serve this population effectively, outreach specialists must understand the issues unique to MSFWs and be able to speak English and Spanish.

Outreach specialists:

- contact MSFWs to explain the services available at Workforce Solutions Offices;
- notify MSFWs of job openings and of their rights and benefits under state and federal employment-related laws
- provide information on the ES and Employment-Related Law Complaint System, including sexual harassment;
- assist MSFWs in filing work registrations and applications, preparing worker complaints, and arranging appointments and transportation;
- provide information about services available through electronic means and how to access this information;
- identify qualified MSFWs seeking employment, according to guidelines of the federal regulations at 20 CFR Parts 651, 653, and 658 (The initial and follow-up outreach contacts are made to assist MSFWs in becoming employed or improving their employability.);
- contact agricultural and nonagricultural employers, program operators, community- and faith-based organizations, and education and training providers on behalf of MSFWs;
- present information to students about migrant education programs in the state;
- outreach with local public and private community agencies and MSFW organizations to establish community referral networks;

- provide advocacy group presentations;
- coordinate with other office partners in serving MSFWs;
- distribute MSFW-assistance brochures;
- perform joint outreach and recruitment missions with National Farmworker Jobs Program (NFJP);
- attend staff training conducted by US Equal Employment Opportunity Commission and DOLETA, Wage and Hour Division;
- present and participate in meetings with the Texas A&M University's Colonias Program and Center for Housing and Urban Development, which includes the Promotora program;
- solicit jobs, training opportunities, and employment-related services for MSFWs;
- provide agricultural and nonagricultural employers with information, services, and assistance related to labor issues and needs;
- accept job postings while performing outreach activities in the field;
- refer MSFWs to the nearest Workforce Solutions Office to receive services;
- refer qualified MSFWs from the MSFW Outreach Log and from previous contacts through follow-up activities, when there is a job or jobs available for referral; and
- when there are no job openings available for referral of MSFWs to suitable employment, select qualified MSFWs from the MSFW Outreach Log and offer a job development plan to enhance the MSFWs' applications with additional and/or transferable occupational skills as well as matching options for nonagricultural jobs.

To meet agricultural employers' needs, Texas Workforce Solutions will continue to improve the agricultural referral process, including, but not limited to:

- integrating services for farmworkers and agricultural employers and workers;
- identifying workers who are job-ready when arriving at the work site;
- providing employers with industry information, farmworkers' rights, and support services;
- engaging agricultural employers to determine short- and long-term employment and training needs;
- assisting employers in analyzing state and local peak production seasons and recruiting an adequate labor supply;
- collaborating and coordinating with the Texas Department of Agriculture, Rural Development, to increase viability and sustainability in agricultural areas of the state; and
- using the job-matching process for temporary agricultural work on an intrastate and/or interstate basis through ARS.*

*Texas is primarily a labor supply state for ARS.

TWC has created a variety of communication resources to support Texas Workforce Solutions partners in providing meaningful service to agricultural employers and farmworkers. These communication resources are intended to help find solutions to their employment and training needs. TWC provides these resources by means of the following:

- Electronic service
- Media and printed information
- Organizational coordination

Additionally, TWC partners with agricultural associations to provide educational seminars for employers. FLC and/or the SMA distributes information on various employment topics such as the Employment Service and Employment-Related Law Complaint System. TWC may assist in locating resources and speakers for these educational events. Through these seminars and other interactions with agricultural employers, TWC strives to expand and improve FLC and/or SMA services.

FLC also updates and publishes the *Texas Directory of Farm and Ranch Associations*. This publication lists contact information for state organizations with agricultural business interests.

This and other resources are available on TWC Agricultural Services web page, which links to numerous agriculture-related reports.[1]

Agricultural employer and farmworker services are based on each Board's service delivery plan. The plan details programs that the Board provides through Workforce Solutions Offices under its direction. Additionally, Boards have established BSUs to reach out to employers. BSUs strive to understand the needs of their business communities, including agricultural employers, by collaborating with MSFW outreach workers, community partners, chambers of commerce, and industry associations.

BSUs are charged with helping businesses recruit qualified farmworkers and helping job seekers gain employment suited to their skills. The Boards address the following issues:

- Lack of transportation to worksites—Board staff and Workforce Solutions Office staff work with community- and faith-based organizations and other entities to provide temporary transportation services during peak agricultural seasons.
- Limited knowledge of state and federal employment laws and regulations—Workforce Solutions Office staff hosts forums to educate employers and agricultural crew leaders on state/federal laws and regulations.
- Lack of efficient use of local human resources—Workforce Solutions Office staff facilitates communication among growers, such as cooperatives, on farmworkers' specific needs. One resource is the AgriLife County Extension Agent.
- Lack of skilled workers—Workforce Solutions Office staff coordinates short-term training on local crops and farming (for example, forklift certification, food safety, and CDL).
- Lack of facilities and/or staff to screen and interview potential farmworkers—Workforce Solutions Office staff provides space in the Workforce Solutions Office for agricultural employers to interview workers. Workforce Solutions Office staff also provides intake and referral activities at the growers' locations.

- Limited administration of farm labor contractors—Workforce Solutions Office staff provides forms and instructions for completing crew leader registration, ensures that farm labor contractors' registration cards are current, and maintains crew leader logs in the Workforce Solutions Offices.
- Limited or inadequate housing—ARS requires employers to provide no-cost housing to workers who cannot reasonably return to their place of residence after work each day. This is one of the challenges employers face when using ARS, especially in providing housing options suitable for families. TWC participates in MET's Regional Farmworker Housing Summit. (MET is the housing grant coordinator for the NFJP grantee under the WIOA §167 housing grant for Texas.) This regional summit illustrates the valuable collaboration undertaken with housing authority municipalities and nonprofits throughout Texas.

MSFWs in Texas often face poverty, low academic achievement, limited English proficiency, and inadequate job training and readiness, as well as various social problems. The Texas workforce system's approach focuses on those barriers to acquire and retain productive employment. To this end, Workforce Solutions Offices reaffirm existing community partnerships and continuously establish new community partnerships to meet the needs of local businesses and MSFWs, while providing job seekers with job search workshops, job placement services, referrals, and support services.

[1] https://twc.texas.gov/businesses/agricultural-services

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

To meet agricultural employers' needs, Texas Workforce Solutions will continue to improve the agricultural referral process by performing activities that include, but are not limited to:

- integrating services for farmworkers and agricultural employers and workers;
- identifying workers who are job-ready when arriving at the worksite;
- providing employers with industry information, guidance on farmworkers' rights, and support services;
- engaging agricultural employers to determine short- and long-term employment and training needs;
- assisting employers in analyzing state and local peak production seasons and recruiting an adequate labor supply;
- collaborating and coordinating with the Texas Department of Agriculture, Rural Development, to increase viability and sustainability in agricultural areas of the state; and
- using the job-matching process for temporary agricultural work on an intrastate and/or interstate basis through ARS.*

*Texas is primarily a labor supply state for ARS.

TWC has created a variety of communication resources to support Texas Workforce Solutions partners in providing meaningful service to agricultural employers and farmworkers. These

communication resources are intended to help find solutions to their employment and training needs. TWC provides these resources by means of the following:

- Electronic service
- Media and printed information
- Organizational coordination

Additionally, TWC works with agricultural associations to provide educational seminars for employers. FLC and/or the SMA distributes information on various employment topics such as the ES and Employment-Related Law Complaint System. TWC may assist in locating resources and speakers for these educational events. Through these seminars and other interactions with agricultural employers, TWC strives to expand and improve FLC and/or SMA services.

FLC also updates and publishes the *Texas Directory of Farm and Ranch Associations*. This publication lists contact information for state organizations with agricultural business interests.

This and other resources are available on TWC's Agricultural Services web page, which links to numerous agriculture-related reports.[1]

Agricultural employer and farmworker services are based on each Board's service delivery plan. The plan details programs that the Board provides through Workforce Solutions Offices under its direction. Additionally, Boards have established BSUs to reach out to employers. BSUs strive to understand the needs of their business communities, including agricultural employers, by collaborating with MSFW outreach workers, community partners, chambers of commerce, and industry associations.

BSUs are charged with helping businesses recruit qualified farmworkers and helping job seekers gain employment suited to their skills. The Boards address the following issues:

- Lack of transportation to worksites—Board staff and Workforce Solutions Office staff work with community- and faith-based organizations and other entities to provide temporary transportation services during peak agricultural seasons.
- Limited knowledge of state and federal employment laws and regulations—Workforce Solutions Office staff hosts forums to educate employers and agricultural crew leaders on state and federal laws and regulations.
- Lack of efficient use of local human resources—Workforce Solutions Office staff facilitates communication among growers, such as cooperatives, on farmworkers' specific needs. One resource is the AgriLife County Extension Agent.
- Lack of skilled workers—Workforce Solutions Office staff coordinates short-term training on local crops and farming (for example, forklift certification, food safety, and CDL).
- Lack of facilities and/or staff to screen and interview potential farmworkers—Workforce Solutions Office staff provides space in the Workforce Solutions Office for agricultural employers to interview workers. Workforce Solutions Office staff also provides intake and referral activities at the growers' locations.
- Limited administration of farm labor contractors—Workforce Solutions Office staff provides forms and instructions for completing crew leader registration, ensures that

farm labor contractors' registration cards are current, and maintains crew leader logs in the Workforce Solutions Offices.

- Limited or inadequate housing—ARS requires employers to provide no-cost housing to workers who cannot reasonably return to their place of residence after work each day. This is one of the challenges employers face when using ARS, especially in providing housing options suitable for families. TWC participates in MET's Regional Farmworker Housing Summit. (MET is the housing grant coordinator for the NFJP grantee under the WIOA §167 housing grant for Texas.) This regional summit illustrates the valuable collaboration undertaken with housing authority municipalities and nonprofits throughout Texas.

Boards receive assistance from TWC in implementing strategies that address these issues through coordination among federal and state agencies and private organizations. TWC's efforts encourage the use of ARS to link employers needing agricultural labor in Texas. Using ARS enables employers to recruit workers without the use of foreign labor, which is particularly critical because of the cap on the number of H-2B workers allowed to obtain visas and the complexity of the H-2A process.

TWC also collaborates with Boards to develop innovative ways to serve agricultural employers and engage communities in economic and rural development. To these ends, TWC coordinates and facilitates Agricultural Employer Forums (Forums) in partnership with agriculturally significant areas of the state, including the Lower Rio Grande Valley, Middle Rio Grande, Upper Rio Grande, and South Plains Boards, and TWC's MA. The Forums are a cooperative effort between federal and state governments and the private sector to keep the public informed about issues that impact agricultural employers and workers. The Forums may cover laws that affect the agricultural sector; they also provide education, outreach, and information on regulations to spur greater compliance by employers and better working conditions for agricultural workers. Depending on the needs of agricultural associations and employers, the following agencies may participate:

- Texas Department of Agriculture
- Internal Revenue Service
- US Social Security Administration
- US Equal Employment Opportunity Commission
- US Department of Justice/Office of Special Counsel
- Texas Health and Human Services Commission
- TWC's Tax Department
- DOL, Wage and Hour Division
- DOLETA
- US Department of Homeland Security
- US Immigration and Customs Enforcement
- MET, Inc.
- Agricultural institutions of higher education

- Local and regional water allotment and irrigation districts

[1] https://twc.texas.gov/businesses/agricultural-services

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).

Organizational Coordination

Boards receive assistance from the FLC and/or the SMA in implementing strategies that address these issues through coordination among federal and state agencies and private organizations. FLC's and/or SMAs efforts encourage the use of the agricultural recruitment system to link employers needing agricultural labor in Texas with MSFW supply. Use of the agricultural recruitment system enables employers to recruit workers without the use of foreign labor, which is particularly critical because of the cap on the number of H-2B workers allowed to obtain visas and the complexity of the H-2A process.

TWC also collaborates with Boards to develop innovative ways to serve agricultural employers and engage communities in economic and rural development. To these ends, TWC coordinates and facilitates Agricultural Employer Forums (Forum) in partnership with agriculturally significant areas of the state, including the Lower Rio Grande Valley, Middle Rio Grande, Upper Rio Grande, and South Plains Boards, and TWC's SMA. The Forums are a cooperative effort between federal and state governments and the private sector to keep the public informed about issues that impact agricultural employers and workers. The Forums may cover laws that affect the agricultural sector; they also provide education, outreach, and information on regulations to spur greater compliance by employers and better working conditions for agricultural workers. Depending on the needs of agricultural associations and employers, the following agencies may participate:

- Texas Department of Agriculture
- Internal Revenue Service
- US Social Security Administration
- US Equal Employment Opportunity Commission
- US Department of Justice/Office of Special Counsel
- Texas Health and Human Services Commission
- TWC's Tax Department
- US Department of Labor, Wage and Hour Division
- US Department of Labor, Employment and Training Administration
- US Department of Homeland Security

- US Immigration and Customs Enforcement
- MET, Inc.
- Agricultural institutions of higher education
- Local and regional water allotment and irrigation districts

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.

Transmission of the Combined State Plan (Plan) includes assurances that interested parties were given an opportunity to review and provide public comment on the Plan; such parties include, but are not limited to, WIOA §167 National Farmworker Jobs Program grantees, other appropriate farmworker groups, public agencies, agricultural employer organizations, and other interested employer organizations.

This agricultural outreach plan was posted for public comment, November 26, 2019 through December 26, 2019. No public comments were received during the 30-day comment period.

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 Indicators Reflecting Equity

TWC will continue to work with Boards to maintain and improve performance for the equity-ratio indicators and minimum service-level indicators. For the past several years, Texas met all five equity-ratio indicators and continues to see strong performance in this area. Additionally,

as of June 30, 2017, five of the seven minimum service-level indicators were met for PY'16. During the SMA's visits in PY'16, the SMA discussed performance for these measures with Board management, Workforce Solutions Office management, and MSFW outreach staff. Boards with MSFW-significant Workforce Solutions Offices have received monitoring reports that recommend improvement and enhanced services delivery to MSFWs. Monitoring efforts during PY'17 have focused on the changes in performance resulting from the PY'13 recommendations.

Meeting the placement minimum service level indicators for PY'17 may pose challenges for TWC, as experienced in PY'16. The following conditions contribute to this challenge:

- Current MSFW minimum service level indicators place MSFW labor supply states, such as Texas, at a disadvantage. Because of the mobility of MSFWs—many workers move to take jobs in other states—the high placement rate of 42.5 percent of registered MSFWs is unattainable.
- MSFWs reside in areas that experience the highest rates of unemployment.
- Many states do not require UI claimants who file interstate claims to register in the local job matching system or to participate in the UI availability-for-work requirement.
- Wages are depressed in areas with high unemployment, which increases the migration of local workers to other parts of the state and to other states.
- Much of the work performed by MSFWs has been paid on a piece-rate basis.

Performance standards are based on placements at an hourly rate, thus excluding placements paid by piece rate. Therefore, reported performance does not accurately reflect all activity in the wages at placement category. Workforce Solutions Office staff can increase placements and meet the minimum service level indicators by developing strategies to serve MSFWs by:

- emphasizing services that will result in more MSFWs being placed in agricultural and nonagricultural jobs;
- providing local agricultural peak-season plans to assist agricultural employers and to engage in the agricultural sector while creating job placement initiatives for MSFWs;
- referring MSFWs to Workforce Solutions Office services;
- stressing the use of electronic, self-service systems to encourage MSFWs take an active role in their job search.
- coordinate with Workforce Solutions Office partners to foster an effective outreach program—including maintenance of the MOU with MET and other farmworker organizations and community partners; and
- promote economically self-sustaining, year-round jobs through skills development under the National Farmworker Jobs Program (NFJP), MET, and curriculum development with local community colleges.

MSFW-Significant Workforce Solutions Office Affirmative Action Plans

DOLETA has designated the Edinburg, Mission, and Weslaco Workforce Solutions Offices (Lower Rio Grande Valley Board) as representing the top 20 percent of MSFW activity nationally. These Workforce Solutions Offices have implemented affirmative action plans to ensure that the number of MSFW outreach specialists on the staff continues to reflect the local MSFW population.

The composition of TWC's ES staff at these Workforce Solutions Offices has not significantly changed during the past 10 years; however, there has been some turnover in outreach specialists. TWC and the Texas workforce system have announced job vacancies through various farmworker organizations, including MET, which is TWC's NFJP partner. Most ES staff members are long-term employees who are familiar with the employment issues of MSFWs and are sensitive to their needs. Approximately 70 percent of ES staff in these significant locations have worked in or been involved in agriculture and are familiar with the industry. Staff has traditionally worked closely with outside agencies, organizations, and workforce service providers to coordinate services for MSFWs. Additionally, staff is familiar with ongoing agricultural activities and trends, employment-related issues, and the laws and regulations that protect this population.

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.

An assessment of progress is noted throughout this AOP section. The following explanation expands upon other achievements and achievement gaps of the previous AOP.

E. STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The Texas SMA has had the opportunity to review and comment on the agricultural outreach plan and has approved the plan as submitted. The SMA contributed to the design, scope, and priorities of this plan as a method of continuing to serve and meet the needs of Texas agricultural employers, workers, and industry.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	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;	Yes

The State Plan must include	Include
4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	66.9%	68.0%	66.9%	68.0%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Fourth Quarter After Exit)	68.7%	68.7%	68.7%	68.7%
Median Earnings (Second Quarter After Exit)	$5,525	$5,525	$5,525	$5,525
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

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)).

Texas Adult Education and Literacy Content Standards were finalized, meeting the requirement that, by July 1, 2016, TWC content standards for adult education align with state-adopted challenging academic content standards under the Elementary and Secondary Education Act of 1965, as amended. TWC curriculum aligned with the new standards on October 1, 2016. These content standards align with the Texas Essential Knowledge and Skills (TEKS) state-adopted academic content standards, as adopted under §1111(b)(1) of the Elementary and Secondary Education Act of 1965 as well as the Texas College and Career Readiness Standards; the high school End-of-Course Exams for the State of Texas Assessments of Academic Readiness (STAAR); the Texas Certificate of High School Equivalency; and the Texas Success Initiative, the Texas college readiness assessment.

TWC contracted to facilitate the addition of entry-level industry expectations to the AEL content standards. Four lead organizations, along with industry experts and adult educators, worked with TWC to align standards to four target industries. The result of this project, which was completed in 2018, was the Texas Adult Education and Literacy Content Standards 2.0 (Standards 2.0), which updates and aligns the 2016 Texas Adult Education and Literacy Standards with the knowledge, skills, and abilities required for success in in-demand entry- and intermediate-level jobs in four industry clusters: advanced manufacturing; construction and extraction; health care sciences; and transportation, distribution, and logistics. While the 2016 content standards were unchanged with this update, Standards 2.0 aligns academic standards

with jobs and provides a resource for workforce development specialists and educators to focus instruction and career guidance, guide the skills development needed for work, and to define skills and tasks not easily identified in academic standards.

For PY '19, Texas will amend the content standards to incorporate civics and community and family content competencies to the AEL Content Standards.

B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION 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 fall 2017, Texas conducted a statewide competition of services, under RFP 320-18-01, to fund contracts through June 30, 2020. Thirty-six AEL grant recipients were awarded grants. The grant period is for two years (that is, 24 months) with an option for TWC to renew the grant for an additional one-year period, as many as three times. The start date for the original two-year period (24-month period) was July 1, 2018. If TWC determines at the end of the initial two-year term that the grantee is not performing or that the outcomes are not being achieved, TWC can

allow the grant to expire. If the grantee is struggling, and TWC has an enhanced technical assistance plan in place to support the grantee, TWC can authorize the grant for another year to reassess at the end of that year whether to continue to fund the grant.

In its Request for Proposals (RFP), Texas incorporated and specifically indicated the considerations specified in WIOA §231(e) as grant award requirements required of eligible providers. These considerations were scored as narrative questions in the RFP, and offerors were required to provide narrative detail to demonstrate how they will meet each consideration.

All grant recipients are required to implement the following AEL activities:

Adult Education, including activities based upon the State's AEL content standards and the statutory definition in WIOA, which include academic instruction and education services below the postsecondary level that increase an individual's ability to:

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

AEL instruction must be organized through an organizational principle called an Academy to align AEL instruction, Career and College Planning, and Career Pathways services.

Literacy activities, including services for individuals with low-levels of literacy. These activities are aligned to the statutory definition in WIOA and include activities to support an individual's ability to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

English Language Acquisition (ELA) activities, as defined in WIOA to include programs of instruction that are designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language. ELA activities address transition requirements outlined in WIOA Regulation §463.31 and appropriately lead to:

- attainment of a secondary school diploma or its recognized equivalent; and
- transition to postsecondary education and training; or
- employment.

ELA activities include proven or evidence-based instructional techniques and learning strategies that support oral skills development for English language learners. AEL grant recipients will meet the requirements §463.31 through a variety of strategies including, but not limited to:

- offering educational and career counseling services through Career Pathways Navigator services offered under contract by each grant recipient that enable English language learners to transition to postsecondary education and training or employment;
- alignment of curricula to the state content standards and align to the reading, writing, speaking, and comprehension needs of English language learners; and
- enrollment in Career Pathways programs including IET and Integrated EL Civics.

Integrated English Literacy and Civics Education activities, as defined in WIOA, are aligned with education services provided to English language learners (ELLs) who are adults, including professionals with degrees and credentials in their native countries, that enable such adults to achieve in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

As outlined in AEL Letter 04-16, Change 1, which promulgated revised policy guidance on this issue, AEL grantees must use funds allocated under WIOA §243 to provide EL Civics services in combination with Integrated Education and Training (IET). Integrated EL Civics funds must be used to support the IET service approach outlined in AEL Letter 02-16, Change 1, including Workforce Training and Workforce Preparation Activities. Integrated EL Civics must:

- include instruction in literacy and English as a second language (ESL);
- include instruction on the rights and responsibilities of citizenship and civic participation;
- be provided in combination with IET, including AEL activities, Workforce Preparation Activities, and Workforce Training outlined in AEL Letter 02-16;
- be designed to prepare adult ELLs for and place them in unsubsidized employment in high-demand industries and occupations that lead to economic self-sufficiency; and
- be integrated with Local Workforce Development Board (Board) and Workforce Solutions Office functions to carry out the activities of the program.

Integrated Education and Training (IET), as defined in WIOA, which provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for educational and career advancement. AEL grant recipients have been implementing and expanding IET programs as an option under required Career Pathways components and will continue these services. Projects are being implemented with the required elements of contextualized and concurrent AEL, workforce preparation activities and workforce training.

Workforce Preparation Activities, as defined in WIOA, are activities, programs, and services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in using resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, training, or employment.

AEL grant recipients are implementing Workforce Preparation Activities as part of contracted WIOA §243, Integrated EL Civics Education Services, and through IET.

Family Literacy Activities, as defined in WIOA, are activities that are of sufficient intensity and quality, to make sustainable improvements in the economic prospects for a family, that better enable parents or family members to support their children's learning needs, and that integrate each of the following activities:

- Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency
- Interactive literacy activities between parents or family members and their children

- Training for parents or family members regarding how to be the primary teacher for their children and how to be full partners in the education of their children
- An age-appropriate education to prepare children for success in school and life experiences

Family literacy activities are required under Texas law and are integrated into AEL contracts statewide.

Grantees are also required to implement one of three services models, referred to as "Intensive Services" models:

Workplace Adult Education and Literacy (Workplace AEL), as defined in WIOA, are adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.

Services for Internationally Trained English Language Learner Professionals provide services including, but not limited to:

- basic skills preparation for professional credentialing exams;
- specialized career advising;
- ESL services contextualized for targeted occupations; and/or
- professional opportunities.

ESL services contextualized for targeted populations provide enough intensity to allow for rapid progress and use the appropriate English language assessment to determine whether a participant's academic or professional English skills are sufficient for academic coursework.

Transition to Reentry and Post-Release Services as defined in WIOA are educational programs for transition to reentry initiatives and other post-release services with the goal of reducing recidivism. Grantees may provide services under this category that include educational counseling or casework to support incarcerated individuals' transition to reentry and other post-release services.

TWC is committed to making long-term investments that enhance the capacity of providers to implement research-based models, including programs that support accelerated options, such as integrated education and training, Workplace AEL, distance learning, and service models that support the career advancement of ELLs, including Integrated EL Civics education. These services are required of all AEL grant recipients statewide and promote the employment and postsecondary education and training advancement of students. To these ends, TWC promotes innovative career pathways programs and opportunities for students to gain incremental marketable skills and reach their goals. The use of innovative strategies, often leveraging interagency collaborations, allows programs to generate positive employment and workforce training outcomes, while simultaneously serving more students at a range of functional levels.

TWC encourages activities that uphold the following priorities, including priorities that leverage the workforce development opportunities and efficiencies offered through concurrent enrollment:

- Expand integration with Boards and Workforce Solutions Offices (that is, one-stop centers) including concurrent enrollment in workforce system program under WIOA,

TANF, the state child care program, Trade Act, vocational rehabilitation, and other Workforce Solutions services

- Establish or expand partnerships with community colleges and other training organizations that create greater opportunities for adult learners to transition to postsecondary education and workforce training programs, including concurrent enrollment in IET services
- Develop innovative strategies to meet the needs of adult learners based on local resources, including strategies that:
    - enhance, support, and use educational delivery mechanisms that facilitate the immediate delivery of services to students; or
    - facilitate the progress of students from standard AEL programs toward a service-delivery activity that results in employment, a training certificate or certification, or college degree.

Each Program Year, grantees are assigned enrollment targets for these different AEL services delivery models, including EL Civics, Integrated EL Civics, Intensive Services, and IET.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

TWC's AEL grant recipients use funds, as allowable, to provide educational programs for individuals in correctional institutions and other institutionalized individuals. Academic programs include the following:

- Basic education

- Special education programs as determined by the Texas Education Agency
- English literacy programs
- Secondary school credit programs
- IET
- Concurrent enrollment
- Peer tutoring
- Transition to reentry initiatives and other post-release services with the goal of reducing recidivism

Corrections is an optional activity for grantees, and the solicitation of §225 funds is combined with the overall grant application, with grantees proposing corrections activities and associated funding. As part of the grant competition, TWC ensures that in areas of the state where correctional facilities are located, contracts are negotiated to include this activity.

To further support the expansion of allowable corrections activities under WIOA, TWC has received a discretionary grant from DOLETA to assist communities in planning and implementing comprehensive reentry programs to help adults who have been involved in the adult criminal justice system make successful transitions back to the community. Partnering with the Texas Department of Criminal Justice (TDCJ), Boards, and Workforce Solutions Offices in the target area, TWC will implement programs and strategies that will improve coordination of post-release and pre-release services to eliminate the gap between release from prison and enrollment into a reentry program leading to employment with the goal of reducing recidivism.

TWC is working to implement IET in correctional facilities (where permitted) to support the successful transition of incarcerated individuals from prison to employment. One example is the Accelerate Texas program's partnership with the Windham School District (the statewide school district serving incarcerated offenders) to improve incarcerated adults' basic skills and support the attainment of an industry-recognized Level 1 certificate before their release from prison.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and

its functions to carry out the activities of the program.

TWC requires the implementation of Integrated EL Civics education into all its statewide grants, including assigning enrollment targets for Integrated EL Civics.

Grant recipients deliver Integrated EL Civics education through a program of study delivered as follows:

- Instructional services in:
    - **English as a Second Language and literacy** instruction; and
    - **Civics** education instruction emphasizes the rights and responsibilities of citizenship, naturalization procedures, civic participation, and US history and government to help students acquire the skills and knowledge to become active and informed parents, workers, and community members;
- Delivery:
    - **In combination with Integrated Education and Training (IET)** in specific occupations or occupational clusters, provides workforce training opportunities for eligible participants
    - **to prepare and place participants in unsubsidized employment** in in-demand occupations that leads to economic self-sufficiency; and
    - **in collaboration with Boards** to carry out the activities of the program.

TWC's policy guidance letter on Integrated EL Civics education, AEL Letter 04-16, Change 1, Implementing Integrated Education and Training English Literacy and Civics Education—*Update*, outlines the revised programmatic and funding requirements of the program under WIOA. TWC requires all grant recipients to submit their Integrated EL Civics education models through an online Implementation Plan portal that allows the agency to review programmatic design and compliance and provide related technical assistance.

Additionally, as outlined in AEL Letter 07-17, TWC requires that grantees provide all participants with a syllabus that includes general information about the course, attendance requirements, and course objectives, in addition to the following (for all IET programs, including Integrated EL Civics):

- A description of each of the three core components of an IET program of study, including:
    - AEL activities;
    - Workforce Preparation Activities; and
    - Workforce Training;
- A single set of learning objectives that identifies specific adult education content, Workforce Preparation Activities, and Workforce Training competencies
- The schedule for the IET program of study, showing how the core components are provided concurrently within the scope of the program

- Information about the recognized postsecondary credential for which participants will prepare, including how the credential is earned and which organization administers the credential

Grantees are required to enter participants who receive Integrated EL Civics services in combination with IET, into the statewide data system using a specific code to track these participants.

Beginning in PY 2019, Texas will implement the process of incorporating civics competencies into all ESL curriculum. The process includes updates to the Texas AEL Content Standards, policy changes, and incorporation into statewide professional development and training.

Integrated EL Civics education is a required activity for AEL grantees. Related service delivery requirements are included in all statewide grants, with enrollment targets assigned to each grantee for this program model. These requirements were incorporated into the second statewide competition held in fall of 2017 for AEFLA funds, aligning with Subpart C in WIOA Title II, related to competition, direct and equitable access, same grant process, and use of the 13 considerations described in Section 231(e) of AEFLA Section 243. To support the integration of this model with IET, TWC developed a differential cost model, calculating a higher-cost-per participant to allow the setting of targets for all career pathways models, including Integrated EL Civics. This additional funding is expected to help pay the costs of aligning the curriculum and help pay the participants' tuition in postsecondary education and training.

Integrated EL Civics education is a required activity for AEL grantees, with specific enrollment targets assigned to each grantee for each program year. To better prepare these Integrated EL Civics participants for unsubsidized employment, grantees are required to work with their Boards for the purposes of identifying and understanding labor market information, supporting participants with supplemental services to remove barriers from their educational goals, and identifying career opportunities. This is required for all program models, including Integrated EL Civics.

One area of growth is Integrated EL Civics models in entrepreneurial training. The training prepares individuals to successfully own and operate their own businesses, which many already are doing to some extent. By building the entrepreneurial training models into reputable businesses, TWC can better support the objectives of economic self-sufficiency and business growth in Texas. Several program providers have worked with their Boards to broaden the program's entrepreneurial curriculum and better serve participants in their region.

For example, the Dallas area AEL program has implemented an entrepreneurship program that provides ESL instruction and skills training for future entrepreneurs, collaborating with the Local Workforce Development Board, local businesses, the Chamber of Commerce, and other local organizations to ensure that students in the program have guided mentors and adequate workforce preparation for creating businesses.

As a requirement of all program implementation, including the Integrated EL Civics model, grantees are required to work with their Boards for the purposes of identifying and understanding labor market information, supporting participants with supplemental services to remove barriers from their educational goals, and identifying career opportunities to support placement in in-demand jobs. Additionally, several programs have worked with their Boards to broaden the program's entrepreneurial curriculum, where applicable, to better serve participants in their region.

To further support the transition of English language learners into the United States and increase the enrollment pipeline into the Integrated EL Civics programs, Texas will begin the process of incorporating civics competencies into all ESL curriculum through updates to the Texas AEL Content Standards and related professional development on the standards and associated curriculum and instruction models.

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

TWC continues to use State Leadership funds to support activities that strategically position the statewide system not only for continuous improvement across program outcomes but also for innovation in new directions related to full system integration with core programs and postsecondary education and training.

TWC will continue to focus the allowable grant funds made available under WIOA §222(a)(2) to carry out State Leadership activities that enhance the quality and compliance of the AEL system and support the development of innovative models of service delivery.

Required projects under WIOA §223 for which TWC has designated State Leadership funds, and anticipated projects that will be continued or designated for development and implementation, include the following:

- Both the Career Pathways Expansion and the Accelerate Texas initiatives support the continued development of content and delivery models that support career pathways as required under section 223(a)(1)(A). Career Pathways Expansion supports professional development and other assistance, including developing mentoring-related models that pair expert providers with providers that are emerging in their development of fully integrated career pathways including alignment to Local Workforce Development Board services and informational resources. Accelerate Texas supports the expansion of IET models and other postsecondary transition models, including workplace and apprenticeship projects with employers. Both these initiatives increase the capacity to expand, develop, and implement IET models that focus on career pathways service approaches that include workforce training, development and integration efforts with Workforce Solutions, Texas community colleges, employers, and other system stakeholders.

- Texas currently has a statewide professional development center as required under section 223(a)(1)(B). It supports high-quality statewide professional development to AEL providers and other system stakeholders and provides expansion effort support in other areas, such as the statewide rollout of the AEL Content Standards 2.0. Funds are dedicated for both supporting volunteer-based providers and developing administrative and instructional leadership among AEL practitioners through the Leadership Excellence Academy, and for the Standards Alignment to Industry Clusters Expansion, to help facilitate the publication of, and training on, content developed through the Standards Alignments to Industry Clusters grant.

- The Career Pathways Expansion project also supports the dissemination of instructional and programmatic practices as required in §223(a)(1)(B) in reading, math, and ESL, and is a state leadership initiative currently awarded to a community college.

While TWC staff continues to use strategic evaluation and monitoring processes that allow staff to provide just-in-time technical assistance, several State Leadership projects are planned to augment the state technical assistance efforts as required under §223(a)(1)(C).

The statewide professional development center and projects described above, support:

- the development and dissemination of instructional programmatic practices and related technical assistance as required under §223(a)(1)(C)(i) and based on the most rigorous or scientifically valid research available and appropriate to support eligible providers in implementing reading, writing, mathematics, career pathways, ELA, and distance learning;
- development and training of civics and family and community standards into the AEL Content Standards,
- the development of Leadership Excellence Academies for instructors and administrators
- coordination of activities with other professional development capacity projects funded by AEL
- distance learning and technology development, deployment, and support as required under §223(a)(1)(C)(iii), which continues and is planned through the Distance Learning and Technology Integration Institute at the statewide professional development center to enhance the development and implementation of technology applications, including increased distance learning and the expansion of a statewide learning management system to provide online professional development for staff training.
- Data-driven professional development planning, services, and implementation
- Routine and concentrated support to AEL grantees and providers
- management and development of the Learning Management System (LMS), the Texas AEL personal development (PD) Portal, including information on contract trainers vetted and often trained by TRAIN PD
- management and development of the agency-provided LMS (Texas AEL PD Portal)
- event planning for statewide, regional, or local conference or business events
- research activities to evaluate PD effectiveness and for other purposes as approved by TWC
- provision of information resources for the public, educators, and students:

Activities to develop and disseminate instructional and programmatic practices are based on scientifically valid research under §223(a)(1)(C)(i) include the Focus on the Basics initiative, which focuses on research and development to expand best practices in reading, math, and English as a second language

Activities to support the monitoring and evaluation of the quality and improvement of services and innovation expansion as required under section 223(a)(1)(D). Evaluation of local provider services is a priority for the AEL program. TWC staff has worked to develop a strategic evaluation and monitoring process that draw from best practices developed across TWC's divisions. Texas is implementing a program quality model to support student success that links deployment of WIOA program enhancements, evaluation of monthly program performance and information and findings from the TWC's monitoring department to just-in-time technical

assistance and the deployment of targeted professional development to support continuous program improvement. Section 223 funds support activities within this quality improvement model and include the dissemination of information about models and proven or promising practices within the State through section 223 funded mentoring and professional development projects.

Wide-Scale Evaluation of the Quality of Adult Education Services

In addition to regular programmatic monitoring and evaluation, TWC AEL staff is working with the TWC Division of Operational Insight on a large-scale evaluation process that will analyze the effectiveness of professional development activities as well as student intake, orientation, and onboarding, as they relate to programmatic outcomes.

TWC has invested heavily in providing professional development to teachers in the AEL program. DOI will be working with AEL to see whether TWC can measure the effectiveness of professional development by looking at student engagement and outcomes, before and after the teachers participate in professional development. It is not clear yet whether TWC will have a enough students to evaluate before and after the professional development. However, at some point, TWC expects to have enough data; therefore, even if the project is delayed, TWC's initial analysis and planning should ultimately prove useful.

TWC has been accepted into the PY'19 American Institute for Research National Reporting System Evaluation Learning Community sponsored by the Office of Career, Technical, and Adult Education to develop enhanced evaluation models based on principles of evaluation and how to conduct valid evaluations to answer critical questions around program practices and procedures.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

Additionally, the Commission may designate other activities of statewide significance that promote the purpose of WIOA, including, but not limited to, the following:

- Assistance to local providers in developing and implementing programs that achieve WIOA's objectives, and in measuring the progress of those programs in achieving the objectives, including meeting state performance;
- Promotion of workplace AEL activities;
- Continued development and dissemination of curriculum frameworks;
- Continued rollout and professional development on the content standards
- Outreach, develop, and pilot strategies for improving teacher quality and retention; and
- Development and implementation of programs and services to meet the needs of adults with learning disabilities or limited English-language proficiency.
- Performance enhancement mentor initiatives to support performance accountability
- Performance follow-up and case management activities
- Support and promotion of integration efforts between workforce system partners
- Promotion and support for reaching special populations in receiving AEL services

The following descriptions below provide more detail on allowable State Leadership Activities for which the Commission may designate section 223 funds.

AEL Performance Quality Improvement Awards

The Performance Quality Improvement Awards support Adult Education and Literacy (AEL) grant recipient project performance and innovation through dissemination of information about models and proven or promising practices in the state. These awards recognize AEL grant recipients' overall program performance and efforts in employer partnerships.

Pell Grant Ability to Benefit Capacity Expansion

The Ability to Benefit initiative provides funding to support colleges in developing services for students who lack a high school diploma or high school equivalency and qualify for Pell Grants under new federal Ability to Benefit provisions in federal financial aid regulations.

Student Support Call Center

The purpose of the Student Support Call Center is to support AEL students with a focus on high school equivalency mathematics instruction. The call center operates within the infrastructure of TWC's call center phone system and is staffed by individuals trained to provide remote mathematics support. In addition to phone support, call center staff uses online tutoring software to provide visual support to students as they work through questions.

Professional Development Center

The Professional Development (PD) Center is a statewide support system for AEL grant recipients and service providers, Boards, and community- and faith-based organizations engaged in AEL services. The PD Center provides a comprehensive statewide support system that includes, but is not limited to:

- statewide PD training for more than 6,000 local AEL staff and partner agencies;
- trainers located in different regions of Texas to ensure relevance and responsiveness;
- ongoing recruitment and vetting of PD subject matter expert trainers and maintenance of an online, searchable trainer index;
- development, conversion, and adaptation of curricula and multimedia course content;
- management of an online learning management system;
- event management;
- statewide purchases of PD services; and
- statewide and local needs analyses and research to improve local performance, promote innovation, and strengthen service quality to students and staff.

Learning Management System

The Learning Management System (LMS) is a cloud-based, full-featured, off-the-shelf secure system with course registration and management for in-person, hybrid, and online training events. Funds support access to a cloud-based course library and interactive resources, a web conferencing integrated add-in, and training fees to sufficiently accommodate instructors, administrators, and software content to provide a full array of PD services across Texas. The LMS:

- enables the PD Center to deliver training using a variety of modalities, including online, face-to-face, and hybrid;
- allows for content authoring, training materials storage, and content import/export;
- centralizes and automates the registration, management, and tracking of both external and internal PD trainings and certifications at individual, sub-recipient, grant recipient, and statewide levels;
- provides transcripts for staff trained through the AEL system; and
- provides a 24/7 option for professional development, increasing skills, knowledge, and abilities for AEL staff and stakeholders.

Distance Learning Mentor Initiative

This initiative provides funding to implement consortia to build capacity, expand, and/or improve performance of AEL Distance Learning (DL) initiatives throughout Texas. Consortia take advantage of the economy of scale by creating a larger network of resources and encouraging relationships, so organizations are not working in isolation but instead identifying common needs, goals, and resolutions. Mentor sites:

- serve as single point of contact to AEL on DL initiatives;
- support mentee pilots;
- develop DL curricula and blended learning models; and
- establish and maintain a resource platform for AEL providers who are new to DL in Texas.

Professional Development for Nonprofit Adult Literacy Organizations

Professional Development for Nonprofit Adult Literacy Organizations include PD services for tutors, instructors, program administrative staff, and trainers of nonprofit adult literacy organizations. These services include:

- training on literacy volunteer management, which may include volunteer recruitment, training, placement, monitoring, and retention;
- low literacy instruction/tutoring for either native English or nonnative English speakers;
- development of collaborative partnerships and data sharing relationships with AEL grant recipients, libraries, Boards, and VR;
- data sharing relationships with collaborating entities; and
- other services based on the results of a statewide needs assessment and in collaboration with TWC.

Leadership Excellence Academy

The Leadership Excellence Academy (LEA) program builds leadership capacity within AEL local-grantee management, with the objective to develop, implement, and sustain LEAs that provide access to LEA workshops, webcasts, online courses, technical assistance, and electronic portfolios. TWC will continue to provide access to both an Instructional LEA and Administrator

LEA to support providers through an intensive, year-long professional development opportunity to support program growth and performance.

Texas AEL Content Standards Update

To further the alignment of Adult Education and Literacy competencies in demand by employers, TWC contracted to facilitate the addition of entry-level industry skill requirements to the AEL Content Standards. Four lead organizations, along with industry experts and adult educators, worked with TWC to align standards to four target industries. The result of this project, which was completed in 2018, was the Texas Adult Education and Literacy Content Standards 2.0 (Standards 2.0), which updates and aligns the 2016 Texas Adult Education and Literacy Standards with the knowledge, skills, and abilities required for success in in-demand entry- and intermediate-level jobs in four industry clusters: advanced manufacturing; construction and extraction; health care sciences; and transportation, distribution, and logistics. While the 2016 content standards were unchanged with this update, Standards 2.0 aligns academic standards with jobs and provides a resource for workforce development specialists and educators to focus instruction and career guidance, guide the skills development needed for work, and to define skills and tasks not easily identified in academic standards.

Beginning in PY'19, Texas will continue to advance the standards by incorporating civics and community and family content competencies to the standards to ensure that all facets of AEL activity have alignment to recognized proficiencies.

Performance Follow-Up and Case Management

The Performance Follow-Up and Case Management program supports performance data on exit-based measures. Funds support an allocation for grant recipients to provide staff time for follow-up and case management or to purchase such services from entities, including Workforce Boards for students who are not coenrolled in Board services. Funds are allocated through a proportionate distribution with a base amount.

Performance Enhancement Mentor Initiative

The Performance Enhancement Mentor Initiative supports poor-performing providers through intensive program support and mentoring delivered by the initiative, with high-performing peer providers.

Integration Funding

The objective of the Integration Funding initiative is to promote and facilitate integration efforts between WIOA core programs and other workforce system partners. TWC has funded these integration initiatives in previous program years and will pursue continuous improvement around integration in the future.

Initiatives for Special Populations

This initiative promotes and supports efforts to reach special populations in receiving AEL services, such as, but not limited to, serving opportunity youth, serving skilled immigrants, expansion of reentry and post-release service models, and capacity-building for workplace AEL models.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Ongoing Program Monitoring and Oversight

Evaluation of local provider services is a priority for the AEL program. TWC staff has worked to develop a strategic evaluation and monitoring process that draws from best practices developed across TWC's divisions. Texas is implementing a program quality model to support student success that links evaluation of monthly program performance and information and findings from the agency's monitoring department to just-in-time technical assistance and the deployment of targeted professional development to support continuous program improvement.

The AEL Department provides a Monthly Performance Report (MPR) to the director of the Workforce Development Division. The MPR meeting is facilitated by AEL program and contract management staff and led by the AEL director and AEL program supervisor. It includes a monthly snapshot of both program and financial performance across all AEFLA programs, including section 223 projects.

The MPR is the result of a multiphase process that uses timely data gathered from the Texas Educating Adults Management System (TEAMS) to measure program performance against contract deliverables as well as state and federal performance targets. TEAMS is Texas' state-of-the-art, web-enabled system that maintains student-level data, including demographic, assessment, and outcome data, as well as class, site, program, and provider information. TEAMS users can analyze class, site, or program information using standard reports generated at the user level. TEAMS provides a wide range of information about adult education, including snapshots of student and program performance, personnel qualifications, and staff development activities.

AEL program providers are required to validate their data monthly and submit quarterly Data Sign-off Reports through TEAMS. The Data Sign-off Report requires program providers to describe areas of strength as well as concern. Program providers also are required to submit monthly expenditure reports in TWC's Cash Draw and Expenditure Reporting (CDER) system and quarterly narrative reports using a predetermined template that requests information on specific TWC objectives and overall program objectives.

AEL contract deliverables reflect TWC's commitment to strong performance and accountability. These deliverables include a combination of program and financial accountability and encourage program providers to exhibit strong planning through the development of project plans, continuous improvement plans, and standard operating procedures.

To prepare for the MPR, AEL program staff meet, weekly, at a minimum, to evaluate the overall health of each program, which is measured against contract deliverables; progress toward measures; state performance measures; and expenditures. Program staff members discuss trends in data and issues of concern and develop support plans to address those issues. Because services are aligned to workforce areas, staff can see where specific issues are isolated throughout the state. This provides a structure under which staff can engage TWC's Statewide Professional Development Center and other Section 223-funded professional development and technical assistance support projects to address concerns.

If a program does not show improvement after being placed on a support plan, TWC places it on a Technical Assistance Plan (TAP). TAPs use a timeline of deliverables to improve and support

program function. TAP actions may include additional targeted professional development support, one-on-one training in specific areas of weakness or concern, and technical assistance visits by TWC staff to meet and address issues. Members must meet specific benchmarks for a period of four consecutive months to have a TAP lifted. Programs that consistently fail to meet contract deliverables once placed on a TAP are placed on a Corrective Action Plan. Programs that fail to meet objectives beyond this point are subject to sanctions and deobligation of program funds.

Responsive professional development efforts funded under section 223(a)(1)(B) of WIOA is a central component of the quality model. TWC AEL assesses the quality and responsiveness of professional development through multiple approaches, including the review of local program improvement and remediation of deficiencies that may result after professional development and technical assistance efforts.

For example, through the quality model, a provider that month to month shows poor performance in reading or oral language scores will be advised by their TWC AEL program support specialist or assigned professional development specialist to schedule professional development in these areas. Once the program receives professional development services, the AEL department monitors program improvement to report in the MPR. Professional development is only one remedy to address program improvement and is deployed with other forms of technical assistance.

While changes in local program improvement is perhaps the most direct means of assessing the quality and effectiveness of professional development, it is not the only method of quality review in place. Professional development trainers are required to meet established quality and professional criteria developed and assessed by the state PD Center and AEL staff; training is reviewed by AEL staff to assure alignment with agency objectives and best practices based on the most rigorous or scientifically valid research available Specific professional development efforts funded under section 223 focus on developing curricula and training, including training-of-trainer models on ensuring support for instruction in the essential components of reading instruction and instruction related to the specific needs of adult learners. The Literacy Institute within the state PD Center is focused on professional development in the essential components of reading instruction and instruction related to the specific needs of adult learners. TWC AEL reviews both training curricula deliverables and training for these projects against best practices based on the most rigorous or scientifically valid research available. Section 223-funded projects, Literacy Texas and Career Pathways Expansion, focus on specifically training volunteers in the content areas, including reading and career pathways implementation and quality. These projects all have deliverables supporting the dissemination of information about relevant models and promising practices.

Additionally, all professional development events include session evaluations and these evaluations are provided to the AEL office, which reviews them monthly.

Subrecipient Monitoring

TWC's Subrecipient Monitoring (SRM) department works with TWC AEL staff to ensure that all 36 grantees are compliant and are serving as good stewards of federal funds. Grantees are selected annually for on-site reviews based on a robust risk analysis that includes both objective criteria and input from AEL. All AEL grantees are monitored either in person or through a desk review, with all programs receiving on-site monitoring once every three or four years.

While on-site, SRM reviews expenditures that include, but are not limited to disbursements, cash management, financial reporting, and records management (including eligibility and

assessment documentation). To ensure that the grantee has adequate internal controls, staff will conduct interviews with key staff to confirm that internal processes for participant intake, screening, and placement comply with TWC's AEL policy. Testing samples are identified using the Texas Educating Adult Management System (TEAMS) database and compared with on-site records, testing will include the review of student test scores, credentials, and Measurable Skill Gains.

SRM hosts a preplanning meeting with TWC AEL staff to discuss any potential issues before the on-site visit. This gives SRM the opportunity to ask questions about specific items of interest identified during the desk review. It also provides SRM with any technical assistance items that AEL staff has reviewed and discussed with the grantee, including performance issues. The process ensures that SRM obtains an accurate review of program and financial activity and any ongoing issues

Before a review, SRM will request that the grantee submit documents for SRM to conduct a review and analysis to determine each area that will be tested on-site. At the end of the on-site review, SRM conducts an exit conference with the grantee, in which staff identifies any findings or areas of concern that will be identified later in an official report.

The results of SRM reviews improve the technical assistance targeted to local projects.

Deobligation of Funds

TWC is keenly focused on performance to ensure that funds are used effectively to serve customers and produce positive results. Contracted performance benchmarks and performance standards highlight TWC's expectation that grantees will maintain or exceed performance standards through effective service delivery and innovation. TWC rule §800.78, which was amended December 2018, allows funds to be deobligated, including voluntarily, if they are not being used effectively and at expected levels at specified time frames to serve individuals who need AEL services. However, TWC staff works diligently with grantees to provide technical support and assistance in developing strategies to ensure that funds are used to serve customers efficiently and effectively, thereby mitigating risks.

Under current budgetary conditions—as in the past—the need for AEL services exceeds Texas' available resources, and no workforce area is funded to fully meet its needs. TWC expects that AEL grant recipients will identify, and coordinate with, all available organizations and programs in their workforce areas to expand and leverage deliverable services beyond those provided solely through AEL funding.

Self-Evaluation and Monitoring of Local Programs

As part of their deliverables, all TWC grant recipients (sole providers and lead grant recipients for consortia of providers) are required to:

- submit a detailed project plan and expenditure projections for AEL-funded activities;
- submit a detailed local professional development plan;
- develop and maintain a procedure that outlines a process for continuous monitoring of subrecipients; and
- if applicable, use TEAMS to regularly monitor program performance across all providers.

Programs use the detailed project plan as an opportunity to analyze their performance, determine the cause of areas of weakness or concern, and develop strategies for improvement in the coming year. Programs are required to tie their professional development activities to this plan to ensure adequate training and support for program improvements.

TWC AEL staff also holds regular conference calls and biyearly meetings for program members to share challenges as well as best practices. These forums build on what is working in the field and provide peer-mentoring opportunities.

Additionally, programs are required to regularly solicit student evaluations to assess satisfaction with curricula, instructors, and institutions.

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
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

The State Plan must include	Include
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of
Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for
influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an
officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,00 0 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its

instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to wioa@ed.gov at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)
2. Grants.gov - Certification Regarding Lobbying (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)

APPLICANT'S ORGANIZATION	**Enter information in this column**
Applicant's Organization	Texas Workforce Commission
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	Edward
Last Name	Serna
Title	Executive Director
Email	Edward.serna@twc.state.tx.us

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc.

TWC grants for AEFLA-funded activities, including the 2017 AEL statewide grants, which began July 1, 2018, adhere to §231(c) and ensure that eligible providers have equitable access to apply and compete for grants and contracts. All TWC AELFA-funded grants and contract opportunities are published on two statewide websites: the Texas SmartBuy-Electronic State Business Daily Search and Texas.gov eGrants Application to ensure equal access to application information. Furthermore, TWC provides notifications to public parties that wish to be notified of these grant and procurement opportunities via email notification, which they may register for on the TWC website.

TWC also ensures equitable access to and participation in all projects and activities conducted with federal adult education funds. The 2017 statewide AEFLA grant required offerors to describe how they effectively met the 13 considerations under WIOA, which includes how responsive the offeror is to serving individuals in need of AEL services and the ability to serve individuals with disabilities. Before awarding contracts, which went into effect July 1, 2018, for the AEL statewide grant, TWC required AEFLA grantees to describe the steps to be taken to

address the access needs of students, teachers, and other program beneficiaries to overcome barriers to equitable participation. Barriers addressed were those based on gender, race, color, national origin, disability, and age.

Additionally, general contract terms for all AEL contractors, including those funded under AEFLA §223 (state leadership activities) and §231, are required to comply with the nondiscrimination provisions of Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act, and the Americans with Disabilities Act. General contract terms for all AEFLA-funded contracts require grantees not to discriminate against any employee, applicant for employment, or beneficiary because of race, color, religion, sex, national origin, age, physical or mental disability, temporary medical condition, political affiliation or belief, or citizenship, and to ensure that the treatment of employees and applicants are free of discrimination.

Regarding AEFLA administrative funds, which fund TWC staff administering the AEFLA program in Texas, TWC's equal opportunity policy conforms to all applicable federal and state laws to provide equal opportunity in employment and maintains processes to ensure nondiscriminatory practices are enforced within the agency's hiring practices. AEFLA-funded staff and TWC staff are required to take training on diversity, equal opportunity employment, and discrimination prevention.

Programs must address the special challenges that students, teachers, and other program beneficiaries face in overcoming barriers to participation and are required to describe how individuals will benefit from equitable access to services, including access in the areas of facilities, assessment, orientation, and overall service delivery.

TWC ensures equal opportunities for all eligible students, teachers, and other program beneficiaries to participate in any project or activity carried out under the applicable programs, including AEL, and promotes the ability of such students, teachers, and beneficiaries to meet high standards. AEL grantees are required to provide accessible, safe, and convenient instructional facilities that are ADA-accessible, near public transportation, close to free parking, and secure and safe.

TWC ensures that local providers give equal access to, and afford equitable participation in, all such projects and activities through the monitoring and technical assistance process, and that they follow the applicable laws.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year

adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a

holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	32.7%	34.2%	32.7%	34.2%
Employment (Fourth Quarter After Exit)	30.3%	30.3%	30.3%	30.3%
Median Earnings (Second Quarter After Exit)	$4,854	$4,854	$4,854	$4,854
Credential Attainment Rate	34.1%	34.1%	34.1%	34.1%
Measurable Skill Gains	44.1%	44.1%	44.1%	44.1%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

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[13] Sec. 102(b)(2)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The Rehabilitation Council of Texas (RCT), which is the state rehabilitation council for Texas, met quarterly with the leadership of the state vocational rehabilitation (VR) programs and the Texas Workforce Commission (TWC), the state-designated agency, as a part of the RCT's regular meetings. During these meetings, VR and TWC provided quarterly updates and the RCT provided input and made recommendations regarding VR services program matters.

The RCT uses a committee structure to provide focused review and comment to VRD. These committees are: the executive committee; the program planning and review committee which is comprised of all RCT members; the policy, procedures and personnel development committee; the customer satisfaction and needs assessment committee; and the membership and education committee. While the detail work is done in the committee structure, all comments and recommendations are made from the full RCT.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

The following is a summary of the input and recommendations made regarding the combined state plan.

Recommendation: Regarding Cooperative Agreements with Agencies Not Carrying Out Activities, clarify whether VRD coordinates with state AT programs other than the UT AT Project, and if so, include them in this section of the CSP, and if not, list them in this section and explain why VRD is not coordinating with them at this time.

Response: VRD is unaware of any other state assistive technology programs other than the University of Texas' Texas Technology Access Program (TTAP).

Recommendation: Regarding Coordination with Education Officials, consider a focus on STEM be added to this section.

Response: VRD agrees and included information in this section about the PCI initiative, Explore STEM!

Recommendation: Regarding Coordination with Education Officials, expand collaboration between VRD, education officials and ISD's beyond Pre-ETS in the CSP, to include a full array of VR services to students with disabilities, such as, but not limited to apprenticeships.

Response: VRD agrees with the recommendation and has added that apprenticeships are included as an appropriate service that may be available to customers. Based on the Explore Apprenticeships initiative that occurred in two areas of the state during summer 2019, it is anticipated that interest in apprenticeships will grow and enhanced collaboration with ISDs will be expanded to apprenticeships.

Recommendation: Regarding Coordination with Education Officials, make the Texas Transition and Employment Guide a hyperlink.

Response: VRD agrees, and a hyperlink to the Texas Transition and Employment Guide was added.

Recommendation: Regarding State's Strategies, add… "Implements employment premiums to reward providers who maintain training and skills necessary to work with blind or visually impaired customers" to the CSP.

Response: VRD agrees that it is important to maintain a sufficient provider base to serve customers who are blind or visually impaired. VRD has implemented several policies and standards to support this goal and will conduct further review of this recommendation in anticipation of further consideration by TWC's three-member Commission.

Recommendation: Regarding State's Strategies, additional disabilities where VRD should build staff capacity and subject matter experts should include: epilepsy, mental health, and spinal cord injury. Also suggest that the agency build staff capacity and expertise on the following service areas; self-employment, vehicle modification, home/job modifications and workers compensation in the CSP.

Response: VRD is committed to continuing to build staff capacity and expertise in serving customers with a variety of disabilities. VRD currently has counselors who are considered subject matter experts (SMEs) in some of the areas recommended; however, there are some geographic gaps in SMEs across the state. VRD agrees that there is opportunity to build staff capacity in the areas of self-employment, vehicle modifications, home/job modifications, and workers' compensation. State office program specialists for self-employment and workers' compensation have provided training to field staff in these areas and will continue to do so. The state office program specialists for Assistive and Rehabilitation Technology also host webinars with the Unit Assistive Technology specialists to provide valuable information on assistive technology, vehicle modifications, and home and job modifications, which is shared with counselors.

Recommendation: Regarding State's Strategies, TWS should include a mechanism within the ReHabWorks program to remind counselors to consider assistive technology to support the individual throughout the VR process.

Response: VRD is committed to ensuring that staff members realize the importance of assistive technology to support customers with disabilities. The recommendation to add a ReHabWorks (RHW) change to assist counselors with considering assistive technology throughout the VR process will be discussed with management and the RHW team. Additionally, VRD revised policy to include a requirement that the Diagnostic Interview case note must include a statement regarding discussion of assistive technology with the customer. Also, assistive technology consideration will be included in new counselor training conducted by the Training and Development department. VRD is emphasizing the importance of assistive technology, and recently added an additional program specialist to the state office program specialists for the

Assistive and Rehabilitation Technology team. Each unit also has an assistive technology specialist to provide guidance and technical assistance to staff working with customers who may benefit from assistive technology.

Recommendation: Regarding State's Strategies, add, work with and reach out to individuals with disabilities who are Asian to this section.

Response: VRD serves eligible individuals of all ethnicities and races and is committed to outreaching all populations that may need VR services.

Recommendation: Regarding State's Strategies, In Goal Area 2, feedback from communication with the providers of the Pathways to Career Initiatives should be included in this section.

Response: VRD agrees that input from providers and participants of the eight Pathways to Careers initiatives is important. While surveys and evaluations are used with some of the initiatives, additional thought will be given as to the best modalities for gathering feedback about each initiative.

Recommendation: Regarding Arrangements and Cooperative Agreements for the Provision of Supported Employment Services, add the number of ISD's, as compared to the total number of ISD's in the state, that have cooperative agreements to provide transition services as well as those who offer supported employment services. If these numbers are not readily available, add gathering these numbers to the plan. If the numbers are low, add increasing cooperative agreements with ISD's to the CSP.

Response: VRD does not have agreements with ISDs to provide supported employment services. There may be agreements that require ISDs to provide supported employment services through Medicaid waiver programs; however, those are not through VRD. The only agreements that VRD has with ISDs are with the Texas School for the Deaf and the Texas School for the Blind and the Visually Impaired, and these agreements are for summer programs for students with disabilities, not for supported employment. VRD coordinates with ISDs across the state to provide a variety of services to students with disabilities, including supported employment and customized employment, when appropriate.

Recommendation: Regarding Arrangements and Cooperative Agreements for the Provision of Supported Employment Services, add the reason VRD partners with TX APSE, including how the relationship benefits customers.

Response: VRD has determined that there is not a current Texas Association of People Supporting Employment First (APSE) chapter; however, one is under development. The content regarding Texas APSE has been deleted.

Recommendation: Regarding Arrangements and Cooperative Agreements for the Provision of Supported Employment Services, reword this section to clarify and substantiate whether every ESP will work with every disability to provide supported employment services or not.

Response: While employment service providers may accept referrals of customers with any disability, some employment service providers have developed skills and capacity to serve customers with certain primary disabilities and may accept referrals on that basis. Because employment services providers are private entities, they can choose to accept or deny specific referrals but must comply with contract requirements and the Standards for Providers.

Recommendation: Regarding Arrangements and Cooperative Agreements for the Provision of Supported Employment Services, clarify whether TWS-VRS has identified an adequate number of ESPs to provide supported employment services, or if this is an area where more providers are needed, include this need in the CSP.

Response: VRD has not determined a specific number of supported employment providers that would be considered adequate to serve customers across the state. VRD is currently revising policy pertaining to supported employment and will continue to have open enrollment periods for vendors interested in providing supported employment services. If VRD determines that additional supported employment providers are not needed, then recruitment of these providers through open enrollment will be decreased.

Recommendation: Regarding Coordination with Employers, add a list of state and federal entities to support the claim that VRD is working with federal and state entities and local boards.

Response: VRD includes the names of some of the state and federal agencies that VRD is working with in the later part of this section. The US Veterans Administration has been added.

Recommendation: Regarding Coordination with Employers, add the numbers to the report of past symposia and job fairs as well as percentage of increase for planned growth. Consider using actual employment numbers as a measure of success and growth for these activities.

Response: VRD has added the number of events in 2018 and 2019 and has not set a percentage increase for 2019 but will consider whether that is an appropriate indicator of coordination with employers for future tracking. Additionally, VR will not have a specific number per symposia and job fairs because these events are open to the public and not all individuals with disabilities attending these events are VR customers.

Recommendation: Regarding Coordination with Employers, add how many students from targeted populations, such as: blind or significantly visually impaired (not including SWEAT), hard of hearing or deaf, neurodevelopmental disorders, mental health disorders and individuals from minority backgrounds, participated in SEAL, SEARCH or other summer work experience activities to the numbers reported in this section. Add plans to increase participation by these targeted populations.

Response: Students who are blind or visually impaired, deaf or hard of hearing, have neurodevelopmental disorders including autism and mental health disorders, and have minority backgrounds have participated in Summer Earn and Learn, Project Search, Explore STEM! and other student activities. VRD is committed to ensuring that students from these targeted populations continue to participate in initiatives such as Summer Earn and Learn,

Project Search, Explore STEM! and other summer work experience. VRD will work with the Division of Operational Insight (DOI) to analyze participation by targeted population and report this information in future years.

Recommendation: Regarding Coordination with Employers, TWS-VRS should consider adding their role in working with the National Employment Team, NET, through CSAVR, that markets the VR program to corporations and businesses nationwide and connects these businesses with VR in each state to the CSP. TWS has a point of contact with the NET program to communicate with these employers to help clients find jobs.

Response: VRD agrees with the recommendation and has added additional information about the NET to this section.

Recommendation: Regarding State's Goals and Priorities, add, "such as", and provide examples of the advocacy organizations and providers, under the last bullet: "Input from customers, advocacy organizations, and providers" to this section.

Response: VRD agrees with the recommendation and has added Disability Rights Texas as an example.

Recommendation: Regarding Goals and Plans for Distribution of Title VI Supported Employment Funds, add clarification on what state general revenue fund employment services are used by VRD to this section.

Response: The Texas legislature has appropriated general revenue dollars to support the requirement that states must provide a 10 percent match for 50 percent of their federal supported employment allotment. As with the federal funds, these general revenue funds are used to provide supported employment services to youth with disabilities.

Recommendation: Regarding Goals and Plans for Distribution of Title VI Supported Employment Funds, consider adding cognitive disabilities to the list of targeted disabilities in Goal Area 1 to improve customer employment outcomes.

Response: Cognitive disabilities are now captured under the heading of Neurodevelopmental Disabilities. This change in terminology is reflected in the *Diagnostic and Statistical Manual of Mental Disorders* (DSM-V). Neurodevelopmental Disabilities is currently part of Goal Area 1. Following the 2020 CSNA, additional disability groups may be targeted in future goals.

Recommendation: Regarding Statewide Assessment, confirm the definition of "most significant disability" provided here is accurate based on what was developed in cooperation with the RCT. (Federal regulations allow each state and RCT to define "most significant disability".)

1. VRD agrees with the recommendation and has added content to clarify the definition of most significant disability.

Recommendation: Regarding Statewide Assessment, remove the word "possibly" under the section titled Underserved Populations, as it sounds like we are not sure that these are underserved populations. If we are certain these populations are underserved, state "underserved populations identified:".

1. VRD agrees with the recommendation and revised the language to read, "Based on data in the 2017 CSNA, likely underserved populations and unmet needs include…."

Recommendation: Regarding Statewide Assessment, it is unclear how the agency identifies these underserved populations. RCT suspects additional categories of disability, including: traumatic head injury, and spinal cord injury should be on this list as well. Consider adding them.

Response: Unserved populations are defined as groups of people who are not being served by VRD or who are being served in lower numbers than expected. Underserved populations are defined as groups of people who are not being served as effectively as expected and may have lower employment outcomes. During the 2020 CSNA, data and other information collected will assist RCT and VRD to determine if additional disability populations need to be added to "unserved" or "underserved". Specific indicators include groups of people who are receiving fewer relevant services than other populations, experience longer wait times to receive services, and have poorer perceived quality of services.

Recommendation: Regarding Statewide Assessment, add a plan for TWS-VRS to provide training for staff to gain more knowledge on how to work with persons with significant disabilities. Those disability groups should include mental health, TBI, Spinal cord injury, multiple sclerosis, epilepsy and/or other underserved populations the agency identifies in this category.

Response: VRD agrees that continued training of staff in serving individuals with significant disabilities is important. During the 2020 CSNA, VRD will determine likely underserved populations, and will engage the TWC Training and Development department as well as VR staff members who are considered SMEs to determine the best training approaches.

Recommendation: Regarding Statewide Assessment, people on social security also may be receiving benefits from different waiver programs. Add a sentence that indicates VR staff will also be informed/learn about waiver programs and how the waiver programs may benefit recipients to go to work or be affected by going to work under Priority 2.

Response: VRD agrees with the recommendation and has added a statement about the training provided by state office program specialists to SMEs for Social Security benefits on waiver programs.

Recommendation: Regarding Statewide Assessment, both CAP and the RCT have been working with TWS for some time on informed choice. The RCT recently requested that TWS insert the regulations that address the topic into the policy manual in the chapter for informed choice. We are considering additional guidance, information and additional policy on this subject as well. There is a question in the customer satisfaction survey that addresses informed choice specifically that should be included under Priority 3 in this section of the state plan as a means to quantify how the agency is doing.

Response: VRD agrees that consistent and appropriate implementation of informed choice throughout the VR process is important. Consideration will be given to additional policy and guidance related to how counselors are providing informed choice to customers. While it provides some helpful information, a single survey question is not sufficient as a strategy for evaluation of VRD performance in this area. VRD will work with DOI to determine possible strategies to further evaluate informed choice.

Recommendation: Regarding Statewide Assessment, supported employment is a service, not a goal. It would be more appropriate to state: As Table 4 demonstrates, there is a gap in the employment rate between individuals who did not receive Supported Employment services compared to those who did receive the service. In the table, change SE Goal To "Received SE services". Change the sentence under the table from SE goals to SE services. Do the same thing for table 2

Response: VRD concurs that supported employment is a service; however, it is also reflected in federal reporting requirements as a goal. The Reporting Manual for the Case Service Report (RSA-911) identifies a data element of "Supported Employment Goal on Current IPE," which is described as the "individual has or does not have a supported employment goal on the current IPE." The term "supported employment" is more fully defined in 34 CFR §361.5(c)(53). RSA uses the data submitted in the RSA-911 to evaluate program performance during on-site monitoring, which includes assessing the number of participants who achieved a goal of Competitive Integrated Employment in Supported Employment.

Recommendation: Regarding Statewide Assessment, the strategies outlined in this section do not list a strategy to increase stakeholder involvement. TWS should outline plans to contact disability organizations such as ARC, Diabetes Association, Muscular Dystrophy Association, Multiple Sclerosis association and other groups to work together to provide internships, volunteer positions and summer and year-round work experience programs in this section.

Response: VRD agrees and is developing a stakeholder plan to ensure outreach and engagement with a broader group. This is stated in the plan.

Recommendation: Regarding Statewide Assessment, TWS-VRS should focus on improving providers who can assist a person in obtaining a job in a professional capacity.

Response: VRD agrees that assisting customers who are qualified for professional jobs should be a focus. As an incentive, employment services providers are currently eligible to receive a premium if they place a customer in a job for which the minimum educational requirement is a bachelor's degree.

Recommendation: Regarding Statewide Assessment, add the customer satisfaction survey as the source of the information "Customers value VR services and largely report that services are meeting their employment needs. Up to 78 percent of respondents indicated that they were satisfied or very satisfied with the quality of VR services from VR staff, their inclusion by VR staff in setting goals and making choices, the courteousness and respectfulness of VR staff, and the VR eligibility determination process. For the quality of services from VR service providers, views of respondents were slightly lower, at 68 percent.", and clarify which program year these percentages refer to.

Response: The data stated above is taken from the VR Needs Survey administered by the Public Policy Research Institute at Texas A&M University in fall 2017, not the customer satisfaction survey.

Recommendation: Regarding Cooperative Agreements with Private Nonprofit Organizations, clarify whether Project Search is a program or a service. If it is a program, remove it from the bulleted list of service provider contracts.

Response: Project Search is a program; however, the vendors that provide Project Search services must adhere to the Standards for Providers manual and follow their service provider contracts; therefore, Project Search is contained on this list.

Recommendation: Regarding Cooperative Agreements with Private Nonprofit Organizations, clarify whether supported employment consultants are required to possess the CBTAC. If not, reword to make this clear. If so, explain why the credential is required.

Response: VRD confirmed in this section that only purchased services from supported self-employment and self-employment consultants are required to possess the CBTAC. Having the CBTAC credential ensures that service providers have knowledge of various components of self-employment and supported self-employment.

Recommendation: Regarding Cooperative Agreements with Private Nonprofit Organizations, add the fact that TWS-VRS pays premiums for those who work with persons with a criminal background as well as those who help people find a professional job to this section.

Response: VRD agrees and added content in this section that a premium payment is provided to employment services providers that place those customers with a criminal background as well as placing customers in a professional occupation.

Recommendation: The RCT commends TWC- VRD for maintaining and supporting the expectation that all Texas VR Counselors will have a master's degree and become CRC qualified.

Response: VRD appreciates the RCT's comment and is committed to ensuring that VR services are provided and facilitated by highly qualified VR counselors.

Recommendation: Regarding Annual Estimates and Projections, state the evidence TWC has that supports the prediction that total expenditures will continue to decrease in the immediate

future. The cost of services will go up with inflation and other factors. Clarify how more customers are expected to be served in the next year and costs will go down.

Response: VRD anticipates that average and total expenditures on services will continue to decrease in the immediate future despite recovery from a downward trend in applications. Because new applicants take time to go through eligibility determination processes and start receiving services, financial trends lag a few years behind trends in customers served. Moreover, because participants typically receive services for two to four years, costs may not begin to increase again until 2020. DOI is currently constructing models to support and enhance VRD's financial projections. "Number served" for Table 3 is defined as "customers with a purchased service during the program year" to more accurately represent average and total costs. These figures are tentative, and total program costs may likely exceed predicted values.

Recommendation: Regarding Annual Estimates and Projections, state that numerous factors contributed, and it is unclear which most affected the numbers under PY17 numbers served. (list a variety of factors)

Response: It is difficult to effectively attribute cause, but the low unemployment rate and caseload vacancies are likely factors. Additionally, based on the Workforce Innovation and Opportunity Act, potentially eligible students with disabilities are able to receive pre-ETS without the requirement of an application for services.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

Not applicable

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not applicable

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Not applicable

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

To ensure that individuals with disabilities receive appropriate services, VRD has the following cooperative arrangements with various federal, state, and local agencies and programs to use their services and facilities:

- Collaboration with the Texas Health and Human Services Commission (HHSC) to provide VR services to individuals eligible for home and community-based services under a Medicaid waiver or Medicaid State Plan Amendment. HHSC is the state agency that provides services to individuals with developmental disabilities. VRD also works collaboratively with the Texas Department of State Health Services to provide cooperative VR services to individuals receiving mental health services.
- Coordination with HHSC in referral processes between VR and the Blind Children's Program, the Comprehensive Rehabilitation Services Program, and the Independent Living Services Program
- Coordination with HHSC in implementation of legislation passed by the 86th Texas Legislature.
- MOUs with TEA and independent school districts (ISDs) to enhance coordination of services provided through programs like Project SEARCH and other community programs and support available to improve and expand services for transition-age students with disabilities
- Coordination with the Texas School for the Blind or Visually Impaired to provide specialized programs that prepare students for the transition to postsecondary life and the workplace
- Coordination with the Texas School for the Deaf (TSD) to provide specialized programs that prepare students on the transition to postsecondary life and the workplace
- MOU with the Texas Department of Insurance's Division of Workers' Compensation to enhance referrals for return-to-work efforts
- Coordination with the Social Security Administration (SSA) on employment incentives and support to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program
- MOU with the U.S. Department of Veterans Affairs to maximize case service funds through better access to comparable benefits, and to enhance the case management process while avoiding duplication of services.
- Coordination with the Texas Veterans Commission to help identify veterans who need additional support in securing benefits, gaining employment, and accessing advocacy services.
- Coordination with the Texas Coordinating Council for Veteran Services to help identify trends that have an adverse effect on the veteran population, and create strategies to address and resolve those issues at the state level
- Coordination with the U.S. Department of Labor Office of Federal Contract Compliance Programs to create statewide symposiums and job fairs to meet the federal regulation that requires federal contractors to ensure that no less than 7 percent of their workforce includes individuals with disabilities

- Coordination with the Purchasing for People with Disabilities program in providing training to CRPs
- Coordination with the Texas Criminal Justice Coalition for juveniles and adults to assist and strengthen supports and employment goals by exploring career opportunities
- Coordination with the Texas Department of Transportation on addressing the issue of inadequate transportation, often a major factor in a customer's ability to maintain employment

Additionally, VRD uses TWC's internal structure to:

- verify for Texas businesses that job applicants under the Work Opportunity Tax Credit program are receiving, or have received, VR services under an individualized plan for employment;
- access electronic wage data to verify employment history and income for customers for closure data and SSA/VR reimbursement submission; and
- collaborate with Workforce Solutions Offices regarding customer training and support for employment goals, including participation in symposiums, job fairs, and providing disability awareness training.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

VRD works with organizations across the state to ensure that it meets customers' assistive technology needs, including transition services for students and youth with disabilities and pre-employment transition services for students with disabilities. The organizations include contracted assistive technology evaluation sites across the state and VRD's own Assistive Technology Unit.

Contract providers are required to participate in a thorough testing program to ensure that they meet minimal standards of proficiency to become approved assistive technology providers. VRD uses programs such as the Computer/Electronics Accommodations Program when a customer is interested in employment with the federal government, the Specialized Telecommunications Assistance Program (STAP) for obtaining telecommunication devices, and various assistive technology programs for the deaf and hard of hearing.

Each Texas Workforce Solutions Vocational Rehabilitation Services unit has trained assistive technology staff that will be responsible for sharing knowledge and resources so that updated technology purchases can address the needs of customers with various disabilities, including blindness or visual impairments.

VRD works cooperatively with the Texas Technology Access Program (TTAP), the implementing entity designated by the governor under the Assistive Technology Act of 1998 (29 U.S.C. 3003) §4 to coordinate activities, including the referral of individuals with disabilities. Currently, VRD refers customers to TTAP demonstration centers located throughout the state to ensure that they have an informed choice of assistive technology and that equipment purchased by VRD meets each customers' needs.

VRD participates in annual joint presentations with TTAP at Ability Expo in Houston, Ability Expo in Dallas/Ft. Worth and the Texas Workforce Commission (TWC) statewide conference, which provide opportunities for customers and counselors to learn about new adaptive

equipment and assistive technology that can assist in maintaining competitive, integrated employment.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

VRD coordinates with Texas A&M AgriLife Extension Service and Texas AgrAbility to assist customers with modifications of agricultural equipment and tools, allowing for agricultural producers with disabilities to continue with farming and ranching.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

VRD works with the following:

- Community Resource Coordination Groups (CRCGs), which are local interagency groups composed of public and private providers that come together to develop individualized service plans for children, youth, and adults whose needs can be met only through interagency coordination and cooperation
- Local Workforce Development Boards that provide services to out-of-school youth

5. STATE USE CONTRACTING PROGRAMS.

VRD has a contract with WorkQuest, formerly Texas Industries for the Blind and Handicapped and the Texas State Use Program to provide services in support of agency and divisional operations.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

The provision of quality VR services for Texas students with disabilities is a strategic priority for the Vocational Rehabilitation Division (VRD). VRD policies and procedures have been updated to align with the Workforce Innovation and Opportunity Act (WIOA) §413(B)(F), which sets forth that the individualized plan for employment (IPE) must be developed as soon as possible, but not later than a deadline of 90 days after the date of the determination of eligibility, unless the counselor and the eligible individual agree to an extension to a specific date.

Transition planning by VR counselors and school personnel facilitates the development and implementation of a student's individualized education program (IEP) under the Individuals with Disabilities Education Act §614(d). The goals developed in the IEP are considered in the development of the IPE. The development and approval of an IPE is initiated by a VR counselor. Planning includes conversations about informed choice and program information so that students understand the available options for additional education, training, service providers, and employment.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

VRD maintains collaborative working relationships with public education entities in Texas. VRD services emphasize and provide a coordinated set of age-appropriate activities that enable transition students, parents, education personnel, and others to actively plan for and assist the student to prepare for life after leaving high school, including proactively developing partnerships with communities, service providers, and businesses to create opportunities for students to obtain postsecondary education, training, and competitive integrated employment.

State Education Agency Partnership

TWC VRD works closely with TEA to coordinate transition planning services for students between ages 14–22 who receive special education services in Texas. As required in 34 C.F.R. §361.22(b), TWC-VRD has collaborated with TEA to develop an MOU, current from August 31, 2017 to August 31, 2022, that outlines the responsibilities of TWC's VRD for the provision of transition planning services as well as the fiscal responsibility of TEA for the provision of services as required by the Individuals with Disabilities Education Act.

The MOU represents each agency's commitment to collaborate and cooperatively facilitate the successful transition of students with disabilities from high school to competitive integrated employment using VR services. The MOU includes the addition of pre-employment transition services (Pre-ETS) as defined in C.F.R. §361.48, and other Workforce Innovation and Opportunity Act (WIOA) requirements, operationalizing a referral process for students with disabilities, and a process for inviting counselors to Admission, Review, and Dismissal (ARD) meetings.

The MOU provides for consultation and technical assistance in planning for the transition of students with disabilities from school to post-school activities, including VR services; transition planning for students with disabilities that facilitates the development and completion of the IEP; clarification of the agencies' respective roles and responsibilities, including financial responsibilities for providing transition planning services to students with disabilities; and a description of procedures for outreach to and identification of students with disabilities who are in need of transition services.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

VRD develops partnerships with schools and community organizations to help students with disabilities make a smooth transition to adulthood and work. VRD's counselors throughout the state who are assigned to high schools have a role in preparing students with disabilities for entry into the workplace. VR counselors coordinate closely with high schools to ensure that appropriate students are referred to the VR program. They serve as information resources for teachers and other educational staff and provide resources and information about blindness and other disabilities to parents and transitioning students. They work closely with parents, education staff and community service providers to promote development of skills needed for students to become as independent as possible, as well as competitive in terms of integrated employment. Counselors work with schools to identify students receiving Supplemental

Security Income (SSI) as early as possible in the process to address concerns regarding impact of employment on benefits and to provide resources for benefits counseling.

Pre-ETS are provided to students with disabilities. Required Pre-ETS activities are job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in postsecondary educational programs, workplace readiness training, and instruction in self-advocacy.

To provide transitioning students with more effective and comprehensive preparation for work after high school, VRD is also increasing the number of summer work opportunities with community partners around the state. TWC has launched the Pathways to Careers Initiative (PCI), an initiative to expand Pre-ETS to Texas students with disabilities. The first strategy launched under PCI in summer 2017 was Summer Earn and Learn. VRD partnered with each of the 28 Local Workforce Development Boards (Boards) and their employer partners to provide employability skills training and work experience for students with disabilities. Summer Earn and Learn will continue in subsequent summers. Another strategy is Charting the Course: Planning for Life after High School. This strategy engages students with disabilities and their families in a series of education, awareness, and planning events beginning with the students' eighth grade year. Engaging families earlier in preparing their children for high school promotes better planning for student transition activities in high school and supports a successful transition to further education and employment after high school. Explore STEM! is a PCI strategy that was implemented in summer 2018 and was held for a second year, during summer 2019. Explore STEM! provides students with disabilities the opportunity to explore STEM fields, hear from professionals working in those fields, and experience hands-on activities in various STEM fields. The objective is to encourage more students with disabilities to consider careers in STEM fields.

Other PCI strategies include Capacity Building, Advise TX, Pre-ETS Tools for Students, and a Pre-ETS curriculum. Capacity Building is a strategy to operationalize the MOU between TWC and TEA by engaging VR and school personnel in a series of meetings designed to encourage and assist with relationship building, strategies for successful collaboration, and a better understanding of the VR and Special Education systems. Advise TX is an initiative conducted in partnership with the Texas Higher Education Coordinating Board (THECB). The program employs recent college graduates who are trained to serve as full-time, near-peer college advisers in high schools that have historically low college-going rates. Advisers provide one-to-one assistance to students with disabilities to match their academic and career goals to optimal postsecondary options. Pre-ETS Tools for Students started with the development of a Transition module to be added to the existing Texas OnCourse platform, an electronic tool focused on career and postsecondary exploration. The second phase of this strategy is the development of a resource for parents that will provide information and guidance about topics related to the transition process. It aims to identify and address gaps in existing information and targets all parents, with a concerted effort to reach parents who may not be familiar with the process of transitioning to postsecondary school or work. TWC has also partnered with Texas A&M University to develop a Pre-ETS curriculum that schools can adopt and use as an elective.

VRD counselors work with the high schools to provide consultation and technical assistance regarding the VR process and appropriate services that may be available to customers, such as engaging in apprenticeships.

Consultation and technical assistance is provided at ARDs, and attendance may be in person or through alternative means, including videoconferencing or conference calls (based on 34 C.F.R. §361.22(b)(1)).

When necessary, VRD counselors and school personnel coordinate to satisfy documentation requirements for students and youth with disabilities who are seeking subminimum wage employment, as set forth in 34 CFR §397.4(c). VRD does not pursue subminimum wage employment for customers. When a customer chooses to pursue subminimum wage employment, counseling on other employment options is provided. When, after counseling, subminimum wage employment is still the customer's choice, the VR case is closed. Those customers who choose subminimum wage employment receive counseling, guidance, and referral services within the first six months of employment and annually thereafter.

TWC has regional and state office transition specialists who provide support to VR counselors and VRD field office managers in developing collaborative partnerships with and increasing cooperation between VRD, local school districts, and other community organizations as resources for students with disabilities. These transition specialists assist with the development of policy, training, and strategies that lead to effective provision of transition services.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Local education agencies maintain fiscal responsibility for transition services that are also considered special education or related services, and that are necessary for ensuring a free, appropriate public education to children with disabilities within Texas, including those outlined in the IEP (34 C.F.R. §361.22(c)).

Additionally, House Bill 617, 83rd Texas Legislature, Regular Session (2013), requires that each ISD have an individual identified as the Transition and Employment Designee (TED). The TED is responsible for providing information and resources about effective transition planning and services. VRD has counselors throughout the state assigned to high schools to assist students with disabilities in preparing for entry into the workplace. Nothing related to VRD's responsibilities and requirements under WIOA should be construed as a reduction in local education agencies' responsibility under IDEA to provide and pay for special education and related services as a part of a free and appropriate education to students with disabilities (WIOA §101(c)).

VR counselors (VRCs) coordinate closely with high schools to ensure appropriate students are referred to the VR program. Transition program specialists support the work of VRCs and VRD field office managers in developing collaborative partnerships with and increasing cooperation between VRD, local school districts, and other community organizations as resources for students with disabilities. VRD has transition VRCs and VRCs who act as liaisons for high schools and partner with the educational system to more appropriately serve transition-age students seeking assistance to access adult vocational services.

VRD partnered with other health and human services agencies to assist TEA in developing the Texas Transition and EmploymentGuide for students enrolled in special education programs and their parents. The guide provides information on statewide services and programs that help facilitate the transition to life outside of the public-school system.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

TWC's current MOU with TEA includes the addition of Pre-ETS, as defined in 34 C.F.R. §361.48, and other WIOA requirements, operationalizing a consistent referral process for students with disabilities, and a process for inviting counselors to attend ARD meetings.

TWC's VRD has specialty transition VRCs and VRCs who act as liaisons for high schools and partner with the educational system to more appropriately serve transition-age students seeking assistance to access adult VR services. Partnering with ISDs allows counselors to use office space on campus and be available to students and school staff to discuss VR services, resources available through the Texas workforce system, community, businesses, and other partners necessary to build a network of support. Additionally, it allows counselors to provide relevant seminars, workshops, camps, and summer work experiences throughout the state.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Private Nonprofit Providers

Private nonprofit providers of rehabilitation services are an important part of the VR service delivery process for many customers. VRD routinely works with national organizations, in addition to local private nonprofits to purchase and arrange services that help customers prepare for, obtain, maintain, or advance in employment. For the provision of extended services in Supported Employment, VRD makes arrangements with public and nonprofit agencies or organizations within the state, employers, natural supports, and other entities.

Availability of Information on Service Providers

To assist customers in making informed choices regarding VR providers, TWC's VRD maintains ReHabWorks, an electronic case management system. ReHabWorks contains information specific to each Community Rehabilitation Provider (CRP). Workforce Solutions staff shares information about qualified providers for a service, as it relates to a CRP's experience in working with target populations, foreign languages, and other communication skills such as American Sign Language, ensuring that a customer can make an informed choice when selecting a service provider.

Provider Contracting Process

VRD establishes contractual relationships with providers of VR services, including private nonprofit providers. To expand opportunities and increase efficiency related to recruiting providers, VRD posts notification of contracting opportunities on the Electronic State Business Daily (ESBD), where organizations can complete an application to become a service provider if the organization meets the requirements listed in the ESBD posting.

Service Provider Contracts

The VR Standards for Providers (Standards) are published on the TWC website and specify the scope of work for providing contracted goods and services. Contracted providers are required to follow the VR Standards, which specify the terms and conditions of the contractual relationship, approved services, expected outcomes, fees, staff qualifications, and required documentation. Revisions to the Standards are made periodically, and notices of upcoming changes are published on the TWC Provider Resource website at least 30 days in advance of the effective date of the changes. GovDelivery notices are sent out to announce posted changes, and the CRP contacts reference the TWC-VR SFP for updates every 30 days. Providers are contractually responsible for complying with the most recent standards and their individual contract. Examples of services include:

- orientation and mobility;

- assistive technology training;
- diabetes education;
- employment supports for brain injury;
- environmental work assessment;
- independent living services for older individuals who are blind;
- job placement;
- job skills training;
- personal social adjustment training;
- Pre-Employment Transition Services;
- Project SEARCH;
- supervised residential services for individuals in recovery;
- self-employment, including supported self-employment;
- supported employment services;
- vocational adjustment training;
- vocational evaluation and assessment;
- wellness recovery action plans (WRAP);
- work adjustment training; and
- work experience.

Oversight and Monitoring of Contracted Service Providers

TWC purchases services only from providers that follow the VR Standards. TWC-contracted service providers are subject to both ongoing and periodic programmatic and financial monitoring. Risk assessment tools are used at the state and the regional level to identify service providers to be monitored. On-site monitoring visits may be scheduled. Additionally, service providers not identified through the risk assessment tools may also be monitored. A monitoring team includes representatives from TWC VRD and VR Contract Oversight Monitoring. Contractors found in noncompliance with VR Standards may be placed on a corrective action plan. Sanctions vary and may include financial restitution where appropriate. All contractors are provided ongoing technical assistance. In addition to monitoring, VR Standards also require ongoing self-evaluation by each contracted service provider.

Credentialing Requirements

Each VR contracted service provider must have one individual designated as the Director for VRD communication and accountability purposes. Each contracted service provider must have a director who possesses University of North Texas director credentials.

VRD also has partnered with the Center for Social Capital to develop the training and the Certified Business Technical Assistance Consultant (CBTAC) credential, which must be obtained and maintained by vendors from whom VR purchases self-employment services, including

supported self-employment services. Having the CBTAC credential ensures that service providers are knowledgeable about various components of self-employment and supported self-employment.

Premiums are payments made to employment service providers in addition to the base rate paid for services when the VRD customer and/or service provider staff achieve certain criteria. Premium payments are available for vocational adjustment training, job skills training, job placement, and supported employment.

Premiums are offered to service providers that serve individuals who are deaf, have autism, have criminal backgrounds, and have a bachelor's degree or higher and are seeking a professional occupation to encourage development of higher skills among the provider community. Staff members who serve deaf customers must hold a certification from the Board for Evaluation for Interpreters, a Registry of Interpreters for the Deaf certification, or a Sign Language Proficiency Interview (SLPI) rating of intermediate or higher. For service providers to earn the premium when working with individuals with autism, they must show proof that they have retained staff possessing the Autism Specialization from the University of North Texas.

Approved providers also receive training in the field from VRCs, state office program specialists, employment assistance specialists, University of North Texas online courses, and Criss Cole Rehabilitation Center staff. Training may include:

- disability awareness, including blindness, to give providers a better understanding of the challenges and limitations faced by customers;
- education on Americans with Disabilities Act requirements to ensure that providers understand the guidelines and law governing provision of accommodations to customers;
- education on other employment-related laws and recruitment, job matching, job customization, work accommodations, and retention; and
- Texas Confidence Builders training, which provides the philosophy TWC VRD has adopted to help customers gain personal independence, acceptance, and adjustment to blindness, and find meaningful work.

Identifying and Developing Vendors

Designated regional program specialists are responsible for identifying and developing entities that are interested in providing services described in the VR Standards. Program specialists provide technical assistance and guidance as new providers are approved and as existing providers add new services.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

Evidence of Collaboration, Contracts, and Agreements

To provide seamless service delivery to customers and ensure effective use of resources, TWC VRD maintains the following collaborations with community partners and other state agencies:

- VRD Program Specialists provide information and technical assistance to the appropriate Texas Health and Human Services (HHS) Medical and Social Service Divisions when changes to VR employment services occur.
- VRD works with the appropriate HHS Medical and Social Service Divisions to ensure that service definitions in the 1915(c) home-and community-based waivers accurately reflect Centers for Medicare and Medicaid Services and Rehabilitation Services Administration regulations. This partnership allows services that result in competitive integrated employment to be delivered efficiently and timely through the payer of first resort.
- VRD offers free intensive training and technical assistance to HHS' Medical and Social Services Divisions' Behavioral Health and Intellectual and Developmental Disabilities (IDD) Services Departments Special Projects Unit and community providers to become Benefits Subject Matter Resource staff.
- VRD partners with HHS' Medical and Social Services Divisions' Behavioral Health and IDD Services Departments Special Projects Unit to provide cross training on the VR Long-Term Supports and Services System.
- VRD uses its current partnership with the Social Security Administration (SSA) to encourage Employment Service Providers (ESPs) to become employment networks (ENs) under the SSA Ticket to Work Program. VRD offers incentive payments to ESP-ENs that provide: supported employment or job placement services during the provision of VR services; and extended support to Ticket to Work customers after VR case closure in order to advance employment or increase customer earnings.
- VRD partners with school districts that provide transition services to youth and considers all aspects of the cooperative agreements in place to ensure continuity and timeliness of services for those school districts that initiate supported employment services before or after a student graduates.

VRD has representation in the following:

- The Texas Council for Developmental Disabilities
- Texas Statewide Behavioral Health Coordinating Council
- Mental Health Coordination and Subustance Use Disorder Party Workgroup, which is a subcommittee of the Behavioral Health Advisory Committee
- Behavioral Health Advisory Committee
- Texas Coordinating Council for Veteran Services
- State Independent Living Council
- Texas Council on Consumer Direction
- The Promoting Independence Advisory Committee
- HHS Cross Agency Liaison Initiatives

- Governor's Committee on People with Disabilities

Contracts

VRD has vendor contracts with ESPs to provide specific employment services, which include supported employment services. VRD counselors may refer customers with all disabilities, including blindness and visual impairments, to ESPs with contracts for supported employment services. The TWC-VR Standards for Providers manual outlines the staff qualifications, service description, process and procedures and fee for Supported Employment.

G. COORDINATION WITH EMPLOYERS

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

TWC VRD continually seeks ways to increase the number of Texans with disabilities who successfully train for, obtain, and retain competitive integrated employment. The Business Relations Team was created to improve services to local businesses and help them achieve a diversified workforce by hiring qualified individuals with disabilities. Team members have successfully partnered to provide a coordinated array of outreach, consultation, and technical assistance services to Texas businesses.

VRD began using the state labor exchange system, WorkInTexas, in preparation for its new launch in August 2019. The new system allows VR to report on their work with business partners in alignment with the other WIOA employer services. The Business Relations Team disseminates resources to Texas businesses through the Business Services website which provides information about the benefits of partnering with VRD, including available services, resources such as the *Guide for Hiring People with Disabilities*, and helpful websites.

The Business Relations Team is increasing coordination with other state and federal entities that administer employment training programs and is also working jointly with Local Workforce Development Boards' (Boards) Business Services Units. The result of this coordination is growth in the number of jointly held business symposia and job fairs in communities across Texas (49 events in 2019 and up to 60 events planned for 2020), and more outreach and awareness activities to inform employers about the services available through the workforce system, including VR. VRD partnerships with Boards, the US Department of Labor Office of Federal Contract Compliance programs, Health and Human Services, the Veterans Administration, and employers will help ensure that the business community and Texans with disabilities who are seeking competitive integrated employment have the greatest level of support, resources, and services available to help them succeed.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

The Pathways to Careers Initiative (PCI) is an initiative to expand pre-employment transition services (Pre-ETS) to Texas students with disabilities. PCI will ensure that Texas is effectively preparing students with disabilities to achieve competitive, integrated employment through participation in employability skills and work-readiness training, career exploration activities, work experience, and counseling on postsecondary education.

Summer Earn and Learn (SEAL) was the first PCI statewide strategy and involves employability skills training and paid work experience for students with disabilities. It is offered in each local workforce development area (workforce area) during the summer months, when students are out of school. Boards have developed work experience opportunities with employers in their workforce areas in high-growth occupations, skilled trades and crafts, and other high-demand occupations. During summer of 2019, more than 2,500 students and nearly 1,000 employers participated in SEAL.

Project SEARCH

The Project SEARCH business-led pre-employment training program is a one-year school-to-work program that takes place entirely at the workplace. The program includes a combination of classroom instruction, career exploration, and hands-on training through worksite rotations. Project SEARCH serves students with various disabilities, including significant intellectual and developmental disabilities. Typically, these are students who are on an IEP and in their last year of high school eligibility. The goal for these customers is competitive integrated employment within the business community or the business where the worksite rotations occur.

Project SEARCH has expanded from one original program site established in 1996 at Cincinnati Children's Hospital in Ohio, to over 500 sites internationally. Project SEARCH in Texas began in 2007 with Seton Healthcare Family in Austin. As of fall 2019, Texas has 29 Project SEARCH sites. Sites are led by a host business and include key partners, including VRD, ISDs, CRPs, and local authorities. Each Project SEARCH site typically has 8–12 participants per year. Approximately, 225 students participated in Project SEARCH for the 2018-2019 school year.

Texas Project SEARCH Locations and Partners

#	Partner Name	Location
1	Epiroc, Garland	Garland ISD, Texas Workforce Solutions, Quest Employment, Dallas Metrocare Services
2	Medical Center of Lewisville, Lewisville	Lewisville ISD, Texas Workforce Solutions, Quest Employment
3	Texas Wesleyan University, Fort Worth	Fort Worth ISD, Texas Workforce Solutions, MHMR of Tarrant County
4	Seton Medical Center Williamson, Round Rock	Round Rock ISD, Texas Workforce Solutions, Goodwill Industries of Central Texas, Bluebonnet MHMR
5	Baylor Scott & White Hospital, College Station	College Station ISD, Texas Workforce Solutions, Brazos Valley Center for Independent Living, MHMR of Brazos County
6	Baylor Scott & White Hospital, Brenham	Brenham ISD, Texas Workforce Solutions, The Whole Solution, MHMR of Brazos County
7	SanMar, Inc. Irving	Irving ISD, Texas Workforce Solutions, Dallas Metrocare Services
8	United Healthcare, Sugarland	Fort Bend ISD, Texas Workforce Solutions, Texana

#	Partner Name	Location
9	Seton Medical Center Hays, Kyle	Hays Consolidated ISD, Texas Workforce Solutions, Goodwill Industries of Central Texas, Hill Country MHMR
10	Seton Medical Center Williamson, Round Rock	Round Rock ISD, Texas Workforce Solutions, Goodwill Industries of Central Texas, Bluebonnet MHMR
11	The City of Lewisville, Lewisville	Lewisville ISD, Texas Workforce Solutions, Quest Employment
12	Embassy Suites Dallas Frisco Conference Center, Frisco	Frisco ISD, Texas Workforce Solutions, LifePath
13	La Cantera Hill Country Resort, San Antonio	San Antonio Northside ISD, Texas Workforce Solutions, PCSI, Alamo Local Authority
14	Baylor Scott & White Lakeway, Austin	Lake Travis ISD, Westlake ISD, Texas Workforce Solutions, East Seals Central Texas, Austin Integral Care
15	Christus Trinity Mother Frances Hospital, Tyler	Tyler ISD, Texas Workforce Solutions, Winning Edge Employment, Andrews Center
16	Seton Northwest, Austin	Leander & Georgetown ISDs, Texas Workforce Solutions, Goodwill Industries of Central Texas, Bluebonnet MHMR
17	Christus Santa Rosa Children's Hospital, San Antonio	San Antonio ISD, Texas Workforce Solutions, PCSI, Alamo Local Authority
18	Baylor Scott & White, Plano	Plano ISD, Texas Workforce Solutions, LifePath
19	Texas Children's Health Plan, Houston	Houston ISD, Texas Workforce Solutions, SCI Inc., MHMRA
20	Dow Chemical, Freeport, TX	Brazosport ISD, Texas Workforce Solutions, SCI Inc, Gulfport Center
21	The Hospitals of Providence Memorial Campus, El Paso	El Paso ISD, Texas Workforce Solutions, Nidia Escobar, Emergence MHMR
22	Hilton Conference Center, College Station	Bryan ISD, Brazos Valley CIL, Texas Workforce Solutions, MHMR of Brazos County
23	Covenant Hospital, Lubbock	Levelland ISD, Lubbock Cooper ISD, Frenship ISD, Quest Employment, Texas Workforce Solutions, StarCare
24	Texas Health Presbyterian Hospital, Richardson	Richardson ISD, Quest Employment, Texas Workforce Solutions, Metrocare
25	The City of Garland, Garland	Garland ISD, Texas Workforce Solutions, Quest Employment, Dallas Metrocare Services
26	Houston Dow Chemical, Houston	Houston ISD, Texas Workforce Solutions, SCI Inc., MHMRA

#	Partner Name	Location
27	Northwest Texas Healthcare System, Amarillo	Amarillo ISD, Texas Workforce Solutions, Quest Employment, Texas Panhandle Center, Texas Health and Human Services
28	The Hospitals of Providence East Campus, El Paso	Socorro ISD, Texas Workforce Solutions, Empowering Hands, Emergence MHMR
29	Highland Springs Retirement Community, Dallas	Richardson ISD, Quest Employment, Texas Workforce Solutions, Metrocare

At times, groups of students with disabilities may be brought together to teach vocational skills. These activities are called Group Skills Trainings (GSTs). The following are examples of GSTs that involve coordination with employers.

S.W.E.A.T. Program

In collaboration with the Texas School for the Blind and Visually Impaired, VRD holds a five-week summer work program called S.W.E.A.T. (Summer Work Experience in Austin, Texas) in which up to 15 students who are blind or visually impaired are trained in employability skills, independent living skills, and mobility training, and gain four weeks of work experience with businesses in the Austin area. It is a program designed to prepare students for success in the world of work and adult living through increased independence, competence, and self-confidence.

W.A.C.O. @ TX A&M Program

VRD collaborates with the Brazos Valley Center for Independent Living and Texas A&M Center on Disability and Development to hold the W.A.C.O. (Work and College Opportunities) @ Texas A&M summer work program. Participants receive development and instruction in professionalism, self-determination, and teamwork. They experience and learn about college opportunities and work in the community16–20 hours a week while living on campus.

The Houston VR staff coordinated several career mentorship opportunities, such as the one held at the NASA Johnson Space Center. During the NASA mentorship day, students with disabilities were given a tour of the Mission Control Center and a hands-on exercise with a space station mock-up.

VRD will also leverage existing business partnerships to identify additional opportunities to better prepare students for the workplace and help them obtain jobs. VRD will pursue additional partnerships with businesses that have an interest in pre-employment training for high school students to ensure that students entering the workforce are appropriately equipped with the technology and skills to adapt to work in the 21st century.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

Texas Health and Human Services

TWC VRD will continue to collaborate with HHS, the state agency responsible for providing services to individuals with developmental disabilities and administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

Collaboration occurs in the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program. VRCs provide information to mutually served customers to assist them in understanding how to navigate the long-term support and services system.

Additionally, VRD works with HHS Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

TWC VRD coordinates with the Social Security Administration (SSA) to encourage Employment Service Providers (ESPs) to become employment networks (ENs) under SSA's Ticket to Work Program. TWC VRD offers incentive payments to ESp-ENs that provide:

- supported employment or job placement services during the provision of VR services; and
- extended supports to Ticket to Work customers after VR case closure in order to advance employment or increase customer earnings.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

TWC VRD continues to collaborate with HHS, the state agency responsible for providing services to individuals with developmental disabilities and administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

Collaboration occurs in the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program. VRCs provide information to mutually served customers to assist them in understanding how to navigate the long-term support and services system.

Additionally, VRD works with HHS Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

TWC VRD and select ESPs participate in the Partnership Plus program. Additionally, VRD is participating in the Promoting Opportunity Demonstration (POD) pilot that tests benefit offset in the Social Security Disability Insurance program to determine its effects on outcomes such as earnings, employment, and benefit payments.

SSA and HHSC have a data exchange agreement that allows HHSC to access SSA data. Through a third-party agreement (State Verification and Exchange System), VRD is able to obtain SSA data regarding cost reimbursement from HHSC.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

Mental Health

Working with Texas HHS, VRD promotes mental health evidence-based practices and other evidence-informed models of service that will improve competitive integrated employment outcome strategies for customers.

Other examples of collaboration include:

- increasing coordination and developing new partnerships with other state and community organizations—mental health organizations, local authorities, and universities—that serve individuals with developmental or intellectual impairments and mental health disorders to develop resources, expand knowledge, and implement best practices;
- working with the HHS Office of Mental Health to identify and implement best practices, engage potential community partners, and facilitate service coordination; and
- participating in the Mental Health First Aid training conducted by local mental health authorities, which teaches VRCs and other professionals how to assist someone experiencing a mental health crisis.

Training is another area that emphasizes interagency cooperation. VRD program specialists provide the following training:

- Annual training on the VR programs to Home and Community Based Services waiver providers, service coordinators and case managers, the Private Provider Association of Texas, Providers Alliance for Community Services of Texas members, community centers staff, including customer benefits officers, and the Statewide Intellectual and Developmental Disabilities Consortium;
- Training on VR services and benefits and work incentives to HHS Managed Care Organization service coordinators and management, and other service providers and Medicaid waiver case managers;
- Training on TWC VR employment services, benefits, and work incentives to members of the seven-statewide mental health peer-operated support groups; an
- Training on benefits and work incentives every six months for TWC VRD staff, ESPs, HHS providers, and IDD and mental health staff;
- Overview of benefits and work incentives to HHS staff, providers, and other community stakeholders throughout the year;
- Overview of TWC VR services and best practices for mutually served customers for HHS Service Coordinators, Case Managers, private providers, and other staff;
- Overview of Wellness Recovery Action Plan (WRAP) for community partners;
- Training to ESPs statewide on best practices in the provision of employment services to individuals with the most significant disabilities; and

- Training on assistive technology for community partners.

Plans for Improving Supported Employment Services

TWC-VRD will continue to focus on strengthening supported employment services by:

- Assisting ESPs in using the Supported Employment Assessment that focuses on discovery and person-centered techniques, vocational theme development, and providing worksite observations;
- Considering additional supported employment policy revisions, such as clarifying who is appropriate for supported employment services;
- Working with VRCs on applying the supported employment planning and service provision to improve customer participation and informed choice by requiring review and signatures at each benchmark;
- Providing ongoing training to TWC's VRD subject matter experts, who provide technical assistance to VRCs on identifying and coordinating extended service/long-term support before beginning the benchmark process;
- Ensuring that all criteria for determining job stability to ensure extended service/long-term support after VR case closure are being applied; and
- Continuing to provide specific employment services to people with Neurodevelopmental Disorders to improve their success in obtaining and maintaining employment.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

The Texas Workforce Commission (TWC), Vocational Rehabilitation Division (VRD) is committed to ensuring that consumers receive services from qualified rehabilitation professionals as set forth in §101(a)(7) of the Rehabilitation Act of 1973 as amended by WIOA and 34 C.F.R. §361.18. VRD has established procedures to support the Comprehensive System of Personnel Development (CSPD). RCT provides input to VRD in addressing issues related to personnel development. The Policy, Procedures, and Personnel Development Committee of RCT meets quarterly to discuss the development and maintenance of policies and procedures in support of the CSPD standard.

VRD requires an employee who serves in a position functionally classified as a vocational rehabilitation counselor (VR counselor), transition vocational rehabilitation counselor (Transition VR counselor), or unit support coordinator (USC) to meet the Comprehensive System of Personnel Development (CSPD) standard as required by the TWC Qualified Vocational Rehabilitation Counselor program.

As of July 1, 2019, the Vocational Rehabilitation Division (VRD) had 1138 full-time employment (FTE) staff positions to provide direct services to 59,384 VR customers, broken down as follows:

- Vocational Rehabilitation Counselors (VRCs)
- Transition Vocational Rehabilitation Counselors (TVRCs)
- Unit Support Coordinators (USCs)
- Vocational Rehabilitation Teachers (VRTs)
- Rehabilitation Assistants (RAs)

VRD's average caseload size is 80-85.

The number of VR participants served has declined recently. As a result, staffing projections will be held constant for the next two years; however, staffing needs will be reassessed annually as VRD implements outreach and awareness strategies to engage with more individuals with disabilities, including students with disabilities. Additionally, VRD has initiated staff recruitment and retention initiatives. As the number of counselors stabilizes and newer counselors gain experience, VRD expects to increase the number of customers served. As the number of individuals served increases, the number of support staff and in-house service providers remains constant for the next two years and will be assessed to ensure sufficient staff to meet the expected need. VRD anticipates that it will be able to meet some of the need for more staff capacity to deliver services for the current biennium through the expected efficiencies achieved through current and future Rapid Process Improvement (RPI) activities and other quality improvement activities.

Table 2: Vocational Rehabilitation Division Attrition Rate as of July 1, 2019.

Job title	Average Workforce (average filled positions)	Total Separations	Volun	Invol	Retire	Other (transfer to outside agency)	Year-to-date (YTD) Rate	Vol YTD Rate
VRC	477.83	94	59	4	19	12	19.67%	12.35%
TVRC	136.75	29	23	1	1	4	21.21%	16.82%

Table notes:

- YTD Rate calculated by dividing Total Separations by Average Strength
- Vol YTD Rate calculated by dividing Volume by Average Strength
- Attrition Rate information provided by TWC Human Resources

Outreach activities will continue to be conducted to broaden the population of individuals with disabilities being served by VRD. Outreach, education, and awareness efforts will be targeted to underserved and unserved populations such as transition students, veterans, and individuals

with neurodevelopmental disorders (including autism), and psychological disorders such as bipolar disorder or schizophrenia.

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

Column one of following table identifies the number of VRD staff needed to provide direct customer services currently.

Projected Vocational Rehabilitation Division Personnel Needs through Program Year (PY) 2023

Job Title	PY'18 Total Positions	PY'18 Vacancies as of 6/30/19	PY'19	PY'20	PY'21	PY'22	PY'23	Total Need
VRC	520	47	0	0	0	0	0	0
TVRC	159	11	0	0	0	0	0	0
Unit Support Coordinator	28	1	0	0	0	0	0	0
Criss Cole Rehabilitation Center VRC	4	0	0	0	0	0	0	0
Vocational Rehabilitation Teacher (Field)	37	3	0	0	0	0	0	0
Vocational Rehabilitation Teacher (CCRC)	35	1	0	0	0	0	0	0
Rehabilitation Assistants	355	25	0	0	0	0	0	0

Table notes:

- Vacancies column is as of July 1, 2019, per Active Position Report.
- Vacancy totals are included in the number of positions (first column), these are not additional positions.

VRD has forged productive, proactive working relationships with Texas universities that train rehabilitation professionals. Involvement with Texas universities results in student requests for practicum and internship placements within VRD. Internships have been offered since 1999 for students completing master's degrees in Rehabilitation Counseling or Rehabilitation. In PY'18, VRD hosted 17 internships. Evaluations of student interns come directly from certified, licensed, or Qualified Vocational Rehabilitation Counselor (QVRC) internship supervisors and department advisors from the intern's university.

Job vacancy notices are routinely posted on WorkInTexas.com, TWC's statewide online jobsite. Hiring supervisors can also request a broader distribution of vacancy notices by having TWC Human Resources post them to additional sites such as Indeed.com, Monster.com, and others.

Recruitment continues for bilingual Spanish- and English-speaking candidates to fill positions located in areas with high Spanish-speaking populations. Opportunities to promote employment to all community sectors are achieved by sharing job postings with universities.

VRD encourages the hiring of qualified individuals with disabilities and strives to ensure that staff represents ethnic diversity and thereby reflects the population of Texas and the customers we serve. Ethnic distribution of VRD employees and Texas residents is shown below.

Ethnic Group	VRD Employees	Texas Residents
Caucasian	40.0%	42.87%
Hispanic	29.8%	38.93%
African American	27.9%	11.67%
Asian	1.6%	4.46%
American Indian/Alaska Native	0.6%	0.24%
Native Hawaiian/Other Pacific Islander	0.1%	0.07%

SOURCES: Texas Workforce Commission Human Resources, U.S. Census Bureau 2013-2017 American Community Survey 5-Year Summary File, Texas Demographic Center, and Texas Department of Transportation, Texas Department of Motor Vehicles. Additionally, approximately 7.5percent of VR employees have reported a disability, such as blindness/visual impairment, deaf/heard of hearing, physical and mental.

For the purpose of calculating the agency turnover, losses are counted only when an individual terminates employment with the agency. Losses do not include vacancies created because of employee promotions, reclassifications, demotions, or transfers within the agency.

VRD has established several strategies for recruitment, preparation, and retention of qualified personnel. Plans reflect continued annual needs assessment, quarterly review of strategies and interventions for recruitment, and updated review of the QVRC program following each semester to ensure satisfactory progress.

Recruitment of Qualified Personnel

VRD has a recruitment plan that identifies in-state and out-of-state entities from which qualified personnel may be hired. VRD also has designated recruitment coordinators who work closely with each of these organizations. For each identified organization, the coordinator makes contact to establish specific recruitment strategies for each program. The recruitment plan coordinator regularly reviews and updates the plan. Depending on location, size, and nature of the class, and need of the institution, VRD employs the following approaches to recruitment:

- Participates in advisory committees for partnering universities allowing access and contribution to program improvement processes and to students for on-site visits;
- Conducts classroom orientations and distributes recruitment information for graduating students;
- Collaborates with the administration of distance-learning programs to determine effective processes for recruiting distance-learning students;
- Sends job postings regularly to VR graduate programs of more than 90 U.S. universities;

- Coordinates with universities for graduate VR internships to recruit rehabilitation counselors; and
- Participates in job fairs and employment conferences to recruit individuals from minority backgrounds and individuals with disabilities.

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

The following table identifies the number of VRD staff needed to provide direct customer services through Program Year 2023.

Table: Projected Vocational Rehabilitation Division Personnel Needs through Program Year (PY) 2023

Job Title	PY'18 Total Positions	PY'18 Vacancies as of 6/30/19	PY'19	PY'20	PY'21	PY'22	PY'23	Total Need
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Rehabilitation Assistants	355	25	0	0	0	0	0	0

Table 1 notes:

- Vacancies column is as of July 1, 2019, per Active Position Report.
- Vacancy totals are included in the number of positions (first column), these are not additional positions.

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

During the Fall 2018 to Summer 2019 school year, VRD worked with six Texas university master's degree rehabilitation counseling programs. While there are other universities in Texas which offer a master's degree in rehabilitation counseling, the listed universities are the ones used by VRD.

- Stephen F. Austin University
- University of North Texas
- University of Texas at Austin
- University of Texas at Rio Grande Valley
- Texas Tech University
- University of Texas at El Paso

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

A total of 81 students graduated in 2018-2019 from the universities listed in Table 3 with credentials of academic preparedness to meet national rehabilitation counselor certification requirements. Additionally, there may be periodic changes in the academic preparedness in meeting certification requirements due to changing laws, public regulations, and/or delivery of rehabilitation services as practiced in the United States. The different university rehabilitation counseling programs may also vary accordingly, which would affect academic certification requirements.

Table 3: Fall 2018 – Summer 2019 Students Enrolled and Previous-Year Graduates

Institution	University Students Enrolled	University Graduates from the Previous Year
Texas Tech University	100	24
University of North Texas	118	24
University of Texas at Rio Grande Valley	157	5
University of Texas at Austin	9	6
Stephen F. Austin University	14	1
University of Texas at El Paso	20	10
TOTAL	418	70

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

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meeting certification requirements due to changing laws, public regulations, and/or delivery of rehabilitation services as practiced in the United States. The different university rehabilitation counseling programs may also vary accordingly, which would affect academic certification requirements.

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University of Texas at El Paso	20	10
TOTAL	418	70

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

VRD has forged productive, proactive working relationships with Texas universities that train rehabilitation professionals. Involvement with Texas universities results in student requests for practicum and internship placements within VRD. Internships have been offered since 1999 for students completing master's degrees in Rehabilitation Counseling or Rehabilitation. In PY'18, VRD hosted 17 internships. Evaluations of student interns come directly from certified, licensed, or Qualified Vocational Rehabilitation Counselor (QVRC) internship supervisors and department advisors from the intern's university.

Job vacancy notices are routinely posted on WorkInTexas.com, TWC's statewide online jobsite. Hiring supervisors can also request a broader distribution of vacancy notices by having TWC Human Resources post them to additional sites such as Indeed.com, Monster.com, and others.

Recruitment continues for bilingual Spanish- and English-speaking candidates to fill positions located in areas with high Spanish-speaking populations. Opportunities to promote employment to all community sectors are achieved by sharing job postings with universities.

VRD encourages the hiring of qualified individuals with disabilities and strives to ensure that staff represents ethnic diversity and thereby reflects the population of Texas and the customers we serve. Ethnic distribution of VRD employees and Texas residents is shown below.

Ethnic Group	VRD Employees	Texas Residents
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SOURCES: Texas Workforce Commission Human Resources, U.S. Census Bureau 2013-2017 American Community Survey 5-Year Summary File, Texas Demographic Center, and Texas Department of Transportation, Texas Department of Motor Vehicles. Additionally, approximately 7.5percent of VR employees have reported a disability, such as blindness/visual impairment, deaf/heard of hearing, physical and mental.

For the purpose of calculating the agency turnover, losses are counted only when an individual terminates employment with the agency. Losses do not include vacancies created because of employee promotions, reclassifications, demotions, or transfers within the agency.

VRD has established several strategies for recruitment, preparation, and retention of qualified personnel. Plans reflect continued annual needs assessment, quarterly review of strategies and interventions for recruitment, and updated review of the QVRC program following each semester to ensure satisfactory progress.

Recruitment of Qualified Personnel

VRD has a recruitment plan that identifies in-state and out-of-state entities from which qualified personnel may be hired. VRD also has designated recruitment coordinators who work closely with each of these organizations. For each identified organization, the coordinator makes contact to establish specific recruitment strategies for each program. The recruitment plan coordinator regularly reviews and updates the plan. Depending on location, size, and nature of the class, and need of the institution, VRD employs the following approaches to recruitment:

- Participates in advisory committees for partnering universities allowing access and contribution to program improvement processes and to students for on-site visits;
- Conducts classroom orientations and distributes recruitment information for graduating students;
- Collaborates with the administration of distance-learning programs to determine effective processes for recruiting distance-learning students;
- Sends job postings regularly to VR graduate programs of more than 90 U.S. universities;
- Coordinates with universities for graduate VR internships to recruit rehabilitation counselors; and
- Participates in job fairs and employment conferences to recruit individuals from minority backgrounds and individuals with disabilities.

Preparation of Qualified Personnel

VRD has a system to recruit and hire individuals as VRCs who have master's degrees in Rehabilitation Counseling. The QVRC database is maintained to monitor counselors who are required to meet CSPD qualifications. Monitoring also includes the number of counselors with master's degrees in Rehabilitation Counseling or closely related fields, as well as the number who are Certified Rehabilitation Counselors (CRCs) or Licensed Professional Counselors (LPCs). As of July 1, 2019, there were 710 positions (including 57 vacancies) required to meet the CSPD standard. Of the 653 filled positions, 483 counselors met the standard and 170 had not yet met it.

Applicants who meet the CSPD standard are preferred for counselor positions. The hiring manager must obtain a transcript for any candidate for a counselor position who has a bachelor's degree or higher prior to making a salary offer. For counselor candidates with a master's degree or a current CRC or LPC certification, the manager must provide the transcript or license certificate to the CSPD coordinator for review. The CSPD coordinator will verify whether an applicant meets the educational requirements or CSPD standard. The verification must be completed before the hiring manager makes a salary offer.

If a candidate is hired who does not meet the CSPD standard, he or she must participate in the QVRC program and complete the required coursework within seven years after completing the initial training year.

Counselors are required to sign the QVRC Acknowledgment form within 30 days of hire. By signing this required form, the counselor agrees that to hold a counselor position, they must meet the CSPD standard at the time of employment or by completing the educational requirements within the established CSPD timeline. Counselors not achieving the standard within the prescribed time are not allowed to continue functioning in this capacity. VRD provides funding for master's degrees in Rehabilitation Counseling, if alternate funding sources are not available.

Growth and development for all levels of staff is essential. VRD staff attend external trainings provided by such agencies as the American Association of Diabetes Educators, the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, the Association for Education and Rehabilitation of the Blind and Visually Impaired, the Assistive Technology Industry Association, the Council of State Administrators for Vocational Rehabilitation, the National Council of State Agencies for the Blind, and the University of Arkansas CURRENTS. Staff are encouraged to attend national, state, and local conferences related to VR, including the Association of People Supporting Employment First National Conference, Texas Association of Vocational Adjustment Coordinators, Southeast Regional Institute on Deafness training, Assistive Technology Industry Association International Conference, and the Capacity Building Institute regarding building capacity for postsecondary transition of students with disabilities. In so doing, they can receive training and network with other professionals.

Additionally, trainings are conducted within the regions by designated training staff, and within the field offices by senior counselors, unit program specialists, managers, and others.

Staff members also participate in training modules developed by the TWC Training and Development department's VRC job-specific training. Training needs and priorities are identified on an ongoing basis. Past training has been in the areas of diabetes, substance abuse, caseload management, employment assistance, worker's compensation, criminal background checks, mental health first aid, counseling and adjustment to blindness, career choice counseling, autism, and self-employment. During their first year of employment, counselors attend internal training conducted by TWC Training and Development to enhance skills and

develop a basic understanding of policy and how to implement caseload management processes.

Mississippi State University (MSU) has a graduate certificate program for Vision Specialists in Vocational Rehabilitation. This program provides specialized training for VRCs/TCs from around the country. The program consists of four graduate courses designed to train VRCs/TCs to become more effective in their work with customers who are blind or visually impaired. These increased professional skills enable graduates to help customers with vision loss learn independent living skills and assist them in becoming employed. At the end of the program, they receive the Vision Specialist in Vocational Rehabilitation Certificate.

Retention of Qualified Personnel

The Texas legislature sets the state's classification schedule, which determines pay grades for counselors and other classified positions as well as the salary schedule for the pay range agencies must use for compensation. VRD supports a wide range of learning activities for all classifications of employees. Staff views professional growth and development activities as a benefit that enhances retention. All staff has professional development plans created in coordination with managers as part of the performance management process. Other retention strategies are as follows:

- Flexible work schedules allow for four- or four-and-a-half-day workweeks, as well as teleworking opportunities, when feasible;
- A career ladder for counselors ranging from VRC I–IV, with respective salary compensation;
- A variety of training opportunities in leadership skills development;
- VRD will cover the cost of the CRC exam and in-state travel to achieve the examination;
- A recognition award program is in place to highlight staff achievement;
- Access to training to support credential maintenance is available at no cost to the employee; and
- An educational reimbursement program is in place for support staff working toward attainment of a bachelor's degree.

3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

Qualified Vocational Rehabilitation Counselors

VRD is committed to ensuring its workforce is highly skilled, professionally trained, and duly prepared to serve Texans with disabilities with the highest quality service delivery. Toward this goal, VRD has a plan to achieve standards for counseling staff in compliance with §101(a)(7) of the Rehabilitation Act as amended by WIOA and 34 C.F.R. §361.18.

There are no state-approved certifications or licensing requirements for VR counselors in Texas. Therefore, VRD has established standards for academic preparedness focused on the national requirements of the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselor (CRC) certification. However, the national requirements are subject to change as our laws, public regulations or delivery of rehabilitation services evolve. As mentioned previously, the different university rehabilitation counseling programs may also affect certification requirements.

VRD ensures that staff is well-qualified to assist individuals with disabilities. There is emphasis of educational requirements at the bachelor's, master's, and doctoral levels in fields related to rehabilitation. However, the degree field may include other degrees that prepare individuals to work with customers and employers. For example, bachelor's degrees might include not only VR counseling, but also social work, psychology, disability studies, human resources, special education, or another field that reasonably prepares individuals to work with customers and employers. For individuals hired at the bachelor's level, there is a requirement for at least one year of paid or unpaid experience related to direct work with individuals with disabilities.

VRD recognizes master's or doctoral degrees in fields of specific study, such as VR counseling, clinical rehabilitation counseling, behavioral health, behavioral science, disability studies, human relations, human services, marriage and family therapy, occupational therapy, psychology, psychometrics, rehabilitation administration/services, social work, special education, vocational assessment/evaluation, or another field that reasonably provides competence in the employment sector in a disability field or rehabilitation-related fields.

A counselor meets the CSPD standard by holding a master's degree in VR counseling; master's degree in "counseling or counseling-related field" with specific coursework; master's, specialist, or doctoral degree in specific majors with specific coursework; current CRC certificate from CRCC; or current LPC licensure.

Therefore, a counselor with a master's degree in counseling or a counseling-related field must, at a minimum, complete a graduate course in the Theories and Techniques of Counseling and successfully complete six graduate courses with a primary focus in the following areas:

- one course on assessment;
- one course on occupational information or job placement;
- one course on case management and rehabilitation services;
- one course on medical aspects of disabilities;
- one course on psychosocial aspects of disabilities; and
- one course on multicultural issues.
- A counselor with a master's or doctoral degree in one of the listed specific fields of study must complete a graduate course on the Theories and Techniques of Counseling, and successfully complete six graduate courses each with a primary focus in the areas listed, plus one course on Foundations of Rehabilitation Counseling.

Although VR has taken steps to hire rehabilitation counselors with master's degrees in VR counseling, several factors pose challenges to this undertaking. A significant barrier to hiring counselors with master's degrees in rehabilitation counseling is the expanse of Texas that must be served. VR affords rehabilitation assistants (RAs) who attain an undergraduate degree the

opportunity for employment in VR as VRCs. The years of knowledge and experience on a caseload coupled with their undergraduate degree have proven beneficial to VR.

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.

VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are disabled. Additionally, VR strongly supports specialized training and maintaining specialty caseloads in the areas of blindness and visual impairments, deafness and hard of hearing, and transition, to name a few. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

All staff members have access to internal and external training designed to develop the knowledge and skills necessary to achieve success in their positions, provide developmental activities for new and emerging leaders, and enhance service delivery for customers. Trainings are delivered through classroom, webinar, and teleconference.

Orientation to Rehabilitation and Blindness training is a one-week program attended by all newly hired VR staff members, except for part-time employees. Participants develop an awareness of the nature of blindness and the impact it has on all aspects of a person's life.

Introduction to Blindness training is a two-week program that introduces participants to the nonvisual blindfold training strategy. Under blindfold, staff members experience the key emotional factors and learn alternative techniques in the adjustment to blindness process, discovering that blindness does not preclude an individual from living an independent and successful life.

Immersion Training is a four- to six-week program. Application of the Texas Confidence Builder philosophy, using the least restrictive adaptation model, structured discovery, problem solving, and adult learning theory includes techniques to facilitate emotional adjustment to blindness. The Orientation and Mobility portion of Immersion Training allows for individualized training and opportunity for immediate feedback.

Eye Medical is a three-day training designed to provide staff members with a basic understanding of the anatomy of the eye, familiarize them with pathological conditions causing vision loss, and develop a referential body of knowledge related to diagnostics, treatment, training, and long-term vocational implications.

Staff members are encouraged to be aware of current research by using the Internet Resources link available on TWC's Intranet. Information disseminated by the National Institute on Disability and Rehabilitation Research and a variety of other government and university research centers can be reached from this link. Many VR staff members are leaders or active members of the Association of Education and Rehabilitation of the Blind and Visually Impaired.

Individual training plans are developed for all new counselors. Training plans for new employees foster competencies in skills required for different job categories. TWC's Training and Development provides or coordinates more formal, extensive trainings for caseload carrying staff.

Many of the courses in the Master's in Rehabilitation Counseling degree provide opportunities for practical application on actual caseloads. Counselors and other staff learn about assistive

technology, including screen readers, voice-activated software, special keyboards, braille devices, closed circuit televisions, portable note takers, etc., as part of the intensive Employment Assistance Training program. VR Teachers (VRTs) are provided with a three-year individual training plan that includes the following:

- Four weeks wearing a blindfold at the Criss Cole Rehabilitation Center participating in classes with customers;
- Three weeks of training in teaching, process, procedures, and employment assistance training for VRTs;
- Extensive braille training—all VRTs must demonstrate competency annually by completing The Annual Braille Project and submitting it for review by the VRT Program Specialist; and
- Training transcripts, letters of recommendation from a certified VRT, and funding to help interested teachers become academy certified.

All staff members participate with their supervisors in planning annual goals and identifying training needs and goals. Combined with input received from VR managers and administrators, this process assesses training needs and determines annual training calendar offerings.

VRD meets adaptive communication needs. For example, with the Limited English Proficiency (LEP) Language Line, staff members can establish communication with customers in numerous languages, including those commonly found in Texas.

Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. A full-time employee in the VR Braille Unit prepares documents in braille, large print, or electronic format. Dedicated computers with braille translation software and braille embossers are available in each field office. Staff members use these to produce documents, such as letters to customers or meeting agendas.

VRD employs Assistive Technology Specialists to support staff using assistive programs with standard agency software to complete their job duties. The specialists assess staff skill levels, recommend and implement training approaches, and coordinate service delivery statewide.

The Deafblind Unit serves customers who are deafblind. Specialists fluent in sign language consult with caseload-carrying staff, customers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed.

VRD works closely with the education system in transitioning students with disabilities from high school to postsecondary training or employment. TVRCs participate in training covering the Admission, Review, and Dismissal (ARD) process as well as the Individualized Education Program (IEP). When conducting seminars or workshops for the ARD and IEP process, trainers may also include parents and professionals from:

- TEA's Special Education Division
- Regional education service centers and local education agencies (LEAs)
- Disability Rights Texas
- Partners Resource Network, Inc.
- Texas School for the Blind and Visually Impaired

Additionally, VR staff members participate in cross-trainings with other entities involved in education for students with vision loss or visual impairment, such as the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, and sponsors and participates in workshops and seminars to help education staff members develop expertise in working with these students.

VRD is committed to maintaining support for in-service and academic training that ensures all staff receives the necessary knowledge and skills to be successful and that provides developmental activities for new and emerging leaders. While there are several positions within VR that support field operations, the focus of statewide training is typically programmatic to enhance direct service delivery to customers. All staff has access to training opportunities through the professional development plan created through the management chain's professional development process. Training content for field staff is typically developed within the system of statewide training product modules disseminated through field management staff. Content learning includes topics that directly relate to the knowledge, skills, abilities, and attitudes necessary to perform jobs as expected by management and as detailed in job descriptions. Content training strategies include the following:

- Continued focus on the foundations of the VR process for counselors and RAs, including accurate eligibility determination, inclusion of customers in planning for service delivery, thorough assessment and planning practices, models for VR counseling, informed customer choice, service to culturally diverse populations, purchasing practices, supported employment, customized employment, and other strategies for quality employment assistance, service delivery, and effective case note documentation;
- Training in working with employers and customers to increase knowledge of the Americans with Disabilities Act, the Rehabilitation Act Amendments of 1998, the Olmstead decision, available independence initiatives, and WIOA to enhance employment options and employment knowledge;
- Training in the Individuals with Disabilities Education Act, appropriate options and alternatives for effective transition services and Social Security work incentive programs, including programs under the Ticket to Work and Work Incentive Improvement Act of 1999;
- Training in assessing appropriate rehabilitation technology interventions;
- Extending opportunities to take advantage of training available from external sources for ongoing dissemination of timely trends related to disability and treatment modalities within the field of rehabilitation;
- Coordinating with the Texas Administrators of Continuing Education and other entities as appropriate to develop localized training in targeted disability areas; and
- Implementation of training for new counselors that focuses on critical thinking and sound decision making.

VRD staff is encouraged to be aware of current research by using the Internet Resources link available on TWC's Intranet. Information disseminated by the National Institute on Disability and Rehabilitation Research and a variety of other government and university research centers can be reached from this link. VR works closely with the Mississippi State University Research and Training Center on Blindness and Low Vision and other research and training centers to stay current in the field of blindness.

VRD will initiate outreach and increase staff knowledge and skills in effective rehabilitation strategies for serving such customers by:

- researching and implementing best practices;
- building staff capacity and expertise to serve individuals who are blind and have additional disabilities (e.g., through the implementation of the Mental Health First Aid training, a full-day course that should be taken by all staff members who have direct contact with customers); and
- increasing coordination and developing new partnerships with other state and community organizations, including mental health organizations, HHSC's Office of Mental Health Coordination, and the Helen Keller National Center for deafblind youth and adults.

VRD managers receive training on a variety of management issues, including ethics, communication, leadership, monitoring for quality service delivery and compliance, and management information system tools.

VRD has also developed partnerships with organizations such as the National Council on Rehabilitation Education to ensure the active dissemination of research development for the field of rehabilitation. Additionally, VR uses studies from the Institute on Rehabilitation Issues to assist in the development of practices for service delivery.

4. STAFF DEVELOPMENT

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are disabled. Additionally, VR strongly supports specialized training and maintaining specialty caseloads in the areas of blindness and visual impairments, deafness and hard of hearing, and transition, to name a few. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

All staff members have access to internal and external training designed to develop the knowledge and skills necessary to achieve success in their positions, provide developmental activities for new and emerging leaders, and enhance service delivery for customers. Trainings are delivered through classroom, webinar, and teleconference.

Orientation to Rehabilitation and Blindness training is a one-week program attended by all newly hired VR staff members, except for part-time employees. Participants develop an awareness of the nature of blindness and the impact it has on all aspects of a person's life.

Introduction to Blindness training is a two-week program that introduces participants to the nonvisual blindfold training strategy. Under blindfold, staff members experience the key emotional factors and learn alternative techniques in the adjustment to blindness process,

discovering that blindness does not preclude an individual from living an independent and successful life.

Immersion Training is a four- to six-week program. Application of the Texas Confidence Builder philosophy, using the least restrictive adaptation model, structured discovery, problem solving, and adult learning theory includes techniques to facilitate emotional adjustment to blindness. The Orientation and Mobility portion of Immersion Training allows for individualized training and opportunity for immediate feedback.

Eye Medical is a three-day training designed to provide staff members with a basic understanding of the anatomy of the eye, familiarize them with pathological conditions causing vision loss, and develop a referential body of knowledge related to diagnostics, treatment, training, and long-term vocational implications.

Staff members are encouraged to be aware of current research by using the Internet Resources link available on TWC's Intranet. Information disseminated by the National Institute on Disability and Rehabilitation Research and a variety of other government and university research centers can be reached from this link. Many VR staff members are leaders or active members of the Association of Education and Rehabilitation of the Blind and Visually Impaired.

Individual training plans are developed for all new counselors. Training plans for new employees foster competencies in skills required for different job categories. TWC's Training and Development provides or coordinates more formal, extensive trainings for caseload carrying staff.

Many of the courses in the Master's in Rehabilitation Counseling degree provide opportunities for practical application on actual caseloads. Counselors and other staff learn about assistive technology, including screen readers, voice-activated software, special keyboards, braille devices, closed circuit televisions, portable note takers, etc., as part of the intensive Employment Assistance Training program. VR Teachers (VRTs) are provided with a three-year individual training plan that includes the following:

- Four weeks wearing a blindfold at the Criss Cole Rehabilitation Center participating in classes with customers;
- Three weeks of training in teaching, process, procedures, and employment assistance training for VRTs;
- Extensive braille training—all VRTs must demonstrate competency annually by completing The Annual Braille Project and submitting it for review by the VRT Program Specialist; and
- Training transcripts, letters of recommendation from a certified VRT, and funding to help interested teachers become academy certified.

All staff members participate with their supervisors in planning annual goals and identifying training needs and goals. Combined with input received from VR managers and administrators, this process assesses training needs and determines annual training calendar offerings.

VRD meets adaptive communication needs. For example, with the Limited English Proficiency (LEP) Language Line, staff members can establish communication with customers in numerous languages, including those commonly found in Texas.

Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. A full-time employee in the VR Braille Unit prepares documents in

braille, large print, or electronic format. Dedicated computers with braille translation software and braille embossers are available in each field office. Staff members use these to produce documents, such as letters to customers or meeting agendas.

VRD employs Assistive Technology Specialists to support staff using assistive programs with standard agency software to complete their job duties. The specialists assess staff skill levels, recommend and implement training approaches, and coordinate service delivery statewide.

The Deafblind Unit serves customers who are deafblind. Specialists fluent in sign language consult with caseload-carrying staff, customers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed.

VRD works closely with the education system in transitioning students with disabilities from high school to postsecondary training or employment. TVRCs participate in training covering the Admission, Review, and Dismissal (ARD) process as well as the Individualized Education Program (IEP). When conducting seminars or workshops for the ARD and IEP process, trainers may also include parents and professionals from:

- TEA's Special Education Division
- Regional education service centers and local education agencies (LEAs)
- Disability Rights Texas
- Partners Resource Network, Inc.
- Texas School for the Blind and Visually Impaired

Additionally, VR staff members participate in cross-trainings with other entities involved in education for students with vision loss or visual impairment, such as the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, and sponsors and participates in workshops and seminars to help education staff members develop expertise in working with these students.

VRD is committed to maintaining support for in-service and academic training that ensures all staff receives the necessary knowledge and skills to be successful and that provides developmental activities for new and emerging leaders. While there are several positions within VR that support field operations, the focus of statewide training is typically programmatic to enhance direct service delivery to customers. All staff has access to training opportunities through the professional development plan created through the management chain's professional development process. Training content for field staff is typically developed within the system of statewide training product modules disseminated through field management staff. Content learning includes topics that directly relate to the knowledge, skills, abilities, and attitudes necessary to perform jobs as expected by management and as detailed in job descriptions. Content training strategies include the following:

- Continued focus on the foundations of the VR process for counselors and RAs, including accurate eligibility determination, inclusion of customers in planning for service delivery, thorough assessment and planning practices, models for VR counseling, informed customer choice, service to culturally diverse populations, purchasing practices, supported employment, customized employment, and other strategies for quality employment assistance, service delivery, and effective case note documentation;

- Training in working with employers and customers to increase knowledge of the Americans with Disabilities Act, the Rehabilitation Act Amendments of 1998, the Olmstead decision, available independence initiatives, and WIOA to enhance employment options and employment knowledge;
- Training in the Individuals with Disabilities Education Act, appropriate options and alternatives for effective transition services and Social Security work incentive programs, including programs under the Ticket to Work and Work Incentive Improvement Act of 1999;
- Training in assessing appropriate rehabilitation technology interventions;
- Extending opportunities to take advantage of training available from external sources for ongoing dissemination of timely trends related to disability and treatment modalities within the field of rehabilitation;
- Coordinating with the Texas Administrators of Continuing Education and other entities as appropriate to develop localized training in targeted disability areas; and
- Implementation of training for new counselors that focuses on critical thinking and sound decision making.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

VRD staff is encouraged to be aware of current research by using the Internet Resources link available on TWC's Intranet. Information disseminated by the National Institute on Disability and Rehabilitation Research and a variety of other government and university research centers can be reached from this link. VR works closely with the Mississippi State University Research and Training Center on Blindness and Low Vision and other research and training centers to stay current in the field of blindness.

VRD will initiate outreach and increase staff knowledge and skills in effective rehabilitation strategies for serving such customers by:

- researching and implementing best practices;
- building staff capacity and expertise to serve individuals who are blind and have additional disabilities (e.g., through the implementation of the Mental Health First Aid training, a full-day course that should be taken by all staff members who have direct contact with customers); and
- increasing coordination and developing new partnerships with other state and community organizations, including mental health organizations, HHSC's Office of Mental Health Coordination, and the Helen Keller National Center for deafblind youth and adults.

VRD managers receive training on a variety of management issues, including ethics, communication, leadership, monitoring for quality service delivery and compliance, and management information system tools.

VRD has also developed partnerships with organizations such as the National Council on Rehabilitation Education to ensure the active dissemination of research development for the

field of rehabilitation. Additionally, VR uses studies from the Institute on Rehabilitation Issues to assist in the development of practices for service delivery.

New Counselors

All new counselors are trained using a sequence of learning events. The sequence includes an assigned coach who uses a published quick start guide, which includes a learning plan for on-the-job training and required and optional courses. The learning plan guides the new counselor's learning activities during the initial probationary period. Based on the learning plan, training is provided throughout the initial year through a series of required courses, peer training, and coaching sessions that focus on learning to guide each customer to successful achievement of his or her employment and/or independent living goals. Training covers VR policies and procedures as well as values-based decision making, informed customer choice, employment assistance, and successful closures. Additionally, new counselors learn effective strategies for caseload management, working with Community Rehabilitation Program (CRP) providers, assessing employment trends, matching employer needs to qualified consumers, and building successful partnerships with customers, businesses, schools, and other community resources. Following completion of the probationary period, the counselor and supervisor create a professional development plan, which addresses the required educational standards of their position. The professional development plan is updated annually regarding training activities and progress toward meeting educational requirements.

New RAs

All new RAs are trained using a sequence of learning activities. The sequence includes an assigned coach and a quick start guide, which includes a learning plan for on-the-job training and required and optional courses. Training is provided throughout the initial year through attendance at a required course on RA fundamentals, other courses as assigned by the RA's supervisor, peer training, and coaching sessions. The fundamentals course focuses on the roles of the RA in facilitating successful employment outcomes for customers. The required course addresses both internal and external customer service, purchasing, disability etiquette, and an overview of values-based decision making and the RA's role in the VR process. Following completion of the initial training period, the RA and supervisor develop a professional development plan that identifies additional training and development activities to support the RA's successful performance.

New Vocational Rehabilitation Managers

New VR managers also participate in a sequence of learning activities to develop their skills and competencies. This sequence includes a regional orientation followed by a series of self-directed activities guided by a comprehensive orientation outline. These activities provide training for new managers in VR program management, effective coaching, and values-based decision making. Following completion of the initial learning activities, the new manager receives professional development training in management courses, which may be through the Governor's Center for Management Development and other available resources. A regional director guides the new manager through this process. VR managers comply with TWC's performance planning and review policy for evaluating the performance of VR staff within the division. This system requires that supervisory personnel formally evaluate an employee's performance in the essential functions of the employee's position as per TWC Human Resources policies.

This system promotes clear understanding between the supervisor and the employee of the priorities and objectives for the upcoming period. In reviewing performance against

expectations, emphasis is placed on results achieved through service delivery, identification of reasons for variance from expected results, and establishment of appropriate development plans that serve to deliver skill-enhancing, practical learning opportunities.

RCT has the opportunity to review and comment on the policies, procedures, and programmatic direction of the VRD. RCT representatives are invited to fully participate in development and review of policies and procedures. VR directors meet quarterly with RCT to present updates and share input regarding knowledge, skills, and abilities of VR staff and overall VR program outcomes.

In summary, a comprehensive and overarching training design is in place to meet the learning needs of all VR staff. While these activities are provided in a myriad of venues and through multiple modalities, all opportunities for training are specifically directed toward skill enhancement and credential building to form the most qualified staff possible to deliver services to customers in Texas. Although all staff members do not have direct customer contact, all staff members have a direct impact on the success of the VR program by providing vocational services and an increased opportunity for independence.

Personnel to Address Individual Communication Needs

One way VRD meets adaptive communication needs is by using the LEP Language Line. This allows staff to communicate with customers in numerous languages, including those commonly found in Texas.

Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. A full-time employee in the VR Braille Unit prepares documents in braille, large print, or electronic format. Dedicated computers with braille translation software and Braille embossers are available in each field office. Staff uses these to produce documents, such as letters to customers or meeting agendas.

VRD employs Assistive Technology specialists to support staff using assistive programs with standard agency software to complete their job duties. Specialists assess staff skill levels, recommend and implement training approaches, and coordinate service delivery statewide.

The Deafblind Unit serves customers who are deafblind. Specialists fluent in sign language consult with caseload carrying staff, consumers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed.

Additionally, VR staff participates in cross-trainings with other entities involved in education for students with visual loss, such as the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, and sponsors and participates in workshops and seminars to help education staff members develop expertise in working with these students.

ReHabWorks (RHW) is the electronic case management system used by VRD. RHW contains information specific to each CRP vendor. VR staff has access to and shares provider information regarding qualifications, services provided, location, experience in working with target populations, foreign languages, and other communication skills (for example, Braille).

VRD continues to provide effective modes of communication for staff, applicants, eligible individuals with disabilities, and its community partners and stakeholders based on individualized needs. Alternative formats include, but are not limited to, American Sign Language interpreters, Spanish interpreters, and AT&T Language Line interpreters for languages such as Vietnamese, Cambodian, Chinese dialects, etc. Also available are captioning,

braille through the VR Braille Unit, large print, reader services, and electronic formatting and screen readers. VRD also recruits bilingual staff for caseloads with high concentrations of customers who speak languages other than English.

Some unit management decisions lead to the development of specialty caseloads in which a concentration of customers' needs services requiring additional counselor skills. For example, counselors and RAs who are hired to serve caseloads with a concentration of deaf and hard-of-hearing customers are preferred to have manual communication skills at the time of hire. These counselors and RAs receive ongoing professional development specific to this target population. The professional development plan created for these individuals includes specific skills maintenance or enhancement activities that may be accessed through external training providers, in addition to traditional training opportunities within VRD.

Coordination of Personnel Development Under the Individuals with Disabilities Education Act

VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are blind or visually impaired and/or have other disabilities. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities, and all procedures and activities related to personnel development described are responsive to WIOA and the amendments made to the Rehabilitation Act of 1973, the Americans with Disabilities Act, and the Individuals with Disabilities Education Act. VRD develops partnerships with high schools, education service centers, and TEA to assist with professional development for personnel who work with students with disabilities.

VRD has specialty TVRCs and VRCs who act as liaisons for high schools and partner with the educational system to serve transition-age students seeking assistance to access adult vocational services. Partnering with ISDs allows counselors to use office space on campus to ensure that student customers have access to resources available through the workforce investment system, community, businesses, and other partners necessary to build a network of support. The increase in the number of students with autism, physical and neurodevelopment disabilities, and psychiatric or dual diagnoses reinforces the need to continue best practices components of IDEA. Staff works closely with TEA, centers for independent living, communities, and businesses to achieve collaboration, effective programming, and customer satisfaction. As a result, these efforts improve the effectiveness of VR services for transition customers. Such collaborations take on many different forms in training VRD and educational staff, as well as in impacting families. VRD staff will continue to collaborate with ISDs in the provision of Pre-ETS as specified in WIOA. Additionally, counselors are often invited to education service centers to participate in educator training and to present training, particularly for more effective transition planning for students. VR staff works with schools in creating job fairs that allow students to meet with employers and gather information about the labor market. Family nights are hosted in some areas to invite interested members of the public to VRD offices to share resource information, discuss service delivery issues, and give input regarding best practices that would better support students and their families.

In some areas, community partners such as churches, Workforce Solutions Offices, and community centers assist in providing training to school personnel on understanding cultural diversity in Texas. Training objectives that include sensitivity to cultural issues are integrated in the provision of the principles of ethics in service delivery. Given the cultural diversity within the expanse of Texas, this is an issue often addressed in external conferences with presentations to ensure that staff is sensitive to and aware of the manner in which the VR process is applied.

VRD continues to enhance partnerships with TEA, high schools, community colleges, stakeholders, and businesses to leverage relations that better prepare students to transition to postsecondary education and the workforce.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

One way VRD meets adaptive communication needs is by using the LEP Language Line. This allows staff to communicate with customers in numerous languages, including those commonly found in Texas.

Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. A full-time employee in the VR Braille Unit prepares documents in braille, large print, or electronic format. Dedicated computers with braille translation software and Braille embossers are available in each field office. Staff uses these to produce documents, such as letters to customers or meeting agendas.

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maintenance or enhancement activities that may be accessed through external training providers, in addition to traditional training opportunities within VRD.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are blind or visually impaired and/or have other disabilities. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities, and all procedures and activities related to personnel development described are responsive to WIOA and the amendments made to the Rehabilitation Act of 1973, the Americans with Disabilities Act, and the Individuals with Disabilities Education Act. VRD develops partnerships with high schools, education service centers, and TEA to assist with professional development for personnel who work with students with disabilities.

VRD has specialty TVRCs and VRCs who act as liaisons for high schools and partner with the educational system to serve transition-age students seeking assistance to access adult vocational services. Partnering with ISDs allows counselors to use office space on campus to ensure that student customers have access to resources available through the workforce investment system, community, businesses, and other partners necessary to build a network of support. The increase in the number of students with autism, physical and neurodevelopment disabilities, and psychiatric or dual diagnoses reinforces the need to continue best practices components of IDEA. Staff works closely with TEA, centers for independent living, communities, and businesses to achieve collaboration, effective programming, and customer satisfaction. As a result, these efforts improve the effectiveness of VR services for transition customers. Such collaborations take on many different forms in training VRD and educational staff, as well as in impacting families. VRD staff will continue to collaborate with ISDs in the provision of Pre-ETS as specified in WIOA. Additionally, counselors are often invited to education service centers to participate in educator training and to present training, particularly for more effective transition planning for students. VR staff works with schools in creating job fairs that allow students to meet with employers and gather information about the labor market. Family nights are hosted in some areas to invite interested members of the public to VRD offices to share resource information, discuss service delivery issues, and give input regarding best practices that would better support students and their families.

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VRD continues to enhance partnerships with TEA, high schools, community colleges, stakeholders, and businesses to leverage relations that better prepare students to transition to postsecondary education and the workforce.

J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

Per §101 of the Rehabilitation Act of 1973 (RA73), the 2017 CSNA described the VR service needs of Texas residents with disabilities, particularly the VR service needs of:

- individuals with the most significant disabilities, including their need for supported employment services;
- individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved;
- individuals with disabilities served through other components of the statewide workforce development system; and
- youth with disabilities and students with disabilities, including their need for Pre-ETS or other transition services.

Additional items required of the 2017 CSNA included:

- an assessment of the needs of individuals with disabilities for transition services and pre-employment transition services, and the extent to which such services provided under RA73 are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA);
- an assessment of the need to establish, develop, or improve community rehabilitation programs (CRPs) within the state;
- a report submitted to the Texas Workforce Commission (TWC) containing information about updates to the assessments, for any year in which updates are made; and
- the process that the state will use to demonstrate that required Pre-ETS are made available to potentially eligible students with disabilities before using any Pre-ETS funding on authorized activities.

Methodology

The 2017 CSNA includes information from five main sources:

1. An Internet-based needs assessment survey that was contracted with the Public Policy Research Institute at Texas A&M University to gather perspectives from customers, staff, and others
2. Customer satisfaction surveys
3. Data from ReHabWorks (the automated case management system used by the Texas VR program)
4. Five town hall meetings held across Texas in Dallas, El Paso, Houston, McAllen, and San Antonio
5. Ten key informant interviews of VR managers and counselors, including one VR manager from each integrated service area and one from each of the previously separate

designated state units (DSUs) for blind and general VR services, one experienced counselor, and one novice counselor.

Data Collection and Organizational Challenges

Data was gathered from January to October 2017. During this period, the Texas VR program underwent significant organizational change.

Based on a mandatory review of all Texas state agencies conducted by the Texas Sunset Commission, the 84th Texas Legislature passed legislation that reorganized the administering agencies of the VR program. The Texas VR program was statutorily transferred from the Texas Health and Human Services Commission (HHSC) to TWC. The VR program transfer was effective September 1, 2016. Additionally, legislation required the combination of the two, separate DSUs in Texas to one DSU. HHSC retained other direct customer service delivery programs, including independent living services, comprehensive rehabilitation services; blind children's services; and the blindness education, screening, and treatment program. The VR program's DSU combination and reorganization process was completed on October 1, 2017. Although there was a hiring freeze during the reorganization period, counselor positions were added to meet customer demand through the realignment of staff positions.

In view of these changes, collected data were screened in collaboration with VR staff to distinguish programmatic issues from passing concerns. For each source of data collected, TWC's Division of Operational Insight (DOI) coordinated and worked with the Rehabilitation Council of Texas (RCT) to help prioritize each VR service need that emerged from analysis. The resulting 2017 State Plan goals thus reflect needs identified through consensus-driven and pragmatic methods.

To be considered as having a significant disability, a VR customer must have serious limitations in one or more functional areas and require multiple VR services over an extended period. Having a most significant disability means that the VR customer must have serious limitations in three or more functional areas (for example, mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) and require multiple VR services over an extended period. Additionally, if an individual is an SSI or SSDI recipient, then he or she is presumed eligible and considered to have at least one significant disability.

As shown in Table 2, Employment Rate for FFY'14-'16 by Severity of Disability, individuals with significant and most significant disabilities have less success in achieving employment with VR services. Formulating strategies aimed at mitigating the impact of disability significance will prove helpful for the next triennium.

Table 2. Employment Rate for FFY'14—'16 by Severity of Disability
SOURCE: DOI's ReHabWorks Closure Aggregates

Disability Significance	Closures	Successful	Employment Rate
No Significant Disability	6,646	5,745	86.4%
Significant Disability	46,125	31,192	67.6%
Most Significant Disability	15,842	9,303	58.7%

CSNA Information Goals

Analysis of Town Hall Meetings

Organizational change also created temporary challenges that likely affected the perceptions of customers, staff, and other stakeholders at town hall meetings. For example, some town hall meeting comments addressed concerns about customers' access to information on the combination of the DSUs. Communication and collaboration needs were mentioned 89 times during town hall meetings, whereas employer or staff training needs were mentioned 39 times.

Table 1. VR Needs Mentioned during 2017 Town Hall Meetings
SOURCE: DOI Town Hall Textual Analysis

VR Program or Service Need	Number of Mentions
Communication/Collaboration	89
Employer/Staff Training	39
Readiness/Work-Based Learning	34
Transportation/Housing	23
PAS & Supported Employment	18
Outreach & Marketing	15
Benefits & Work Incentives	10
Disability-Related Skills	10
Customer Choice	6
Academic/Vocational Training	2
Treatment of Impairments	2
Budgeting	1
Medical/Vocational Assessment	1

A few comments concerned the need for additional VR service providers, especially service providers that offer specialty skills training like orientation and mobility. Other comments expressed dissatisfaction with providers that did not meet expectations of quality and timeliness. These concerns will be addressed as the Texas VR program moves forward to implement the 2017 State Plan goal. Cultivating good working relationships between TWC's VR division and external service providers is a top priority. It is important for the VR division to have a strong provider base to deliver needed services to customers. It is also important for the VR division to identify providers that have a record of success. Learning how to leverage TWC's expansive information and tool sets will play a vital role in developing and expanding services for customers, as well as resolving short- and long-term challenges.

B. WHO ARE MINORITIES;

Demographics of Disability in Texas

When data collection for the 2017 CSNA began (January 2017), there were about 3,030,000 Texans with disabilities, approximately 12 percent of the state's population. Of that 12 percent, 50 percent were male, 50 percent were female, 32 percent identified as Hispanic or Latino, and 24 percent identified as belonging to a minority racial group. The approximately 235,000 VR participants served during FFY'14–16 generally mirrored these demographics. However, 45

percent of VR participants were female, reflecting the state's current labor force. At present, 66 percent of participants in the VR program achieve employment at VR case closure.

Identified Vocational Rehabilitation Service Needs

As part of its focus, the 2017 CSNA studied trends that were first identified in the 2014 CSNA and previous CSNA cycles. Goals previously established by the VR program, in coordination with the RCT, remain relevant. The Texas VR program will continue to assess gathered data to consider opportunities and solutions as the newly reorganized TWC VR division matures.

Per the 2017 CSNA, service improvement recommendations include:

- revising paperwork and approval processes for community rehabilitation programs and supported employment customers;
- integrating mobile and other communication technology with VR program operations; and
- increasing customer and staff awareness of other components of the Texas workforce and health care systems.

These recommendations echo perceptions from the 2014 CSNA that VR service delivery, eligibility, and approval processes need refinement.

2017 CSNA Goals

Goal Area 1: Target Populations

Priority 1

Improve customer employment outcomes for individuals with significant disabilities, including individuals who are blind or have significant visual impairments, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities.

Outreach to Individuals with Disabilities Who Are Minorities

VRD engages in numerous programs and activities designed to inform and make available VR and supported employment services to minorities and those who have the most significant disabilities. Examples of these activities include:

- required training in language services for individuals with Limited English Proficient (LEP) for all VRD staff (this training provides guidance on best practices and specific resources for effectively communicating with our unique population of LEP customers; it also includes web-based instruction and desk references for quick access to information);
- ongoing outreach initiatives with colleges and universities that have historically served African American students;
- collaboration with the Alabama-Coushatta Tribe of East Texas to make services available to Native Americans with disabilities;
- customer access to the Language Line as a resource for those who are not fluent in English;

- VRD staff attendance at community job fairs held for the Hispanic population and meeting with groups, such as the Hispanic Chamber of Commerce, Casa de Amigos, the League of United Latin American Citizens, and Catholic Charities (for example, VRD has targeted outreach activities with Catholic Charities of Lubbock and the Guadalupe-Parkway Neighborhood Centers);
- outreach activities with African American groups such as the local Sickle Cell Anemia Association, Minority Business Alliance, African American Family Conference, and NAACP (for example, the Abilene office has an ongoing relationship with the International Rescue Committee, which works with a high percentage of African refugees);
- collaboration with the American G.I. Forum that targets the needs of Hispanic veterans and has assigned bilingual counselors who have completed the Social Security work incentive training to work with veterans with significant disabilities receiving SSDI benefits and wanting to work;
- counselor participation in training to learn to speak other languages and to learn sign language;
- specialized caseloads for certain disabilities to help develop the expertise needed to most benefit the customers served;
- active recruitment of Spanish-speaking VR counselors;
- development of relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities;
- knowledge of issues impacting minorities is encouraged, including trainings and health summits conducted by the Center for the Elimination of Disproportionality and Disparities, which many staff members have attended; and
- engagement with the faith-based community to educate and inform minority and other allied congregations about VRD services (for example, VRD staff participates in the Texas Annual Conference of the United Methodist Church).

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Underserved Populations

Based on data in the 2017 CSNA, likely underserved populations and unmet needs include:

- individuals who are 55 years or older and unemployed at application, especially in view of the increasing number of seniors seeking work;
- individuals who need supported employment to seek first jobs, or those who are pursuing advancement;
- individuals with neurodevelopmental disabilities, such as autism, or psychosocial disabilities, such as borderline personality disorder, who need more counselors and staff trained for constructive interaction with these individuals;
- students who need Pre-ETS and other transition services, especially in rural or economically disadvantaged school districts;

- veterans who need information on TWC services and greater community outreach to recruit as VR customers; and
- visually impaired individuals, who need more blind services providers and independent living services that support vocational goals.

Meeting the Needs of Underserved Populations

The data collected during the 2017 CSNA revealed that the employment rate for VR participants with significant disabilities changed only within a range of +/- 5 percent during FFY'14–'16. Because individuals with the most significant disabilities have almost one-third less success in employment, more strategic attention dedicated to this population should deliver specific strategies to improve employment rates.

Organizational changes during the VR program's integration with TWC allow greater access to TWC's Labor Market and Career Information (LMCI) department's tools and other TWC resources. These TWC resources will help support informed customer choices and meet employer needs, especially for youth and students with disabilities. The combination of blind and general VR services has positioned the division to make better use of disability-specific expertise to address a continuum of disability severity. Changes to the VR program also promise to maximize counselors' time with customers and allow for the creation of collaborative on-the-job training opportunities for counselors and other field staff. The future of the Texas VR program is customer-centered and needs-conscious, emphasizing access to resources and other employment-related programs at TWC.

The implementation of Rapid Process Improvement (RPI) strategies is benefiting the Texas VR program as well. RPI is a management tool based on the Theory of Constraints/Lean Management and provides a methodical approach to engaging staff to quickly identify, map, and improve the processes of an organization. RPI projects are designed to ensure that the division is making the most effective use of service delivery options available for both customers and employers.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

Identified Vocational Rehabilitation Service Needs

As part of its focus, the 2017 CSNA studied trends that were first identified in the 2014 CSNA and previous CSNA cycles. Goals previously established by the VR program, in coordination with the RCT, remain relevant. The Texas VR program will continue to assess gathered data to consider opportunities and solutions as the newly reorganized TWC VR division matures.

Per the 2017 CSNA, service improvement recommendations include:

- revising paperwork and approval processes for community rehabilitation programs and supported employment customers;
- integrating mobile and other communication technology with VR program operations; and
- increasing customer and staff awareness of other components of the Texas workforce and health care systems.

These recommendations echo perceptions from the 2014 CSNA that VR service delivery, eligibility, and approval processes need refinement.

Goal Area 1: Target Populations

Priority 3

Provide a customer service delivery system that makes information available on options for services, providers, careers, and other areas, to enable informed customer choice and the delivery of quality and timely services.

Discussion: Developing the Service Delivery System

The development of the customer service delivery system is ongoing. Data regarding all WIOA changes is being gathered, and changes related to the combination and integration of the two DSUs have been finalized. Further analyses of internal and external data will guide the development of strategies for making best use of LMCI tools and resources. The VR needs survey conducted by Texas A&M demonstrated that developing new strategies in this area will prove helpful; 29 percent of survey respondents indicated that they had no knowledge of LMCI tools. After the release of the needs assessment, VRD implemented an ongoing statewide training initiative to educate VR staff in the application of LMCI information in support of informed customer choice and timely delivery of quality services through access and application of relevant decision-making information. As the reorganized VR division continues to mature, other strategies may be addressed to identify or create systems to use LMCI tools with providers for better vocational counseling and augmented information for the provider base.

Concerning the provider base, in cities, VR participants reported that public transportation is often unreliable, while in rural areas, public transportation is often nonexistent. It was suggested that ride sharing, nonprofit transportation charities, and family and friends can supplement the capabilities of public transportation. Concerning affordable child care, which was also identified as a barrier to employment, TWC administers the Child Care Development Block Grant. There is a need to further explore how VR customers can access these services during the rehabilitation process.

In response to needs assessment findings, VRD has been investigating the geographical distribution of service providers, especially employment service providers. While regional imbalances in provider to customer ratios do not yet seem to have affected employment rates, the VR program is dedicated to developing a larger base of service providers in Texas' most populated counties. Customer saturation rates of individual providers and provider types are also an item of interest. The limited availability of certain types of service providers, in some areas, can pose challenges. For example, assistive technology providers and other specialty service providers must often travel from urban areas.

Through the reorganization of the VR program and the combination of DSUs and creation of a common policy manual, great strides have been made to broaden the enrollment contract process and increase providers across the state. As required by Senate Bill 20, 84th Texas Legislature, Regular Session (2015), VR has made efforts to improve contracting practices. However, there is more work to be done to relieve providers of intensive paperwork and documentation processes while allowing more flexibility to achieve customers' employment goals in meaningful and integrated settings. After the release of the needs assessment, VRD has made significant strides in reducing the number of Supported Employment forms and the volume of paperwork required of Supported Employment providers.

Customers value VR services and largely report that services are meeting their employment needs. According to the VR Needs Survey administered by the Public Policy Research Institute at Texas A&M University in fall 2017, up to 78 percent of respondents indicated that they were

satisfied or very satisfied with the quality of VR services from VR staff, their inclusion by VR staff in setting goals and making choices, the courteousness and respectfulness of VR staff, and the VR eligibility determination process.

Goal Area 3: Partnerships

Priority 1

Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs.

Discussion: Strengthening Relationships with Collaborators

With VR's merger into TWC, the agency has entered into data agreements with other federal and state agencies, including Veterans Affairs (VA). These agreements will help forge the way for programmatic collaboration and customer coordination for available services and resources.

To help anticipate and target Pre-ETS, TWC has also obtained per-county counts of students with disabilities who are under a 504 Plan or receive IDEA services, current as of 2013–2014, from the US Department of Education's Office of Civil Rights. TWC has developed strategies for networking with school districts and has plans to extend strategy development for outreach to homeschooling cooperatives and others to offer Pre-ETS and general VR services earlier in students' secondary and postsecondary experiences.

Additionally, the VR division has worked with numerous employers to provide training and assessment to assist in developing employer partnerships with large and small employers to expand the community of employers familiar with hiring individuals with disabilities to meet their workforce needs. The division continues to work with the National Employment Team to facilitate employer relationships at the national level.

Feedback and data gathered in the needs assessment for the 2017 CSNA encourage opportunities for additional and enhanced collaboration that have come about through some of the programmatic changes which moved other support programs HHSC. For example, HHSC outsourced the Independent Living program in Texas to the Centers for Independent Living. Meanwhile, the Independent Living Services for Older Individuals Who Are Blind (ILS-OIB) program has been retained in TWC with VR. As a result, formal referral processes and policies have been developed to expand the network of providers available for referral of those individuals needing independent living services and to increase the referral to VR of individuals who may benefit from ILS-OIB services. In one year, FFY'17, the VR division served 1,780 new customers in the ILS-OIB program following the program's redesign.

Similarly, the Comprehensive Rehabilitation Services program, which serves individuals with traumatic spinal cord or brain injury, and the Blind Children's Vocational Discovery and Development program also remained in HHSC, which presents further opportunities to collaborate to provide referrals and receive referrals when those customers are ready for VR. VRD has subsequently developed a new service delivery model, Employment Supports for Brain Injury, to replace the previous Post-Acute Brain Injury services and enhance focus on employment outcomes.

Other collaboration with LEAs, higher education, and Boards has resulted in customer access to post–high school scenarios that provide training and employment in meaningful and higher-paying jobs. Texas will continue to focus on developing and enhancing partnerships and broad

collaboration, not only because of its strong emphasis in WIOA, but also because it ultimately results in a more responsive and effective service delivery system for VR customers. In addition, VRD is developing a stakeholder plan to ensure outreach and engagement with a broader group.

The full CSNA report was published in spring 2018. The VR service needs identified by the report are guiding TWC's VR division in programmatic improvements and enhancements for meaningful employment outcomes for customers, and strategies to better leverage relationships with employers and collaboration with partners. The next triennial CSNA will be conducted in Federal Fiscal Year 2020.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

Goal Area 2: Services to Students and Youth with Disabilities

Priority 1

Expand and improve vocational rehabilitation services, including pre-employment transition services (Pre-ETS) for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities.

Discussion: Meeting Pre-ETS Needs

Over the past several years, the number of both eligible students and funds expended has increased. The number of students served increased by close to 10 percent, while funds, per transaction, increased by about 20 percent on average. The data from the 2017 CSNA shows several actions taken to address the needs of students and youth with disabilities.

Both the collected data and the reports recorded in town hall meetings make clear that the need for assistance in accessing meaningful employment persists among students with disabilities. The VR division is continuing work on this need and WIOA's programmatic requirements and continue to develop strategies to enhance progress. The division has established a method to project the number of potentially eligible students needing services, enabling necessary access to the authorized nine services. Regarding the service needs of students in the program, several strategies have been used to enhance service availability for summer activities. TWC has implemented science, technology, engineering, and math (STEM) education activities for students with disabilities using an interdisciplinary and applied approach.

Community college relationships are also proving helpful in coordinating services for students in elective coursework. An interactive website, accessible by smartphone, has also been developed to engage students in considering employment options and testing their knowledge about earnings and the realities of self-support. The website has experienced high volume usage with as many as 110,000 visits per month during the school year and 10,000 visits per summer month. Several statewide initiatives have been implemented to increase preparation and skill building for work among students. Summer Earn and Learn, a summer work-based learning opportunity in partnership with the Boards, began in 2016 and has now completed its third year. A statewide Capacity Building initiative is underway to bring school and VR personnel together to build relationships and operationalize the MOU between the Texas Education Agency and TWC. Transition and Pre-ETS modules have been added to the Texas OnCourse tool through partnership with the University of Texas at Austin.

Priority 2

Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain an employment outcome.

Discussion: Supported Employment (SE) Services

Although funds have been expended and service policies expanded, customer and stakeholder feedback gathered during the 2017 CSNA reveals that continued enhancement is needed to maximize the effectiveness of SE services. As Table 4 demonstrates, there is a gap in the employment rate between individuals with and without an SE goal.

Table 4: FFY'14–'16 SE Employment Rate
SOURCE: DOI's ReHabWorks Closure Aggregates

SE Goal?	Closures	Successful	Employment Rate
No	66,605	44,885	67%
Yes	3,607	2,141	59%

However, among students with SE goals, the employment rate is higher, as seen in Table 5.

Table 5: FFY'14–'16 SE Student Employment Rate
SOURCE: DOI's ReHabWorks Closure Aggregates

Student with SE Goal?	Closures	Successful	Employment Rate
No	6,136	3,225	53%
Yes	319	190	60%

To improve employment rates, suggestions include flexibility in opportunities, increases in on-site work experiences, automated systems to assist providers in managing the reporting requirements of the services, and protections for the customer. All are under review for implementation. Continued data tracking will help identify effectiveness in technology or work experience training and may define service options that can be added for enhanced successes. Furthermore, the provision of SE services for customers was recently the focus of an RPI project to identify opportunities for new or enhanced strategies for greater successes. The VR division has executed a memorandum of understanding with the Texas Education Agency (TEA) that includes prohibiting contracts between TEA or local education agencies (LEAs) and employers who pay subminimum wage. Customers already served in subminimum employment receive counseling consistent with Employment First principles and WIOA requirements to encourage meaningful employment in an integrated environment with or without supports.

Finally, the VR division has also launched a capacity-building project for VR and LEA staff to develop skills for practical application through joint training.

Projecting Potentially Eligible Students for Pre-employment Transition Services

For required and coordinated pre-employment transition services (Pre-ETS), the Texas VR program has developed a method to project future expenditures. Beginning in January of each year, TWC will project Pre-ETS expenditures on a Federal Fiscal Year (FFY) basis as follows:

1. Add previous FFY total spending on required and coordinated services
2. Divide by the previous FFY's number of Pre-ETS customers

3. Multiply by the number of anticipated Pre-ETS customers for the current FFY; then
4. Subtract the result from the VR award's set-aside fund to determine the amount of money available to spend on authorized Pre-ETS for the current FFY

At the end of each FFY, TWC is reconciling the projections with actual expenditures and making appropriate adjustments, when necessary. The VR program will continue to update estimates of potentially eligible students with disabilities in collaboration with TEA and the US Department of Education.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

The 2017 CSNA included an assessment of the need to establish, develop, or improve community rehabilitation programs (CRPs) within the state

As part of its focus, the 2017 CSNA studied trends that were first identified in the 2014 CSNA and previous CSNA cycles. Goals previously established by the VR program, in coordination with the RCT, remain relevant. The Texas VR program will continue to assess gathered data to consider opportunities and solutions as the newly reorganized TWC VR division matures.

Per the 2017 CSNA, service improvement recommendations include:

- revising paperwork and approval processes for community rehabilitation programs and supported employment customers;
- integrating mobile and other communication technology with VR program operations; and
- increasing customer and staff awareness of other components of the Texas workforce and health care systems.

These recommendations echo perceptions from the 2014 CSNA that VR service delivery, eligibility, and approval processes need refinement.

VRD staff works with a network of CRPs across the state, including those that provide disability education, work readiness, and employment services. To increase the competencies of these providers, VRD:

- requires Employment Service Providers (ESPs) staff to obtain training and credentialing to ensure that job skills trainers, job placement specialists, supported employment specialists, self-employment specialists, and vocational adjustment trainers have the basic skills necessary to facilitate services so the customer achieves required deliverables as defined in the VR Standards;
- requires each Standards' contractor who provides a service for customers to have a director who is credentialed to oversee staff and compliance;
- implements employment premiums to reward providers that maintain training and skills necessary to work with specific populations to increase successful outcomes, such as for customers who have a criminal background, who are deaf or hard of hearing, who have Autism Spectrum Disorder, and who have brain injury;
- has implemented new Work Experience services to allow youth and adult customers to participate in volunteer, internship, or paid temporary work settings that help customers learn or enhance soft and hard skills in areas of interest and determine a

potential or planned vocational goal for placement; Work Experience services can also be used for trial work evaluations as a means of providing information necessary to determine eligibility.

To improve services provided by VRD CRPs across the state, VRD:

- continually assesses the need to change or modify CRP services based on the emerging needs of customers and businesses;
- continues to operate an outcome-based payment system for supported employment and job placement services that require an individual plan for each customer; plans to implement employment premiums to obtain providers with specialty skills and to reward providers that maintain training and skills necessary to work with specific populations, such as blindness/visual impairments and mental health in order to increase successful outcomes;
- continues to expand Work Experience services for youth and adults;
- continually explores opportunities to add innovative programs supportive of WIOA Pre-ETS requirements, customized employment, and other services to prepare and support customers in their long-term employment placement;
- continues to review the need for new services for youth and adult customers to assist in job readiness and in obtaining and maintaining competitive integrated employment;
- continues the use of transition educator providers. The transition educator service provider is an individual who is not currently a contracted provider; has a master's degree or a bachelor's degree in rehabilitation, counseling and guidance, psychology, education, or a related field; and is or has been an employee of a school system or a Texas education service center within the past fiscal year. These providers were added to better meet the needs of transition-age students and to provide services to customers in underserved areas of the state; and

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

Local education agencies maintain fiscal responsibility for transition services that are also considered special education or related services, and that are necessary for ensuring a free, appropriate public education to children with disabilities within Texas, including those outlined in the IEP (34 C.F.R. §361.22(c)).

Additionally, House Bill 617, 83rd Texas Legislature, Regular Session (2013), requires that each ISD have an individual identified as the Transition and Employment Designee (TED). The TED is responsible for providing information and resources about effective transition planning and services. VRD has counselors throughout the state assigned to high schools to assist students with disabilities in preparing for entry into the workplace. Nothing related to VRD's responsibilities and requirements under WIOA should be construed as a reduction in local education agencies' responsibility under IDEA to provide and pay for special education and related services as a part of a free and appropriate education to students with disabilities (WIOA §101(c)).

VRD has specialty TVRCs and VRCs who act as liaisons for high schools and partner with the educational system to serve transition-age students seeking assistance to access adult vocational services. Partnering with ISDs allows counselors to use office space on campus to ensure that student customers have access to resources available through the workforce investment system, community, businesses, and other partners necessary to build a network of support. The increase in the number of students with autism, physical and neurodevelopment disabilities, and psychiatric or dual diagnoses reinforces the need to continue best practices components of IDEA.

Staff works closely with TEA, centers for independent living, communities, and businesses to achieve collaboration, effective programming, and customer satisfaction. As a result, these efforts improve the effectiveness of VR services for transition customers. Such collaborations take on many different forms in training VRD and educational staff, as well as in impacting families. VRD staff will continue to collaborate with ISDs in the provision of Pre-ETS as specified in WIOA. Additionally, counselors are often invited to education service centers to participate in educator training and to present training, particularly for more effective transition planning for students. VR staff works with schools in creating job fairs that allow students to meet with employers and gather information about the labor market. Family nights are hosted in some areas to invite interested members of the public to VRD offices to share resource information, discuss service delivery issues, and give input regarding best practices that would better support students and their families.

In some areas, community partners such as churches, Workforce Solutions Offices, and community centers assist in providing training to school personnel on understanding cultural diversity in Texas. Training objectives that include sensitivity to cultural issues are integrated in the provision of the principles of ethics in service delivery. Given the cultural diversity within the expanse of Texas, this is an issue often addressed in external conferences with presentations to ensure that staff is sensitive to and aware of the manner in which the VR process is applied.

The following strategies will expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities by:

- providing supported employment services to youth with the most significant disabilities, and enhanced coordination to ensure extended support is in place for customers to achieve and maintain employment outcomes;
- evaluating, revising, and developing policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services;
- expanding and increasing partnerships with schools to facilitate the coordination and provision of Pre-ETS to students with disabilities;
- continuing Project SEARCH to assist students and youth with developmental disabilities to successfully transition to competitive, integrated employment;
- developing and delivering a transition training module on best practices pertaining to provision of transition services, guidance and career exploration, postsecondary options, job readiness, and encouragement of customer self-advocacy;

- collaborating with TEA, education service centers, LEAs, and post-secondary education institutions to improve access and transition for students moving from secondary to postsecondary education and training;
- developing additional work experience options such as part-time, summer, and volunteer work experiences and other work-based learning opportunities; and
- enhancing existing statewide Pre-ETS initiatives that leverage partnerships with Boards, secondary and postsecondary education institutions, and employers.

K. ANNUAL ESTIMATES

Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

The *2017 Disability Status Report* (DSR) published by the Cornell University Employment and Disability Institute estimates the percentage of noninstitutionalized working-age (ages 21 to 64) Texans with disabilities. The 2017 DSR uses data from the 2017 *American Community Survey* (ACS).

In 2017, per the DSR, the prevalence of disability in Texas for working-age people was 9.7%. Working-age people with disabilities numbered about 1,559,300 out of a total working-age population of 15,995,900. The highest prevalence rate was for ambulatory disability, with 4.8% of working-age Texas residents reporting this type of impairment. The lowest prevalence rate was for self-care disability, with 1.7% of working-age Texas residents reporting this type of impairment. About 7.4% of working-age people with disabilities were not working but seeking jobs, whereas 15.7% of working-age people without disabilities were not working but seeking jobs. The employment rate for working-age people (ages 21 to 64) with disabilities was 40.2% compared to 78.3% for working-age people without disabilities.

Based on the information above, the DRS estimates that somewhere between 115,388 (the 7.4% of working-age people with disabilities who were not working but seeking jobs) and 654,906 (the 40.2% of working-age people with disabilities who were employed but may need supports to retain employment) people with disabilities may consider applying for vocational rehabilitation (VR) services in Texas. However, the number of individuals expected to apply for services is likely less than 115,388 because not all people with disabilities will be eligible for VR services. As an example, people with disabilities who are already employed may have sufficient supports, and the ACS tends to overestimate disability prevalence due to self-reporting. Therefore, the approximately 75,000 to 90,000 VR eligible customers that the VR program has historically served per year is not outside reasonable boundaries for meeting actual service needs.

In view of historical service trends and estimated service needs per the ACS, the VR division (VRD) anticipates that the number of individuals applying for VR services will recover from a downward trend and increase in Federal Fiscal Year (FFY) 2020–2021. The following table shows the actual number of VR applications for FFY 2016–19 and projections for FFY 2020–21. The projected trend in applications is partly attributable to a continued effort by VRD to increase outreach, referrals, and partnerships with other state agencies.

Table 1: Actual and Projected Applications for VR Services FFY 2016–21

Year	Applicants	Percent Change from Prior Year	Eligibility Determinations	Percent Change from Prior Year
2016	42,641	5.24%	35,839	5.00%
2017	35,694	-16.29%	30,749	-14.20%
2018	30,241	-15.28%	25,508	-17.04%
2019	29,477	-2.53%	25,188	-1.25%
2020	***31,760***	***7.75%***	***27,254***	***8.20%***
2021	***36,568***	***15.14%***	***31,549***	***15.76%***

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

The following table shows the actual number of eligible VR customers served FFY 2016–19 and projections for FFY 2020–21. "Customers served" for this purpose is defined as customers receiving purchased services. Customers who received a service with a supported employment service category code during a given PY are Title VI; otherwise they are classified as Title I.

Table 2: Actual and Projected Number of Eligible VR Customers Served by Title I and VI Funds FFY 2016-21

Year	Program	Number Served	Percent Change from Prior Year
2016	Vocational Rehabilitation - Title I	86,472	7.89%
2017	Vocational Rehabilitation - Title I	85,243	-1.42%
2018	Vocational Rehabilitation - Title I	80,528	-5.53%
2019	Vocational Rehabilitation - Title I	77,705	-3.51%
2020	***Vocational Rehabilitation - Title I***	***73,298***	***-5.67%***
2021	***Vocational Rehabilitation - Title I***	***72,231***	***-1.45%***
2016	Supported Employment - Title VI	4,392	-4.85%
2017	Supported Employment - Title VI	3,482	-20.72%
2018	Supported Employment - Title VI	2,861	-17.83%
2019	Supported Employment - Title VI	2,676	-6.47%
2020	***Supported Employment - Title VI***	***2,925***	***9.32%***
2021	***Supported Employment - Title VI***	***3,431***	***17.27%***

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The following table shows the actual number of eligible VR customers served FFY 2016–19 and projections for FFY 2020–21. "Customers served" for this purpose is defined as customers receiving purchased services. Customers who received a service with a supported employment service category code during a given PY are Title VI; otherwise they are classified as Title I.

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2019	Supported Employment - Title VI	2,676	-6.47%
2020	***Supported Employment - Title VI***	***2,925***	***9.32%***
2021	***Supported Employment - Title VI***	***3,431***	***17.27%***

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

Texas is not under an order of selection.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Texas is not under an order of selection.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

VRD anticipates average and total expenditures on services to continue to decrease in the immediate future. "Customers served" for this purpose is defined as customers with a purchased service during the program year to more accurately represent average and total cost.

Table 3: Estimated and Projected Caseloads and Costs FFY 2016-21

Year	Program	Number Served	Average Cost	Total Cost
2016	Vocational Rehabilitation - Title I	72,654	$2,061.91	$149,806,207.24

Year	Program	Number Served	Average Cost	Total Cost
2017	Vocational Rehabilitation - Title I	74,309	$1,770.98	$131,599,564.64
2018	Vocational Rehabilitation - Title I	71,202	$1,496.73	$106,570,276.90
2019	Vocational Rehabilitation - Title I	69,301	$1,516.15	$105,071,038.69
2020	***Vocational Rehabilitation - Title I***	***61,534***	***$1,584.38***	***$97,493,063.84***
2021	***Vocational Rehabilitation - Title I***	***55,977***	***$1,799.92***	***$100,754,475.92***
2016	Supported Employment - Title VI	4,319	$2,846.49	$12,294,004.19
2017	Supported Employment - Title VI	3,460	$2,897.37	$10,024,916.83
2018	Supported Employment - Title VI	2,823	$2,574.98	$7,269,161.98
2019	Supported Employment - Title VI	2,651	$2,711.74	$7,188,821.18
2020	***Supported Employment - Title VI***	***2,882***	***$2,753.11***	***$7,934,476.04***
2021	***Supported Employment - Title VI***	***3,373***	***$2,872.66***	***$9,690,110.69***

Assuming current trends continue, VRD believes there are funds available to serve all individuals currently eligible for VR services and individuals in plan status. VRD anticipates having the necessary funds to cover the cost of expected eligibility determinations and planned services. Factors that could change the VRD estimates include:

- changes in federal and state appropriations; and
- changes in state statutes.

Should further information become available about the impacts of these changes on VR programs, projections will be updated.

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

TWC VRD and RCT collaborated to establish goals and priorities to advance the continued provision of high-quality VR services to eligible customers. Both agree that the following priorities are critical to the successful accomplishment of these goals:

- Enhance the quality and scope of services through appropriate coordination with other agencies and organizations; and
- Maximize funding for the program by identifying and using available comparable services and benefits.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

Goal Area 1: Target Populations

Priorities:

- Improve customer employment outcomes for individuals with significant disabilities to include individuals who are blind or significantly visually impaired, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities.
- Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' provision of vocational counseling on decisions impacting employment.
- Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to (1) enable informed customer choice and (2) deliver quality and timely services.

Goal Area 2: Services to Students and Youth with Disabilities

Priorities

- Expand and improve vocational rehabilitation services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities.
- Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain an employment outcome.

Goal Area 3: Partnerships

Priority:

Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

Data from the FFY'17 Comprehensive Statewide Needs Assessment (CSNA) were used to establish VRD goals and priorities. Trends identified in the full 2014 CSNA and the limited-scope 2015 CSNA (which focused on youth and students with disabilities) continue to be relevant, based on 2017 CSNA findings. The priorities associated with each Goal Area articulated above, as previously established by the VR program in coordination with RCT, continue to be relevant. Refer to the Statewide Assessment section for a more detailed discussion of 2017 CSNA findings pertaining to the identified Goal Areas and the priorities associated with each.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

VRD is currently reporting on five of the six combined performance and accountability measures although targets have not been set. The measures are:

- Measurable Skill Gains
- Credential Attainment
- 2nd Quarter After Exit Median Earnings
- 2nd Quarter After Exit Employment Rate
- 4th Quarter After Exit Employment Rate

VRD is piloting the Effectiveness in Serving Employers measure.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

Information obtained from the following sources was used to establish VRD's goals and priorities:

- WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions Final Rule published August 19, 2016;
- RCT Annual Report;
- FFY 2017 CSNA
- Texas Workforce Investment Council plan;
- State and Legislative Budget Board measures;
- Reports to RCT on the DSU's progress in implementing strategies and priorities in the VR state plan, etc.; and
- Input from customers and advocacy organizations, such as Disability Rights Texas.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

The State of Texas is not under a selection order.

B. THE JUSTIFICATION FOR THE ORDER

The State of Texas is not under a selection order.

C. THE SERVICE AND OUTCOME GOALS

The State of Texas is not under a selection order.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

The State of Texas is not under a selection order.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

The State of Texas is not under a selection order.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

The State of Texas is not under a selection order.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

TWC's Vocational Rehabilitation Division (VRD) provides supported employment services for customers with the most significant disabilities, including youth with the most significant disabilities. Funds received under Title VI, Part B §622 (also known as the supported employment program) of the Rehabilitation Act of 1973, as amended, are used to serve these individuals.

VR customers with the most significant disabilities may have multiple disabilities or functional limitations that result in the requirement for extended support services essential to retaining competitive integrated employment.

Texas' provision of supported employment services is integral to the state's overall plan to provide services that result in competitive integrated employment outcomes for VRD customers.

Goal Area 1: Target Populations

The goals for Goal Area 1 are as follows:

- Improve customer employment outcomes for individuals with the most significant disabilities, including but not limited to individuals who are blind or significantly visually impaired; individuals who are from minority backgrounds; individuals with neurodevelopmental disorders (including autism, intellectual disabilities and learning disabilities); individuals with mental health disorders; and veterans with disabilities.
- Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' ability to provide vocational counseling on decisions impacting employment.
- Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to enable them to make an informed choice and to provide them with quality services that are delivered in a timely manner.

Goal Area 2: Services to Students and Youth with Disabilities

The goals for Goal Area 2 are as follows:

- Expand and improve vocational rehabilitation services, Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or

employment and improve coordination with state and local secondary and postsecondary educational entities.

- Provide supported employment services for youth and other individuals with the most significant disabilities who require extended support to achieve and maintain employment.

Goal Area 3: Partnerships

The goal for Goal Area 3 is as follows:

- Enhance collaboration and coordination with local workforce development boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs.

In addition to the above goals, priorities for funds received under section 603 of the Rehabilitation Act of 1973 as amended are to increase the number of customers receiving supported employment services who achieve employment outcomes and the number of supported employment services providers statewide. Also, maintain the number of customers receiving supported employment services within their home communities.

Funding

WIOA §110 funding is available statewide to VR counselors to serve Texans with the most significant disabilities. Services leading to supported employment are integrated into the VR service delivery system. At case closure, or at the conclusion of any time-limited post-employment services, the services paid for by §110 funds are concluded. Extended services and support may be necessary to maintain the employment outcome after a customer's case has been closed. Extended services and support involve either on- or off-site monitoring (as requested by the customer or legal representative) for as long as needed to ensure the customer's job stability. Extended services and support are provided and funded by sources other than VRD and may include the employer. Both natural supports and paid supports, including long-term supports and services provided by other state and federal programs, can be used to facilitate extended services.

Extended services can be provided for up to four years or until the individual turns 25 years of age. For individuals 25 and older, VR assists with coordinating extended services. Supported employment services last 24 months unless there is management approval to provide services for a longer period.

Other Funding Sources

Potential funding sources include the Social Security Administration's Ticket to Work Program and the Texas Health and Human Services Commission's programs to include:

- The majority of 1915(c) state Home and Community-based Services (HCS) Medicaid waivers;
- Employment services provided through general revenue funds
- 1915(k) Community First Choice; and
- Title XX community services.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

Extended services are provided to the VR customer when he or she reaches job stability, defined as:

- performing in a competitive, integrated job to the employer's satisfaction;
- satisfied with the job placement;
- having the necessary modifications and accommodations at the worksite;
- having reliable transportation to and from work; and
- having extended services and support needs in place.

As customers progress through the supported employment process, VRD uses naturally occurring work supports as extended services. As appropriate, paid support is administered through other state agencies or community resources not funded by VRD. Documentation requirements for supported employment services require the ESP to identify strategies for using the naturally occurring work or social supports (including ongoing natural and paid supports) for extended services. When extended services are not available for youth with disabilities, VRD provides extended supports for up to four years or until the individual turns 25 years of age. Extended services for individuals 25 and older are not available with VRD funding.

A customer's extended services are identified and documented in the customer's Individualized Plan for Employment. VRD providers do not provide services to customers during the 90-day period between "Job Stability" and "Service Closure." If VRD providers do provide direct services to a customer during this period, job stability ends and is not reestablished until at least 30 days after the direct services or job change has occurred. A VRD-supported employment case is closed after a customer successfully maintains job stability for 90 days, with extended services being provided only by non–vocational rehabilitation resources.

- *how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.*

VRD identifies and makes arrangements, including entering into cooperative agreements, with other state agencies and other appropriate entities to assist in the provision of supported employment services. VRD coordinates with other public or non-profit agencies or organizations within the state, employers, natural supports, and other entities with respect to the provision of extended services. Collaboration with community organizations and other state agencies, to identify, develop, and implement cooperative agreements and partnerships, is essential to achieving successful employment outcomes for customers, particularly those with the most significant disabilities.

Other potential funding sources include the Social Security Administration's Ticket to Work Program and the Texas Health and Human Services Commission's programs to include:

- The majority of 1915(c) state Home and Community-based Services (HCS) Medicaid waivers;
- Employment services provided through general revenue funds

- 1915(k) Community First Choice; and
- Title XX community services.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

Collaboration occurs in the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program. VRCs provide information to mutually served customers to assist them in understanding how to navigate the long-term support and services system.

Additionally, VRD works with HHS Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

TWC VRD coordinates with the Social Security Administration (SSA) to encourage Employment Service Providers (ESPs) to become employment networks (ENs) under SSA's Ticket to Work Program. TWC VRD offers incentive payments to ESP-ENs that provide:

- supported employment or job placement services during the provision of VR services; and
- extended supports to Ticket to Work customers after VR case closure in order to advance employment or increase customer earnings.

TWC VRD and select ESPs participate in the Partnership Plus program. Additionally, VRD is participating in the Promoting Opportunity Demonstration (POD) pilot that tests benefit offset in the Social Security Disability Insurance program to determine its effects on outcomes such as earnings, employment, and benefit payments.

SSA and HHSC have a data exchange agreement that allows HHSC to access SSA data. Through a third-party agreement (State Verification and Exchange System), VRD is able to obtain SSA data regarding cost reimbursement from HHSC.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

To expand and improve services to all individuals with disabilities, VRD will:

- increase coordination with mental health organizations, local school districts, postsecondary education institutions, and HHSC's Medical and Social Services Division-IDD and Behavioral Health Services Special Project Unit; build staff capacity and

expertise by using internal and external subject matter experts to provide training to counselors working in specialized areas including autism, blind or visually impaired, epilepsy, mental health, spinal cord injury, and brain injury;

- continue to refine the VRD quality assurance process, and quality improvement program, to evaluate and monitor performance; and
- increase VRD use of labor market and career information and data available for identifying target occupations and placement and/or advancement opportunities for program participants.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

A broad range of assistive technology services and devices may be provided at each stage of the rehabilitation process. During PY'17-18, funds were reserved and used for Innovation and Expansion (I&E) activities to implement strategies.

Assistive technology services and tools are parts of a technology-based approach used to maintain, increase, or improve the functional capabilities of individuals with disabilities as part of the rehabilitation process. It is a primary goal of VRD to expand the knowledge, access, and use of assistive technology for all customers, staff, employers, and community partners. Examples of VRD strategies include:

- consultation on and assistance with vehicle modifications, work place modifications, and residential modifications;
- research regarding new and emerging technologies; and
- exploring ways in which assistive technology can be more efficiently applied as a part of VR services to students with disabilities and VRD services to employers.

Assistive technology from the University of Texas' Texas Technology Access Program (TTAP) is a viable resource for customers. This program has updated equipment, and VRD will enhance its partnership with the University of Texas' TTAP.

VRD will continue to work cooperatively with TTAP, the implementing entity designated by the state governor under the Assistive Technology Act of 1998 §4 (29 U.S.C. 3003), to coordinate activities, including the referral of individuals with disabilities. Currently VRD refers customers to TTAP demonstration centers located throughout the state to ensure that customers have an informed choice of assistive technology.

VRD participates in annual joint presentations with TTAP at Ability Expo in Houston, Ability Expo in Dallas/Fort Worth, and TWC's statewide conference, which provides opportunities for customers to learn about new adaptive equipment and assistive technology that can assist them in maintaining competitive integrated employment.

VRD has established a state office Assistive Technology (AT) team staffed by two Program Specialists for Assistive and Rehabilitation Technology (PSARTs). The PSARTs maintain a selection of current commonly used AT for demonstrations, staff trainings, displays, and conferences. These items will periodically be refreshed to ensure that they are current. Additionally, the PSARTs are available to staff cases with counselors and demonstrate use of equipment through videos or Skype.

A state office mailbox is available so that field staff can send questions and obtain consistent responses from the PSARTS. Questions and answers will be used to create an FAQ and made available to all staff.

The assistive technology needs of VR customers are assessed on an individual basis. When assistive technology needs are identified, counselors consult with the state office program specialist for assistive technology to determine the available assistive technology options that can meet the customers' needs to reduce impediments to employment and training. Additionally, VRD contracts with private vendors to provide assistive technology evaluations. Through these evaluations, customers and counselors are presented with assistive technology options that can best meet the customers' needs.

The AT team is expanding staff capacity in assistive technology by training regional teams to become subject matter experts in assistive technology. Additionally, each field unit has an assistive technology specialist to assist counselors in determining the assistive technology needs of their customers. By having more assistive technology subject matter experts, VRD will ensure appropriate equipment is loaned to customers and/or purchased.

VRD employs several strategies to identify underserved populations, including minorities, those with significant, neurodevelopmental disorders (such as autism), psychological disorders (such as bipolar disorder or schizophrenia), and veterans with disabilities.

Outreach to Serve Individuals with Disabilities Who Have Been Unserved or Underserved by Vocational Rehabilitation

Texas veterans with disabilities are an underserved VR customer group. To better serve this population of customers, VRD will increase VR services to veterans with disabilities and improve coordination with other federal and state entities providing veterans' services by:

- evaluating policies, procedures, and rules specific to veterans to provide seamless and efficient access to services for veterans with disabilities;
- ensuring staff is aware of the existing MOU between legacy DARS and the U.S. Department of Veterans Affairs, which details the referral process between the two entities and coordination of services on behalf of eligible veterans;
- enhancing coordination with other entities serving veterans with disabilities, to help veterans more easily navigate available programs and services;
- expanding the Veterans Think Tank, which consists of internal and external subject matter experts who share knowledge, resources, and strategies to more efficiently and effectively coordinate services and case management activities; and
- increasing collaboration with veterans' stakeholder organizations and service providers to include:
    -
        - TWC's Texas Veterans Leadership Program
        - Texas Veterans Commission
        - HHS
        - U.S. Department of Veterans Affairs

The CSNA identified other underserved populations such as youth transitioning from high school and individuals with mental illness. These results are consistent with the priority areas identified in early 2014 during the legacy DARS strategic planning process for FY'15–19. Additionally, the CSNA identified several opportunities for continued improvement of service delivery processes, including increasing customer engagement, improving customer service, streamlining eligibility, and increasing staff and customer knowledge of work incentives and how work impacts Social Security Disability Insurance benefits and Supplemental Security Income. These opportunities for improvement are further addressed in section "j. Statewide Needs Assessment" of this plan.

State Rehabilitation Council Support

RCT partners with VRD in fulfilling the requirements of the federal Rehabilitation Act for the delivery of quality, customer-responsive VR services. Its stated mission is to partner with TWC to advocate for Texans with disabilities in the VR process.

RCT is a valued and active partner in the development of VR goals, priorities, and policies; funds are allocated by TWC for the operation of RCT to meet its mandate and obligations. RCT reviews, analyzes, and advises TWC on:

- performance related to eligibility;
- the extent, scope, and effectiveness of VR services; and
- functions performed by TWC.

RCT also reviews findings from quarterly customer satisfaction surveys and assists with the VRD VR state plan and the comprehensive statewide needs assessment.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

VRD employs several strategies to identify underserved populations, including minorities, those with significant, neurodevelopmental disorders (such as autism), psychological disorders (such as bipolar disorder or schizophrenia), and veterans with disabilities.

Outreach to Individuals with Disabilities Who Are Minorities

VRD engages in numerous programs and activities designed to inform and make available VR and supported employment services to minorities and those who have the most significant disabilities. Examples of these activities include:

- required training in language services for individuals with Limited English Proficient (LEP) for all VRD staff (this training provides guidance on best practices and specific resources for effectively communicating with our unique population of LEP customers; it also includes web-based instruction and desk references for quick access to information);
- ongoing outreach initiatives with colleges and universities that have historically served African American students;
- collaboration with the Alabama-Coushatta Tribe of East Texas to make services available to Native Americans with disabilities;

- customer access to the Language Line as a resource for those who are not fluent in English;
- VRD staff attendance at community job fairs held for the Hispanic population and meeting with groups, such as the Hispanic Chamber of Commerce, Casa de Amigos, the League of United Latin American Citizens, and Catholic Charities (for example, VRD has targeted outreach activities with Catholic Charities of Lubbock and the Guadalupe-Parkway Neighborhood Centers);
- outreach activities with African American groups such as the local Sickle Cell Anemia Association, Minority Business Alliance, African American Family Conference, and NAACP (for example, the Abilene office has an ongoing relationship with the International Rescue Committee, which works with a high percentage of African refugees);
- collaboration with the American G.I. Forum that targets the needs of Hispanic veterans and has assigned bilingual counselors who have completed the Social Security work incentive training to work with veterans with significant disabilities receiving SSDI benefits and wanting to work;
- counselor participation in training to learn to speak other languages and to learn sign language;
- specialized caseloads for certain disabilities to help develop the expertise needed to most benefit the customers served;
- active recruitment of Spanish-speaking VR counselors;
- development of relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities;
- knowledge of issues impacting minorities is encouraged, including trainings and health summits conducted by the Center for the Elimination of Disproportionality and Disparities, which many staff members have attended; and
- engagement with the faith-based community to educate and inform minority and other allied congregations about VRD services (for example, VRD staff participates in the Texas Annual Conference of the United Methodist Church).

Outreach to Serve Individuals with Disabilities Who Have Been Unserved or Underserved by Vocational Rehabilitation

Texas veterans with disabilities are an underserved VR customer group. To better serve this population of customers, VRD will increase VR services to veterans with disabilities and improve coordination with other federal and state entities providing veterans' services by:

- evaluating policies, procedures, and rules specific to veterans to provide seamless and efficient access to services for veterans with disabilities;
- ensuring staff is aware of the existing MOU between legacy DARS and the U.S. Department of Veterans Affairs, which details the referral process between the two entities and coordination of services on behalf of eligible veterans;
- enhancing coordination with other entities serving veterans with disabilities, to help veterans more easily navigate available programs and services;

- expanding the Veterans Think Tank, which consists of internal and external subject matter experts who share knowledge, resources, and strategies to more efficiently and effectively coordinate services and case management activities; and
- increasing collaboration with veterans' stakeholder organizations and service providers to include:
    - TWC's Texas Veterans Leadership Program
    - Texas Veterans Commission
    - HHS
    - U.S. Department of Veterans Affairs

The CSNA identified other underserved populations such as youth transitioning from high school and individuals with mental illness. These results are consistent with the priority areas identified in early 2014 during the legacy DARS strategic planning process for FY'15–19. Additionally, the CSNA identified several opportunities for continued improvement of service delivery processes, including increasing customer engagement, improving customer service, streamlining eligibility, and increasing staff and customer knowledge of work incentives and how work impacts Social Security Disability Insurance benefits and Supplemental Security Income. These opportunities for improvement are further addressed in section "j. Statewide Needs Assessment" of this plan.

State Rehabilitation Council Support

RCT partners with VRD in fulfilling the requirements of the federal Rehabilitation Act for the delivery of quality, customer-responsive VR services. Its stated mission is to partner with TWC to advocate for Texans with disabilities in the VR process.

RCT is a valued and active partner in the development of VR goals, priorities, and policies; funds are allocated by TWC for the operation of RCT to meet its mandate and obligations. RCT reviews, analyzes, and advises TWC on:

- performance related to eligibility;
- the extent, scope, and effectiveness of VR services; and
- functions performed by TWC.

RCT also reviews findings from quarterly customer satisfaction surveys and assists with the VRD VR state plan and the comprehensive statewide needs assessment.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

A Pre-ETS mailbox was developed so field staff can ask questions and obtain consistent responses from the state transition program specialists leading up to implementation of Pre-ETS.

The following strategies will expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or

employment, and improve coordination with state and local secondary and postsecondary educational entities by:

- providing supported employment services to youth with the most significant disabilities, and enhanced coordination to ensure extended support is in place for customers to achieve and maintain employment outcomes;
- evaluating, revising, and developing policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services;
- expanding and increasing partnerships with schools to facilitate the coordination and provision of Pre-ETS to students with disabilities;
- continuing Project SEARCH to assist students and youth with developmental disabilities to successfully transition to competitive, integrated employment;
- developing and delivering a transition training module on best practices pertaining to provision of transition services, guidance and career exploration, postsecondary options, job readiness, and encouragement of customer self-advocacy;
- collaborating with TEA, education service centers, LEAs, and post-secondary education institutions to improve access and transition for students moving from secondary to postsecondary education and training;
- developing additional work experience options such as part-time, summer, and volunteer work experiences and other work-based learning opportunities; and
- enhancing existing statewide Pre-ETS initiatives that leverage partnerships with Boards, secondary and postsecondary education institutions, and employers.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

VRD staff works with a network of CRPs across the state, including those that provide disability education, work readiness, and employment services. To increase the competencies of these providers, VRD:

- requires Employment Service Providers (ESPs) staff to obtain training and credentialing to ensure that job skills trainers, job placement specialists, supported employment specialists, self-employment specialists, and vocational adjustment trainers have the basic skills necessary to facilitate services so the customer achieves required deliverables as defined in the VR Standards;
- requires each Standards' contractor who provides a service for customers to have a director who is credentialed to oversee staff and compliance;
- implements employment premiums to reward providers that maintain training and skills necessary to work with specific populations to increase successful outcomes, such as for customers who have a criminal background, who are deaf or hard of hearing, who have Autism Spectrum Disorder, and who have brain injury;
- has implemented new Work Experience services to allow youth and adult customers to participate in volunteer, internship, or paid temporary work settings that help customers learn or enhance soft and hard skills in areas of interest and determine a potential or planned vocational goal for placement; Work Experience services can also

be used for trial work evaluations as a means of providing information necessary to determine eligibility.

To improve services provided by VRD CRPs across the state, VRD:

- continually assesses the need to change or modify CRP services based on the emerging needs of customers and businesses;
- continues to operate an outcome-based payment system for supported employment and job placement services that require an individual plan for each customer; plans to implement employment premiums to obtain providers with specialty skills and to reward providers that maintain training and skills necessary to work with specific populations, such as blindness/visual impairments and mental health in order to increase successful outcomes;
- continues to expand Work Experience services for youth and adults;
- continually explores opportunities to add innovative programs supportive of WIOA Pre-ETS requirements, customized employment, and other services to prepare and support customers in their long-term employment placement;
- continues to review the need for new services for youth and adult customers to assist in job readiness and in obtaining and maintaining competitive integrated employment;
- continues the use of transition educator providers. The transition educator service provider is an individual who is not currently a contracted provider; has a master's degree or a bachelor's degree in rehabilitation, counseling and guidance, psychology, education, or a related field; and is or has been an employee of a school system or a Texas education service center within the past fiscal year. These providers were added to better meet the needs of transition-age students and to provide services to customers in underserved areas of the state; and
- requires ESPs to identify strategies for using the naturally occurring work and social supports (including ongoing natural and paid supports) for extended services.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

VRD established a framework of quality assurance and quality improvement. This framework addresses the concept of continuous quality assurance and quality improvement using mission and strategic planning, leadership, communication, customer satisfaction results, data analysis, monitoring, and performance evaluation. This involves strategies to improve performance with respect to WIOA §116 performance accountability measures and includes the following actions:

- VRD, in cooperation with TWC Operational Insight, will collect, monitor, and evaluate data for the WIOA core measures, and develop strategies to address gaps in performance that are identified through routine reports, quarterly performance reports through on-site budget and performance reviews, and the quality assurance program.
- VRD will assess and identify staff training needs and opportunities to build competency and increase capacity to assist program participants with identification of an employment goal and development of the Individualized Plan for Employment.
- VRD will implement training courses and develop new community partnerships to focus on postsecondary education to increase employment in high-skill, high-wage

occupations by increasing the number of customers receiving postsecondary education and training.

- VRD will replicate initiatives such as Project SEARCH to provide training and certificates as well as on-the-job skills gains and/or credentials for employment.
- VRD will continue to use the Business Relations Team, which is composed of Business Relations Coordinators (BRCs) who work with regional and field management and staff to provide a variety of services to employers.
- VRD will continue to enhance its system to assess and monitor effectiveness in serving employers. The VR BRCs will coordinate more closely with Boards, and work in partnership and as team members in the Business Services Units.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

As a division of TWC, VRD participates in the planning for and evaluation of the Texas workforce system conducted by the Texas Workforce Investment Council (TWIC), which serves as the state workforce investment board. These activities include:

- participating in the development and implementation of the state-mandated strategic plan for the Texas workforce system;
- participating in TWIC meetings and serving on the TWIC Apprenticeship and Training Advisory Committee; and
- reporting quarterly and annually as requested by TWIC on the division's activities to implement goals and objectives in the Texas workforce system strategic plan.

VRD works closely with other TWC departments to provide information, partner on community initiatives, and enhance customer referral processes.

Ongoing collaborative efforts between VRD and each of the 28 Boards have resulted in projects, initiatives, and processes such as joint community outreach and awareness events, summer youth initiatives, employer symposia and job fairs, customer referrals, coordination of services, and cross-training for staff.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

Goal Area 1: Target Populations

Priorities

- Improve customer employment outcomes for individuals with significant disabilities, including but not limited to individuals who are blind, or significantly visually impaired; individuals who are from minority backgrounds; individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities); individuals with mental health disorders, and veterans with disabilities.
- Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' ability to provide vocational counseling on decisions impacting employment.

- Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to enable them to make informed choices and to provide them with quality services that are delivered in a timely manner.

Strategies

- Strengthening and expanding collaboration, outreach, and education with various partners to efficiently and effectively use existing resources.
- Assessing business processes, policy, training, and organizational capacity on an ongoing basis to make consistent improvements in employment outcomes.
- Increasing employer knowledge and awareness regarding the benefits of hiring individuals with disabilities.
- Increasing customer knowledge and awareness of VRD services and benefits offered to individuals with disabilities, and other state and federal assistance programs.
- Promoting the use of the Language Line as a resource for those who are not fluent in English.
- Actively recruiting VR counselors who are Spanish speakers to better serve the Hispanic population.
- Strengthening and developing relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities.
- Providing eye exams to Hispanic individuals in south Texas who lack other medical resources.

Success will be measured by:

- an increase in the number of individuals with developmental or intellectual disabilities, neurodevelopmental disorders (including autism), or mental health disorders, and veterans served;
- an increase in the number of successful employment outcomes for target populations; and
- enhanced customer satisfaction results indicated by the customer satisfaction

Goal Area 2: Services to Students and Youth with Disabilities

Priorities

- Expand and improve VR services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities.
- Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain an employment outcome.

Strategies

A Pre-ETS mailbox was developed so field staff can ask questions and obtain consistent responses from the state transition program specialists. The following strategies will expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities:

- Providing supported employment services for youth with the most significant disabilities, and enhanced coordination to ensure extended supports are in place for customers to achieve and maintain employment outcomes.
- Evaluate, revise, and develop policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services.
- Develop a transition training module, which will provide guidance and best practices pertaining to provision of transition services.
- Expand and increase partnerships with state and local secondary and postsecondary educational institutions and organizations to facilitate the identification of best practices, leveraged resources, and improved coordination.
- Continue the statewide Pathways to Careers Initiative (PCI) to expand Pre-ETS to Texas students with disabilities. PCI includes eight strategies: Summer Earn and Learn, Charting the Course: Planning for Life after High School, Explore STEM!, Pre-ETS Tools for Students, Pre-ETS Elective Curriculum, Capacity Building, Advise Texas, and Student HIREability Navigators. Through the PCI initiative, students with disabilities will be better prepared to achieve competitive integrated employment through participation in employability skills and work readiness training, career exploration activities, work experience, and postsecondary education.

Success will be measured by:

- an increase in successful outcomes for students with disabilities and youth; and
- an increase in consumer satisfaction of students and youth with disabilities as measured by the consumer satisfaction survey.

Goal Area 3: Partnerships

Priorities

Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs.

Strategies

VRD will do the following to strengthen partnerships with Boards and enhance strategies to develop and maintain employer relationships that result in competitive integrated employment outcomes and work-based learning experiences:

- Continuing to collaborate on special initiatives and activities for youth, veterans, and other persons with disabilities;
- Developing and implementing summer work experience programs with the Boards;

- Increased participation in Board committees;
- Increased coordination with Board Business Service Units and with other business intermediaries such as local Chambers of Commerce;
- Providing information to VR partners pertaining to various disabilities, assistive technology, and suggestions for reasonable accommodations;
- Developing and implementing agency-wide business relationships strategies with a regional focus that creates a unified, comprehensive approach to serving businesses;
- Providing Dual Customer Service to staff, to instruct on how to best contact and meet the needs of our business partners; and
- Aligning counseling critical thinking processes around employment opportunities and data to engage customers in defining their optimal vocational opportunities.

Success will be measured by:

- an increase in sustained business relationships leading to successful outcomes for our consumers;
- an increase in work-based learning experiences; and
- an increase in the number of partnerships for special initiatives and ongoing coordination of services to businesses.

Technology

Computer assistive technology services and assistive technology devices are provided for customers at each stage of the rehabilitation process.

The State Office AT team provides resources such as online video trainings, webinars, and workshops on available assistive technology, and will offer hands-on training and education throughout the state. This AT team is training subject matter experts across the state in the areas of assistive technology and vehicle modifications which will ensure field staff are better equipped to provide individualized services that support and facilitate customer participation in education, rehabilitation, and accomplishment of employment goals. Services may also include assistance with accessible transportation and independent living needs.

To meet the assistive technology needs of VR customers with visual impairments, VRD has designated state program specialists and regional staff that work with blind specialty caseloads to provide assistive technology to individuals who are blind or visually impaired. VRD continues to work with organizations across the state to support Pre-ETS for students with disabilities, including:

- contracted assistive technology evaluation sites; and
- the VRD Assistive Technology Unit

Contract providers are required to complete a thorough testing program to ensure they meet minimal standards of proficiency to become approved assistive technology providers. VRD coordinates with other programs when assistive technologies are needed that are not vision related. VRD also uses programs such as the Computer/Electronics Accommodations Program

when a customer is interested in employment with the federal government, the Specialized Telecommunications Assistance Program to obtain telecommunication devices, and various assistive technology programs for the deaf and hard of hearing.

Diabetes Services

When customers seek VR services, diabetes is sometimes the underlying cause of the disability. Diabetes is often a contributing factor for customers with amputations, end stage renal disease, cardiovascular disease, stroke, and hearing loss. Additionally, customers with a secondary condition of diabetes sometimes comprise as much as 70 percent of blind services caseloads. Addressing the diabetes is often necessary for the customer to receive the full benefit of medical services and to address potential job implications.

The Diabetes Program Specialist provides training and consultation to vocational rehabilitation counselors, other agency staff, and diabetes educators regarding the physical and vocational implications of diabetes, its complications, and needed accommodations. Critical to a customer's success is an understanding of how diabetes impacts the ability to work (sick days, lost time, increased health care costs), and adaptive techniques and equipment to manage the disease.

Specifically, the Diabetes Program Specialist delivers training on the impact of diabetes on businesses and the functional and vocational implications of diabetes and its complications through internal training of staff and diabetes educators via the Texas Confidence Builder training. The Diabetes Program Specialist develops innovative ways to educate providers of diabetes education on the abilities of customers with disabilities to self-manage their diabetes, the adaptive techniques for, equipment and supplies, and the challenges of managing diabetes at work.

System of Quality Assurance

VRD's system for monitoring and performance management includes having a robust system of case review requirements. State statute requires that VRD review 10% of all cases each year. Statistically valid sampling methodology is used to determine the unit specific goals based on customers served. Consideration also is given to actual cases that meet the risk criteria and other trends observed during case reviews and data analysis. The quarterly unit case review plan has specific focus area goals to be performed at the unit level. An important goal is to review a minimum of 10 percent of all cases, with a focus on cases that present a higher risk due to case cost, case length, lack of engagement, or failure to render timely services within federally mandated parameters. Review information and detailed data analysis is used to develop, enhance, or modify current training, policy, and/or coaching needs at all levels.

Increased Emphasis on Braille Literacy

A braille training program for new Vocational Rehabilitation teachers (VRTs) and Independent Living Services for Older Individuals Who Are Blind (ILS-OIB) workers that incorporates the Simply Braille curriculum was designed and is now being delivered by the VRD VRT program specialists.

Braille training is provided to customers individually or in group classes by VRT and OIB workers. Customers may also be supported when taking braille correspondence courses through Hadley Institute for the Blind.

All VRTs and ILS-OIB workers have received instruction in the Unified English Braille (UEB) system. Additionally, all new VRTs and ILS-OIB workers will receive the UEB training.

Barriers to serving unserved and underserved populations identified in the CSNA included:

- lack of awareness of the impact of receiving services on Social Security benefits, highlighting the disincentive to work from the fear of losing benefits;
- lack of awareness of VRD services among customers and/or parents;
- lack of awareness of VRD services among doctors and other medical professionals;
- growing need for services that will require partners to leverage available funding and may require increased funding; and
- scarcity of available transportation that creates challenges for potential customers, especially in rural areas, to access VRD offices, providers, and jobs.

Strategies

The following VRD strategies address the barrier created by not understanding the impact of service receipt on Social Security benefits:

- Work closely with community partners such as the local Social Security Administration (SSA) offices and Work Incentives Planning and Assistance programs to dispel inaccurate perceptions regarding loss of benefits and attempt to work efforts.
- Provide statewide training for all VRCs on basic benefits and work incentives support and services.
- Expand training for additional VRD staff to be Benefits Subject Matter Resources (SMRs), including a train-the-trainer component for all SMRs, and provide ongoing statewide training in federal and state work incentive programs for all VRD staff.
- Enhance current partnership with the SSA to encourage ESPs to become ENs under the SSA Ticket to Work Program. VRD offers incentive payments to ESP-ENs that provide:
    - supported employment or job placement services during the provision of VR services; and
    - extended support to Ticket to Work customers after VR case closure to advance employment or increase customer earnings.

The following VRD strategies address the barrier created by the lack of awareness of VRD services among customers, parents, and doctors and other medical professionals:

- Increase collaboration with other organizations to improve customer access to services.
- Increase outreach efforts in the business community.
- Educate community leaders on the availability of VRD services to enhance outreach efforts to all ethnic groups.
- Offer the 2-1-1 Texas statewide referral helpline, a service that assists customers with referrals to appropriate agencies for help.
- Enhance community outreach activities.

The following VRD strategies address the growing need for services by leveraging other partner and community resources, and seeking opportunities to increase efficiency in VRD structure and processes:

- VRD will continue to work to educate state officials and oversight authorities about the value of VR services to Texans with disabilities and to the overall state economy.
- VRD will leverage existing resources and make every effort to draw down the maximum federal funding match to provide needed services for Texans with disabilities.
- VRD will fully use SSA programs and work to maximize SSA/VR reimbursements.
- VRD will provide budget management training for staff.

VRD strategy addressing the barrier created by scarcity of available transportation will be to continue to advocate for local improvement in public transportation at HHS' regional coordination forums.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

For VRD, a portion of federal funds allocated were used for Innovation and Expansion (I&E) activities, including but not limited to, the following strategic initiatives consistent with the requirements of the Rehabilitation Act.

Technology

VR customers were offered individualized technology-related to support and facilitate their participation in rehabilitation, education, and employment opportunities. Technology-related services also included assisting customers with transportation and independent living needs. As provided, assistive technology services can be described as ways in which a technology-based approach is used to maintain, increase, or improve the functional capabilities of individuals with disabilities as part of their rehabilitation process. Ensuring and supporting access to and use of appropriate assistive technology is essential for customers, employers, and community partners.

To help provide statewide support for assistive technology and vehicle modifications, the following strategies were used:

- Support from state office program specialists in the areas of vehicle modifications, workplace modifications, residential modifications, assistive hardware and software, and other assistive technologies.
- Continued access to assistive technology equipment through the device loan program
- The establishment of a State Office Assistive Technology (AT) team staffed by two PSARTs. The PSARTs maintain a selection of current commonly used AT for demonstrations, staff trainings, displays, and conferences. These items will periodically be refreshed to ensure that they are current. Additionally, the PSARTs are available to staff cases with counselors and demonstrate use of equipment through videos or Skype.
- The AT team is expanding staff capacity in assistive technology by training regional teams to become subject matter experts in AT. Additionally, each field unit has an AT specialist to assist counselors in determining the AT needs of their customers. By having more AT subject matter experts, VRD will ensure that appropriate equipment is

purchased or loaned to customers. Access to research and information regarding new and emerging technologies.

- Development of teams of assistive technology subject matter experts and vehicle modification experts to help support the service delivery process throughout the state.
- Presentation of information by state office program specialists on relevant topics during monthly teleconferences to help share information with staff.
- Coordination of case staffing sessions to review and discuss individual needs related to assistive technology.
- Continued efforts to develop or enhance partnerships in the community that can help provide resources for customers, for example, the University of Texas' Texas Technology Access Program.

Diabetes Services

When customers seek VR services, diabetes is sometimes the underlying cause of the disability. Diabetes is often a contributing factor for customers with amputations, end stage renal disease, psychological disorders, cardiovascular disease, stroke, and hearing loss. Additionally, customers with a secondary condition of diabetes may comprise as much as 70 percent of blind services caseloads. Addressing the diabetes is necessary for the customer to receive the full benefit of medical services and to address potential job implications.

The diabetes program specialist provides training and consultation to VR counselors, other TWC staff, and diabetes educators on the physical and vocational implications of diabetes, its complications, and needed accommodations. Critical to a customer's success is an understanding of how diabetes impacts the ability to work (sick days, lost time, increased health care costs), and adaptive techniques and equipment to manage the disease.

Specifically, the diabetes program specialist delivers training on the impact of diabetes on businesses, and the functional and vocational implications of diabetes and its complications through internal training of staff and diabetes educators through the Diabetes Education Texas Confidence Builder training. The diabetes program specialist develops innovative ways to educate providers of diabetes education on the abilities of customers with disabilities to self-manage their diabetes, the adaptive techniques for, equipment and supplies, and the challenges of managing diabetes at work.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

VRD employs several strategies to identify underserved populations, including minorities, those with significant, neurodevelopmental disorders (such as autism), psychological disorders (such as bipolar disorder or schizophrenia), and veterans with disabilities.

Outreach to Individuals with Disabilities Who Are Minorities

VRD engages in numerous programs and activities designed to inform and make available VR and supported employment services to minorities and those who have the most significant disabilities. Examples of these activities include:

- required training in language services for individuals with Limited English Proficient (LEP) for all VRD staff (this training provides guidance on best practices and specific

resources for effectively communicating with our unique population of LEP customers; it also includes web-based instruction and desk references for quick access to information);

- ongoing outreach initiatives with colleges and universities that have historically served African American students;
- collaboration with the Alabama-Coushatta Tribe of East Texas to make services available to Native Americans with disabilities;
- customer access to the Language Line as a resource for those who are not fluent in English;
- VRD staff attendance at community job fairs held for the Hispanic population and meeting with groups, such as the Hispanic Chamber of Commerce, Casa de Amigos, the League of United Latin American Citizens, and Catholic Charities (for example, VRD has targeted outreach activities with Catholic Charities of Lubbock and the Guadalupe-Parkway Neighborhood Centers);
- outreach activities with African American groups such as the local Sickle Cell Anemia Association, Minority Business Alliance, African American Family Conference, and NAACP (for example, the Abilene office has an ongoing relationship with the International Rescue Committee, which works with a high percentage of African refugees);
- collaboration with the American G.I. Forum that targets the needs of Hispanic veterans and has assigned bilingual counselors who have completed the Social Security work incentive training to work with veterans with significant disabilities receiving SSDI benefits and wanting to work;
- counselor participation in training to learn to speak other languages and to learn sign language;
- specialized caseloads for certain disabilities to help develop the expertise needed to most benefit the customers served;
- active recruitment of Spanish-speaking VR counselors;
- development of relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities;
- knowledge of issues impacting minorities is encouraged, including trainings and health summits conducted by the Center for the Elimination of Disproportionality and Disparities, which many staff members have attended; and
- engagement with the faith-based community to educate and inform minority and other allied congregations about VRD services (for example, VRD staff participates in the Texas Annual Conference of the United Methodist Church).

Outreach to Serve Individuals with Disabilities Who Have Been Unserved or Underserved by Vocational Rehabilitation

Texas veterans with disabilities are an underserved VR customer group. To better serve this population of customers, VRD will increase VR services to veterans with disabilities and improve coordination with other federal and state entities providing veterans' services by:

- evaluating policies, procedures, and rules specific to veterans to provide seamless and efficient access to services for veterans with disabilities;
- ensuring staff is aware of the existing MOU between legacy DARS and the U.S. Department of Veterans Affairs, which details the referral process between the two entities and coordination of services on behalf of eligible veterans;
- enhancing coordination with other entities serving veterans with disabilities, to help veterans more easily navigate available programs and services;
- expanding the Veterans Think Tank, which consists of internal and external subject matter experts who share knowledge, resources, and strategies to more efficiently and effectively coordinate services and case management activities; and
- increasing collaboration with veterans' stakeholder organizations and service providers to include:
    -
        - TWC's Texas Veterans Leadership Program
        - Texas Veterans Commission
        - HHS
        - U.S. Department of Veterans Affairs

The CSNA identified other underserved populations such as youth transitioning from high school and individuals with mental illness. These results are consistent with the priority areas identified in early 2014 during the legacy DARS strategic planning process for FY'15–19. Additionally, the CSNA identified several opportunities for continued improvement of service delivery processes, including increasing customer engagement, improving customer service, streamlining eligibility, and increasing staff and customer knowledge of work incentives and how work impacts Social Security Disability Insurance benefits and Supplemental Security Income. These opportunities for improvement are further addressed in section "j. Statewide Needs Assessment" of this plan.

VRD collaborates with Workforce Solutions Offices regarding customer training and support for employment goals, including participation in symposiums, job fairs, and providing disability awareness training.

Students who are blind or visually impaired, deaf or hard of hearing, have neurodevelopmental disorders including autism and mental health disorders, and have minority backgrounds have participated in Summer Earn and Learn, Project Search, Explore STEM! and other student activities. VRD is committed to ensuring that students from these targeted populations continue to participate in initiatives such as Summer Earn and Learn, Project Search, Explore STEM! and other summer work experience. VRD will work with the Division of Operational Insight (DOI) to analyze participation by targeted population and report this information in future years.

TWC-VRD will continue to focus on strengthening supported employment services by:

- Assisting ESPs in using the Supported Employment Assessment that focuses on discovery and person-centered techniques, vocational theme development, and providing worksite observations;

- Considering additional supported employment policy revisions, such as clarifying who is appropriate for supported employment services;
- Working with VRCs on applying the supported employment planning and service provision to improve customer participation and informed choice by requiring review and signatures at each benchmark;
- Providing ongoing training to TWC's VRD subject matter experts, who provide technical assistance to VRCs on identifying and coordinating extended service/long-term support before beginning the benchmark process;
- Ensuring that all criteria for determining job stability to ensure extended service/long-term support after VR case closure are being applied; and
- Continuing to provide specific employment services to people with Neurodevelopmental Disorders to improve their success in obtaining and maintaining employment.

Technology

VR customers are offered individualized technology-related to support and facilitate their participation in rehabilitation, education, and employment opportunities. Technology-related services also included assisting customers with transportation and independent living needs. As provided, assistive technology services can be described as ways in which a technology-based approach is used to maintain, increase, or improve the functional capabilities of individuals with disabilities as part of their rehabilitation process. Ensuring and supporting access to and use of appropriate assistive technology is essential for customers, employers, and community partners.

To help provide statewide support for assistive technology and vehicle modifications, the following strategies were used:

- Support from state office program specialists in the areas of vehicle modifications, workplace modifications, residential modifications, assistive hardware and software, and other assistive technologies.
- Continued access to assistive technology equipment through the device loan program
- The establishment of a State Office Assistive Technology (AT) team staffed by two PSARTs. The PSARTs maintain a selection of current commonly used AT for demonstrations, staff trainings, displays, and conferences. These items will periodically be refreshed to ensure that they are current. Additionally, the PSARTs are available to staff cases with counselors and demonstrate use of equipment through videos or Skype.
- The AT team is expanding staff capacity in assistive technology by training regional teams to become subject matter experts in AT. Additionally, each field unit has an AT specialist to assist counselors in determining the AT needs of their customers. By having more AT subject matter experts, VRD will ensure that appropriate equipment is purchased or loaned to customers. Access to research and information regarding new and emerging technologies.
- Development of teams of assistive technology subject matter experts and vehicle modification experts to help support the service delivery process throughout the state.
- Presentation of information by state office program specialists on relevant topics during monthly teleconferences to help share information with staff.

- Coordination of case staffing sessions to review and discuss individual needs related to assistive technology.
- Continued efforts to develop or enhance partnerships in the community that can help provide resources for customers, for example, the University of Texas' Texas Technology Access Program.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

Goal Area 1: Target Populations

Priorities:

- Improve customer employment outcomes for individuals with the most significant disabilities to include individuals who are blind or significantly visually impaired, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities.
- Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' provision of vocational counseling on decisions impacting employment.
- Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to (1) enable informed customer choice and (2) deliver quality and timely services.

Measures: Provide VR services that support quality employment outcomes for individuals with the most significant disabilities by meeting or exceeding performance goals.

Name of Measure:	Goal	PY'18 Performance	Percent of Goal
Number of Customers Who Achieved Employment Outcomes – VR	14,551	13,537	93.0%
Percent of Customers Who Achieve Employment Outcomes – VR	55.8%	59.37%	106.4%

Measure: An increase in the number of participants served with neurodevelopmental disabilities, psychological disabilities, and participants who are veterans.

Populations PARTICIPANTS[1] SERVED	PY'17[2]	PY'18[3]
with neurodevelopmental disability[4]	24,687	25,142
with psychological disability[5]	20,920	19,992
veterans	2,114	1,686

The table above compares the PY'17 and PY'18 performance for service to customers with neurodevelopmental disability or psychological disability, or customers who are veterans.

In PY'18, VRD served 25,142 customers with a neurodevelopmental disability, an increase of 455 from PY'17.

In PY'18 VRD served 19,992 customers with a psychological disability, a decrease of 928 customers from PY'17.

In PY'18 VRD served 1,686 veteran customers, a decrease of 428 from PY'17.

Measure: An increase in the number of successful employment outcomes for target populations.

Populations SUCCESSFUL OUTCOMES	PY'17	PY'18
with neurodevelopmental disability	3,156	3,257
with psychological disability	2,704	2,907
veterans	433	275

The table above compares PY'17 and PY'18 VRD successful employment outcomes for target populations with neurodevelopment disability or psychological disability or customers who are veterans.

In PY'18, VRD saw successful employment outcomes for 3,257 customers with neurodevelopmental disability, an increase of 101 from PY'17.

In PY'18, VRD saw successful employment outcomes for 2,907 customers with psychological disability, an increase of 203 from PY'17.

In PY'18, VRD saw successful employment outcomes for 275 customers who are veterans, a decrease of 158 from PY'17

Goal 1 Strategies Contributing to the Success of Goals:

- Strengthening and expanding collaboration, outreach, and education with various partners to efficiently and effectively use existing resources.
- Assessing business processes, policy, training, and organizational capacity in an ongoing basis to make consistent improvements in employment outcomes.

- Increasing employer knowledge and awareness regarding the benefits of hiring individuals with disabilities.
- Increasing customer knowledge and awareness of VRD services and benefits offered to individuals with disabilities, and other state and federal assistance programs.
- Promoting the use of the Language Line as a resource for those who are not fluent in English.
- Actively recruiting VR counselors who are Spanish speakers to better serve the Spanish-speaking population.
- Strengthening and developing relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities.
- Providing eye exams to Hispanic individuals in South Texas who lack other medical resources.

Goal Area 2: Services to Students (Ages 14–22) and Youth (Ages 14–24) with Disabilities

Priorities

- Expand and improve VR services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities.
- Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain a successful competitive integrated employment outcome.

Measure: An increase in successful outcomes for students with disabilities and youth.

Populations SUCCESSFUL OUTCOMES	PY'17	PY'18
Youth only	2,263	2,240
Student & Youth	3,268	3,436

The above table compares the successful employment outcomes in PY 2017 and PY 2018 for student and/or youth populations in VRD services.

In PY'18, VRD saw successful employment outcomes for 2,263 youth-only (not a student, because a customer can be a youth without being a student) customers, a decrease of 23 from PY'17.

In PY'18, VRD saw successful employment outcomes for 3,436 students and youth-only customers, an increase of 168 from PY'17.

Goal 2 Strategies Contributing to Success of Goals:

VRD developed a formalized method of reviewing proposed ideas and initiatives for Pre-ETS. This method includes the establishment of a core group of staff members who review proposed ideas for Pre-ETS biweekly. Additionally, a Pre-ETS mailbox was developed so field staff can ask questions and obtain consistent responses from the state transition program specialists leading up to implementation of Pre-ETS. The following strategies were implemented to expand and improve VR services for students and youth with disabilities who are transitioning from high

school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities:

- Provide supported employment services for youth with the most significant disabilities, and enhanced coordination to ensure extended supports are in place for customers to achieve and maintain employment outcomes.
- Evaluate, revise, and develop policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services.
- Develop a transition training module, which will provide guidance and best practices pertaining to provision of transition services.
- Expand and increase partnerships with state and local secondary and postsecondary educational institutions and organizations to facilitate the identification of best practices, leveraged resources, and improved coordination.
- Continue the Pathways to Careers Initiative (PCI)which expands Pre-ETS to students with disabilities. PCI includes eight strategies: Summer Earn and Learn, Charting the Course: Planning for Life after High School, Explore STEM! Pre-ETS Tools for Students, Pre-ETS Elective Curriculum, Capacity Building, Advise Texas, and Student HIREability Navigators. Through PCI, students with disabilities will be better prepared to achieve competitive-integrated employment through participation in employability skills and work readiness training, career exploration activities, work experience, and postsecondary education.
- Non-PCI Pre-ETS strategies were expanded to include Year-Round Paid Work Experience, Group Skills Trainings, and Explore Apprenticeship.

Goal Area 3: Partnerships

Priorities:

Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities, such as internships, volunteer positions, and summer and year-round work experience programs.

Measure: An increase in services provided to businesses to support hiring, retention, and advancement strategies of the businesses.

In PY'18, there were 91 VRD partnerships, compared to 882 in PY 17. The PY 2018 number is significantly lower from the number reported for PY 2017 because, upon further evaluation of tools used to extract the data, it was determined that the number of hires were reported rather than the number of business relationships.

Measure: An increase in work-based learning experiences.

In PY 2018, 4,686 customers participated in work-based learning opportunities across the state. Some of the work-based learning programs included Summer Earn and Learn, Project Search, WINCO, Walgreens Distribution Center, WACO Project, and year-round paid work experience.

Measure: An increase in the number of partnerships for special initiatives and ongoing coordination of services to businesses.

In PY'18, there were 45 partnerships for special initiatives with businesses, compared to 42 in PY'17.

Goal 3 Strategies Contributing to Success of Goals:

VRD implemented the following strategies to strengthen partnerships with Boards and enhance strategies to develop and maintain employer relationships that result in competitive integrated employment outcomes and work-based learning experiences:

- Continuing to collaborate on special initiatives and activities for youth, veterans, and other individuals with disabilities;
- Developing and implementing summer work experience programs with Boards;
- Increased participation in Board committees;
- Increased coordination with Board Business Service Units and other business intermediaries such as local chambers of commerce;
- Providing information to VR partners pertaining to various disabilities, assistive technology, and suggestions for reasonable accommodations;
- Developing and implementing agency-wide business relationships strategies with a regional focus that creates a unified, comprehensive approach to serving businesses;
- Providing dual customer service to staff to instruct on how to best contact and meet the needs of our business partners; and
- Aligning counseling critical thinking processes with employment opportunities and data to engage customers in defining their optimal vocational opportunities.

Goal for VRD

In addition to the goals listed above, priorities for funds received under the Rehabilitation Act §603 are to increase the number of customers receiving supported employment services who achieve employment outcomes and the number of supported employment service providers statewide, and to maintain the number of customers receiving supported employment services within their home communities.

Goal: Provide supported employment services to individuals with the most significant disabilities who require extended supports to achieve and maintain an employment outcome.

Measure: 50 percent or greater of VRD customers exiting the VR program after receiving supported employment services will achieve an employment outcome.

PY'18	Goal	Above/Below Target
81.32%	50%	(+) 31.32%

In VRD, 81.32 percent of customers achieved employment outcomes after receiving supported employment services, exceeding the target by 31.32 percent.

[1] Customers active with an IPE or closed after IPE

[2] Program Year 2017

[3] Program Year 2018

[4] Neurodevelopmental Disability: Based on primary, secondary, or tertiary disability cause code of Attention-Deficit Hyperactivity Disorder (ADHD) (code 07), Autism (code 08), Cognitively Impaired (previously Mental Retardation) (code 25), or Specific Learning Disabilities (code 34).

[5] Psychological: Based on primary, secondary, or tertiary disability cause code of: Alcohol Abuse or Dependence (code 02), Anxiety Disorders (code 04), Depressive and other Mood Disorders (code 15), Drug Abuse or Dependence (other than alcohol) (code 18), Eating Disorders (code 19), Mental Illness (code 24), Personality Disorders (code 29), or Schizophrenia and other Psychotic Disorders (code 33).

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Goal Area 1: Target Populations

Priorities:

- Improve customer employment outcomes for individuals with the most significant disabilities to include individuals who are blind or significantly visually impaired, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities.
- Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' provision of vocational counseling on decisions impacting employment.
- Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to (1) enable informed customer choice and (2) deliver quality and timely services.

Goal 1: Factors That Impeded Achievement of the VRD Goals and Priorities:

- The implementation of the WIOA requirement for competitive integrated employment closures phased out homemaker closures and thus reduced the number of overall successful closures obtained in prior years.
- Additional research is needed to better identify factors that may be impeding achievement of goals and priorities for individuals with psychological disabilities.
- There are numerous federal and state programs available to assist veterans, some focusing specifically on veterans with disabilities. Veterans may be accessing these services prior to applying for VR services or may not be aware that VR is also available to assist them with achieving their employment goals. An increase in training by state office staff for counselors with specialty caseloads, such as counselors with psychological and veteran caseloads, may be needed to enhance outreach efforts and improve coordination with federal, state, and community programs.
- A decrease in the number of applicants may be attributed in part to a low unemployment rate and a tight labor market, which means fewer people exiting the program.
- An increase in counselor vacancies affected consistency of customer engagement, which impacted achievement of successful outcomes.

Goal Area 2: Services to Students (Ages 14–22) and Youth (Ages 14–24) with Disabilities

Priorities

- Expand and improve VR services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities.
- Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain a successful competitive integrated employment outcome.

Goal 2: Factors That Impeded Achievement of the VRD General Goals and Priorities for Youth and Students:

- Significant staff effort has been focused on engaging students earlier to provide more Pre-ETS services, which are described in the WIOA regulations as services provided early in a student's career exploration continuum and well before a student will achieve his or her employment goal. As a result, in the initial years of implementing WIOA, the number of successful closures will decrease while the length of time students is served by VR is anticipated to increase.
- For youth with disabilities, WIOA increases the length of time and depth of services being provided in supported employment. This results in cases being open longer and, therefore, fewer cases being closed successfully in the initial years of WIOA implementation.
- TWC increased the number of counselors focused solely on serving students. Additionally, VR established a State Office Transition and Preemployment Transition Services (Pre-ETS) team, composed of a program manager, project manager, and five program specialists whose focus is on policy development, training, guidance to field staff on Pre-ETS and transition, and program development and coordination with other agencies.

Goal Area 3: Partnerships

Priorities:

Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities, such as internships, volunteer positions, and summer and year-round work experience programs.

Goal 3 Partnerships: Factors That Impeded Achievement of the VRD General Goals and Priorities for Youth and Students:

None identified

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

In addition to the goals listed above, priorities for funds received under the Rehabilitation Act §603 are to increase the number of customers receiving supported employment services who achieve employment outcomes and the number of supported employment service providers statewide, and to maintain the number of customers receiving supported employment services within their home communities.

Goal for VRD

Provide supported employment services to individuals with the most significant disabilities who require extended supports to achieve and maintain an employment outcome.

Measure: 50 percent or greater of VRD customers exiting the VR program after receiving supported employment services will achieve an employment outcome.

PY'18	Goal	Above/Below Target
81.32%	50%	(+) 31.32%

In VRD, 81.32 percent of customers achieved employment outcomes after receiving supported employment services, exceeding the target by 31.32 percent.

The following strategies contributed to the achievement of the goal:

- Continued development and implementation of improved benchmark system for the provision of specific supported employment services statewide.
- Developed and implemented complimentary services for specific populations, such as individuals with autism and deafness diagnoses
- Developed a supported employment technical assistance training model for staff members to improve their ability to determine when supported employment services are needed.
- Developed tools to help staff members monitor and provide guidance to supported employment contract providers.
- Continued to require credentialing for Supported Employment providers to educate and train best practices and improve service delivery.
- In late 2018, a workgroup was formed with ESPs, field staff, and the state office to review the forms and SE policies. The workgroup recommended changes to the forms to reduce the time spent completing forms and that instead could be better used to provide supports for SE customers.
- State office staff is working to develop training to educate ESPs on best practices and how to work with customers who are visually impaired or blind. The training will result in additional payments for assisting our visually impaired and blind customers similar to the payments for assisting our customers with autism or who are deaf.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

- Additional research is needed to better identify factors that may be impeding achievement of goals and priorities for individuals with psychological disabilities.

- A decrease in the number of applicants may be attributed in part to a low unemployment rate and a tight labor market, which means fewer people exiting the program.
- An increase in counselor vacancies affected consistency of customer engagement, which impacted achievement of successful outcomes.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

ROW	PERFORMANCE CATEGORY	FFY2018*	PY19	PY20	PY21	PY22	PY23
1	Number of total applicants	30,241	25,277	22,749**	29,317***	30,783***	32,322***
2	Number of total eligible individuals	25,297	22,664	20,398**	25,070***	26,324***	27,640***
3	Agency implementing order of selection (Y/N)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
4	Number of individuals on order of selection waiting list at year-end	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
5	Percent of eligible individual with an IPE who received no services	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Number of individuals in plan receiving services	51,378	44,345	38,832**	49,492***	51,976***	54,565***

*FFY 2018 (FFY'18) the final RSA-113 report has been submitted. RSA has discontinued the RSA-113 report; therefore, there will not be an FFY' 19 iteration.

** It is not clear to VRD whether the decrease in numbers for PY19 will become normative or if they are atypical. Additionally, VRD cannot know what to expect after July 1, 2020. Consequently, the projected PY20 totals reflect lower totals accordingly.

*** VRD cannot reasonably anticipate whether the decrease in numbers experienced in PY19 and carrying into PY20 will have a similar impact on future PY data. Additionally, there are no solid precedents from which we can model given that we do not know what the continuing impact of COVID-19 may be nor do we know how quickly the job market will stabilize..

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

For VRD, a portion of federal funds allocated were used for Innovation and Expansion (I&E) activities, including but not limited to, the following strategic initiatives consistent with the requirements of the Rehabilitation Act.

Technology

VR customers were offered individualized technology-related to support and facilitate their participation in rehabilitation, education, and employment opportunities. Technology-related services also included assisting customers with transportation and independent living needs. As provided, assistive technology services can be described as ways in which a technology-based approach is used to maintain, increase, or improve the functional capabilities of individuals with disabilities as part of their rehabilitation process. Ensuring and supporting access to and use of appropriate assistive technology is essential for customers, employers, and community partners.

To help provide statewide support for assistive technology and vehicle modifications, the following strategies were used:

- Support from state office program specialists in the areas of vehicle modifications, workplace modifications, residential modifications, assistive hardware and software, and other assistive technologies.
- Continued access to assistive technology equipment through the device loan program
- The establishment of a State Office Assistive Technology (AT) team staffed by two PSARTs. The PSARTs maintain a selection of current commonly used AT for demonstrations, staff trainings, displays, and conferences. These items will periodically be refreshed to ensure that they are current. Additionally, the PSARTs are available to staff cases with counselors and demonstrate use of equipment through videos or Skype.
- The AT team is expanding staff capacity in assistive technology by training regional teams to become subject matter experts in AT. Additionally, each field unit has an AT specialist to assist counselors in determining the AT needs of their customers. By having more AT subject matter experts, VRD will ensure that appropriate equipment is purchased or loaned to customers. Access to research and information regarding new and emerging technologies.
- Development of teams of assistive technology subject matter experts and vehicle modification experts to help support the service delivery process throughout the state.
- Presentation of information by state office program specialists on relevant topics during monthly teleconferences to help share information with staff.
- Coordination of case staffing sessions to review and discuss individual needs related to assistive technology.
- Continued efforts to develop or enhance partnerships in the community that can help provide resources for customers, for example, the University of Texas' Texas Technology Access Program.

Diabetes Services

When customers seek VR services, diabetes is sometimes the underlying cause of the disability. Diabetes is often a contributing factor for customers with amputations, end stage renal disease, psychological disorders, cardiovascular disease, stroke, and hearing loss. Additionally, customers with a secondary condition of diabetes may comprise as much as 70 percent of blind services caseloads. Addressing the diabetes is necessary for the customer to receive the full benefit of medical services and to address potential job implications.

The diabetes program specialist provides training and consultation to VR counselors, other TWC staff, and diabetes educators on the physical and vocational implications of diabetes, its complications, and needed accommodations. Critical to a customer's success is an understanding of how diabetes impacts the ability to work (sick days, lost time, increased health care costs), and adaptive techniques and equipment to manage the disease.

Specifically, the diabetes program specialist delivers training on the impact of diabetes on businesses, and the functional and vocational implications of diabetes and its complications through internal training of staff and diabetes educators through the Diabetes Education Texas Confidence Builder training. The diabetes program specialist develops innovative ways to educate providers of diabetes education on the abilities of customers with disabilities to self-manage their diabetes, the adaptive techniques for, equipment and supplies, and the challenges of managing diabetes at work.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

TWC's VRD is committed to providing quality services to customers with the most significant disabilities, including youth between ages 14–24 with the most significant disabilities. VRD uses supported employment (SE) and supported self-employment services (SSE), which are outcome-based services.

VRD-supported employment (SE) offers competitive integrated employment in the community for customers with the most significant disabilities who need individualized assistance finding the most appropriate job match and require extended services, also known as long-term support within the work, community, and home environment, to maintain employment after VRD closes the VR case. Customers who benefit from VRD SE are those for whom traditional VR approaches have not been effective. Although customers in SE have the ability to compete in the open job market, they often require ongoing supports and assistance to learn how to interact with potential employers and perform job tasks and responsibilities. They also must require extended services (long-term support) not funded by VR to maintain long-term competitive integrated employment once VRD closes their case. Common resources that provide extended services for customers include nonprofits, as well as other county, state, and federal programs, as well as family and friends. Customers receiving VRD SE often have no or very limited work history in competitive integrated employment, have been excluded from community services through institutionalization, or have only participated in segregated work programs, such as enclaves, day habilitation programs funded by the Texas Health and Human Services Commission (HHSC).

VRD SE services offer the best possible match between customer skills, interests, abilities, support needs, and an employer's unmet needs. VRD uses the "place, then train" concept, a two-part process to describe SE. The first step is to place customers with the most significant disabilities into a competitive integrated job based on their preferences, interests, assets, and abilities, as identified during a community-based assessment and a SE planning meeting. The second step is to provide training and support to the customer directly related to the job and then coordinate and train the designated extended service providers, or natural supports, to ensure a smooth transition with no interruption in service delivery prior to VRD case closure.

Furthermore, 68 percent of respondents reported satisfaction with the quality of services from VR service providers. VRD works in partnership with public and private nonprofit organizations, employers, and other appropriate resources for extended supports (long-term supports) to meet a customer's individual needs that are necessary for the customer to maintain long-term competitive integrated employment obtained through SE. In PY'17, 23,372 participants with most significant disabilities received VRD services. Of these participants, 2,192 received VRD SE services during PY'17, with 582 exiting the VR program during PY'17. Of these, 582 exiting participants, 479 (82.30 percent) exited with a successful employment outcome. In PY'18, 23,665 participants with most significant disabilities received VRD services. Of these participants, 2,027 received VRD SE services during PY 18, with 511 exiting the VR program during PY 18. Of these 511 exiting participants, 418 (81.80%) exited successfully with an employment outcome.

To achieve a smooth transition from VR SE services to HHSC SE services (extended long-term supports and services), TWC collaborates with HHSC on each agency's responsibilities and timelines for the provision of services. VRD counselors are encouraged to invite HHSC providers and staff to plan meetings and maintain contact with the service coordinator, case manager, or other long-term support and services staff throughout the process. Additionally, VRD participated with HHSC in crafting the 1915(c) Medicaid home- and community-based waivers employment services definitions to ensure that the transition from VR to HHSC SE is as seamless as possible, without interruption in service delivery. With appropriate customer releases, HHSC shares the customer's individual-directed plan and plan of care with VRD, and VRD provides HHSC with the Individualized Plan for Employment. VRD will provide SE services for a period not to exceed 24 months. Extended services will be provided to youth with the most significant disabilities for a period not to exceed four years or when they reach 25 years of age; the extended services are provided by the designated state unit with the funds reserved under 34 C.F.R. §363.22 and §363.4(a)(2).

VRCs work with Employment Service Providers (ESPs) SE specialists, HHSC providers, or service coordinators/case managers, and customers' natural support networks to develop short- and long-term support strategies based on individual needs. This ensures the appropriate amount of support is available and provided so that employment can be maintained. Extended services, known in Texas as long-term support and services, can be publicly funded, "natural" or "in-kind," or paid by the customer through SSI, Social Security Disability Insurance (SSDI), or another Social Security Administration Title II work incentive program. Examples of extended services include, but are not limited to, consulting with a customer's job supervisor regarding areas of concern or training needs; creating supports and strategies to improve work performance through job coaching; providing assistance with medication management or hygiene; and identifying and training on transportation options. All HHSC waivers include employment services, and TWC and HHSC have a partnership focusing on training community providers and 1915(c) local authorities in employment services.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

SE cases remain open for a 90-day period after being identified as "stable," with stable defined as the customer:

- performing in a competitive, integrated job to the employer's satisfaction;
- satisfied with the job placement;
- having the necessary modifications and accommodations at the worksite;

- having reliable transportation to and from work; and
- having extended services in place and support needs met and working without intervention from SE or SSE providers.

Additionally, during the 90-day period between "Job Stability" and "Service Closure" for supported employment, ESPs do not provide services to customers.

In supported SE, "stability" is defined as:

- the business is in operation with all supports necessary to run the business for at least eight weeks; and
- the customer is working without support from the VRD-funded ESP.

The customer's business must operate for an additional 90-day period with no support from the SSE provider ESP to reach case closure.

If VRD SE or SSE providers provide direct services to customers between stability and closure of the service, another "stability" period must be achieved before final outcomes are achieved for service closure. Once customers successfully maintain stability with extended services from by non-VRD resources only, the VRD SE or SSE case is closed.

A customer's extended services are documented, including the identified extended service provider, for both SE and SSE services in the customer's Individualized Plan for Employment.

Collaboration with community organizations and other state and federal agencies to identify, develop, and implement cooperative agreements and partnerships is essential to achieving successful employment outcomes for customers, particularly those with the most significant disabilities.

TWC VRD identifies and makes arrangements, including entering into cooperative agreements with other state agencies and other appropriate entities, to assist in the provision of SE and SSE services. With respect to the provision of extended services, VRD makes arrangements with other public or nonprofit agencies or organizations within the state, employers, natural supports, and other entities.

Funding through WIOA Title VI and the Rehabilitation Act of 1973 §110, as amended, is available statewide to all VRCs to serve Texans with the most significant disabilities. At case closure, or at the end of any time-limited post-employment services, the services paid for by Title VI, Part B and/or §110 funds are terminated.

Additional potential funding sources include the Social Security Administration's Ticket to Work Program, HHSC programs (Mental Health, IDD, Medicaid including waivers), and Centers for Independent Living (CILs).

Additionally, HHSC is the operating authority for:

- the majority of 1915(c) state Home and Community-based Services (HCS) Medicaid waivers;
- 1915(k) Community First Choice;
- Title XX social services; and
- employment services provided through state general revenue funds.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) 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 WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Texas Workforce Commission Vocational Rehabilitation Division

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Texas Workforce Commission

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Cheryl Fuller

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Vocational Rehabilitation Division Director

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.

FOOTNOTES

[14] Public Law 113-128.
[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.
[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.
[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.
[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.
[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.
[20] Applicable regulations, in part, include the citations in footnote 6.

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	Cheryl Fuller
Title of Signatory	Vocational Rehabilitation Division Director
Date Signed	02/28/2020

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), 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:**

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) “is an independent State commission” (Yes/No)	No
3.b.(B) “has established a State Rehabilitation Council” (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR	No

The State Plan must include	Include
services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	

The State Plan must include	Include
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	

The State Plan must include	Include
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available

to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	12.2%	20.0%	18.3%	22.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

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.

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.)

Employment Opportunities for Older Workers

Employment opportunities for older workers (individuals 55 years of age and older) are closely tied to the long-term projections for jobs in industries and occupations previously discussed in the Plan's section on economic, workforce, and workforce development activities. The majority of employment opportunities for older workers in Texas involve office and administrative support, followed by healthcare, retail sales, and maintenance/custodial. Older workers in Texas also hold positions in the fields of community and social services, education and library, and food preparation and training. Although not abundant, positions do exist and are held by older workers in the construction, transportation, and production industries.

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))

Driven by rapid population growth and an aging baby-boomer population, long-term projections for Texas include increased demand for service-sector jobs, primarily in the fields of Leisure and Hospitality, Education, and Health Services. These three industries, in addition to Trade, Transportation, and Utilities, account for more than 55 percent of the jobs in Texas.

Training programs for SCSEP participants in Texas include computer literacy, including Microsoft Office, accounting, cash management, general office and clerical, customer service, time management, custodial, and safety. Training hours are tailored to particular employment opportunities, providing SCSEP participants the necessary skills for unsubsidized positions as customer service representative, general office clerks, accounting clerks, personal care attendants, medical assistants, home health aides, and custodians, all of which can be found in high-demand industries.

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))

Current and projected employment opportunities for industries in Texas include, but are not limited to, Healthcare and Social Assistance, Management, Accommodation and Food Services, Construction, and Administrative and Waste Services.

Within these industries, the need for customer service representatives and general office clerks has increased in the last five years, and this growth trend is expected to continue. Training

programs aligned with these occupations will ensure SCSEP participants in Texas are suited for available positions.

Mature labor force participants composed 17.3 percent of the Texas workforce in 2010. The proportion of the Texas population age 55 and older is projected to continue to increase and account for a greater percent of the workforce. Moreover, employers across Texas agree that their baby boomer workers (born 1946 to 1964) are remaining in the workforce. The trend reflects workers' decisions to postpone retirement because of fulfilling careers, longer lives, changing retirement plans and resources, or shrinking retiree health benefits. This trend has the potential to affect the workforce and the overall economy in numerous ways.

Education is a key aspect of a competitive workforce and the type of job opportunities that workers may pursue. Approximately 82.8 percent of the population over age 25 in Texas (23,765,128 individuals) had at least a high school diploma in 2017, and roughly 28.7 percent (8,237,430 individuals) had at least a bachelor's degree.

https://www.census.gov/quickfacts/fact/table/TX/EDU635217#EDU635217

Although recent trends indicate that many mature workers will need or simply want to remain in the workforce, many of these individuals may require help identifying transferable skills that lead to new career opportunities, as well as education and training to develop technical talent.

B. SERVICE DELIVERY AND COORDINATION

1. A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS. THIS MAY ALTERNATIVELY BE DISCUSSED IN THE STATE STRATEGIES SECTION OF THE STRATEGIC PLAN, BUT REGARDLESS OF PLACEMENT IN DOCUMENT, MUST INCLUDE:

A. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

<u>Coordination with Other Programs, Initiatives, and Entities</u>

Grantees will pursue both state- and local-level strategies to strengthen partnerships and working relationships in each of the categories below. TWC will:

- Seek Boards' cooperation in generating Older Worker Reports from WorkInTexas.com to facilitate participant recruitment by grantees' field coordinators;
- Encourage grantees and Boards to refine memoranda of understanding (MOUs) to specify roles and responsibilities for:
    - Outreach to employers;
    - Workforce services to seniors;
    - Case management services for coenrolled participants; and
    - Other joint efforts as appropriate;
- Encourage Boards to:
    - Coenroll seniors seeking full-time work under WIOA and/or other workforce programs, as appropriate; and

- Provide for the location of participant assistants at Workforce Solutions Offices when feasible, and train participant assistants as job developers to assist older job seekers; and
- Propose sessions on older worker issues and best practices at TWC's Annual Workforce Forum.

Grantees and Boards will:

- Provide information on and referrals to the services available at Workforce Solutions Offices;
- Negotiate community service assignments for senior participants at Workforce Solutions Offices, when feasible; and
- Negotiate for colocation of grantee staff at Workforce Solutions Offices when funding and office space is available.

Grantees will:

- List participant openings and staff openings in WorkInTexas.com;
- Assist job-ready participants to register online in WorkInTexas.com;
- Promote job seeker workshops and job clubs at Workforce Solutions Offices and, when feasible, Individual Employment Plans (IEPs) for participants; and
- Provide updates to Boards on SCSEP activities and successes in the local workforce development area (workforce area).

Boards will:

- Provide core workforce services to SCSEP participants and other older job seekers; and
- Provide current and future labor market information on industries, occupations, and required skill sets to older job seekers.

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))

Activities Carried Out under Other Titles of the Older Americans Act

Grantees will employ the following strategies to promote an ongoing dialogue and coordination with other providers serving seniors:

- Share information and resources relevant to senior health, support services, and older job seekers at Aging Texas Well Advisory Committee meetings;
- Explore opportunities for improving the quality of training and access to training for community-based direct service workers caring for individuals with disabilities;
- Attend the Area Agencies on Aging (AAAs) quarterly training meeting when feasible; and
- Contact regional specialists to schedule interpreters and other communication access services if assistance is needed for training and employment services with the deaf and hard of hearing.

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))

Public and Private Entities and Programs Serving Older Americans

TWC will share items of interest with grantees on the employment of individuals with disabilities and accessible technology. Grantees will:

- Use 2-1-1 Texas Referral and Information Network (TIRN) and other directories of service and support organizations to identify entities and programs in the community that refer and support seniors;
- Coordinate with local service providers, AAAs, and community stakeholders to assess needs and develop solutions for local transportation services;
- Participate in meetings, as appropriate, with senior service providers, both public and private; and
- Communicate and coordinate with members of the local disability community on activities, resources, and services for seniors with disabilities in the workforce area.

Grantees will:

- Continue to use computer, adult basic education (ABE), high school equivalency, continuing education, and other targeted training courses at community colleges, taking advantage of course discounts for individuals 55 to 64 years of age and free classes for individuals 65 years of age and older;
- Work with Boards to encourage community colleges to create short-term education and training programs that are relevant for local targeted industries and high-priority occupations; and
- Encourage community colleges to develop education and training programs relevant for older individuals' learning styles and pace; and continue two-way referrals to local VR programs.

D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

SCSEP grantees in Texas routinely work with Workforce Solutions Centers to review and analyze current market conditions and trends to ensure training programs for SCSEP participants are relevant to available opportunities. Additionally, SCSEP field coordinators network with for-profit employers at job fairs and other employment related events.

SCSEP grantees also seek connections with industry leaders to identify employment opportunities for older job seekers in local communities.

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)

Improve and Expand Grantee Communications

The state's size – 268,581 square miles – and travel costs limit regular face-to-face meetings. Grantees implement several strategies to increase and improve communication. TWC will schedule and facilitate grantee conference calls, as needed, to share information. Grantees will encourage field staff to connect with other field staff in the same workforce area and coordinate on efforts that strengthen partnerships with Boards and other local entities.

Other Education and Training Providers

SCSEP providers have promoted the American Association for Community Colleges' "50 Plus Initiative" through SSAI's SCSEP subgrantee network. The initiative is designed to help low-income, older job seekers with workforce training and in making career changes to high-demand fields through programs offered at community colleges. TWC seeks to enhance these efforts by:

- Sharing information with grantees on literacy, English as a Second Language (ESL), and high school equivalency resources developed by TWC's Adult Education and Literacy (AEL) Department; and
- Attending relevant meetings and conferences, when possible, to identify training and vocational rehabilitation (VR) resources for seniors.
- SSAI's subgrantee MET has connected with the One Stops in the 28 Texas workforce regions in its service territory to participate in the WIOA MOU process and determine IFA cost sharing.

F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Rural Local Economic Development Offices

The governor has designated TWC as the administrator of the state's portion of SCSEP in rural communities. Along with providing oversight and technical assistance, TWC manages statewide planning and coordination of the state's grant application and performance reporting. TWC also supports SCSEP outreach efforts, including those engaging local economic development offices. In Texas, rural development is led by the governor's Rural Development Initiative, which assists rural communities and small businesses in creating and retaining jobs through business development and community strategic planning. The following organizations are also committed to promoting rural development initiatives in Texas:

- Texas Rural Foundation, a nonprofit corporation established to raise money from public, private, corporate, and other sources to finance health, community development, and economic development programs in rural Texas; and
- Association of Rural Communities in Texas (ARCIT), a resource that promotes the policy of best practices in the delivery of public services to enhance the quality of life for all rural Texans.

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.)

Employer Outreach: SCSEP Staffing

SCSEP grantees in Texas network with employers and business and community organizations through local project directors. The American Association of Retired Persons (AARP) fosters job matching and senior-friendly work environments for its members through employment specialists at 10 project offices located across Texas. SER National appoints a national workforce development coordinator and regional coordinators to encourage employment of older workers. Additionally, Experience Works (EW) staff members reach out to employers to support recruitment of older workers.

Employers as Customers

Grantees commit to assisting both job seekers and employers by helping to vet aptitude and fit of individuals for job responsibilities. As part of this process, grantees identify the qualities possessed by many older job seekers that employers seek:

- Commitment to doing quality work;
- Strong customer service orientation;
- Getting along with other employees;
- Dependability in times of crisis;
- Ability to pass a drug test; and
- Consistent, reliable performance.

Once employers' needs are defined, staff is better able to promote the skills and competence of participants as trained workers who will add value to the business.

Grantees will:

- Pursue partnerships with employers that:
    - Are developing job openings requiring the same or similar skill requirements possessed by older participants;
    - Have successfully employed participants;
    - Are listed on AARP's National Employer Team, which is committed to hiring seniors;
    - Are seeking older participants, based on the local wisdom of Boards, business organizations, and others in the community; or
    - Are identified in online labor market information as major employers in local industries with the greatest employment potential for participants;
- Publicize the success stories of former participants and their employers, thereby attracting other employers to consider hiring older job seekers; and
- Attend chamber of commerce and Board meetings and other economic development organizations to:
    - Expand employer networks;
    - Learn about job opportunities from employers; and

- Contact employers to determine the skills and qualities needed to be successful in these jobs.

3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))

In Texas, service to minority older workers at the local levels is based on a long-term strategy.

Grantees will:

- Monitor and share statewide and grantee-specific minority enrollment data and factors/barriers impacting minority recruitment;
- Use Texas grantees' conference calls to share statewide and grantee-specific factors impacting minority recruitment, share best practices, and brainstorm solutions to address recruitment/enrollment challenges;
- Ensure that field staff members are aware of the increasing proportion of Hispanic and Asian seniors in Texas;
- Analyze enrollment targets and geographic areas where performance is strong and where improvement is needed;
- Identify factors contributing to minority enrollment strengths and factors impeding minority enrollments;
- Share best practices for minority recruitment and provide technical assistance to grantee's Texas field staff;
- Target outreach to specific underserved minority groups in counties where they are a larger proportion of the SCSEP-eligible population in the grantee's service area; and
- Where Hispanic enrollments are low, ensure that recruitment materials are in Spanish and consider hiring bilingual, Spanish-speaking participant staff.

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)

Of the twenty-eight (28) Workforce Development Board Areas (Boards) in Texas, sixteen (16) include at least one county experiencing persistent levels of unemployment. This demographic contributes to the reliance upon supportive services by most-in-need SCSEP participants residing in these areas.

Persistent unemployment and supportive services needs are most heavily concentrated among the neighboring Workforce Development Board Areas along the Texas-Louisiana border and Gulf Coast, and in South Texas and the Rio Grande Valley. The eastern portion of the state fair better in terms of poverty levels, averaging 16.6% among the North East, East, Deep East, South East, and Gulf Coast Board Areas, while the Coastal Bend, Cameron, Middle Rio Grande and Lower Rio Grande Board Areas experience a much higher poverty rate of 26.7%. Middle Rio Grande is especially hard hit, with 44% of its area affected by persistent unemployment and a poverty rate of 22%. Pockets of persistent unemployment and poverty exist through the state, including Presidio and Hudspeth counties in West Texas, with poverty levels of 22.4% and 17.8%, respectively. Mitchell County, located in the South Plains region of the state experiences

poverty levels of 21.4%, while Hall and Floyd counties in the Panhandle average poverty levels of 22.6%. Jones County, an outlier in the West Central Board area, has a poverty rate of 22%.

Texas develops statewide data on priority community needs from data collected by two state agencies:

- Texas Health and Human Services Commission (HHSC) – needs requested by callers to the state's 2-1-1 TIRN system for each of the twenty-five (25) Area Information Centers; and
- Texas Department of Housing and Community Affairs (TDHCA) – priority needs identified by thirty-five (35) Community Services Block Grant (CSBG) entities as part of their annual plans

The table below summarizes the needs most commonly requested to the 2-1-1 TIRN system, including assistance with paying utility bills and rent; food assistance through the Supplemental Nutrition Assistance Program (SNAP), food pantries, and organizations operating food voucher systems; and Medicaid assistance. Priority needs will vary with the workforce area. The Concho Valley workforce area, for example, had many requests for low-cost or free dental care, homeless shelters, and community clinics. For the Cameron County and Lower Rio Grande Valley workforce areas, Temporary Assistance for Needy Families (TANF) applications and Medicare savings were frequently requested.

Priority Needs Based on Requests Received by 2-1-1 TIRN Area Information Centers (AICs)

Type of Need	No. of AICs Listing as Priority 1-5 Need	No. of AICs Listing as Priority 6-10 Need
Utility Bill Assistance	25	0
Food Stamps	18	2
Food Pantries/Food Vouchers	17	6
Rent Payment Assistance	17	7
Medicaid	11	4
Tax Preparation	4	7
Dental Care	2	8
Housing Authorities	2	5
Prescription Expense Assistance	2	4
TANF Applications	2	2
Money for Gasoline	2	0
Community Clinics	1	10
Homeless Shelters	1	8
Low-Income, Subsidized Rental Housing	1	3
Adult Protective Services	1	1

Type of Need	No. of AICs Listing as Priority 1-5 Need	No. of AICs Listing as Priority 6-10 Need
Adult State/Local Health Insurance	1	1
Medicare Savings Program	1	1
Special Needs Registries	1	1
Weatherization Programs	1	0
Tiers Transfer	1	0
Information and Referral	1	0
Benefits Assistance	1	0
Clothing	1	0
Holiday Gifts/Toys	0	7
Medical Transportation	0	6
Child Care Subsidies	0	3
Medicare	0	2
Job Assistance Center	0	2
Women, Infants, and Children	0	2
Legal Aid	0	2
Immunizations	0	2
Municipal Police	0	1
Fans and Air Conditioners	0	1
Community Shelter	0	1
Physician Referrals	0	1
SSDI Applications	0	1
Social Security Numbers	0	1
Section 8 Housing Voucher	0	1
Family Planning	0	1

CSBG priorities are listed in the following table. These include housing, employment assistance, health care, utility bill assistance, adult education and training, transportation, and food assistance. Housing authorities, Workforce Solutions Offices, public and nonprofit clinics, high school equivalency and job training programs, food pantries and food voucher programs, and organizations providing assistance with paying utility bills and providing low- or no-cost transportation are all good candidates for needed community services. Each entity has additional priority needs that vary from area to area.

Priority Needs Identified by Community Services Block Grant Entities

Type of Need	2019 SCSEP Survey Rank
Lack of safe and affordable housing	1
Lack of living wage jobs	2
Lack of employment skills to gain living wage jobs	3
Assistance to meet basic needs (rent, utilities)	4
Lack of Education (including basic education)	5
Lack of affordable health care / lack of insurance / RX assistance	6
Food / lack of nutrition / lack of healthy food	7
Lack of transportation	8
Lack of employment	9
Assistance to connect to available resources / lack of coordination of services	10
Lack of life skills (ex. budgeting, healthy lifestyle)	11
Lack of affordable childcare	12
Home repair assistance and assistance to make homes more energy efficient	13
Healthcare assistance	14
Lack of mental health services or substance abuse services	15
Assistance to become self-sufficient	16
Assistance with childcare	17
Lack of resources for elderly, disabled, and special populations	18
Lack of dental services	19
Lack of civic engagement	20
Lack of youth activities and lack of recreational activities	21

AAAs' priority needs for seniors, listed below, include transportation, home–delivered meals, legal assistance, congregate meals, coordination of care, information referral, and in–home respite care for caregivers. Additional host agencies could be recruited from public and nonprofit entities that are providing these services or are seeking human resources to provide these services.

TWC will share with each grantee the needs identified by the 2-1-1 TIRN entities, CSBGs, and AAAs in the grantee's service area. Grantees will also continue to gather input from local government officials and informal networks with colleagues in local organizations and agencies.

Priority Needs of Seniors Identified by Area Agencies on Aging

Type of Need	2019 Texas CSBG Survey Ranking
Transportation	1
Medical and Dental	2
Food	3
Equipment (work/office)	4
Computer Classes	5
Clothing	6
Basic Literacy Classes	7
GED Classes	8
English as a Second Language Classes	9
Other	10

Identifying Organizations and Entities Addressing Priority Needs

Community resource guides in hard copy and online, including the 2-1-1 TIRN website, are a starting point for grantees to identify agencies and organizations that address priority needs. One promising online resource, Texas Connector, is a statewide online database developed by the OneStar Foundation. The database includes 2-1-1 TIRN resources and GuideStar, USA, Inc., information on nonprofit organizations in Texas. Texas Connector is unique because its mapping tool allows users to:

- Outline an area on an online map – a neighborhood, a county, or cluster of counties;
- Map all the entities and organizations providing services in the outlined area;
- Access basic demographic information about the area;
- Map where specific resources such as food banks or health clinics are located; and
- Print a report with the selected information.

Texas Connector locates support resources and identifies potential host agencies that address the community's priority needs and may assist with recruiting participants.

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))

The goal of SCSEP in Texas is to serve eligible participants through training opportunities that both improve or build skill levels for available jobs in the community. The long-term goal is to ensure that the job matching is appropriate for both the employer and older worker so that the relationship will be retained and benefit the employer, the older worker, and the state's economy. Partnerships for integrating services are crucial to these strategies. The SCSEP service provider's success is measured by its attainment of negotiated goals for serving the older worker population, increases in services within the network of nonprofits and public agencies

within communities, and cultivation of skilled workers for employers. TWC reviews performance results and offers assistance and training in areas needing improvement.

The state is committed to serve all eligible participants, including minorities. SCSEP will strive to improve outreach efforts and services for this population. Recommendations include the following:

- Help SCSEP participants attain the skills to better fill employment needs;
- Work with and expand nonprofit agencies' efforts to provide meaningful community service;
- Texas grantees will increase the frequency of formal collaboration among each other to:
    - Problem solve and evaluate alternative solutions to issues;
    - Share best practices and performance progress;
    - Plan and coordinate collaborative activities; and
    - Explore areas for collaboration likely to improve or enhance SCSEP services in the state.
- Work with businesses and nonprofit agencies to develop training assignments in which today's skills are learned on-the-job, resulting in unsubsidized employment;
- Assist the business community in attracting, employing, and retaining older workers;
- Continue to actively partner with Boards;
- Expand referrals to HHSC;
- Place emphasis on creative partnerships with groups that advocate and provide services to veterans and individuals with disabilities; and
- Expand relationships with chambers of commerce.

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))

The state's strategy for continuous improvement in the level of SCSEP participants' placements into unsubsidized employment focuses on fostering a multitalented workforce.

The technical and occupational skills of many SCSEP participants often lag behind today's employment requirements. Qualities offered by the older worker, such as work ethic and reliability, are valued by employers, but the need for technical skills is also a concern. Training and retraining of SCSEP participants is designed to help their employability.

SCSEP service providers seek to gather input from the business community, community leaders, host agency supervisors, the participants themselves, and local government officials about the job skill needs within their organizations and community. This effort includes networking at chamber of commerce events and other business organizations' functions. The information gathered enables development of meaningful training opportunities for older workers and suitable matches for unsubsidized work.

Recommendations include the following:

- Place SCSEP "graduates" in industries and occupations with high growth or substantial employment need;
- Research labor market information and consult with Boards and their contractors, economic development agencies, chambers of commerce, and local business partners to identify targeted industries and high-growth occupations appropriate for seniors, local employers that are hiring, and skills and qualities needed to be successful in these jobs;
- Strengthen initial assessments of participant skills, knowledge, interests, aptitudes, and qualities, and define career objectives that are relevant for the participant's interests and abilities and local business needs;
- Assess the participant's barriers and skills gaps to create IEPs with timelines for OJE, specialized training, and support services;
- Ensure host agency assignments provide skills training that is relevant for participant career objectives and employer needs;
- Develop effective relationships with participants and monitor their training progress so grantees can gauge when participants are ready to start looking for employment and intervene or revise IEPs;
- Promote a motivated attitude through counseling and monitoring participants;
- Coordinate with Workforce Solutions Offices to provide effective job search preparation and support;
- Require participants to register with a Workforce Solutions Office and with WorkInTexas.com;
- Follow up frequently with participants in on-the-job experience arrangements to ensure that participants have the skills, confidence, and qualities to be successful in the job;
- Intervene early, as needed, to resolve any obstacles to successful employment; and
- Respect participants' right of refusal of a job when they feel unprepared or unsuited for the job.

<u>Grantees will implement the following strategies:</u>

- Continue to remind participants and host agencies during initial orientations and throughout participants' SCSEP tenure that SCSEP is a temporary training program, not an employment program.
- Encourage participants to take advantage of online advice to older job seekers, such as AARP.org, Monster.com, and Quintscareer.com.

Additionally, TWC provides online resources developed by its Labor Market and Career Information Department:

- Texas Career Alternatives Resource Evaluation System (Texas CARES) (http://www.texascaresonline.com); and

- Texas WorkPrep Learning Management System (http://www.texasworkprep.com/texasworkprep.htm), which includes these online courses: Texas Job Hunter's Guide, Succeed at Work, and Your Next Job

Specialized Training Plans

- Pursue low- or no-cost computer training for participants before they report to their community service assignments or early in their assignments. Free or low-cost training is often available at libraries, Workforce Solutions Offices, school districts' community education programs, Goodwill, and community colleges. AARP's Virtual Career Network (VCN) - SCSEP Checklist and EW's *JobReady* provide skills and knowledge training for a variety of occupations, software training that crosses most industries, and testing and certification for skills learned;
- Pursue agreements with local employers for on-the-job experience;
- Pursue specialized training opportunities in which a job opening is not required by employers. Participants attend training for potential placement;
- Pursue certificate training opportunities for high-growth occupations and industries. For example, teacher assistant classroom training followed by six-week internships leading to a certificate and employment offer from a local school district; and
- Identify relevant curricula for short-term training that is free or low-cost, and encourage local training providers, such as community colleges, to offer training in these areas.

Pursue or provide transferable workplace skills training. For example, SER National provides 30 hours of training for participants who are close to being job ready but who need a little more self-assurance and motivation. Community colleges and Workforce Solutions Offices will be encouraged to offer more transferable workplace skills courses.

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))

Rural Areas

An estimated 19.4 percent of the state's SCSEP-eligible population is rural. SCSEP's definition of *rural* is based on Rural Urban Commuting Area (RUCA) codes, defined at the census tract level. Four workforce areas (Northeast Texas, West Central Texas, Deep East Texas, and Golden Crescent) are mostly rural. One workforce area, Middle Rio Grande, is 100 percent rural. Seventy-seven counties, or almost one-third of the state's counties, have 75 percent or more rural populations. Fifty-eight counties have 100 percent rural populations. At the opposite end of the spectrum, the populations in three one-county workforce areas (Tarrant County, Greater Dallas, and Capital Area) are 100 percent urban.

Strategies to Address Rural Service Delivery Challenges

The sheer size of Texas –268,581 square miles– makes rural areas a particularly significant challenge to service providers. The state's widest east-west expanse is 801 miles, and the maximum north-south distance is 773 miles. The extent of the state's rural areas is also underscored by the fact that 95.7 percent of the state's land area is rural.

Grantees' greatest obstacles to providing SCSEP services in rural areas and assisting participants in finding unsubsidized jobs are all related to shortages of resources, services, and jobs, particularly in more isolated areas.

Urban/Rural Distribution of SCSEP-Eligible Population in Workforce Areas

Workforce Area	Urban	Rural	Total	% Rural
Alamo	70,351	6,298	76,649	8.2%
Brazos Valley	5,799	3,056	8,855	34.5%
Cameron County	25,060	1,190	26,250	4.5%
Capital Area	20,219	0	20,219	0.0%
Central Texas	9,573	2,647	12,220	21.7%
Coastal Bend	21,157	13,930	35,087	39.7%
Concho Valley	4,731	1,914	6,645	28.8%
Dallas	65,354	0	65,354	0.0%
Deep East Texas	4,622	14,201	18,823	75.4%
East Texas	19,836	15,186	35,022	43.4%
Golden Crescent	3,869	4,106	7,975	51.5%
Gulf Coast	150,465	11,288	161,753	7.0%
Heart of Texas	10,315	3,508	13,823	25.4%
Lower Rio Grande	43,225	0	43,225	0.0%
Middle Rio Grande	0	12,534	12,534	100.0%
North Central	29,620	13,614	43,234	31.5%
North East Texas	4,343	9,038	13,381	67.5%
North Texas	4,855	2,835	7,690	36.9%
Panhandle	7,688	6,842	14,530	47.1%
Permian Basin	8,559	7,274	15,833	45.9%
Rural Capital Area	13,559	4,312	17,871	24.1%
South Plains	9,179	5,770	14,949	38.6%
South Texas	11,254	5,915	17,169	34.5%
Southeast Texas	15,241	0	15,241	0.0%
Tarrant	42,573	0	42,573	0.0%
Texoma	5,075	2,431	7,506	32.4%

Workforce Area	Urban	Rural	Total	% Rural
Upper Rio Grande/ Borderplex	43,661	1,148	44,809	2.6%
West Central Texas	5,160	8,622	13,782	62.6%

Lack of Adequate Transportation

Lack of adequate transportation significantly hinders SCSEP service delivery in rural areas. In its annual plans, AAAs identified transportation as the number–one priority need for seniors. The minimal transportation available in small towns is on-demand assistance geared toward individuals with disabilities and transporting individuals to medical appointments. Although most SCSEP participants drive their own cars, for those who do not have cars or are no longer able to drive, the lack of transportation poses a significant barrier to SCSEP participation and to finding and retaining unsubsidized employment.

To address rural transportation needs, grantees will:

- Seek to place participants and rotate participants in community service assignments as close as possible to their residences;
- Seek host agency assignments that have transportation resources (faith–based organizations providing community services may be able to serve as host agencies and provide transportation);
- Contact school districts and child care networks/facilities to determine in which rural areas the school bus is a feasible transportation alternative for SCSEP participants;
- Become more knowledgeable about state and local transportation planning processes and how to quantify and accurately characterize transportation needs of older individuals, including older job seekers and older workers; and
- Work with Boards to identify any existing collaborations with rural community transportation providers and planners to address local transportation needs.

Limited Access to Computers

A second resource in short supply that hinders rural SCSEP services is access to computers and the Internet. Low-income older job seekers often have limited or no computer skills. These skills are not only required by employers but important for participants to access the Internet, register in WorkInTexas.com and other online job search databases, and develop Internet search skills. Grantees' field staff members, including participant staff, need access to computers for data collection and communications in a state with such extensive rural areas. Improving access to computers in rural areas will increase the amount of computer and online training available for participants. To address rural technology needs, grantees will contact local businesses, governmental agencies, public libraries, and community- and faith-based organizations regarding ongoing computer and Internet access for participants.

Limited Host Agencies

Many rural areas have few nonprofit organizations and governmental agencies to serve as host agencies for participants. Limited rural transportation options compound the challenges of identifying a sufficient number of host agencies and organizations with diverse skills training

opportunities. More host agencies are needed that can provide general office skills training, computer skills training, and job-specific skills training.

To increase the number of rural host agencies and the diversity of skills training opportunities for participants, grantees will:

- Contact chambers of commerce and faith-based and community-based organizations to identify more potential host agencies;
- Use Texas Connector to identify nonprofit organizations and agencies addressing priority community needs that might serve as host agencies; and
- Work with local agencies and seek community partners to address local transportation solutions to increase the mobility of participants and their access to host agencies.

Lack of Specialized Skills Training

Rural communities often lack opportunities for skills training to supplement participants' OJE service assignments. Increasing access to laptops, desktop computers and iPads coupled with online training is a top priority for most SCSEP grantees in rural areas of Texas. As of October 1, 2015, AARP Foundation uses the VCN – SCSEP Checklist, developed in partnership with the U.S. Department of Labor, and the American Association of Community Colleges (AACC). EW hosts the *JobReady* tool. Both tools offer a variety of online assessments, skills training, and certificates to measure competency levels for training in such fields as health care, sales, customer service, food service, child care, and hospitality. In some workforce areas, occupational demand exists in landscaping services, alternative fuel production, and unarmed security areas.

SER National has used several contractors to provide participants with specialized skills training and certificates of completion on a variety of topics and skill areas, including financial literacy in English and Spanish, entrepreneurship, food service, clerical skills, customer service, vocational English, intensive job search, assessing career options, and job-readiness training. Additionally, a SER National contractor has provided rural participants with mobile computer training.

To expand opportunities for participants' specialized training, grantees will:

- Explore all formats and technologies for low-cost additional training in the most important skills areas identified by local employers;
- Work with local community colleges and Workforce Solutions Offices to expand low- or no-cost skills training tailored to local employers' skill needs when appropriate; and
- Seek opportunities with local employers to access low- or no-cost, short-term skills training that is appropriate for seniors and the local job market.

When an employer does not have an immediate job opening, participants can attend specialized training for high-growth occupations so that when the opportunity arises, participants will have the requisite skills. For example, AARP Foundation SCSEP has trained participants in electronic health records and currently pilots a dual-occupation certification program with MedCerts for participant placement as a Certified Medical Administrative Assistant and Pharmacy Technician. AARP Foundation's Edinburg office has established a specialized skill training partnership with Holiday Inn Express that includes customer hospitality and front desk clerk exposure. The goal is to identify and employ participants at the Edinburg and McAllen, Texas Holiday Express Inn

locations. The AARP Foundation San Antonio Office has developed partnerships with The Alamo, Lackland Air Force Base, Medina Janitorial Services, and Senior Helpers.

Lack of Basic Skills Training

An additional resource that is lacking in most rural areas is basic skills training. Many rural seniors have less than a ninth-grade education and need to improve their language and mathematics skills.

In May 2013, the governor signed Senate Bill (SB) 307, 83rd Texas Legislature, Regular Session (2013), which transferred responsibility for adult education from the Texas Education Agency (TEA) to TWC. A competitive procurement process was used to select AEL providers in 2014. TWC shares links to online directories of AEL providers and relevant Internet links with grantees. To develop more opportunities for basic skills training, grantees will:

- Contact AEL providers to identify existing basic skills training opportunities in their workforce areas; and
- Use software and online sources to access basic skills training. AARP Foundation's VCN and EW's JobReady provide some basic skills training.

Lack of Jobs

The lack of jobs in rural areas makes it more difficult for grantees to help participants, even those who are "job ready,", obtain unsubsidized jobs.

To expand rural participants' job opportunities, grantees will:

- Explore the feasibility of self-employment with participants, and consult with Workforce Solutions Offices, the Small Business Administration, Senior Core of Retired Executives, and other organizations about the most promising types of microenterprise businesses in the workforce area, assessment of an individual's suitability for self-employment, available local and online resources-including mentoring support-and other feasibility considerations; and
- Share results, challenges, ideas, and opportunities during grantee conference calls.

Special Populations

Focusing on Special Populations

Grantees work with local agencies to target recruitment activities in underserved areas and in areas of higher concentrations of minorities and most-in-need populations. Targeted recruitment efforts are based on census data, local and state demographic data, and Texas population and aging statistics.

Grantees monitor enrollment levels of most-in-need populations at least quarterly. Field staff members are trained to profile and manage their territories, so they are able to track and plan for exits, plan for adequate recruitment activity to fill vacancies quickly, and seek to ensure that special populations are adequately served.

Recruitment Methods for Special Population Groups

Grantees often need to go beyond traditional recruitment methods to connect with and enroll individuals from special population groups. General outreach strategies for special populations include:

- Networking with and providing recruitment brochures to community- and faith-based organizations that serve and advocate for these special population groups; and
- Visiting locations and displaying recruitment brochures and flyers where priority populations may congregate, such as laundries, senior centers, nutrition centers, health clinics, and other health care providers.

In addition to general outreach methods for special populations, grantees use the following recruitment methods to reach specific populations:

- Veterans and qualified spouses
    - Networking with local veteran representatives at Workforce Solutions Offices, county judges, senior centers, AAAs, and HHSC; and
    - Contacting and making presentations to local veterans' organizations, veteran medical clinics, and other veteran-related organizations in the community.
- Individuals with disabilities
    - Networking with TWC, HHSC, SSA, and AAAs;
    - Contacting disability navigators or former disability navigators at Workforce Solutions Offices to identify local disability advocates and relevant community organizations serving or supporting individuals with disabilities; and
    - Contacting TWC VR Centers for Independent Living (located in 27 Texas cities).
- Individuals who are age-eligible but not receiving benefits under SSA Title II – Contacting SSA, HHSC, and Workforce Solutions Offices to identify these individuals.
- Individuals in areas with persistent unemployment and limited employment prospects– Conducting outreach in counties classified as having persistent unemployment: Willacy, Hidalgo, Starr, Maverick, Zavala, and Presidio, along the Rio Grande; Jasper, Newton, and Sabine in southeast Texas; Matagorda on the Gulf Coast; and Morris in northeast Texas.
- Individuals who are English – language learners (ELLs)
    - Advertising through local media, including Spanish-language newspapers and radio stations;
    - Networking with local churches, Hispanic/Latino chambers of commerce, restaurants and other businesses that cater to the Hispanic/Latino community, and other Hispanic/Latino or ethnic community organizations;
    - Hiring staff members who speak Spanish or Asian languages to conduct outreach directly; and
    - Translating recruitment materials into Spanish or Asian languages.
- Individuals with low literacy skills – Networking with adult literacy providers, community leaders, churches, and other community organizations.
- Individuals who live in rural areas – Using word of mouth through community leaders and community networks, including current and former participants and host agencies.
- Individuals with low employment prospects

    - Contacting Workforce Solutions Offices, veterans' organizations, and other community organizations;
    - Visiting community centers; and
    - Networking with safety net organizations like food banks.
- Individuals who used WIA or WIOA services but failed to find jobs – Contacting Workforce Solutions Offices to identify and reach out to these individuals
- Individuals who are homeless or at risk of homelessness – Networking with local homeless shelters, homeless coalitions, housing authorities, food banks, churches, and Workforce Solutions Offices
- Individuals with incomes at or below poverty.
    - Networking with SSA, HHSC, Workforce Solutions Offices, and AAAs; and
    - Contacting churches, food banks, thrift shops, and local housing authorities.
- Individuals who are socially, geographically, linguistically, or culturally isolated and at risk of not being able to live:
    - Seeking referrals through HHSC, TWC, SSA, and Workforce Solutions Offices;
    - Networking with Meals on Wheels programs for seniors, churches, and local community organizations to identify and connect with these individuals; and
    - Talking with roadside business owners in geographically isolated areas to identify where potentially eligible seniors live.
- Individuals who are minorities:
    - Using recruitment methods listed for individuals who are ELLs
    - Networking with ministers and leaders at churches with predominantly minority congregations;
    - Making presentations at minority agencies, community centers, and chambers of commerce serving minority communities;
    - Visiting food banks, restaurants, senior centers, and other organizations in minority neighborhoods; and
    - Networking with HHSC, SSA, AAAs, and Workforce Solutions Offices.

2. LIST THE CITIES AND COUNTIES WHERE THE PROJECT WILL BE CONDUCTED. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

The chart below identifies the counties in which SCSEP is administered by TWC and includes the number of SCSEP authorized positions and changes from the prior year.

Texas SCSEP PY'18 List of Counties and Authorized Positions

Texas	County	Authorized Positions	Current Enrollments	Authorized Positions + / - Change from Previous Year
48003	Andrews	0	0	(2)
48007	Aransas	4	4	(1)
48009	Archer	0	1	(1)
48013	Atascosa	5	1	(3)
48015	Austin	3	0	0
48019	Bandera	3	0	0
48023	Baylor	0	0	(1)
48025	Bee	4	7	0
48027	Bell	20	19	2
48035	Bosque	3	1	0
48039	Brazoria	20	14	(1)
48041	Brazos	10	5	2
48043	Brewster	0	0	(2)
48047	Brooks	2	4	(1)
48049	Brown	5	8	(1)
48057	Calhoun	2	0	(1)
48063	Camp	0	0	(2)
48073	Cherokee	7	17	0
48077	Clay	2	0	0
48089	Colorado	3	0	(1)
48091	Comal	9	11	0
48109	Culberson	0	0	(1)
48123	DeWitt	3	2	0
48131	Duval	3	6	0
48135	Ector	12	10	(4)
48157	Fort Bend	28	42	3
48163	Frio	3	1	(1)
48171	Gillespie	3	0	0
48175	Goliad	1	2	0
48177	Gonzales	3	1	0

Texas	County	Authorized Positions	Current Enrollments	Authorized Positions + / - Change from Previous Year
48183	Gregg	11	13	(3)
48185	Grimes	4	2	1
48187	Guadalupe	9	8	(1)
48203	Harrison	8	14	0
48221	Hood	5	7	0
48229	Hudspeth	1	0	0
48237	Jack	1	0	0
48239	Jackson	2	1	0
48247	Jim Hogg	1	4	0
48249	Jim Wells	6	4	(1)
48255	Karnes	2	2	0
48259	Kendall	2	0	0
48265	Kerr	7	2	0
48271	Kinney	0	2	(1)
48273	Kleberg	4	3	0
48275	Knox	1	1	0
48283	La Salle	1	0	(1)
48285	Lavaca	3	1	0
48289	Leon	2	1	(1)
48293	Limestone	3	2	0
48297	Live Oak	2	0	0
48309	McLennan	22	21	6
48313	Madison	1	0	(1)
48315	Marion	2	2	(2)
48321	Matagorda	6	13	0
48323	Maverick	10	22	(3)
48325	Medina	5	2	(1)
48329	Midland	9	8	(2)
48347	Nacogdoches	6	11	(2)

Texas	County	Authorized Positions	Current Enrollments	Authorized Positions + / - Change from Previous Year
48365	Panola	2	1	(2)
48371	Pecos	2	0	(1)
48377	Presidio	2	5	0
48379	Rains	2	1	0
48385	Real	1	1	0
48389	Reeves	2	0	(1)
48391	Refugio	1	1	0
48395	Robertson	2	0	(1)
48401	Rusk	5	6	(2)
48409	San Patricio	7	8	(2)
48419	Shelby	3	4	(1)
48423	Smith	21	20	3
48427	Starr	13	11	(3)
48457	Tyler	4	2	4
48459	Upshur	5	1	1
48461	Upton	0	0	(1)
48463	Uvalde	5	12	0
48467	Van Zandt	7	7	(1)
48469	Victoria	8	9	(1)
48471	Walker	0	1	0
48473	Waller	4	0	1
48475	Ward	2	2	0
48477	Washington	4	4	(1)
48481	Wharton	5	10	(2)
48485	Wichita	12	21	0
48487	Wilbarger	2	2	0
48489	Willacy	5	7	(3)
48491	Williamson	18	5	2
48493	Wilson	4	1	0
48495	Winkler	1	1	0

Texas	County	Authorized Positions	Current Enrollments	Authorized Positions + / - Change from Previous Year
48499	Wood	5	6	(1)
48505	Zapata	2	4	(1)
48507	Zavala	3	4	0
TOTAL		453	459	(41)

Equitable Distribution

The number of DOL-authorized SCSEP positions by county is based on the ratio of eligible individuals in each county to the total eligible population in the state.

Current Distribution

The following table provides the number of counties that are underserved and overserved, both statewide and for each county. Texas defines significant variance as both over +/– 10 percent variance and more than +/– three positions variance.

Summary of Counties with Variances in PY'18 Quarter 3

Grantee	Number of Counties	Percent of All Counties with Authorized Positions (232)	Average Percentage of Variance
Underserved Statewide	110		
AARP Foundation	14	46.7%	8.3%
Institute for Indian Development	2	66.7%	71.4%
SER – Jobs for Progress National, Inc.	4	57.1%	13.0%
Senior Service America, Inc.	49	57.2%	48.0%
State Grantee	41	47.7%	53.8%
Overserved Statewide	73		
AARP Foundation	12	40.0%	21.2%
Institute for Indian Development	1	33.3%	5.6%
SER – Jobs for Progress National, Inc.	28	30.1%	87.6%
Senior Service America, Inc.	3	42.9%	43.1%
State Grantee	29	33.7%	59.0%

Combined Total Under- and Overserved Counties in PY'18 Quarter 3

Grantee	Number of Counties	Percent of All Counties with Authorized Positions (232)	Average Percentage of Variance
Under- and Overserved Statewide	183		
AARP Foundation	26	86.7%	10.3%
Institute for Indian Development	3	100%	34.4%
SER – Jobs for Progress National, Inc.	7	100%	18.6%
Senior Service America, Inc.	77	82.4%	53.3%
State Grantee	70	81.4%	49.4%

3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

Counties are underserved because of the following issues:

State Grantee:

- Difficulty in reaching income-eligible individuals who are both physically able and seeking work.

AARP Foundation

High turnover of participants in urban areas due to exits for employment:

Currently Texas has a total variance of 11.9 percent based on 2nd quarter data. This is a decrease of 0.5 percent from 1st quarter. It should be noted that the state of Texas has the 2nd lowest variance rate of all the states that AARP Foundation currently serves. While Bastrop, Hays, Fayette, Kimble, and Ellis Counties show significant variance percentage their actual participant slot variance is collectively negligible. These more rural areas will be targeted for enhanced program marketing efforts to attract more participants to the program. In contrast, Bexar County continues to decrease enrollment through placement activity.

SER-Jobs for Progress, Inc.

Durational limit waivers ended, resulting in increased participant exits.

Senior Service America, Inc.

In their PY'18 equitable distribution report for Q3 to the U.S. DOL, SSAI reported the following counties as underserved and attributed the under service to the fact that its TX subgrantee, MET, Inc., has undergone significant staff restructuring this year. To address the inequity, SSAI HQ staff conducted an in-service with MET's SCSEP Director on equitable distribution. Following the in-service, MET staff are now focused on enrolling in the counties that are under 100 percent of service level enrollment in terms of their ED status, such as Wise, Liberty, Kaufman, and Eastland, as well as those that are under enrolled generally, such as Collin, Denton, and Lubbock for example.

County	# of participants served since July 1	% of slots served	Variance b/s # served for year and # of slots
Eastland	1	25%	-3
Kaufman	6	67%	-2
Liberty	6	67%	-2
Wise	2	20%	-3

SCSEP grantees in Texas overserved counties for the following reasons:

- State grantee (Experience Works) – Used over-enrollment to compensate for counties in which recruitment of income-eligible individuals is difficult;
- SER-Jobs for Progress, Inc. – Jefferson and McLennan have few authorized positions, so over-enrollment is more likely; and
- Senior Service America, Inc. – With regard to counties that have meet or exceed 100 percent of enrollment this year and are still above the current number of slots, SSAI has focused the staff of its TX subgrantee, MET, on exiting participants into unsubsidized employment in these counties, such as Potter, Polk, and Parker.

In Texas, there are twenty-one (21) significantly underserved counties and nineteen (19) significantly overserved counties. The state's goal is to maximize the number of counties and workforce areas with zero balance, in which the number of participants in a county equals the number of authorized positions in the county. Any proposed exchange of positions and counties will be submitted to DOL for approval.

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.

To address under enrollment, grantees will:

- Focus on and schedule time for community networking and recruitment in underserved counties;
- Locate participant staff in rural areas where recruitment is more challenging;
- Strive to enroll new participants more promptly after participants exit; and
- Work more closely with Workforce Solutions Offices to recruit and enroll participants.

To address over enrollment, grantees will:

- Train subgrantee staff on the importance of achieving "zero balance" with number of authorized positions;
- Focus on placing participants in overserved counties in unsubsidized jobs; and
- Freeze enrollments in significantly overserved counties.

B. EQUITABLY SERVES RURAL AND URBAN AREAS.

SCSEP grantees in Texas will review the latest equitable distribution quarterly, reinforce strategies used, and share ideas to support achieving "zero balance" in particularly challenging counties.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

One of SCSEP's primary goals is to provide services for eligible individuals who need additional training and employment support services to assist them to overcome significant barriers and obtain unsubsidized jobs.

In accordance with 20 CFR §641.520(c), grantees apply priority of service for enrollment in the following order:

- Veterans or qualified spouses who have at least one of the other priority characteristics;
- Veterans or qualified spouses who do not have one of the other priority characteristics; and
- Individuals who do not qualify as veterans or qualified spouses and who have at least one of the other priority characteristics.

As specified in 20 CFR §641.520(a), the other priority characteristics include the following:

- Being 65 years of age or older;
- Having a disability;
- Having Limited English Proficiency;
- Having low literacy skills;
- Residing in a rural area;
- Having low employment prospects;
- Having failed to find employment after using services provided through the one-stop delivery system; or
- Being homeless or at risk for homelessness.

5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

Workforce Area	Urban SCSEP–Eligible Population	Rural SCSEP–Eligible Population	Total SCSEP–Eligible Population	% Rural Population
Statewide	655,343	157,659	813,002	19.4%
Alamo	70,351	6,298	76,649	8.2%
Brazos Valley	5,799	3,056	8,855	34.5%
Cameron County	25,060	1,190	26,250	4.5%

Workforce Area	Urban SCSEP–Eligible Population	Rural SCSEP–Eligible Population	Total SCSEP–Eligible Population	% Rural Population
Capital Area	20,219	0	20,219	0.0%
Central Texas	9,573	2,647	12,220	21.7%
Coastal Bend	21,157	13,930	35,087	39.7%
Concho Valley	4,731	1,914	6,645	28.8%
Dallas	65,354	0	65,354	0.0%
Deep East Texas	4,622	14,201	18,823	75.4%
East Texas	19,836	15,186	35,022	43.4%
Golden Crescent	3,869	4,106	7,975	51.5%
Gulf Coast	150,465	11,288	161,753	7.0%
Heart of Texas	10,315	3,508	13,823	25.4%
Lower Rio Grande	43,225	0	43,225	0.0%
Middle Rio Grande	0	12,534	12,534	100.0%
North Central	29,620	13,614	43,234	31.5%
North East Texas	4,343	9,038	13,381	67.5%
North Texas	4,855	2,835	7,690	36.9%
Panhandle	7,688	6,842	14,530	47.1%
Permian Basin	8,559	7,274	15,833	45.9%
Rural Capital Area	13,559	4,312	17,871	24.1%
South Plains	9,179	5,770	14,949	38.6%
South Texas	11,254	5,915	17,169	34.5%
Southeast Texas	15,241	0	15,241	0.0%
Tarrant	42,573	0	42,573	0.0%
Texoma	5,075	2,431	7,506	32.4%
Upper Rio Grande/ Borderplex	43,661	1,148	44,809	2.6%

Sources: Ratios created for each workforce area using zip code populations from 2010 SF1 100% Census File through American Fact Finder (Table P1), zip–to–rural code file (**Census Data http://ruralhealth.und.edu/ruca/final310.csv**), and TWC zip–to–wda crosswalk.

6. THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

Current census data identifies the total SCSEP-eligible population in Texas as 813,002. Of this number, 80.6 percent reside in urban areas. 14.6 percent of the statewide SCSEP – eligible population reside in rural areas.

Urban and rural distribution data is identified by county in the Strategies to Address Rural Service Delivery Challenges of this report.

B. HAVE THE GREATEST ECONOMIC NEED

Of the total SCSEP-eligible population in Texas, 79 percent has been identified as having the greatest economic need, with incomes at or below the federal poverty level.

C. ARE MINORITIES

Based on current census data, the statewide SCSEP-eligible population consists of the following minority groups:

Minority Group	Percent of Eligible Population
Hispanic / Latino	53% of eligible population
Black / African American	36% of eligible population
Asian	14% of eligible population
Pacific Islander	.02% of eligible population
American Indian	.004% of eligible population

D. ARE LIMITED ENGLISH PROFICIENT

Twenty-two percent (22 percent) of the statewide SCSEP-eligible population is identified as having limited English proficiency.

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

A special population identified in the Older Americans Act Amendments of 2006 is the SCSEP-eligible individuals who have the "greatest social need," caused by noneconomic factors, which include physical and mental disabilities; language barriers; and cultural, social, or geographic isolation. Although there are no statistics available for those with the greatest social need, the estimates for the proportion of subset categories include SCSEP-eligible individuals:

- With disabilities – 44.7 percent;
- With Limited English Proficiency – 20.2 percent; and
- Experiencing geographic isolation – 2.4 percent residing in 64 frontier counties averaging fewer than seven persons per square mile.

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))

Strategies to Avoid Participant Disruption

When there is a change in grantee and/or grantee service area, TWC will host a meeting or conference call to develop a transition plan and timetable for:

- Informing participants and host agencies in advance;
- Transferring records;
- Holding orientations for participants and host agencies; and
- Supporting continuity in administrative and programmatic functions.

When positions need to be shifted from overserved to underserved counties, grantees will:

- Use a gradual approach to redistribute the slots through attrition; and
- Encourage and work intensively to assist job-ready participants in overserved counties find unsubsidized employment.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

All WIOA Core Programs

Title I – Adult Program

	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	76.00%		76.00%	
Employment (Fourth Quarter after Exit)	75.00%		75.00%	
Median Earnings (Second Quarter after Exit)	$5,400		$5,400	

	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Credential Attainment Rate	69.00%		69.00%	
Measurable Skills Gain	53.60%		54.60%	

Title I – Dislocated Worker Program

Program Year 2020 Program Year 2021

	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	73.00%		75.00%	
Employment (Fourth Quarter after Exit)	73.00%		75.00%	
Median Earnings (Second Quarter after Exit)	$8,200		$8,200	
Credential Attainment Rate	74.00%		74.00%	
Measurable Skills Gain	56.20%		57.20%	

Title I – Youth Program

Program Year 2020 Program Year 2021

	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	70.00%		70.00%	
Employment (Fourth Quarter after Exit)	74.00%		74.00%	
Median Earnings (Second Quarter after Exit)	$3,147		$3,147	
Credential Attainment Rate	63.00%		63.00%	
Measurable Skills Gain	47.30%		48.30%	

Wagner-Peyser Act Employment Service Program

	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	66.90%		66.90%	
Employment (Fourth Quarter after Exit)	68.70%		68.70%	
Median Earnings (Second Quarter after Exit)	$5,525		$5,525	
Credential Attainment Rate	Not Applicable		Not Applicable	
Measurable Skills Gain	Not Applicable		Not Applicable	

Title II – Adult Education and Family Literacy Act Program

	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	32.70%		32.70%	
Employment (Fourth Quarter after Exit)	30.30%		30.30%	
Median Earnings (Second Quarter after Exit)	$4,854		$4.854	
Credential Attainment Rate	34.10%		34.10%	
Measurable Skills Gain	44.10%		44.10%	

Vocational Rehabilitation Program

	Program Year 2020		Program Year 2021	

	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	Baseline		Baseline	
Employment (Fourth Quarter after Exit)	Baseline		Baseline	
Median Earnings (Second Quarter after Exit)	Baseline		Baseline	
Credential Attainment Rate	Baseline		Baseline	
Measurable Skills Gain	12.20%		18.30%	

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]

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

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

OTHER APPENDICES