

# AGENDA

JULY 12, 2016

## ARKANSAS WORKFORCE DEVELOPMENT BOARD STRATEGIC PLANNING COMMITTEE MEETING

10:00 A.M.

Call to Order

**ACTION Item 1:** Approval of Minutes of April 12, 2016 Meeting

**ACTION Item 2:** PY 2016 – 2019 WIOA Combined State Plan Revisions

- Revisions to the State Plan as Submitted on April 1, 2016
  - Sections I-V ..... Arnell Willis, ADWS
  - WIOA Title I Adult, Dislocated Worker and Youth ..... Mike Kennedy, Grants and Resources Coordinator  
Arkansas Department of Workforce Services
  - WIOA Title II Adult Education ..... Sarah Yager, Program Operations Manager  
Arkansas Department of Career Education
  - WIOA Title III Wagner-Peyser ..... Mike Kennedy, ADWS
  - WIOA Title IV Vocational Rehabilitation ..... Lisa Kelley, Quality Assurance Coordinator  
Arkansas Rehabilitation Services

Katy Morris, Director  
Department of Human Services – Division of Services for the Blind

Embassy Suites  
11301 Financial Centre Parkway  
Little Rock, Arkansas



- Temporary Assistance for  
Needy Families ..... Derwin Taylor, Program Operations Manager  
Arkansas Department of Workforce Services
  
- Jobs for Veterans State Grant ..... Mike Kennedy, ADWS
  
- Supplemental Nutrition Assistance Program (SNAP)  
Employment & Training ..... Donna Dumond, SNAP Administrator  
Arkansas Department of Human Services
  
- Approval of the State Plan by Federal Agencies
- Executive Summary
- Next Steps

**ACTION Item 3:** Regional and Local Planning Guidance ..... Mike Kennedy, ADWS

Committee Action Plan ..... Arnell Willis, ADWS

Announcements

Adjournment

**NEXT MEETING DATES**

October 11, 2016	10:00 a.m.	Committees	Little Rock
	1:00 p.m.	Full Board Meeting	Little Rock
January 10, 2017	10:00 a.m.	Committees	Little Rock
	1:00 p.m.	Full Board Meeting	Little Rock
April 11, 2017	10:00 a.m.	Committees	Little Rock
	1:00 p.m.	Full Board Meeting	Little Rock
July 11, 2017	10:00 a.m.	Committees	Little Rock
	1:00 p.m.	Full Board Meeting	Little Rock
October 10, 2017	10:00 a.m.	Committees	Little Rock
	1:00 p.m.	Full Board Meeting	Little Rock

**For Consideration of the  
Arkansas Workforce Development Board  
Strategic Planning Committee**

**July 12, 2016**

**AGENDA ITEM 1 – ACTION:** Minutes of the April 12, 2016 Committee Meeting

**RECOMMENDATION:** It is recommended that the Strategic Planning Committee approve the minutes of the April 12, 2016 committee meeting.

**INFORMATION/RATIONALE:** Minutes of the meeting are attached.

UNOFFICIAL

**MINUTES**  
**ARKANSAS WORKFORCE DEVELOPMENT BOARD**  
**Strategic Planning Committee**  
**April 12, 2016**

The Arkansas Workforce Development Board Strategic Planning Committee was held on April 12, 2016, at the Embassy Suites Hotel, 11301 Financial Centre Parkway in Little Rock, Arkansas. With the absence of the committee Chair, Mr. Chad Bishop presided with the following members present: Ms. Karen Breashears, Ms. Diane Hilburn, Ms. Katy Morris, Mr. Michael Newcity, and Mayor Harold Perrin. Dr. Charisse Childers, Mr. Robert East, Ms. Melissa Hanesworth, Mr. Brian Itzkowitz and Mr. Mike Preston were unable to attend.

Mr. Bishop recognized a quorum present and called the meeting to order at 10:10 a.m.

Agenda Item 1 – ACTION – Minutes of the January 19, 2016, Strategic Planning Committee:

Mr. Bishop proceeded to Agenda Item 1, asking if there were any additions or corrections to the minutes. The minutes were approved on **a motion by Mayor Harold Perrin, seconded by Ms. Karen Breashears and carried unanimously.**

Mr. Bishop asked Ms. Cindy Varner to provide the Staff Report.

Report from the Staff: Ms. Cindy Varner reported that the WIOA Combined State Plan Federal guidance on development of the state plan was finally issued on March 4, 2016. Due to the delay in the federal agencies publishing guidelines, the U.S. Department of Labor gave an extension to all states to submit their workforce plan on April 1, 2016, and our state plan was submitted on time. She stated that the public comment period was held February 9, 2016 through March 10, 2016, and that a public meeting was held on February 23, 2016 in Little Rock, with virtual meetings in Jonesboro, Camden, Fayetteville and Pine Bluff to allow interested persons an opportunity to make comments on the state plan. No one attended the meetings to make comments. Eight individuals sent an email with comments. The multi-agency State Plan Development Team reviewed each of the eight comments and determined that the state plan addressed the issues already, if it were possible to address the issue.

Ms. Varner stated that the final state plan is over 300 pages. She explained that the staff is going to prepare an Executive Summary of the plan that will be a shorter read and summarize the goals and objectives. The summary will be emailed to the committee within the next two weeks. She reported that a timeline for federal approval of the plan is not known at this time however the plan will be effective on July 1, 2016.

Report on Policies for Review and Approval:

Mr. Bishop asked that Ms. Varner review and answer any questions the committee may have on the two policies on the committee's agenda.

Ms. Varner began by stating that the Open Public Meeting Policy is available in the full board agenda packet on page eight, and the WIOA Title I Funding Distribution Policy can be found on page ten. Ms. Varner explained that both policies are required for WIOA implementation and both have been reviewed by the WIOA Roundtable Interagency Policy Committee prior to being presented to the committee today. She also reported that both are preliminary policies pending the release of the WOIA federal regulations in June.

She began by reviewing the Open Public Meeting Policy explaining that it addresses requirements for local boards to make their meeting dates, agendas, and minutes available to the public. Following discussion the committee made the following two changes to this policy: 1) Added a requirement that meeting dates be submitted for posting online no later than two weeks prior to the meeting date for regularly scheduled meetings; and 2) added a requirement that local boards notify the Arkansas Information Reading Service, a subdivision of the Division of Services for the Blind, about meetings so that individuals with visual impairments can be notified.

Next, the committee reviewed the WIOA Title I Funding Distribution Policy which provides the funding formula to be used for distributing Title I Adult, Dislocated Worker, and Youth grant funds to the ten local workforce boards. Ms. Varner stated that this policy will be reviewed annually and seeks input from Chief Elected Officials.

Following discussion, the Open Public Meeting Policy, with added changes, and the WIOA Title I Funding Distribution Policy were approved for submission to the full board on **a motion made by Mr. Michael Newcity, seconded by Ms. Karen Breashears, and carried unanimously.**

Local Board Workforce Development Plans:

Mr. Bishop asked that Ms. Varner review the suggested Local Board Planning Timeline. Ms. Varner reported that draft planning guidelines based on federal guidance will be provided to local boards no later than April 30<sup>th</sup>. She stated that in June WIOA federal regulations should be released and final local planning guidelines will be presented to this committee at the next meeting on July 12<sup>th</sup>. Following approval from the committee and subsequently the full board on July 12, 2016, local plans will be due on December 31, 2016.

Announcement: Mr. Bishop announced the next meeting of the Strategic Planning Committee will be at 10:00 a.m. on July 12, 2016.

Adjourn: Mr. Bishop adjourned the meeting at 10:39 a.m., on **a motion by Mr. Michael Newcity, seconded by Ms. Diane Hilburn, and carried unanimously.**

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Chad Bishop, Committee

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Arnell Willis, Director Workforce Investment  
Department of Workforce Services

*Minutes recorded by Angela Glasgow  
Department of Workforce Services*

**For Consideration of the  
Arkansas Workforce Development Board  
Strategic Planning Committee**

**July 12, 2016**

**AGENDA ITEM 3 – ACTION:** PY 2016 – 2019 WIOA Combined State Plan Revisions

**RECOMMENDATION:** It is recommended that the Strategic Planning Committee approve the revisions made to the PY 2016-PY 2019 WIOA Combined State Plan Revisions

**INFORMATION/RATIONALE:** Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the U.S. Secretary of Labor that outlines a four-year workforce development strategy for the State’s workforce development system.

On April 1, 2016, the Arkansas Combined Plan was submitted through the federal state plan portal. During April and May 2016, the State received 116 comments from the federal agencies reviewing the plan. State agencies responded to those comments and made revisions to the plan. A list of the 116 comments is included in this agenda packet. Due to the volume of revisions, staff from the respective state agencies will be present on July 12 to discuss the revisions that were made to the plan. The revised state plan is included as an attachment to the committee agenda.

## WIOA State Plan for the State of Arkansas

### Requested Revisions

- **II.a.1.B.iv — Skill Gaps**  
Requested Revision — The state needs to provide links that work and go directly to a table, image or chart.
- **II.a.2.C — State Workforce Development Capacity**  
Requested Revision — We request the State include the U.S. DOL Office of Apprenticeship in this section.
- **II.b.1 — Vision**  
Requested Revision — The state needs to include the text in the link provided, in the portal of this section.
- **II.b.2 — Goals**  
Requested Revision — The state needs to specifically address barriers to employment, including direct information on how Arkansas will identify who these individuals and where they're located. Also include the barriers they face and what Arkansas will do to overcome them.
- **III.a.2.A — Core Program Activities to Implement the State's Strategy**  
Requested Revision — For the paragraph starting with "There are multiple activities funded through Arkansas Rehabilitation Services (ARS) that will support the State's strategy and workforce Development Board." The remainder of the paragraph, comprised of two sentences [(1)The foundation of funded activities is ... in their plans. and (2) In addition to vocational counseling, ARS funds ... grants and loans to people with disabilities.] must be deleted. In lieu of the deleted sentences, RSA recommends five statutorily correct statements that accurately describe the VR process, etc. "Allowable activities, referred to as vocational rehabilitation (VR) services, are those activities necessary to assist individuals with disabilities to prepare for, secure, retain, or regain gainful employment. An individualized plan for employment (IPE) is the foundation for all activities funded by ARS for eligible individuals. Both the outcome goal and the services outlined on each individual's IPE must be consistent with their respective strengths, resources, priorities, concerns, abilities, capabilities, interests, informed choice and economic self-sufficiency. VR services, as practicable, should likewise align with the resources of core partners, and other stakeholders to ensure that people with disabilities meet or exceed their IPE goals. In addition to VR counseling, IPE's may include pre-employment transition and transition services, rehabilitation technology, training for careers that are in demand, post-secondary education, placement with employers, interpreters, accommodations needed for job placement or retaining employment, restorative medical services, positive behavior supports, internships, paid work experiences, and pre-apprenticeship training."
- **III.a.2.B — Alignment with Activities outside the Plan**  
Requested Revision — This narrative needs to describe the alignment with activities outside the plan and partners. This section also needs to describe how this will be accomplished or with which partners it will align. While it does mention the required partners, it does not address the optional ones.

- **III.a.2.C — Coordination, Alignment and Provision of Services to Individuals**  
 Requested Revision — The narrative does not explain "how" the partners will coordinate the services and activities
- **III.a.2.D — Coordination, Alignment and Provision of Services to Employers**  
 Requested Revision — We suggest the state include the \$4M Registered Apprenticeship grant in the coordination of activities and resources needs.
- **III.a.2.F — Partner Engagement with Other Education and Training Providers.**  
 Requested Revision — The state needs to describe "how" they will engage other education and training partners particularly Registered Apprenticeship.
- **III.a.2.G — Leveraging Resources to Increase Educational Access**  
 Requested Revision — We encourage the State to include Arkansas Community College, a key partner in RA \$4m grant, to leverage resources.
- **III.b.1.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.).**  
 Requested Revision — The state needs to coordinate their strategy to integrate. No mention of the WDQI grant to build the data warehouse. They must state what they are doing and include benchmarks.
- **III.b.3.A — State Agency Organization**  
 Requested Revision — The paragraph that begins as follows: "Field Services personnel provide the local level coordination and facilitation of all general vocational rehabilitation services.... " The last sentence in said paragraph reads as follow: "The programs organized under Access and Accommodations provide a variety of direct client and business services and include ... facilitation of attainment of resources through loans and grants, ... in the workplace." Said sentence should be replaced with the following: "The programs organized under Access and Accommodations provide an array of assistive technology, technical assistance, and advocacy services for consumers with significant disabilities, and their potential employers, concerning ergonomics and accommodations in the workplace, i.e., flashing light systems, modified keyboards, voice activated software, and text magnification aids."
- **III.b.5.B.1 — Multi-year grants or contracts**  
 Requested Revision — The state needs to describe the regional structure that will be used to distribute funds in the state.
- **VI.a.2.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.**  
 Requested Revision — Plan did not describe protocol for responding to disasters. A clear description of what is done, how it is done, and the outcome that the state is going after needs to be put in plan.
- **VI.b.2 — Describe how the State will incorporate Registered Apprenticeship into its strategy and services.**  
 Requested Revision — Plan needs to incorporate Registered Apprenticeship grant, and procedures for using the local workforce system.

- VI.b.5 — Describe the State’s criteria regarding local area transfer of funds between the adult and dislocated worker programs.  
 Requested Revision — Plan needs to incorporate Registered Apprenticeship grant, and procedures for using the local workforce system.
- VI-Adult E.7 — The Secretary may require that States provide the most recent data  
 Requested Revision — State failed to justify a reason for not reporting a credential rate when it has reported data on credentials under WIA. Must provide rates for adult, dislocated worker and youth.
- VI-WP (E)(1)(a) — 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.  
 Requested Revision — Plan is missing the months of heavy activity and geographic area of prime activity. Also a summary of agricultural employment needs in the state with projected factors that will affect agriculture.
- VI-WP (E)(1)(b) — 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.  
 Requested Revision — Plan is missing sources of information that were used to provide data on peak season or low season and what partners were contacted.
- VI-WP (E)(2) — Outreach Activities  
 Requested Revision — .
- VI-WP (E)(2)(A) — Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.  
 Requested Revision — State failed to describe outreach for farmworkers who are not being reached by the normal intake activities conducted by the employment services offices.
- VI-WP (E)(2)(B) — Providing technical assistance to outreach workers. 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 complaint system, 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.

Requested Revision — Plan needs to describe how state collaborates with other organizations for outreach activities.

- VI-WP (E)(2)(E) — Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

Requested Revision — Plan needs to describe coordination efforts for outreach with NFJP grantees.

- VI-WP E(3)(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:

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- 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.

Requested Revision — Plan needs to describe how career and training services required under WIOA will be provided to MSFW's at the AJL's..

- VI-WP E(3)(B) — Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.

Requested Revision — Plan needs to describe all marketing that is taking place.

- VI-WP E(4)(B) — Review and Public Comment.

Requested Revision — Plan failed to include a statement confirming NFJP grantees and other MSFW groups of having an opportunity to comment on AOP nor did they share any comments received or not received with responses.

- VI-AEFL B.1 — Adult Education and Literacy Activities (Section 203 of WIOA)

Requested Revision — The plan does not address the scope, content, and organization of its local activities. this is a tier 1 issue for AEFLA

- VI-AEFL C — Corrections Education and other Education of Institutionalized Individuals

Requested Revision — The State does not describe how it will fund each eligible provider to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. The plan does not indicate how the grants and contracts awarded with section 225 funds will be completed and comply with the requirements of Subpart C.

- VI-AEFL D.1 — 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.

Requested Revision — No, The State does not adequately describe how it 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. The plan does not adequately describe how the State will establish IELCE programs that provide educational services consisting of literacy and ELA integrated with civics education - that is, instruction on the rights and responsibilities of citizenship and civic participation.

- **VI-AEFL D.2 — Describe how the State will fund, in accordance with the requirements of title II, subtitle C, Integrated English Literacy and Civics Education services and how the funds will be used for those services.**

Requested Revision — The plan does not adequately describe how the State will establish IELCE programs that provide educational services consisting of literacy and ELA integrated with civics education - that is, instruction on the rights and responsibilities of citizenship and civic participation. The plan does not indicate how the grants and contracts awarded with section 243 funds will be completed and comply with the requirements of Subpart C.

- **VI-AEFL F — Assessing Quality**

Requested Revision — The plan does not sufficiently describe how the State will use these assessments (evaluations) to improve the quality of such programs. The plan does not include a description of how it will assess the quality of its professional development programs designed to improve instruction in the essential components of reading instruction, instruction related to the specific needs of adult learners, instruction provided by volunteers or paid personnel, and dissemination of information about models and promising practices.

- **VI-VR a.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; (General)**

Requested Revision — I suggest adding an introductory paragraph which highlights the key role of the SRC in the development and evaluation of ARS' policies, programs, activities, etc. For example: The Arkansas State Rehabilitation Council (SRC) is a key partner with ARS in the administration of the State's Vocational Rehabilitation (VR) Program. The Arkansas SRC is a citizen advisory council, appointed by the Governor, to provide guidance to ARS to help individuals with disabilities, including individuals with the most significant disabilities, to obtain, maintain and regain competitive integrated employment, promote full inclusion and integration into society, and to maximize independence and economic self-sufficiency. Its membership helps ARS to develop and operationalize the VR State Plan, develop and operationalize ARS' state goals and priorities, shape and review policy, engage in strategic planning, evaluate the effectiveness of the VR Program, analyze consumer satisfaction and provide guidance, including development and review of cooperative agreements.

- **VI-VR a.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; (Blind)**

Requested Revision — Please add something akin to the following: "The Arkansas Division of Services for the Blind is an independent consumer-controlled commission. Hence, this section is not applicable."

Requested Revision — Panel Consensus: No - Inadequate Revisions Requested.  
Requested Revision — Panel Reconvene: Yes - Adequate Per Submitted Revisions.

· **VI-VR a.2 — the Designated State unit's response to the Council's input and recommendations; and (General)**

Requested Revision — Please update this section; per the guidance imbedded within the text provided for Section VI(a)(2) regarding ACTI's Behavior Support Program and the corresponding ACTI Behavior Management Team. The base text is copied directly from Arkansas' proposed State Plan. "ARS welcomes and appreciates SRC input and recommendations. For example during the June 2014 quarterly meeting, members of the ACTI Behavior Management Team (ADD: BMT) provided an overview to the SRC on its recently developed Positive Behavior Support Program (ADD: PBSP), which was currently under consideration for implementation. ADD: [The ACTI BMT is comprised of \_\_\_\_ (job title), \_\_\_\_ (job title), .... and \_\_\_\_ (job title)]. ADD: [The PBSP is designed to do \_\_\_\_, \_\_\_\_, ... \_\_\_\_ for \_\_\_\_, \_\_\_\_, .... \_\_\_\_ population(s) from \_\_\_\_, \_\_\_\_, ... \_\_\_\_.] Two SRC members provided expertise in the development and implementation of these types of programs. SRC recommendations were acknowledged with plans to incorporate them into both the program guidelines and rollout strategy for implementation. Program development and implementation updates were provided to the SRC as part of subsequent quarterly meetings. : ADD: [In addition to the BSP Program, BMT staff are responsible for \_\_\_\_, \_\_\_\_, \_\_\_\_, \_\_\_\_, .... \_\_\_\_]."  
[Note: the responsibilities for BMT staff should be substantial enough to substantiate the full time work equivalence of the reported number of BMT staff.] "In August 2015, the SRC provided recommendations regarding the new ARS Policy Governing the Rates of Payment for Purchased VR Services."

· **VI-VR a.3 — the designated State unit's explanations for rejecting any of the Council's input or recommendations. (Blind)**

Requested Revision — Please add something akin to the following: "The Arkansas Division of Services for the Blind is an independent consumer-controlled commission. Hence, this section is not applicable."

· **VI-VR b.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; (Blind)**

Requested Revision — Please add something akin to the following: "The Arkansas Division of Services fir the Blind has not requested a waiver of statewideness."

· **VI-VR b.2 — the designated State unit will approve each proposed service before it is put into effect; and (Blind)**

Requested Revision — Please add something akin to the following: "The Arkansas Division of Services for the Blind has not requested a waiver of statewideness. Hence, this section is not applicable."

· **VI-VR c.1 — Federal, State, and local agencies and programs; (Blind)**

Requested Revision — Is ReVrb still operational? If so, has ReVrb been altered pursuant to the RSA' reorganization of its technical assistance model? Revise the following statement, or keep it as is, per review of these questions: "DSB continues its participation in the Regional VR Business Network (ReVrb), a group established by the Technical Assistance and Continuing Education (TACE) Center to work on particular issues between vocational rehabilitation and business."

· **VI-VR d.1 — DSU's plans (General)**

Requested Revision — Please describe ARS' agreements with LEAs statewide to ensure that students with the most significant disabilities have the required documentation in place to fulfill the requirements of WIOA Section 511.

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\_\_\_\_\_. ARS was noncompliant in FY 2015 with regards to the 15% pre-employment transition reserve. ARS reported a pre-employment transition shortfall of \$4,755,1432 in FY 2015. Our records indicate that ARS expended merely \$1,200,000 of its required \$5,955,143 in pre-employment transition services in FY 2015 (based upon a total VR award of \$39,700,955). PLEASE INCLUDE THESE FIGURES IN THE RESPONSE, AND please provide a detailed overview of ARS' plan to expend 15% of every VR dollar allotted for pre-employment transition services. Please include, if any, ALL new agreements, and revisions to existing agreements with LEAs, ACE and CRPs regarding transition services; particularly pre-employment transition services.

· **VI-VR d.2.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; (General)**

Requested Revision — Per statements provided by the current ACE Director, the prior ACE Commissioner, the current ARS Commissioner and the prior ARS Commissioner, among others, RSA has been advised that no VR/SE funds have been used to fund the Arkansas College and Career Program at any point between FY 2010 and the present. Likewise, the current ACE Director, ARS Commissioner, ARS Field Services Director and the ARS Chief of Fiscal Services have unequivocally stated that ARS has not allocated any VR/SE funds for the Arkansas College and Career Program. Accordingly, as discussed and agreed, please delete reference to "career coaching" within this section [VI(d)(2)(A)]. Likewise, as detailed in prior correspondence with ARS' Commissioner, please have the Commissioner prepare a signed assurance specific to this, the "Program Specific Requirements for Vocational Rehabilitation (General)." It is required to state, in pertinent part, both that ARS has not previously expended any VR/SE funds for the Arkansas College and Career Program; nor allocated VR/SE funds for the Arkansas College and Career Program. Please submit said assurance, on or before this Wednesday, 04/27/2016, as a WORD attachment with a copy to both the ACE Director and ARS' Fiscal Chief.

· **VI-VR d.2.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; (Blind)**

Requested Revision — Please remove "RSA-approved" from the first sentence regarding DSB's cooperative agreement with the Arkansas Department of Education, Special Education. Has the cooperative agreement been updated per WIOA? If so, please describe the changes? If not, please describe the process and established timeline to revise it. Please note, in particular that the revised or pending agreement must address the following, 1) How DSB and ADE is/will ensure that all of the WIOA Section 113 Required pre-employment activities are provided for eligible and potentially eligible students?; and, 2) How DSB and ADE is/will ensure that all of the WIOA Section 511 services and related documentation is provided for students? As part of AITP and the initiative to reach as many participants as possible under pre-employment transition services, DSB is reaching out to each Local Education Area Supervisor in the school districts across the State and each high school across the State to give presentations/information on services available under pre-employment transition services.

DSB has seven designated pre–employment transition services counselors to reach participants throughout the state.

- **VI-VR d.2.B — transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs; (General)**

Requested Revision — This section has three sentences that need to be revised to ensure that the services being offered by ARS are solely for individuals with disabilities. The three required revisions are as follows: First, please revise the last sentence in the first paragraph: ARS will work with schools to assist the student [ADD: "with significant disabilities"] in identifying, selecting, and pursuing appropriate career objectives.

..... Secondly, please revise the first sentence in the third paragraph as follows: ARS will ensure each [DELETE: "person"] [ADD: "student with a significant disability"] enrolled in a vocational education program receives an interest assessment, and identifies capabilities. NOTE: I assume that this activity is classified as a pre-employment transition service.

..... Thirdly, please revise the second sentence in the third paragraph as follows: ARS [DELETE: "may"] [ADD: "will"] provide accommodations as needed to ensure successful completion of the vocational education program [ADD: "for VR eligible youth in accordance with their respective IPEs; unless these accommodations are the responsibility of the LEA pursuant to FAPE regulations."] NOTE: Accommodations involving purchased services, assistive technology, etc., are VR service (other than pre-employment transition services) and, therefore, must be offered pursuant to an IPE for VR eligible applicants.

- **VI-VR d.2.B — transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs; (Blind)**

Requested Revision — Please address how WIOA Section 113 (required pre-employment activities) and WIOA Section 511 (limitations on the use of subminimum wage) will be considered and actualized by DSB and the ED Agency in both IPE development (including timeline) and IPE implementation. Please provide, to the maximum degree possible, clear and concise plain language type details.

- **VI-VR d.2.C — roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; (Blind)**

Requested Revision — Please describe the roles and responsibilities, including financial responsibilities, of DSB and ADE, in particular, with respect to WIOA Section 113 (required pre-employment activities) and WIOA Section 511 (limitations on the use of subminimum wage). Please provide, to the maximum degree possible, clear and concise plain language type details, including financial responsibilities.

- **VI-VR d.2.D — procedures for outreach to and identification of students with disabilities who need transition services. (General)**

Requested Revision — Please substantially develop this response. ARS’ response should include explicit outreach and engagement type activities, including, as applicable, lessons learned from

ADT, Promise, Search, etc. ARS' response should likewise include explicit plans to identify students with significant disabilities requiring pre-employment transition services; particularly those with 504 Plans or IEPs (particularly those who historically would have transitioned to day treatment programs or sheltered workshops).

- **VI-VR d.2.D — procedures for outreach to and identification of students with disabilities who need transition services. (Blind)**

Requested Revision — Please further develop the fifth paragraph, as practicable, or add a new paragraph, which describes how DSB is/will fulfill the Congressional mandates regarding WIOA Section 113 (required pre-employment activities) and WIOA Section 511 (limitations on the use of subminimum wage).

- **VI-VR f. — Arrangements and Cooperative Agreements for the Provision of Supported Employment Services (General)**

Requested Revision — Please revise the last sentence as follows: ARS will create new agreements based on technical assistance received [ADD: "from RSA; in consultation with the Arkansas State Rehabilitation Council and"] [DELETE: "through"] the Department of Labor, Office of Department of Employment Services [DELETE: "subject matter experts in Employment First and WIOA"] Likewise, please add a description of how ARS' is working with all LEAs statewide to provide the requisite assessments, pre-employment transition activities, etc., required pursuant to WIOS Section 511.

- **VI-VR g.2 — transition services, including pre-employment transition services, for students and youth with disabilities. (General)**

Requested Revision — Please revise the second to last paragraph, as follows, to clarify that these activities are for individuals with significant disabilities: ARS will collaborate with secondary education institutions to coordinate partnerships with employers to provide summer and non-seasonal employment, apprenticeship programs, and internships [ADD: "for students with significant disabilities."] ACTI works directly with potential employers to provide internship sites for students nearing the completion of their training programs [ADD: "; all of whom have significant disabilities."] To date ten employers provide paid and non-paid internship and work-based learning opportunities. Supervisors from the businesses provide weekly feedback on the interns' quality of work and the students are graded based on the measures included on the employer feedback form. Additionally, ACTI offers internship opportunities at ACTI to prepare students [ADD: "with significant disabilities"] for employment opportunities available in the Hot Springs area

- **VI-VR h.1 — the State Medicaid plan under title XIX of the Social Security Act; (General)**

Requested Revision — Revise the last sentence as follows: The team [ADD: ", in consultation with both the Arkansas State Rehabilitation Council and the RSA State Liaison"], will be updating the current interagency agreements to fund braided services and apply for combined waiver programs related to opportunities where individuals participated in employment related activities under WIOA.

- **VI-VR h.2 — the State agency responsible for providing services for individuals with developmental disabilities; and (General)**

Requested Revision — Revise the last sentence as follows: The team [ADD: ", in consultation with both the Arkansas State Rehabilitation Council and the RSA State Liaison"], will be

updating the current interagency agreements to fund braided services and apply for combined waiver programs related to opportunities where individuals participated in employment related activities under WIOA

• **VI-VR h.3 — the State agency responsible for providing mental health services. (General)**

Requested Revision — Revise the last sentence as follows: The team [ADD: ", in consultation with both the Arkansas State Rehabilitation Council and the RSA State Liaison"], will be updating the current interagency agreements to fund braided services and apply for combined waiver programs related to opportunities where individuals participated in employment related activities under WIOA.

• **VI-VR i.1.A.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; (General)**

Requested Revision — Seventy (70), or approximately one third, of ARS' staff are classified as "support staff." It is my understanding that A) VR Assistants, B) Health Care Workers, C) Security Staff and 4) Access & Accommodation staff (of unknown types) constitute a substantial majority of those individuals included in the "support staff" category. Please subdivide the support staff category as follows: Please exclude VR assistants from the support staff category; and create a separate category for VR assistants. -----

----- Likewise, please exclude all staff assigned to Allocations & Accommodations from the support staff category; and list all of the positions funded, in whole, or, in part, with ARS' VR/SE allocations, as separate positions. Please include regular staff and any fully or partially funded Allocations & Accommodations' positions with the Arkansas Alternative Financing Program (ATP), the University of Arkansas, etc.

----- Likewise, exclude security related staff [including security department managers, security guards, police (if any)] from the support staff category; and subdivide security workers into two categories - namely, ACTI and Central Office/Other.

----- Likewise, please divide the remainder of the support staff category (less VR assistants, health-related professionals and security staff) into three groups - namely, 1) Central Office support staff; 2) field office support staff; and 3) ACTI support staff. Please be reminded, as stated above, that no staff from Access & Accommodations are to be include in the support staff category. All of Access & Accommodations' staff must be classified to specific job categories (other than those used by the Central Office, field staff and ACTI). This will facilitate understanding of the program/division's activities.

Requested Revision — Staffing is of particular importance given ARS' significant reorganization, changing goals per WIOA's mandates and SRC recommendations, & ACTI's need to better align with the needs of field staff. Please double check all numbers to avoid double counting by Access & Accommodations; ACTI; Field Services, the Central Office. **COPED VERBATIM BELOW IS THE RESPONSE SUBMITTED BY ARS ON 05/02/2016. PLEASE REVISE/UPDATE PER THE PARENTHEZED/BRAKETED INFORMATION REQUESTS:** ARS currently is serving 14,402 clients and employs ["a total of XXX staff, including X, XXX, and XXX, respectively, identified to Access and Accommodations, ACTI, and Field Service. 15 of the 21 staff, previously assigned to Access and Accommodation, were reclassified as ACTI staff in \_\_ (month) of 2016."] Field Counselors – 76 Field Administrative Staff (" , AKA, VR Assistants") – 70 [SHIFT THE TOTALS FROM BEHIND 1)

STAFF SUPPORTING, 2) ACCESS & ACCOMMODATIONS, 3) ACTI & 4) CENTRAL OFFICE TO IN FRONT OF EACH ENTRY. AND, LIST THE SPECIFIC POSITION AFTER EACH ENTRY] "26 Staff Supporting [VR (Correct?)] Counselor Activities (Business Relations Representatives (add in parenthesis), District Managers (add in parenthesis), Interpreters (add in parenthesis))" "6 Access and Accommodations (manager (1), administrative assistant (1), occupational therapist (2), speech pathologist (1), & physical therapists (1))" "191 ACTI (Medical (), Counseling and Evaluation, Instructors (), Maintenance (), Food Services (), Environmental (), Administration ()). Please note that of ACTI' Counseling and Evaluation Staff, including those previously classified as Rehabilitation Initial diagnosis and Assessment for Clients' staff, or Learning Evaluation Center, are employed either at the central office or district offices. ACTI estimates that these off site personnel will provide approximately 6000 assessments per year." "58 Central Office (executive management (), \_\_\_ () .... \_\_\_ ())" Other – ACTI Security – 11 Other – Central Office Security – 1 Other – [ "\_\_\_\_\_ (UA)" ] Contract – Research Analyst - 1

Requested Revision — Thank You! This is greatly improved! Simply revise the first sentence to include the Central Office and its corresponding 69 staff: "ARS currently is serving 14,402 clients and employs a total of 432 staff, including 5, 188, [DELETE: "and 170"] [ADD: 170 and 69], respectively, identified to Access and Accommodations, ACTI, [DELETE: "and Field Services"] [ADD: Field Services and the Central Office]. In other words, A + B + C + D = 432. As written, 432 includes A + B + C [totaling 363].

• **VI-VR i.1.A.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; (Blind)**

Requested Revision — Please expand the paragraph that commences, "DHS Division of Services for the Blind has sufficient staff on hand ..., " so as to clarify the types of positions held by the 30 employees currently referenced as extra help positions. I assume that these employees (constituting approximately half of DSB's staff) are orientation and mobility instructors, Braille educators, VR counselor assistants, security staff, etc. Hence, for example, reference the number of Braille educators, VR counselor assistants, security staff, etc.

.....  
 ..... Revise the last paragraph (regarding current and projected vacancies) in accordance with the aforementioned position updates for are orientation and mobility instructors, Braille educators, VR counselor assistants, security staff, etc.

• **VI-VR i.1.A.ii — the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and (General)**

Requested Revision — Please revise in accordance with the personnel category additions described in the previous section - namely, i(1)(A)(i).

Requested Revision — This section states that ARS needs 504 staff. Please revise in accordance with the personnel data detailed in the previous section [i(1)(A)(i)]. It includes 432 staff (5 + 188 + 170 + 69), or 72 less position than included in this section (6 + 222 + 193 + 76 + 7). Likewise confusing, I think UA was included with in the central office data in the previous section; but appears to be a 5th category in the section.

Requested Revision — This opening sentence reads as follows: "The number of personnel currently needed is 503. It includes 6, 222, 193, and 82 respectively, identified to Access and Accommodations, ACTI, Field Services, and Central Office." Please add the following sentence BEFORE the current opening sentence: "ARS currently employs 432 individuals." Please add the following sentence AFTER the current opening sentence: "Accordingly, approximately one (1)

out of every 6 (six) needed positions, or 16.43 percent, of ARS' currently needed positions, are unfilled, including, 1, 34, 23, and 13 unfilled positions, respectively, for Access and Accommodations, ACTI, Field Services, and the Central Office. ARS attributes these vacancies to \_\_\_\_\_, \_\_\_\_\_ and blank.

· **VI-VR i.1.A.ii — the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and (Blind)**

Requested Revision — Please expand the paragraph that commences, "DHS Division of Services for the Blind has sufficient staff on hand ..., " so as to clarify the types of positions held by the 30 employees currently referenced as extra help positions. I assume that these employees (constituting approximately half of DSB's staff) are orientation and mobility instructors, Braille educators, VR counselor assistants, security staff, etc. Hence, for example, reference the number of Braille educators, VR counselor assistants, security staff, etc.

.....Regarding the caseload data reported in the last paragraph ("as of 10/01/2013"); please provide more recent data, i.e., effective 10/01/15 (the start of FY 2016).

· **VI-VR i.1.A.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. (General)**

Requested Revision — Please revise in accordance with the personnel category additions described in i(1)(A)(i).

Requested Revision — Please revise in accordance with the previous two sections.

Requested Revision — The opening sentences read as follows: "The number of personnel projected over the next five years is 547. It includes 8, 235, 219, and 85 respectively, identified to Access and Accommodations, ACTI, Field Services, and Central Office. " Please add the following sentence BEFORE the current opening sentences: "ARS currently employs 432 individuals." Please add the following sentence AFTER the current opening sentence: "Accordingly, ARS projects that it will need approximately 115 additional staff (26.7 percent) 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. ARS attributes this substantial increase to \_\_\_\_\_, \_\_\_\_\_ and blank."

· **VI-VR i.1.A.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. (Blind)**

Requested Revision — Please revise the last paragraph (regarding current/projected vacancies) for the additional positions that RSA's reviewer has consistently referenced commencing with DSB VI(I)(1)(A)(I) - namely, orientation and mobility instructors, Braille educators, etc.

· **VI-VR i.2 — Plan for Recruitment, Preparation and Retention of Qualified Personnel (General)**

Requested Revision — ARS has a longstanding VR counselor retention problem which, per ARS' CNA is creating multiple challenges for the existing staff. As of date, 18, or approximately 1 out

of every 6 VR counselor positions is vacant. Please add, if any, specific programs, initiatives, etc. that ARS is currently offering or considering to retain and support ARS' VR counselors.

- **VI-VR i.4.B — Acquisition and dissemination of significant knowledge (Blind)**  
Requested Revision — Please review the third paragraph. It references the TACE. Please revise this paragraph as the TACE, per my understanding, is no longer operational (per RSA funding). Either delete said references, change the name, or otherwise amend as appropriate.  
..... If the TACE is operating under a different name; please add within parenthesis the TACE's new name in the fourth paragraph/bullet regarding WINGS.
- **VI-VR j.1.A — with the most significant disabilities, including their need for supported employment services; (Blind)**  
Requested Revision — Did the CSNA address SE; particularly the Congressionally mandated 50% SE reserve for youth? If so, please provide a concise summary. Likewise, since DSB's most recent CSNA was completed in 2015 - namely, after the passage of WIOA (07/22/2014), RSA's reviewer is requesting further information, if any, regarding the CSNA's findings in accordance with the Congressionally mandated service delivery changes, i.e., those related to WIOA Section 113 (pre-employment transition services); and WIOA Section 511.
- **VI-VR j.1.B — who are minorities; (Blind)**  
Requested Revision — Please provide a summary of the particularized VR needs, if any, identified in the CSNA for the respondents who identified themselves as minorities.
- **VI-VR j.1.C — who have been unserved or underserved by the VR program; (Blind)**  
Requested Revision — Please provide a summary of the particularized VR needs, if any, identified in the CSNA for the respondents that were identified from areas classified as unserved or underserved; particularly in light of their residing in communities with some of the highest unemployment rates in the State.
- **VI-VR j.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 . (Blind)**  
Requested Revision — Did the CSNA (completed in 2015) include a particularized assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services? If this question was addressed in the CSNA, please provide a summary. If not, state that the question was not addressed, and provide details from DSB's understanding. Likewise, did the CSNA (completed in 2015) describe the extent to which transition career services and pre-employment transition services are coordinated with transition services provided under the Individuals with Disabilities Education Act? If this question was addressed in the CSNA, please provide a summary. If not, state that the question was not addressed, and provide details from DSB's understanding.
- **VI-VR k.2.A — The VR Program; (General)**  
Requested Revision — Please subdivide this figure (17,700) between ARS' Three Divisions - namely, 1) Field Services, 2) ACTI, and 3) Access & Accommodations. If individuals are receiving VR/SE services from more than one division, please allocate the eligible individuals to the

primary division. Likewise, if anyone is receiving services (other than VR services) with ARS' VR allocations, please specify with significant details.

Requested Revision — Please delete the brunt of the current response and substitute the following. Please note that the numbers remain the same; but this section's reorganization and expansion make explicit ARS' organizational structure and consumer flow. Arkansas estimates 17,700 eligible individuals ["with disabilities"] will receive ["vocational rehabilitation"] services ["", including approximately 250 as students at ACTI, a state owned and operated CRP. ACTI, pursuant to the services provided by XX psychologists and XX psychological examiners (all of whom are stationed at the central office or regional offices, and were considered staff of ARS' Access and Accommodations Division through \_\_\_\_ (Month) of 2016), will likewise provide approximately 6,000 evaluations for applicants and consumers referred by ARS' field staff. ARS' Access and Accommodations Division, per services provided by its occupational therapists, physical therapists and speech pathologist, is estimated to serve approximately 400 individuals with disabilities referred by ARS' field staff."

- **VI-VR I.1 — Identify if the goals and priorities were jointly developed (General)**

Requested Revision — Please describe ARS' goals and priorities with respect to fulfilling Section 511's mandated services; the 50% SE Reserve; and the 15% pre-employment transition reserve.  
Requested Revision — Please describe ARS' goals and priorities with respect to fulfilling the 50% SE Reserve; as previously requested.

- **VI-VR I.3.B — the State's performance under the performance accountability measures of section 116 of WIOA; and (Blind)**

Requested Revision — Suggested Revisions are Included in the Text Copied Below: DSB is transitioning into using the performance accountability measures under section 116 of WIOA. Steps have been taken to conduct a statistical analysis over the last 3 years [DELETE: "in order to develop a baseline"] [ADD SOMETHING AKIN TO: for consideration by DSB, in consultation with its Independent Commission and RSA, to develop a baseline"] of performance percentages for the agency in order to move forward to set applicable performance standards under section 116 of WIOA.

- **VI-VR I.3.C — other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107. (Blind)**

Requested Revision — Please reference, as applicable, consideration, in DSB's development of its goals and priorities, RSA's observations and/or findings (as reported in the FY 2011 monitoring report).

- **VI-VR n.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. (Blind)**

Requested Revision — Please add goals (or amend the current goals) and strategies related both to Section 511 (limitations on the use of subminimum wage) and the 50 percent minimum SE reserve for youth.

- **VI-VR n.2.A — the provision of extended services for a period not to exceed 4 years; and (Blind)**

Requested Revision — Please specifically address DSB's provision and funding of extended

services for youth, coordination of extended services' funding with traditional funders of extended services, etc.

- **VI-VR n.2.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. (Blind)**

Requested Revision — Please revise per the explanation provided below: Please be reminded that extended services are to be provided for youth (under the specified conditions), per the Rehabilitation Act ("Act"), as amended by WIOA, for up to four years -- NOT 24 MONTHS. Likewise, the definition of "extended services" in FINAL §361.5(c)(19)(v) clarifies that the DSU provides extended services only to "youth with the most significant disabilities" for a period not to exceed four years or until such time as a youth reaches the age of 25 and no longer meets the definition of a "youth with a disability" under final §361.5(c)(58). Of course, FINAL draft regulations, in laymen's terms, are still draft regulations. Regardless, DSB, is required to fund up to 48 months of extended services for youth pursuant to the Act's specified conditions.

- **VI-VR o.1 — The methods to be used to expand and improve services to individuals with disabilities. (General)**

Requested Revision — ADD, as the FIRST (OPENING BULLET), "ARS will meet all the corrective actions required to address ARS' remaining FY 2011 compliance findings by no later than the completion of the first quarter of FY 17. Likewise, ADD THE SPECIFIED QUALIFIER WITHIN THE NOTED BULLET: ARS will [, in consultation with RSA,] complete necessary improvements to the Army Reserve Building adjacent to ACTI in order to improve VR services and to increase employment outcomes.

- **VI-VR o.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. (General)**

Requested Revision — ADD THE QUALIFIER IMBEDDED IN THE BULLET AND DELETE AS DIRECTED: ARS will continue to collaborate with Career Technical Education and Adult Education [ADD: , for VR eligible consumers with disabilities, in accordance with their respective IPEs,] to provide basic and advanced skill based services and resources. [DELETE: to individuals with disabilities.]

- **VI-VR o.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). (General)**

Requested Revision — ADD/DELETE WITHIN THE FIRST BULLET: ARS will meet with school designees [ADD: prior to the close of the 2015/2016 school year] [DELETE: at the beginning of the school year] to review referral procedures and to identify [DELETE: transitioning] students who may benefit from [ADD: SE and] VR services [ADD: , including pre-employment transition services.] -----

----- ADD/DELETE TO THE FOURTH BULLET: ARS will provide [ADD: all of the required WIOA Section 113 pre-employment transition activities, as needed,] including, [DELETE: awareness of pre-employment transition through] job exploration counseling, work based learning experiences in integrated work settings and [DELETE: will provide] workplace readiness training [ADD: i.e.,] [DELETE: through] internships.

- VI-VR o.5 — If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State. (General)**  
 Requested Revision — ADD/DELETE PER IMBEDDED COMMENTS: ARS is working with a design professional to develop a long-term critical maintenance plan for the ACTI campus [ADD, a State owned and operated CRP which is supported by approximately one third of ARS' overall annual allocation of VR funds from RSA].
- VI-VR o.6 — Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA. (General)**  
 Requested Revision — ADD/DELETE AS DETAILED IN THE SECOND BULLET: ARS will work with the other core programs [ADD: in consultation with the Arkansas SRC and RSA's State liaison,] to facilitate a common intake process and electronic protocols that will allow for near real-time evaluation of performance accountability measures. -----  
 ----- ADD/DELETE AS DETAILED IN THE LAST: ARS will use the comprehensive monitoring instrument for CRPs, including ACTI, developed in response to RSA [DELETE: 107 Monitoring.] [ADD: compliance findings from the FY 2011 monitoring review that remain unresolved as of date]. The monitoring instrument [DELETE: establishes] [ADD: will establish] performance indicators [ADD: ,] including [ADD: substantial] increases in employment outcomes [END SENTENCE]. [DELETE: and evaluates] [ADD: The recently developed monitoring instrument will likewise evaluate] if Field Services' needs are met for service provision to ARS consumers.
- VI-VR o.6 — Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA. (Blind)**  
 Requested Revision — Please revise DSB's response, per the comments imbedded by RSA's reviewer within the text copied below: DSB is transitioning into using the performance accountability measures under section 116 of WIOA. Steps have been taken to conduct a statistical analysis over the last 3 years [ADD: ", for consideration by DSB, in consultation with RSA and its Independent Commission,"] [DELETE: "in order to develop"] [ADD: "in the development of"] a baseline of performance percentages for the agency in order to move forward to set applicable performance standards under section 116 of WIOA.  
 ..... Likewise, and, most importantly, please detail specific strategies, (current or pending) by DSB that are designed to achieve the performance measures.
- VI-VR o.8.A — achieve goals and priorities by the State, consistent with the comprehensive needs assessment; (General)**  
 Requested Revision — SEE GOAL SIX AND ADD/DELETE AS DIRECTED: ARS, in partnership with the AR Employment First State Leadership Mentoring Program, [ADD: the Arkansas SRC and the RSA State Liaison,] will establish technical assistance guidelines focused on CRPs transitioning from facility based services to community based services. -----  
 ----- SEE GOAL SIX AND ADD/DELETE AS DIRECTED: ARS will [ADD: , in consultation with RSA,] develop short-term and long-range maintenance plans for ACTI [ADD: a State owned and operated CRP that annually utilizes approximatele one third of ARS' total VR allotment from RSA].
- VI-VR o.8.B — support innovation and expansion activities; and (Blind)**  
 Requested Revision — Please address this question.

- **VI-VR o.8.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. (Blind)**

Requested Revision — Please address this question.

- **VI-VR p.1.A — Identify the strategies that contributed to the achievement of the goals. (General)**

Requested Revision — See the last sentence of the Evaluation and Progress Component of Goal 5 - namely, "To date over 150 students have been placed in local internships; the program has clearly demonstrated to local employers the viability of consumers served at ACTI to fill competitive employment vacancies; and has resulted in additional closures." Please add the following, including the requested data: "However, the number and percentage of ACTI's consumers receiving competitive integrated employment outcomes remains particularly low given ACTI's annual budget of approximately 12,000,000. For example, only \_\_\_ () of ARS' total of \_\_\_ () competitive integrated employment outcomes in Fiscal Year (FY) 2014 were secured by individuals served by ACTI. Likewise only \_\_\_ () of ARS' total of \_\_\_ () competitive integrated employment outcomes in FY 2015 were secured by individuals served by ACTI. The average weekly earnings reported by ACTI for these consumers with competitive integrated employment outcomes in FY 2014 and FY 2015 was, respectively \$ \_\_\_ and \$ \_\_\_\_ .

..... See the ninth bullet in the Evaluation and Progress Component of Goal 6. Add the requested information in the designated spaces as to clarify that the staff are funded by Promise (NOT ARS); to provide pre-employment transition services (as opposed to transition services); and that ARS is paying the wages for the students (not workforce services): "Through the PROMISE grant, competitively awarded to" ["DELETE: only six sites,"] ["ADD: the University of Arkansas,"] "ARS has had the opportunity to provide meaningful and comprehensive" ["ADD: pre-employment"] "transition services to an additional 1,000 youth selected to participate in AR PROMISE. ARS transition specialists" ["ADD: (funded by the Promise Grant)"] are responsible for serving youth on SSI beginning at age 14, and for providing career readiness training, soft-skill development, career exploration activities, work-readiness training, and administering and/or utilizing skills and needs self-inventories, career interest assessments" [end sentence] ["DELETE: , and pre-employment training to ensure the"] ["ADD: Likewise, ARS will fund, as practicable,"] "two paid work experiences" ["DELETE: they"] ["ADD: for participating students placed in jobs developed by"] ["DELETE: receive through"] the Department of Workforce Services" [END SENTENCE] ["DELETE "are appropriate job matches."]

- **VI-VR p.1.A — Identify the strategies that contributed to the achievement of the goals. (Blind)**

Requested Revision — DSB's response provides two out of the three required components for both VR and SE - namely, 1) Goals (Okay); 2) Strategies for Achieving the Goals (Okay); and 3) Results (NOT PROVIDED). Please add, for example: In FY 2015, DSB achieved \_\_\_ VR Outcomes; as opposed to \_\_\_ in FY 2012, FY 2013, FY 2014.

- **VI-VR p.1.B — Describe the factors that impeded the achievement of the goals and priorities. (General)**

Requested Revision — Please substantially revise this section to include, per the CNA, challenges faced 1) by ACTI because of its admissions policies/practices regarding individuals with developmental disabilities and mental health type disabilities; 2) insufficient referral

numbers from field services; and, 3) significant distance from most field offices. Likewise, describe field services challenges, per the CNA, regarding 1) lack of CRPs, particularly, SE providers; 2) insufficient time for face-to-face contact with consumers (merely 35% or so) and job development; and 3) caseload challenges resulting from both staff turnover and vacancies. Requested Revision — Please revise and expand the last sentence of the paragraph that begins, as follows: "In regards to referrals .... ." Its last sentence, should read as follows: "Furthermore, there is further collaboration to bring ACTI programs to the field offices by ["both"] introducing mobile training programs like OSHA ["", and reassigning 15 of the 21 staff previously classified as Access and Accommodations Division staff to ACTI - namely, X psychologists and X psychological examiners. These reclassified staff will continue to provide approximately 6,000 annual rehabilitation initial diagnoses and assessments for applicants and eligible consumers referred by VR counselors from ARS' Field Services Division. But, per their reclassification and supervision by ACTI's director, ARS proposes that these reclassified psychologists and psychological examiners will be better attuned to the full array of VR and SE services available to ARS' consumers at ACTI. Hence, ARS projects a substantial increase of referrals to ACTI by better-informed VR counselors."]

- **VI-VR p.1.B — Describe the factors that impeded the achievement of the goals and priorities. (Blind)**

Requested Revision — Please provide data to support the conclusion that DSB's VR and SE Goals were met; particularly with respect to the number and quality of SE and VR employment outcomes reported by DSB for FY 2015 (in comparison to FY 2012, FY 2013 and FY 2014).

- **VI-VR p.2.A — Identify the strategies that contributed to the achievement of the goals. (General)**

Requested Revision — ADD/DELETE BULLET AS FOLLOWS: Over the last two years, ARS increased SE referral authorizations by 69 percent (370) with 241 individuals [DELETE: employed as successful 26 closures] [ADD: securing SE employment outcomes], which is an increase in successful closures by 78 percent. [ADD: However, SE outcomes constituted only \_\_\_ percent and \_\_\_ percent, respectively, in FY 2014 and FY 2015; substantially lower than the national average for all VR General Agencies of approximately 12 percent.]

- **VI-VR p.2.A — Identify the strategies that contributed to the achievement of the goals. (Blind)**

Requested Revision — DSB's response provides two out of the three required components for the SE Supplement - namely, 1) Goals (Okay); 2) Strategies for Achieving the Goals (Okay); and 3) Results (NOT PROVIDED). Please add, for example, data like the following: In FY 2015, DSB achieved \_\_\_ SE Outcomes; as opposed to \_\_\_ in FY 2012, FY 2013, FY 2014.

- **VI-VR p.2.B — Describe the factors that impeded the achievement of the goals and priorities. (Blind)**

Requested Revision — Please provide data to support the conclusion that DSB's SE Goals were met; particularly with respect to the number and quality of SE employment outcomes reported by DSB for FY 2015 (in comparison to FY 2012, FY 2013 and FY 2014).

- **VI-VR p.3 — The VR program's performance on the performance accountability indicators under section 116 of WIOA. (General)**

Requested Revision — ADD/DELETE AS NOTED IN THE REVISED STATEMENT: ARS is working

with the Arkansas Research Center to perform an analysis of historical data [DELETE: to develop] [ADD: for consideration with RSA in the development of] baselines for the performance accountability measures, which should be completed in [DELETE: January 2016] [ADD REVISED DATE: \_\_\_\_]. These baselines will be used to negotiate benchmarks for the performance accountability measures as listed under section 116 of WIOA.

· **VI-VR p.3 — The VR program's performance on the performance accountability indicators under section 116 of WIOA. (Blind)**

Requested Revision — Please revise this section, per the RSA reviewer's remarks, as imbedded in DSB's response: DSB is transitioning into using the performance accountability measures under section 116 of WIOA. Steps have been taken to conduct a statistical analysis over the last 3 years [ADD: ",for consideration by DSB, in concert with RSA and DSB's Independent Commission,"] in order to develop a baseline of performance percentages for the agency in order to move forward to set applicable performance standards under section 116 of WIOA.

· **VI-VR q.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. (General)**

Requested Revision — ADD SENTENCE TO THE PARAGRAPH THAT CURRENTLY READS AS FOLLOWS: "Over a two year period, active SE cases went from 278 in FY 2013 to 603 in FY 2015, a 46 percent increase in individuals served." [ADD: However, SE outcomes constituted only \_\_\_\_ percent and \_\_\_\_ percent, respectively, in FY 2014 and FY 2015; substantially lower than the national average for all VR General Agencies of approximately 12 percent.]

· **VI-VR q.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. (Blind)**

Requested Revision — Please address both the quality of the SE services provided by DSB's vendors and the quality of the SE outcomes achieved by these vendors.

· **— Additional Comments on the Certifications from the State (General)**

Requested Revision — Please provide the Following: (1) Name of designated State agency or designated State unit, as appropriate; (2) Name of designated State agency; (3) Full Name of Authorized Representative: and (4) Title of Authorized Representative.

· **(a)(1) — The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed;**

Requested Revision — Panel Consensus "No" The Plan still indicates that this is for FY 2016. The plan should be written to be effective for FY 2017.

· **(a)(4) — The characteristics of the population the State agency intends to place in E&T;**

Requested Revision — Panel Consensus No. This section does not address the previous comment. The state must clarify whether the personal exemptions are granted directly by the contractor or recommended by the contractor and granted by DHS.

· **(a)(14) — The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.**

Requested Revision — Panel Consensus No. The state must update this section of the plan to

address how it will honor the dependent care reimbursements according to 7 CFR 273.7(d)(4) and section 6(d)(4)(I) of the Food and Nutrition Act.

- **(a)(15) — The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.**

Requested Revision — Panel Consensus No. The state agency must address how it plans to address dependent care reimbursement.

- **(a)(16) — Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and comment on the proposed reimbursements before they are implemented.**

Requested Revision — Panel Consensus No. Please see comment to section 15

- **SNAP (a)(1) — The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed:**

In General Requirements, a(1) It's not E&T participants but ABAWDs that can perform independent job search for less than half of 20 hours/week. — comment by Sunil Saraf (USDA/FNS)

In Part 1, Job Search Training, Geographic areas, it is mentioned that this component will be a part of the FY 2016 E&T program. Is this WIOA plan for FY 2016 or for FY 2017? — comment by Sunil Saraf (USDA/FNS)

According to section a.2 of this plan, Arkansas intends on implementing a voluntary E&T program. However, the language incorporated in this section of the plan makes references to mandatory and voluntary participants. If the state intends on implementing a voluntary program, ensure the narrative is consistent on E&T being a voluntary program for SNAP work registrants across all sections of the plan. — comment by Arianne Steed (USDA/FNS)

If the state chooses to implement a mandatory program instead of voluntary, be sure to offer qualifying components for able-bodied adults without dependents (ABAWDs) that are consistent with Section 6(o) of the Food and Nutrition Act and 7 CFR 273.24. Job search and job training are not qualifying components. — comment by Arianne Steed (USDA/FNS)

- **SNAP (a)(3) — The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions:**

Ensure consistency in the narrative as to the type of E&T program the state intends on continuing for FY 2016, mandatory or voluntary. The section on exemptions included in this section is not correct. The federal exemptions that would exempt SNAP clients from the general work requirements can be found under 7 CFR 273.7(b)(1). — comment by Arianne Steed (USDA/FNS)

- **SNAP (a)(4) — The characteristics of the population the State agency intends to place in E&T:**

In Table 1, B4, it states that the personal exemptions would be granted by the contractor. Is it

the contractor who will be recommending to the State to grant an exemption or will they implement the exemption themselves? — comment by Sunil Saraf (USDA/FNS)

- **SNAP (a)(5) — The estimated number of volunteers the State agency expects to place in E&T:**  
Are ABAWDs going to be considered as mandatory E&T participants and non-ABAWDs voluntary? If so, this would mean the state will implement a mandatory program for ABAWDs and non-ABAWDs can volunteer to participate. State needs to clarify this in the narrative. — comment by Arianne Steed (USDA/FNS)
- **SNAP (a)(13) — If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period**  
Is the E&T program going to be voluntary for ALL E&T participants or just for non-ABAWDs? This needs to be consistent across the plan. — comment by Arianne Steed (USDA/FNS)
- **SNAP (a)(14) — The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.**  
According to 7 CFR 273.7(d)(4), The State agency must provide payments to participants in its E&T program, including applicants and volunteers, for expenses that are reasonably necessary and directly related to participation in the E&T program. In accordance with program regulations, the reimbursable costs may include, but are not limited to, dependent care costs, transportation, and other work, training or education related expenses such as uniforms, personal safety items or other necessary equipment, and books or training manuals. — comment by Arianne Steed (USDA/FNS)
- **SNAP (a)(15) — The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.**  
In the previous section, AR indicated it will not reimburse participants for dependent care costs. According to 7 CFR 273.7(d)(4), The State agency must provide payments to participants in its E&T program, including applicants and volunteers, for expenses that are reasonably necessary and directly related to participation in the E&T program. In accordance with program regulations, the reimbursable costs may include, but are not limited to, dependent care costs, transportation, and other work, training or education related expenses such as uniforms, personal safety items or other necessary equipment, and books or training manuals. — comment by Arianne Steed (USDA/FNS)
- **TANF (a) Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).**  
Arkansas operates a TANF Block Grant assistance program on a statewide basis in accordance with all applicable federal and state laws and policies. This statewide program has been fully

articulated in previously-approved TANF State Plans by the Administration for Children and Families.

The Department of Workforce Services and the Department of Human Services – Division of County Operations work collaboratively in making the TANF Program services available in each of Arkansas’s seventy-five (75) counties.

**CRITICAL Comment(s)**

**Not complete-** The state does not provide any information regarding income and resource standards, services and benefits that will be provided to the families, disregards, or define who is in a family. This information was previously included in its current TANF plan so please include this information here.

- **TANF (b) Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)**

In accordance with federal requirements, Arkansas requires parents and caretakers to engage in work as a condition of ongoing eligibility unless they are unable to do so due to one or more of the specific criteria outlined in our Exemptions/Deferrals policy. A non-parent adult caretaker who has chosen not to be included as an eligible member is not required to participate in work activities.

Minor parents are excluded from the employment requirement, however, they must be engaged in appropriate education or training programs.

**CRITICAL Comment(s)**

**Not complete-** More information from the state’s current TANF plan is needed in this section. State needs to describe the Exemption/Deferral policy (Section 5 of current State TANF Plan).

- **TANF (c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act)**

As articulated in the federally-approved Work Verification Plan, Arkansas determines the appropriate number of hours of work participation for each parent and caretaker. The appropriate number of hours is based upon the development of the participant’s employment plan.

Arkansas has implemented the following minimum number of hours of participation in work activities for Single Parent and Two-Parent Cases:

- **Single Parent Cases** - A single TANF/TEA participant must be engaged in work activities for a minimum of 30 hours per week.
- **Two-Parent Cases** - In two parent families, one parent must be engaged in a work activity for a minimum of 35 hours per week. If the second parent is not deferred, then both parents must be engaged in work activities - one for a minimum of 35 hours per week and the other for a minimum of 20 hours per week.

Once the employment plan has been developed, the case manager inputs this data into the state’s ANSWER system that opens the case. Case managers then obtain documentation of actual hours of participation and, upon verification, enter these hours into the state’s TANF Program IT System, called ANSWER.

The ANSWER System tracks the actual hours of participation entered for the required activities. In order to remain eligible to receive financial assistance, a participant must participate in the activities outlined in the employment plan for the required number of hours. ANSWER assists the case manager in recognizing the lack of sufficient hours entered via Exception Reports.

These Exception Reports are generated monthly and contain those participants who have not participated in enough hours to comply with the federal requirements.

**CRITICAL Comment(s)**

**Not complete-** More information from the state's current TANF plan is needed in this section. State needs to include Section 4 of its current TANF plan related to work and self-sufficiency such as applicant intake, employability assessment, employment plan and describe work activities.

- **TANF (d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)**

Arkansas restricts the disclosure of information about individuals and families receiving assistance under the program. It is unlawful, except for purposes directly connected with the administration of the TANF program, for any person or persons to solicit, disclose, receive, make use of, or to authorize, knowingly permit, participate in, or acquiesce in the use of, any list of names, or any information concerning persons applying for or receiving such assistance. This includes information from the records, papers, files or communications of the state or local or county office; or information acquired in the course of the performance of official duties.

Information concerning an applicant, recipient, or other persons known to the Department will not be made available without the written consent of the applicant, recipient, or other persons known to the Department except to authorized employees of the Departments of Workforce Services and Human Services and other state or federally funded agencies for certain purposes directly connected to the implementation of the program or other federally funded programs based on need.

**Non Critical Comment(s)**

**Complete information provided-** no additional information required.

- **TANF (e) Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)**

Arkansas continues to operate programs using state and federal funds to prevent or reduce the incidence of out-of-wedlock pregnancies, including abstinence education.

The Arkansas State Legislature implemented the TANF-funded Community Investment Initiatives which includes a component designed to improve outcomes for youth. These outcomes include reducing risky behaviors such as sexual activities, drug use, and criminal behavior.

**CRITICAL Comment(s)**

**Not complete-**State needs more information here. Has not established goals with emphasis on teen pregnancies. Needs to include information from its current TANF plan (Section 8.3)

- **TANF (f) Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)**

The state uses TANF funds for emergency assistance activities that were previously authorized as of September 30, 1995 under the AFDC Emergency Assistance State Plan.

The Arkansas Department of Human Services, Division of Children and Family Services, in collaboration with the Arkansas State Police, provide services to families to alleviate emergency situations, including allegations of child mistreatment, neglect, and statutory rape. For families who are experiencing an emergency situation, the Division provides a maltreatment assessment of the family needs.

**CRITICAL Comment(s)**

**Not complete-** More information from the state's current TANF plan (Section 8.3) is needed in this section. State does not mention that programs focusing on the program of statutory rape so that teenage pregnancy prevention programs may be expanded to include men.

- **TANF (g) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)**

TANF Program participants have access to their monthly cash assistance benefits through electronic benefit transfer (EBT) cards. Policies and procedures are in place to ensure that TANF benefits are only used by recipients to purchase goods and services essential or necessary for the welfare of their families.

The state's EBT Restrictions Plan, approved by the Administration for Children and Families, details the specific policies and procedures related to in place to ensure that monthly cash assistance benefits are both accessible and only used for eligible products and services.

**CRITICAL Comment(s)**

**Not complete-** State needs to provide more detail with regard to its EBT specific policies and procedures in place. Needs to include what is in its current TANF plan (Section 19)

- **TANF (h) Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)**

When benefits are first issued, Arkansas provides clients information about the fees and surcharges that stores may charge clients when using the EBT card to get cash from their TANF benefit accounts. Clients receive an informational brochure with the initial EBT card disbursement.

The brochure explains that clients receive two free ATM transactions per calendar month. For the third and subsequent TANF cash withdrawal in a calendar month, a retailer has the option to charge recipients a fee of \$0.65 per transaction. Retailers are not permitted to charge a TANF recipient any other fees or surcharges in connection with the client's use of their TANF benefit account.

Additionally, the EBT Customer Service telephone number is provided to clients so they can receive information related to lost or stolen cards, PIN retrieval, or report potential erroneous charges or fees.

**Non Critical Comment(s)**

**Complete-** no further content needed.

- **TANF (i) Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)**  
Arkansas does not treat families moving into the state differently than other families under the program.  
**Non Critical Comment(s)**  
Acceptable, but recommend that statement in Section 6.7 of current TANF State Plan be added.
- **TANF (j) Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)**  
Arkansas provides assistance under the TANF Program to individuals who are not citizens of the United States in the same manner and based upon the same eligibility criteria as US citizens, if the non-citizen meets the definition of “qualified alien”. These qualified aliens are persons who entered the United States before August 22, 1996, qualified aliens who entered the United States on or after August 22, 1996 who are excepted from the five-year bar, or aliens who entered the United States on or after August 22, 1996 and have been in "qualified alien" status for at least five (5) years.  
**Non Critical Comment(s)**  
Complete- no further content needed.
- **TANF (k) Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)**  
Arkansas determines eligibility and delivers benefits under the TANF Program in accordance with federal requirements.  
Notices of adverse action are sent to applicants prior to the adverse action being taken. The recipient is allowed to appeal the adverse action if he or she responds within the 30 day time period. Continuation of benefits will be granted provided the appeal was received within ten days from the date of the notice.  
The Department of Human Services administers and conducts hearings in accordance with the Arkansas Administrative Procedures Act 25-15-201 et seq.  
**CRITICAL Comment(s)**  
Not complete- More information from the state’s current TANF Plan (Sections 3 and 6)) is needed in this section.
- **TANF (l) Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—**  
1. providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or  
2. in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.  
The Arkansas Department of Workforce Services works collaboratively with the State’s twenty-five (25) two-year colleges and technical institutions to provide training to low-income recipients in medical occupations to address the low workforce demand.

Prior to the provision of this training, a determination is made regarding whether or not these occupations are determined as “high-demand” in the geographical area by the Department’s Labor Market Information Unit. Attracting and training individuals in elder care will ensure a pool of employees with the skill set necessary to provide quality care.

**Non Critical Comment(s)**

**Complete- no further content needed.**

- **TANF (m)** Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

Arkansas provides funding for the Arkansas Better Chance for School Success Program that is utilized in Arkansas’s TANF program for MOE purposes. The expenditures are utilized in accordance with the regulations provided for under the Arkansas Better Chance program. The Arkansas Better Chance Program is a school readiness program for children ages 3-5 at state licensed child care centers and at schools governed by local health and safety laws for families with gross income not exceeding 200% of the FPL.

**Non Critical Comment(s)**

**Acceptable, but recommend that a statement be added stating that TANF MOE funds are not used to fund any other services.**

- **JVSG (a)** The State is referencing VPL 03-14 for the SBEs but VPL 03-14 Change 2 redefined some of the SBEs (page 289 of 316)
- **JVSG (b)** No system to refer only SBE veterans to the DVOP (page 77)
- **JVSG (c)** Plan states, *“If a veteran self–attests during the initial assessment by AWC staff, the veteran will be referred to a DVOP Specialist...”* and should read, *“If a veteran self–attests to having an SBE during the initial assessment by AWC staff, the veteran will be referred to a DVOP Specialist...”* (page 77)
- **JVSG (d)** Insufficient demonstration of how Priority of Service will be provided or monitored (5<sup>th</sup> page of JVSG plan)
- **JVSG (e)** Plan does not describe how the state provides the mandatory services for SBE veterans (6<sup>th</sup> page of JVSG plan)
- **JVSG (f)** Plan states that HR will keep track of mandatory hire dates and statutorily required training will be completed within 18 months. State must describe how they are tracking this to avoid missing statutory training mandates.



The Honorable Asa Hutchinson  
Governor of Arkansas  
State Capitol  
Room 250  
Little Rock, Arkansas 72201

Dear Governor Hutchinson:

After careful review, the U.S. Departments of Labor and Education (Departments) are pleased to inform you that we have determined that Arkansas' four-year Workforce Innovation and Opportunity Act (WIOA) Combined State Plan (Combined State Plan or State Plan), submitted on April 1, 2016, is substantially approvable. Therefore, the Departments have approved your Combined State Plan, which covers the period July 1, 2016 through June 30, 2020, subject to conditions discussed below. Although the Departments have approved the four-year plan, you must submit a State Plan modification in 2018, as required by sections 102(c)(3)(A) and 103(b)(1) of WIOA.

This decision does not constitute a determination on the program-specific requirements of the Combined State Plan for those programs administered by Federal agencies other than the Departments of Education and Labor: the Temporary Assistance for Needy Families program authorized under 42 U.S.C. 601 et seq., and administered by the Department of Health and Human Services; and the Employment and Training programs under the Supplemental Nutrition Assistance Program authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 and, administered by the Department of Agriculture. You will receive information about the approval status of these portions of the Combined State Plan from the Department of Health and Human Services and the Department of Agriculture within the 120 day timeframe for approval of these portions of your Combined State Plan.

WIOA represents a fundamental transformation of the workforce system to deliver integrated, job-driven services to job seekers, workers, and employers. It supports the development of strong regional economies, and it improves performance accountability so that consumers and investors can get information about programs and services that work. The Departments are encouraged by the progress that Arkansas has made to implement and operationalize WIOA.

We look forward to working with you to continue this important work to strengthen your current plan to continue to take the workforce system to a new level of innovation.

The Departments approved your Combined State Plan, subject to conditions, after reviewing it in light of the requirements contained in sections 102 and 103 of WIOA, and the WIOA State Plan Information Collection Request (ICR), Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act, as well as the program-specific requirements for the included Department of Labor and Education programs. This decision constitutes a written determination that covers the joint planning elements, or "common elements," as well as the program-specific requirements for the six core programs: the Adult, Dislocated Worker, and Youth programs authorized under title I of WIOA and administered by the Department of Labor; the Adult Education and Family Literacy Act (AEFLA) program authorized under title II of WIOA and administered by the Department of Education; the Employment Service program authorized under the Wagner-Peyser Act (Wagner-Peyser), as amended by title III of WIOA and administered by the Department of Labor; and the Vocational Rehabilitation program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, and administered by the Department of Education.

This decision also constitutes a written determination that covers the program-specific requirements for the Combined State Plan programs that Arkansas included in its State Plan that are administered by the Department of Labor: the Jobs for Veterans State Grants program authorized under 38 U.S.C 4100, et. seq.; the Trade Adjustment Assistance for Workers program authorized under chapter 2 of title II of the Trade Act of 1974; and the Unemployment Insurance program authorized under State unemployment compensation laws in accordance with applicable Federal law.

The Departments have approved the State Plan subject to conditions because there are a number of deficiencies set forth in Attachment A to this letter that must be remedied. No later than September 1, 2016, Arkansas must correct the deficiencies identified in Attachment A that can be fully remedied by that date by submitting revised State Plan descriptions that comply with statutory and ICR requirements to the portal at <https://rsa.ed.gov/>. We expect that by September 1, 2016, States will make maximum efforts to correct the deficiencies that can be corrected by that date. However, we recognize that some deficiencies will take longer to remedy. For those deficiencies identified in Attachment A that cannot be remedied by September 1, 2016, Arkansas must provide the Departments with an action plan for correcting each of those deficiencies to [WIOA.Plan@dol.gov](mailto:WIOA.Plan@dol.gov). Arkansas must include in its action plan the specific steps that will be taken to remedy the deficiencies, benchmarks that will be used to monitor progress, and the timeline for correcting each of the remaining deficiencies. Your acceptance of any funds pursuant to this approval with conditions constitutes your agreement to remedy each of the deficiencies identified in Attachment A to the satisfaction of the Departments, and the Notices of Award and Grant Award Notifications used to award Arkansas' funds will include this condition. A determination on any title I waivers requested by Arkansas is provided in Attachment B.

The Departments recognize the unique challenges States faced in developing the initial State Plan required by WIOA, particularly given that: the State Plan requirements under WIOA are substantially different from those required by the Workforce Investment Act of 1998 (WIA); the State Plan information collection request was published on February 22, 2016; and the final regulations are not expected to be publicly available until late June. As such, the Departments are exercising the transition authority provided by section 503 of WIOA to develop a process that ensures the orderly transition from the requirements of WIA to those of WIOA and its strategic vision. As part of this process, however, it is critical that Arkansas work to address the deficiencies in the State Plan in the manner described above and to the satisfaction of the Departments. In the case of those deficiencies that require a longer period for Arkansas to address, the Departments will monitor Arkansas' progress to ensure that the State Plan fully reflects WIOA's planning requirements. If Arkansas fails to make progress in remedying the deficiencies in the State Plan, the Departments may take enforcement actions that are available to them, and Arkansas' funding could be affected.

Finally, per the Departments' State Plan ICR, the State Plan included expected levels of performance for certain primary indicators of performance. Those indicators are the basis for negotiations that the Departments and Arkansas use to establish negotiated levels of performance, which are incorporated into the Combined State Plan and will apply for the first two years.

For the WIOA Adult, Dislocated Worker, Youth, and Wagner-Peyser programs, the Department of Labor is using transition authority in WIOA sec. 503(a) to extend the negotiation period for those indicators past June 30, 2016; negotiations are to conclude no later than August 15, 2016. For the AEFLA program, the Department of Education will complete negotiations by June 30, 2016. For the Vocational Rehabilitation program, the Department of Education is using the transition authority to take the time necessary to implement a negotiation process for the first time for this program, and the program, therefore, will not have negotiated indicators of performance for the first two years of this Plan. For all WIOA core programs, all primary indicators of performance that are not subject to negotiations are designated as baseline indicators for these two years. For those indicators not subject to negotiations, the State was not required to include expected levels of performance in the State Plan.

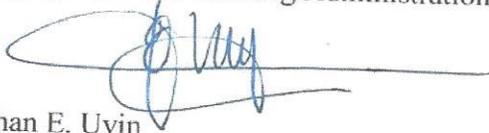
The Departments will provide ongoing technical assistance to help Arkansas realize the vision of WIOA. Following the release of the final regulations, the Departments will provide training on the final regulations and issue additional guidance. The Departments' staff will work with you and your agencies and staff to address important qualitative issues in the initial State Plan that are not listed on the attachment because they do not rise to the level of non-compliance, in order to help Arkansas better position itself to submit a 2018 State Plan modification that reflects its significant experience in implementing WIOA, and articulates the integration and innovations it has undertaken. In other words, the Departments anticipate that the 2018 State Plan modification will be a key step in demonstrating the workforce system transformation envisioned by WIOA.

We appreciate your efforts in submitting this Combined State Plan and commitment to working together with other States and the Departments to support the public workforce system. We look forward to working with you to ensure that the revisions are submitted in a timely manner. If you have any questions, please contact Nicholas Lalpui, Employment and Training Administration, Dallas Regional Administrator, (972) 850-4600 and email: [lalpui.nicholas@dol.gov](mailto:lalpui.nicholas@dol.gov).

Sincerely,



Portia Wu  
Assistant Secretary  
Employment and Training Administration



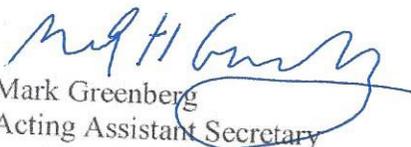
Johan E. Uvin  
Deputy Assistant Secretary  
Delegated the Duties of the Assistant Secretary for Career, Technical, and Adult Education



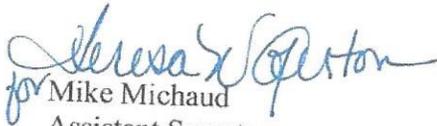
Sue Swenson  
Acting Assistant Secretary  
Office of Special Education and Rehabilitative Services



Janet LaBreck  
Commissioner  
Rehabilitation Services Administration



Mark Greenberg  
Acting Assistant Secretary  
Administration for Children and Families



for Mike Michaud  
Assistant Secretary  
Veterans' Employment and Training Service

*Kevin W Concannon*

Kevin W. Concannon  
Under Secretary  
Food, Nutrition, and Consumer Services

Attachment

cc:

Nicholas Lalpui, Regional Administrator  
Daryl E. Bassett, State Workforce Agency  
Trenia Miles, State Adult Education Agency  
Katy Morris, State Vocational Rehabilitation Agency  
Alan McClain, State Vocational Rehabilitation Agency  
Roseanna Smith, Federal Panel LeadLead  
John Selig, State USDA Agency  
Beverly Buchanan, State Department of Human Services  
Stephanie Robinson, JVSG State Coordinator  
Roy Schultz, DVET

## ATTACHMENT A

### **Arkansas Combined State Plan Deficiencies**

Following is an itemized list of the Arkansas Combined State Plan sections that the Departments determined were deficient, including a summary of the reason for the deficiency. Arkansas must submit revisions for these items in its State Plan or describe its action plan for addressing them no later than September 1, 2016, as described in the Departments' decision letter. The Departments will provide technical assistance to assist Arkansas in making the required revisions to its State Plan. Items below reflect the corresponding requirement in the State Plan ICR.

#### Common Elements

- II.b.2 — Goals. The State provided a response to this element; however, it did not address how the goals for achieving the State's strategic vision are based on the special populations outlined in section II.a of the State Plan.
- III.b.7 — Priority of Service for Veterans. The State provided a response to this element; however, it did not describe the referral process for veterans determined to have a significant barrier to employment.

#### Adult Education and Family Literacy Act

- VI.b — Local Activities. The State provided a response to this element; however, it did not adequately describe which activities will be provided concurrently with other activities.

#### Jobs for Veterans State Grants

- VII.f — Describe how the State implements and monitors the administration of priority of service to covered persons. The State's response did not describe how it implements and monitors the administration of priority of service to covered persons.
- VII.h — Provide the hire date along with mandatory training completion dates for all DVOP specialists and LVER staff. The State's response did not include a list of the hire dates and mandatory training completion dates for all Disabled Veterans Outreach Program (DVOP) specialists and Local Veterans Employment Representative (LVER) staff.

## ATTACHMENT B

### Arkansas Waiver Requests

As part of the Arkansas' WIOA State Plan, the State submitted requests for waivers of certain statutory requirements under titles I and III of WIOA. The Department of Labor, which administers the programs affected by the waiver requests, has made determinations regarding those waiver requests as outlined below. This action is taken under the Secretary of Labor's authority at WIOA Section 189(i) to waive certain requirements of WIOA Title I, Subtitles A, B, and E and Sections 8 through 10 of the Wagner-Peyser Act.

Requested Waiver: Performance requirements at 116(b)(2)(A)(i)(IV) to allow the Credential Attainment Rate to be considered a baseline indicator for the first two years of the State Plan.

The State has requested a waiver of Section 116(b)(2)(A)(i)(IV) to allow the Credential Attainment Rate to be considered a baseline indicator for the first two years of the plan. ETA has determined the State has enough historical information under the Workforce Investment Act in order to negotiate targets for Credential Attainment Rate for WIOA Title I programs. Therefore, ETA is denying this waiver.

Requested Waiver: Performance requirements at WIOA Section 116 WIOA Section – 116 (b)(2)(A)(i)(IV) and the definition of Recognized Postsecondary Credential at WIOA Section 3(52) to allow Career Readiness Certificates and program completion of curriculum and certification to be counted as a credential for the credential attainment rate.

The State has requested a waiver of the performance requirements at WIOA Section 116 WIOA Section 116(b)(2)(A)(i)(IV) and the definition of Recognized Postsecondary Credential at WIOA Section 3(52) to allow Career Readiness Certificates and program completion of curriculum and certification to be counted as a credential for the credential attainment rate. ETA is denying this waiver request. While the type of skills documented in work readiness certificates are foundational for many careers, these certificates do not represent technical preparation for any specific career. Therefore, the Department has determined they are not appropriate for inclusion as a success in the credential attainment indicator.

Requested Waiver: Performance requirements at WIOA section 116 (b)(2)(A)(i)(V) to allow Measureable Skill Gains to be considered a baseline indicator for the first two years of the State Plan.

The State has requested a waiver of performance requirements at WIOA section 116 (b)(2)(A)(i)(V) to allow the Measureable Skill Gains indicator to be considered a baseline indicator for the first two years of the State Plan. This waiver is not needed. To effect an orderly transition to the performance accountability system in Section 116 of WIOA, the Departments of Education and Labor are using transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as "baseline" indicators in the first plan submission. A "baseline" indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on during the

negotiations process. Per the State Plan Information Collection Request (ICR) Appendix I, Measureable Skill Gains is treated as a baseline indicator for all programs except the AEFLA program under Title II of WIOA. For Title I programs, Measurable Skill Gains is treated as a baseline indicator for the first two years of State Plans.

**For Consideration of the  
Arkansas Workforce Development Board  
Strategic Planning Committee**

**July 12, 2016**

**AGENDA ITEM 3 – ACTION:** Regional and Local Planning Guidance

**RECOMMENDATION:** It is recommended that the Strategic Planning Committee approve the regional and local planning guidance for use by local workforce development boards in preparing their regional and local plans for compliance with the Workforce Innovation and Opportunity Act.

**INFORMATION/RATIONALE:** The Workforce Innovation and Opportunity Act (WIOA) requires local workforce development boards and chief elected officials within each of Arkansas’s ten established local workforce development areas to engage in an integrated regional and local workforce planning process to prepare, submit, and obtain approval of a single collaborative regional plan that incorporates local plans for each of the local areas within a given workforce planning region. This is a new requirement for local workforce boards. Regional and local plans must comply with the requirements outlined in WIOA and this guidance document, support the strategies described in the State Plan, and be otherwise consistent with the State Plan.

The attached guidance was developed by consulting the WIOA law and regulations. This draft was developed using the draft regulations available at the time. Due to the release of federal WIOA regulations on June 30, 2016, the staff is reviewing the draft planning guidance against federal regulations and will report any disparities at the committee meeting on July 12, 2016.

Regional and local plans will be due by December 31, 2016.

DEPARTMENT OF WORKFORCE SERVICES  
ISSUANCE NUMBER PY 15-XX

Daryl Bassett, Director

July XX, 2016

TO: Local Workforce Development Board Chairs  
Local Workforce Development Board Directors  
Local Elected Officials

SUBJECT: Regional and Local Planning – Initial Implementation of the Workforce Innovation and Opportunity Act (WIOA)

- I. **Purpose:** The purpose of this workforce system guidance is to provide instructions to local workforce development boards regarding the coordinated submission of transitional regional and local plans for program year (PY) 2016.
- II. **General Information:** The Workforce Innovation and Opportunity Act (WIOA) requires local workforce development boards and chief elected officials within each of Arkansas's ten established local workforce development areas to engage in an integrated regional and local workforce planning process to prepare, submit, and obtain approval of a single collaborative regional plan that incorporates local plans for each of the local areas within a given workforce planning region. This is a new requirement for local workforce boards. Regional and local plans must comply with the requirements outlined in WIOA and this guidance document, support the strategies described in the State Plan, and be otherwise consistent with the State Plan. **This integrated plan must be submitted to the Arkansas Department of Workforce Services no later than December 30, 2016.**
- III. **Action Required:**
  - A. **Transitional Regional Plan.** Each local workforce development board and their respective chief elected official(s) must collaborate with the other local workforce boards and chief elected official(s) within their respective planning region to prepare and submit a transitional two-year regional plan for PY 2016 and PY 2017. A transitional regional plan template, which takes into account the transition from WIA to WIOA, has been developed and is included as ***Appendix A: PY 2016-PY 2017 Transitional Regional Plan Template***. This appendix provides guidelines for transitional regional planning and instructions to address each required element, as well as the documents and information that must be included.
  - B. **Transitional Local Plan.** A transitional two-year local plan for PY 2016 and PY 2017 for each local workforce development board within a workforce planning region must be developed by the local boards and their respective chief elected official(s), in alignment with the transitional regional plan, and submitted as a component of that regional plan. A transitional local plan template, which takes into

account the transition from WIA to WIOA, has been developed and is included as *Appendix B: PY 2016-PY 2017 Transitional Local Plan Template*. This appendix provides guidelines for transitional local planning and instructions to address each required element, as well as the documents and information that must be included.

- C. **Public Comment Period.** The transitional regional/local plan(s) may be posted as one cohesive document for a 30-day period of public comment. Notification of the posting of the regional/local plan(s) must be made simultaneously to all relevant regional/local stakeholders, as well as to the State.

Any comments received in relation to the content of the draft transitional regional plan (and/or its associated local plan(s)) must be addressed within the plan prior to submission to the Arkansas Department of Workforce Services.

D. **Plan Submission and Approval.**

- 1) 1. **Submission.** All transitional regional/local plan packages must be submitted electronically to the following email by close of business on Friday, December 30, 2016: [wioa@arkansas.gov](mailto:wioa@arkansas.gov)

*Note:* Transitional regional plans, along with all associated local plans, must be emailed by a regionally designated single point of contact (POC). Plan submission emails must copy all local workforce development board directors and chief elected officials within the region/local workforce development areas and contain the subject line “[Region Name] PY 2016 – PY 2017 Transitional WIOA Regional Plan.”

- 2) **Approval.** Region/Local plan(s) submitted to the Department are considered approved if:
- i. the Department provides the regional POC with a notification of approval; or
  - ii. at least 90 days has passed, since the submission of the draft plan, without the regional POC receiving any communication from the Department.

The Department may choose not to approve a draft plan submission for any of the following reasons:

- § Deficiencies exist in activities carried out in WIOA subtitles A and B;
- § The plan does not comply with the applicable provisions of WIOA;
- § The plan does not align with the State Plan;
- § The plan does not include local plan submissions from each of the local workforce development boards within the workforce planning region; or
- § Other reasons as the Department may determine.

- E. **Future Planning Requirements.** Following the Department’s approval of a region’s transitional plan (to include local plans), the workforce planning region must begin to make preparations for the development and completion of WIOA (four-year) planning requirements. Such planning requirements are satisfied through an expansion of the two (2) year transitional plan into a more comprehensive

multi-year regional plan and local plan. Guidance regarding comprehensive multi-year regional and local planning requirements will be provided at a future date.

**IV. Inquiries:** To ensure a successful process in the development of the transitional regional/local plans, the Department is prepared to partner with regions and their local boards in providing any necessary assistance, or in hearing recommendations that may prove helpful to other regions/local areas. Any and all questions or concerns are welcome and may be submitted to the following email: [wioa@arkansas.gov](mailto:wioa@arkansas.gov)

**V. Attachments:**

Appendix A: PY 2016 – PY 2017 Transitional Regional Plan Template

Appendix B: PY 2016 – PY 2017 Transitional Local Plan Template

Appendix C: Transitional Planning References and Resources

**VI. Expiration Date:** June 30, 2018

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## Appendix A: PY 2016 – PY 2017 Transitional Regional Plan Template

WIOA requires regional planning— a broad strategic approach to planning focused on the overarching vision, goals, alignment and shared responsibilities within the region. Arkansas intends to implement a two-tiered regional approach to meeting this requirement by allowing a two-year transitional plan. This approach provides latitude for regions that may not yet be able to fully address all of the outlined elements required in a four-year regional plan.

In addressing the elements outlined below, if the planning region is not fully prepared to provide a complete response to the specified element at the time of plan submission, the region must provide an indication of how the region plans to address the respective element requirement in the forthcoming regional plan. **Please address the following elements in a narrative of 15 pages or less.**

- 1.1. Provide the following:
  - A. A reference name for the planning region;
  - B. Identification of the local workforce development areas that comprise the planning region;
  - C. Identification of the county(ies) each local workforce development area serves;
  - D. Identification of the key planning region committee members charged with drafting the regional plan;
  - E. Indication of the local workforce development area each committee member is associated with; and
  - F. A list of key planning region committee meeting dates. [WIOA Sec. 106(a) and (c)]
  
- 1.2. Provide a labor market and economic analysis of the workforce development planning region. This regional analysis must include:
  - A. The economic conditions;
  - B. Labor force employment and unemployment data;
  - C. Information on labor market trends;
  - D. Workforce development activities;
  - E. The educational and skill levels of the workforce, including individuals with barriers; and
  - F. The development and implementation of sector initiatives for existing and emerging in-demand industry sectors or occupations for the region.

Indicate the sources of regional labor market and economic data. [WIOA Sec. 106(c)(1)(C)]

- 1.3. Based upon the regional labor market and economic conditions analysis and *Arkansas's Workforce Development Plan (PY 2016 –PY 2019)* describe the planning region's economic and workforce development oriented vision and strategic goals. [WIOA Sec. 106(c) and Sec. 107(d)]

- 1.4. Describe regional strategies used to facilitate engagement of businesses and other employers, including small employers and in-demand industry sector occupations. Describe methods and services to support the regional workforce system in meeting employer needs. [WIOA Sec. 106(c)]
- 1.5. Describe how the planning region will define and establish regional workforce development service strategies. Describe how the planning region will develop and use cooperative workforce development service delivery agreements. [WIOA Sec. 106(c)(B)]
- 1.6. Describe how the planning region will define and establish administrative cost arrangements, including the pooling of funds for administrative costs, as appropriate, for the region. [WIOA Sec. 106(c)(E)]
- 1.7. Describe how the planning region will determine and coordinate transportation and other supportive services for the region. [WIOA Sec. 106(c)(F)]
- 1.8. Describe strategies and services the planning region will employ to coordinate workforce development programs/services with regional economic development services and providers. [WIOA Sec. 106(c)(G)]
- 1.9. Describe how the planning region will establish an agreement concerning how the planning region will collectively negotiate and reach agreement with the State on local levels of performance for, and report on, the performance accountability measures described in WIOA Section 116(c), for local areas and the planning region. [WIOA Sec. 106(c)(H)] [proposed 20 CFR 677.210(b) and (c)] and [proposed 20 CFR 679.510(a)(2)]

# Appendix B: PY 2016 Transitional Local Plan Template

WIOA requires each local workforce area to develop a local plan that supports and is submitted as a component of its associated regional plan. The narratives framed in the local plan will include more detailed, actionable plans and objectives, consistent with the local plan’s respective regional plan strategic visions and goals. In addressing the elements outlined below, if the local board is not prepared to provide a complete response to a specific element at the time of plan submission, a response must be provided that indicates how the local board plans to fully address that particular element in the multi-year plan.

Transitional local plans are not expected to exceed 75 pages.

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## Section 1: Workforce and Economic Analysis

Please provide a separate response for each of the elements listed below.

- 1.1. Provide an analysis of the economic conditions, including existing and emerging in-demand industry sectors and occupations; and the employment needs of employers in those industry sectors and occupations. [WIOA Sec. 108(b)(1)(A)] and [proposed 20 CFR 679.560(a)]

*Note:* Per WIOA Sec. 108(c), existing economic regional and/or local area analyses may be used if sourced data and/or derived analyses are economically relevant and current (i.e., within two years of the issuance of this guidance).

- 1.2. Provide an analysis of the knowledge and skills required to meet the employment needs of the employers in the local area, including employment needs for in-demand industry sectors and occupations. [WIOA Sec. 108(b)(1)(B)] and [proposed 20 CFR 679.560(a)]
- 1.3. Provide an analysis of the local workforce, including current labor force employment (and unemployment) data, and information on labor market trends, and the educational and skill levels of the workforce in the region, including individuals with barriers to employment. [WIOA Sec. 108(b)(1)(C)] and [proposed 20 CFR 679.560(a)]
- 1.4. Provide an analysis and description of workforce development activities, including type and availability of education, training and employment activities. Include analysis of the strengths and weaknesses of such services, and the capacity to provide such services, in order to address the education and skill needs of the workforce and the employment needs of employers in the region. [WIOA Sec. 108(b)(1)(D)] and [proposed 20 CFR 679.560(a)]

## Section 2: Strategic Vision and Goals

Section 2 responses will require input from members of the local workforce development board and other local stakeholders. Please provide a separate response for each of the elements listed below.

- 2.1 Describe the local board's strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment). Include goals relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) in order to support regional economic growth and economic self-sufficiency. [WIOA Sec. 108(b)(1)(E)]
- 2.2 Describe how the local board's vision and goals align with and/or supports the vision and goals for the State's workforce development system as established by the Arkansas Workforce Development Board. [WIOA Sec. 108(b)(1)(E)] (See Appendix C: Transitional Planning References and Resources)
- 2.3 Describe how the local board's vision and goals contributes to each of the governor's goals. [WIOA Sec. 108(b)(1)(E)] (See Appendix C: Transitional Planning References and Resources)  
Note: The State Plan includes a number of objectives under each goal.
- 2.4 Describe how the local board's goals relate to the achievement of federal performance accountability measures. [WIOA Sec. 108(b)(1)(E)]

### Section 3: Local Area Partnerships and Investment Strategies

Many of the responses in this section, such as targeted sector strategies, should be based on strategic discussions with the local board and partners. Please provide a separate response for each of the elements listed below.

- 3.1 Taking into account the analysis described in Appendix B - Section 1, describe the local board's strategy to work with the entities that carry out the core programs to align resources available to the local area, in order to achieve the strategic vision and goals described in element 2.1. This analysis should include:
- A. A description of the local workforce development system; include key stakeholders and entities associated with administrative and programmatic/service delivery functions. Examples include elected officials, advocacy groups, local workforce development board and committee structure, fiscal agent, operator(s), required program partners, and major contractors providing Adult/Dislocated Worker/Youth program elements. Describe respective roles and functional relationships to one another;
  - B. A list of all Arkansas Workforce Centers in the local area; include address, phone numbers, and hours of operation; and
  - C. An attached organization chart that depicts the local board, administrative and fiscal entities, and service providers. [WIOA Sec. 108(b)(1)(F)]
- 3.2 Describe the workforce development system in the local area that identifies the programs that are included in that system and how the local board will work with the entities carrying out core and other workforce development programs to support alignment to provide services, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et. seq), that support the strategy identified in the State plan under section 102(b)(1)(E). [WIOA Sec. 108(b)(2)]
- Note:* The six (6) core programs identified by WIOA are: Adult, Dislocated Worker, Youth, Adult Education and Literacy, Wagner-Peyser Program, and Vocational Rehabilitation.
- 3.3 Describe how the local board, working with the entities carrying out core programs, will expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment, including how the local board will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable). [WIOA Sec. 108(b)(3)]

- 3.4 Identify and describe (for each category below) the strategies and services that are and/or will be used to:
- A. Facilitate engagement of employers, including small employers and employers in in-demand industry sectors and occupations, in workforce development programs in addition to targeted sector strategies;
  - B. Support a local workforce development system that meets the needs of businesses;
  - C. Better coordinate workforce development programs and economic development; and
  - D. Strengthen linkages between the one-stop delivery system and unemployment insurance programs.

This may include the implementation of initiatives such as incumbent worker training programs, on-the-job training programs, work-based learning programs, apprenticeship models, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies that support the local board's strategy in element 3.1.

[WIOA Sec. 108(b)(4)(A) and (B)].

- 3.5 Describe local and regional efforts to support and/or promote entrepreneurial skills training and microenterprise services, in coordination with economic development and other partners. [WIOA Sec. 108(b)(5)]
- 3.6 Describe how the local board coordinates education and workforce investment activities with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services, and avoid duplication of services. [WIOA Sec. 108(b)(10)]
- 3.7 Describe efforts to coordinate supportive services provided through workforce investment activities in the local area, including facilitating transportation for customers. [WIOA Sec. 108(b)(11)]
- 3.8 Describe strategies to implement the operational goals of the local one-stop system, maximizing coordination of services provided by the State's employment services under the Wagner-Peyser Act (29 U.S.C. 49 et seq.), and the local board's service providers in order to improve services and avoid duplication. [WIOA Sec. 108(b)(12)]

3.9 Describe how the local board will carry out a review of local applications submitted under WIOA Title II Adult Education and Literacy, consistent with the local plan (as described in WIOA Sec. 107(d)(11) and WIOA Sec. 232). [WIOA Sec. 108(b)(13)]

3.10 Based on the analysis described in Appendix B - Section 1, identify the industries where a sector partnership is currently being convened in the local area or where there will be an attempt to convene a sector partnership and the timeframe. Categorize the sector partnerships as active, emerging, or exploring as defined below.

§ Active

- § Has a clear coordinator, convener, or convening team;
- § Is led by industry as demonstrated by private sector members playing leadership roles;
- § Has broad industry engagement as demonstrated by industry members attending meetings, partnering on activities, providing in-kind or financial resources, or similar;
- § Includes critical and engaged partners across programs from workforce development;
- § Can demonstrate that the partnership is not “just a workforce thing,” “just an economic development thing,” or “just an education thing.”
- § Operates in a true labor market region, not within the confines of a workforce area or other geopolitical boundaries;
- § Operates under some kind of shared strategic plan, road map, etc.;
- § Can demonstrate clearly identified priorities and an action plan, be able to demonstrate recent or current activities, services or products that are a direct outcome of the partnership.

§ Emerging

- § Has at least an interim coordinator, convener, or convening team;
- § Has engaged at least one private sector champion to help drive the launch and implementation of a sector partnership;
- § Includes individuals from workforce development, education, economic development and other programs or organizations in strategic partner roles;
- § Actively working to implement strategic priorities outlined in a launch meeting.

§ Exploring

- § Is in the infancy stage, but actively considering or planning the preparation needed to launch a partnership;
- § Working to identify partners who would be involved;
- § Determining if the partnership really makes sense for the community.

- 3.11 Does the local board currently leverage or have oversight of funding outside of WIOA Title I funding to support the local workforce development system? Briefly describe the additional funding and how it will impact the local system. If the local board does not currently have oversight of additional funding, describe any future plans to pursue them.

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## Section 4: Program Design and Evaluation

Many of the responses below should be based on strategic discussions between the local board and one-stop partners. Please provide a separate response for each of the elements listed below.

- 4.1 Describe the one-stop delivery system in the local area including:
- A. The local board's efforts to ensure the continuous improvement of eligible providers of services, including contracted service providers and providers on the eligible training provider list, and ensure that such providers meet the employment needs of local employers, workers and jobseekers. [WIOA Sec. 108(b)(6)(A)]
  - B. How the local board will facilitate access to services provided through the one-stop delivery system in remote areas, through the use of technology, and through other means. [WIOA Sec. 108(b)(6)(B)]
  - C. How entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA section 188, and applicable provisions of the Americans with Disabilities Act of 1990 regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities. [WIOA Sec. 108(b)(6)(C)] (See Appendix C: *Transitional Planning References and Resources*)
  - D. List all required and optional program partners; indicate the program(s) each partner provides and the physical location where the program(s) can be accessed. Describe the roles and resource contributions of the partners. [WIOA Sec. 108(b)(6)(D)]
  - E. Describe how the workforce centers are implementing and transitioning to an integrated technology-enabled intake and case management information system for core programs [WIOA Sec. 108(b)(21)]
- 4.2 Describe the local board's assessment of the type and availability of adult and dislocated worker employment and training activities in the local area. [WIOA Sec. 108(b)(7)]
- 4.3 Describe how the local board will coordinate workforce investment activities carried out in the local area with statewide rapid response activities. [WIOA Sec. 108(b)(8)]
- 4.4 Describe the local board's assessment of the type and availability of youth workforce activities, including activities for youth with disabilities. Identify successful models and best practices for youth workforce activities relevant to the local area. [WIOA Sec. 108(b)(9)]

*Note:* This section must include a description of the program design elements as well as how the local area will implement the 14 program elements.

- 4.5 Describe local board actions to become and/or remain a high-performing local board, consistent with the factors developed by the Arkansas Workforce Development Board. **These factors have not been determined but will include effectiveness and continuous improvement criteria for local boards.** [WIOA Sec. 108(b)(18)]

(See Appendix C: *Transitional Planning References and Resources*)

- 4.6 Describe how training services will be provided in accordance with WIOA Sec. 134(c)(3)(G), the process and criteria for issuing individual training accounts. [WIOA Sec. 108(b)(19)]
- 4.7 If contracts for training services are used, describe processes utilized by the local board to ensure informed customer choice in the selection of training programs, regardless of how the training services are to be provided. [WIOA Sec. 108(b)(19)]
- 4.8 Describe the process utilized by the local board to ensure that training provided is linked to in-demand industry sectors or occupations in the local area, or in another area to which a participant is willing to relocate. [WIOA Sec. 108(b)(22)] and [WIOA Sec. 134(c)(3)(G)(iii)]

## Section 5: Compliance

Responses are focused on the local area's compliance with federal or state requirements. Please provide a separate response for each of the elements listed below.

- 5.1 Describe the replicated cooperative agreements, as defined by WIOA 107(d)(11), in place between the local board and the Vocational Rehabilitation programs operated in the area with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination. [WIOA Sec. 108(b)(14)]
- 5.2 Identify the entity responsible for the disbursement of grant funds as determined by the Chief Elected Official(s). [WIOA Sec. 108(b)(15)]
- 5.3 Describe the competitive processes to award the subgrants and contracts for activities funded by WIOA Title I programs within the local area. This includes, but is not limited to, the process used to award funds to a one-stop operator and other sub-recipients/contractors of WIOA Title I adult, dislocated worker, and youth services. [WIOA Sec. 108(b)(16)]
- 5.4 Describe the local area's negotiated local levels of performance for the federal measures and their implications upon the local workforce system; attach the completed Performance Targets Template. [WIOA Sec. 108(b)(17)]  
  
*Note:* See Appendix C: Transitional Planning References and Resources "Performance Targets Template".
- 5.5 Describe the indicators used by the local board to measure performance and effectiveness of the local fiscal agent (where appropriate), eligible providers and the one-stop delivery system, in the local area. [WIOA Sec. 108(b)(17)]
- 5.6 Describe the process used by the local board for the receipt and consideration of input into the development of the local plan in compliance with WIOA section 108(d). Describe the process to provide an opportunity for public comment prior to submission of the local plan. Be sure to address how members of the public, including representatives of business, labor organizations, and education were given an opportunity to provide comments on the local plan. [WIOA Sec. 108 (b)(20)]
- 5.7 Prior to the date on which the local board submits a proposed local plan, the proposed local plan must be made available to members of the public through electronic and other means.
  - A. Describe how the local board made the proposed local plan available for public comment. [WIOA Sec. 108(d)(1)];

B. Describe how the local board collected and considered public comments for inclusion in the proposed local plan. [WIOA Sec. 108(d)(2)]; and

C. If any comments were received that represent disagreement with the proposed local plan, include such comments within the local plan's attachments. [WIOA Sec. 108(d)(3)]

5.8 List the name, organization, and contact information of the designated equal opportunity officer for each workforce center within the local area.

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**Section 6: Plan Assurances**

Planning Process and Public Comment		References
<input type="checkbox"/>	6.1 The local board has processes and timelines, consistent with WIOA Section 108(d), to obtain input into the development of the local plan and provide the opportunity for comment by representatives of business, labor organizations, education, other key stakeholders, and the general public for a period that is no less than 30 days.	WIOA Sections 108(d); proposed 20 CFR 679.550(b)
<input type="checkbox"/>	6.2 The final local plan is available and accessible to the general public.	Proposed 20 CFR 679.550(b)(5)
<input type="checkbox"/>	6.3 The local board has established procedures to ensure public access (including people with disabilities) to board meetings and information regarding board activities, such as board membership and minutes.	WIOA Section 107(e); proposed 20 CFR 679.390 and 679.550
Required Policies and Procedures		References
<input type="checkbox"/>	6.4 The local board makes publicly-available any local requirements for the public workforce system, such as policies, including policies for the use of WIOA Title I funds.	Proposed 20 CFR 679.390
<input type="checkbox"/>	6.5 The local board has established a written policy or procedure that identifies circumstances that might present conflict of interest for any local workforce investment board or entity that they represent, and provides for the resolution of conflicts.	WIOA Section 107(h); proposed 20 CFR 679.410(a)-(c)
<input type="checkbox"/>	6.6 The local board has copies of memoranda of understanding between the local board and each one-stop partner concerning the operation of the one-stop delivery system in the local area, and has provided the State with the latest versions of its memoranda of understanding.	WIOA Section 121(c); proposed 20 CFR 678.500-510
<input type="checkbox"/>	6.7 The local board has written policy or procedures that ensure one-stop operator agreements are reviewed and updated no less than once every three years.	WIOA Section 121(c)(v)
<input type="checkbox"/>	6.8 The local board has negotiated and reached agreement on local performance measures with the local chief elected official(s) and the Governor.	WIOA Sections 107(d)(9) and 116(c); proposed 20 CFR 679.390(k) and 677.210(b)
<input type="checkbox"/>	6.9 The local board has procurement policies and procedures for selecting one-stop operators, awarding contracts under WIOA Title I Adult and Dislocated Worker funding provisions, and awarding contracts for Youth service provision under WIOA Title I in accordance with applicable state and local laws, rules, and regulations, provided no conflict exists with WIOA.	WIOA Sections 121(d) and 123; proposed 20 CFR 678.600-615 and 681.400
<input type="checkbox"/>	6.10 The local board has procedures for identifying and determining the eligibility of training providers and their programs to receive WIOA Title I individual training accounts	WIOA Sections 107(d)(10), 122(b)(3), and 123; Proposed 20 CFR 679.370(l)-(m) and 680.410-430

<input type="checkbox"/>	6.11 The local board has written procedures for resolving grievances and complaints alleging violations of WIOA Title I regulations, grants, or other agreements under WIOA and written policies or procedures for assisting customers who express interest in filing complaints at any point of service, including, at a minimum, a requirement that all partners can identify appropriate staff contacts and refer customers to those contacts.	WIOA Section 181(c); proposed 20 CFR 683.600
<input type="checkbox"/>	6.12 The local board has established at least one comprehensive, full-service one-stop center and has a written process for the local Chief Elected Official and local board to determine that the center conforms to the definition therein.	WIOA Section 121(e)(2)(A); proposed 20 CFR 678.305
<input type="checkbox"/>	6.13 All partners in the local workforce and education system described in this plan ensure the physical, programmatic and communications accessibility of facilities, programs, services, technology and materials in one-stop centers for individuals with disabilities.	WIOA Section 188; 29 CFR parts 37.7-37.9; 20 CFR 652.8(j)
<input type="checkbox"/>	6.14 The local board ensures that outreach is provided to populations and sub-populations who can benefit from one-stop services.	WIOA Section 188; 29 CFR 37.42
<input type="checkbox"/>	6.15 The local board implements universal access to programs and activities to individuals through reasonable recruitment targeting, outreach efforts, assessments, service delivery, partner development, and numeric goals.	WIOA Section 188; 29 CFR 37.42
<input type="checkbox"/>	6.16 The local board complies with the nondiscrimination provisions of Section 188, and assures that Methods of Administration were developed and implemented.	WIOA Section 188; 29 CFR 37.54(a)(1)
<input type="checkbox"/>	6.17 The local board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188.	WIOA Section 185; 29 CFR 37.37
<input type="checkbox"/>	6.18 The local board complies with restrictions governing the use of federal funds for political activities, the use of the one-stop environment for political activities, and the local board complies with the applicable certification and disclosure requirements	2 CFR Part 225 Appendix B; 2 CFR Part 230 Appendix B; 48 CFR 31.205-22; RCW 42.52.180; TEGL 2-12; 29 CFR Part 93.100
<input type="checkbox"/>	6.19 The local board ensures that one-stop Migrant and Seasonal Farmworker (MSFW) and business services staff, along with the Migrant and Seasonal Farm Worker program partner agency, will continue to provide services to agricultural employers and MSFWs that are demand-driven.	WIOA Section 167
<input type="checkbox"/>	6.20 The local board follows confidentiality requirements for wage and education records as required by the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and applicable Departmental regulations.	WIOA Sections 116(i)(3) and 185(a)(4); 20 USC 1232g; proposed 20 CFR 677.175 and 20 CFR part 603
<b>Administration of Funds</b>		<b>References</b>
<input type="checkbox"/>	6.21 The local board has a written policy and procedures to competitively award grants and contracts for WIOA Title I activities (or applicable	WIOA Section 108(b)(16); proposed 20 CFR

	federal waiver), including a process to be used to procure training services made as exceptions to the Individual Training Account process.	679.560(a)(15); WIOA Section 134(c)(3)(G); proposed 20 CFR 680.300-310
<input type="checkbox"/>	6.22 The local board has accounting systems that follow current Generally Accepted Accounting Principles (GAAP) and written fiscal-controls and fund-accounting procedures and ensures such procedures are followed to insure proper disbursement and accounting of WIOA adult, dislocated worker, and youth program funds.	WIOA Section 108(b)(15)
<input type="checkbox"/>	6.23 The local board ensures compliance with the uniform administrative requirements under WIOA through annual, on-site monitoring of each local sub-recipient.	WIOA Section 184(a)(3); proposed 20 CFR 683.200, 683.300, and 683.400-410
<input type="checkbox"/>	6.24 The local board has a written debt collection policy and procedures that conforms with state and federal requirements and a process for maintaining a permanent record of all debt collection cases that supports the decisions made and documents the actions taken with respect to debt collection, restoration, or other debt resolution activities.	WIOA Section 184(c); 20 CFR Part 652; proposed 20 CFR 683.410(a), 683.420(a), 683.750
<input type="checkbox"/>	6.25 The local board will not use funds received under WIOA to assist, promote, or deter union organizing.	WIOA Section 181(b)(7); proposed 20 CFR 680.850
	<b>Eligibility</b>	<b>References</b>
<input type="checkbox"/>	6.26 The local board has a written policy and procedures that ensure adequate and correct determinations of eligibility for WIOA-funded basic career services and qualifications for enrollment of adults, dislocated workers, and youth in WIOA-funded individualized career services and training services, consistent with state policy on eligibility and priority of service.	Proposed 20 CFR Part 680 Subparts A and B; proposed 20 CFR Part 681 Subpart A
<input type="checkbox"/>	6.27 The local board has a written policy and procedures for awarding Individual Training Accounts to eligible adults, dislocated workers, and youth receiving WIOA Title I training services, including dollar and/or duration limit(s), limits on the number of times an individual may modify an ITA, and how ITAs will be obligated and authorized.	WIOA Section 134(c)(3)(G); Proposed 20 CFR 680.300-320
<input type="checkbox"/>	6.28 The local board has a written policy and procedures that establish internal controls, documentation requirements, and leveraging and coordination of other community resources when providing supportive services and, as applicable, needs-related payments to eligible adult, dislocated workers, and youth enrolled in WIOA Title I programs.	WIOA Sections 129(c)(2)(G) and 134(d)(2); proposed 20 CFR 680.900-970; proposed 20 CFR 681.570
<input type="checkbox"/>	6.29 The local board has a written policy for priority of service at its workforce centers for local workforce providers that ensures veterans and eligible spouses are identified at the point of entry, made aware of their entitlement to priority of service, and provided information on the array of employment, training and placement services and eligibility requirements for those programs or services.	Jobs for Veterans Act; Veterans' Benefits, Health Care, and Information Technology Act; 20 CFR 1010; TEGL 10-09

## Appendix C: Transitional Planning References and Resources

### I. State of Arkansas's Combined Workforce Development Strategic Plan (*State Plan*)

On July 22, 2014, President Obama signed the Workforce Innovation and Opportunity Act (WIOA) providing a framework for Governors and states to make changes to their workforce systems. The federal law sets the parameters for the workforce system which is an integral part of the State's ability to serve jobseekers and employers. WIOA will enable the State to align workforce priorities across multiple partners, training providers, employers and others to ensure we are creating a skilled workforce for today and the future.

An effective workforce development system will be built on a foundation of alignment, innovation, employer engagement, accountability structures and improved data. Arkansas will look beyond WIOA to set broad goals for a comprehensive workforce development system. We will do this by providing the highest quality of service to jobseekers and employers through well-coordinated approaches at the state and local levels. System access will be enhanced through the use of technology and creative partnerships with community organizations and other service providers. While access will be improved for all jobseekers, the provision of services and training will be focused on those most in need and hardest to serve.

The four main goals in the State's Combined WIOA Plan are as follows:

**Strategic Goal 1: Develop an efficient partnership with employers, the educational system, workforce development partners, and community -based organizations to deliver a platform that will prepare a skilled workforce for existing and new employers.**

Goal 1 Objectives:

1. Expand employer partnerships through the support of industry engagement.
2. Identify and promote best practices (private and public) for developing and sustaining partnerships.
3. Expand partnership with economic development to refine sector strategies.
4. Improve communication/participation between education entities, local and state boards, government agencies, community-based organizations, and employers.
5. Increase accountability and clarity of action between all workforce related boards.
6. Increase the utilization of Registered Apprenticeship programs as viable talent development opportunities.
7. Increase connections with employers and Vocational Rehabilitation agencies to provide support and employment for youth and adults with disabilities.
8. Partner with K-12 education, higher education, career and technical education, and adult education to provide consistent rules and eliminate barriers to implementing training programs around the State.
9. Explore data sharing opportunities with non-governmental organizations that are committed partners to the state's workforce center system that will lead to improved intake, referral, and case management for customers served by multiple agencies (both public and private).
10. Expand small business participation.

## **Strategic Goal 2: Enhance service delivery to employers and jobseekers.**

### **Goal 2 Objectives:**

1. Develop a common intake process for jobseekers and businesses that will efficiently connect them with services available from all workforce development partner programs and identify any barriers to employment that need to be addressed.
2. Develop an integrated data system that will enable the sharing of information between partner agencies to more efficiently service both employers and jobseekers.
3. Promote training that leads to industry recognized credentials and certification.
4. Support transportable skill sets for transportable careers.
5. Support career pathways development and sector strategy initiatives as a way to meet business and industry needs.
6. Expand service delivery access points by the use of virtual services.
7. Develop a common business outreach strategy with a common message that will be utilized by all workforce system partners.
8. Develop a menu of services available at each service delivery access point that provides a list of the services and training opportunities available through Arkansas's talent development system.
9. Utilize customer satisfaction surveys to ensure continuous improvement of the State's talent development system.
10. Explore data sharing opportunities with non-governmental organizations that are committed partners to the state's workforce center system that will lead to improved intake, referral, and case management for customers served by multiple agencies (both public and private).

## **Strategic Goal 3: Increase awareness of the State's Talent Development System**

### **Goal 3 Objectives:**

1. Increase access to the workforce development system through a no wrong door approach to services.
2. Change employer and jobseeker perceptions of the workforce system.
3. Develop an image-building outreach campaign that educates Arkansans about the services and the career development opportunities available in the State.
4. Utilize technology, including social media and search engine optimization, to better connect jobseekers and employers with the talent development system in Arkansas.
5. Develop a user-friendly website that provides a common repository of information about career development opportunities that are relevant to K-12 education, parents, educators, adults, employers, government agencies, and the general public.

## **Strategic Goal 4: Address Skills Gaps**

### **Goal 4 Objectives:**

1. Conduct a statewide skills and asset analysis to determine the skills gap present and resources available to solve the skills issue.
2. Develop and implement an action plan to close the basic core, technical, and soft skills gaps in Arkansas.

3. Analyze the effectiveness of currently used job readiness standards and ensure coordination between the Arkansas Career Readiness Certificate program and the Workforce Alliance for Growth in the Economy (WAGE) program.

PY 2016 – PY 2019 Combined State Plan to be found at <http://dws.arkansas.gov/wioa.htm>

## II. State Policy and Guidance.

State policy can be found at <http://dws.arkansas.gov/wioa.htm>

## III. Labor Market and Workforce Information.

### A. Discover Arkansas

Labor Market Information Portal Arkansas Labor Market Information (LMI) is posted online using the Discover Arkansas web portal located at [www.discoverarkansas.net](http://www.discoverarkansas.net) and is available to the general public.

### B. Arkansas State Plan Economic and Workforce Analysis

The Arkansas Combined State Plan includes an analysis of the current workforce. The data provided in Section II of the state plan under strategic elements may be very helpful to local boards in conducting a local area and regional economic and workforce analysis.

To provide local workforce boards in the state with tools for development planning in their own areas, data were downloaded and prepared from the Arkansas Department of Workforce Services Labor Market Information (LMI) website, <http://www.discoverarkansas.net>. These data were then turned into interactive visualizations, which are available at the following websites. These visualizations can be downloaded as an image or in PDF format. The goal is to help stakeholders at the state and local level better understand future industry and occupational needs and to provide workforce development boards with the tools needed to better serve their areas.

The data available at <http://arkansasresearchcenter.org/arc/index.php?cID=153> includes:

- § Industries in 2012
- § Job Growth in 2022
- § Projected Job Growth by Workforce Development Area
- § Projected Job Growth by Industry
- § Percent Workforce in 2022

These data demonstrate the current makeup of the workforce by major industry, as well as projections of the number of jobs these industries will need in 2022. To the right of the visualizations are "filters" to help explore the data choosing multiple regions to compare, such as United States vs Arkansas, Arkansas vs. workforce region, or directly compare regions.

The data available at <http://arkansasresearchcenter.org/arc/index.php?cID=154> includes:

§ Arkansas Occupations, Current and 2022 Projections, which includes data visualizations concerning occupations in Arkansas, both currently and projections for 2022. Occupations are listed by their Standard Occupation Code (SOC) title. The SOC system is hierarchical. SOC Major codes are the top level occupational areas, such as "Construction and Extraction Occupations." At the next level would be SOC Minor, one of which for the above would be "Construction Trades Workers." Finally there is SOC Detail, such as "Stonemasons" or "Carpenters." This web tool allows users to manipulate the data by indicating the level of detail desired.

**IV. PY 2016 Performance Targets Template. (Attached)**

**V. Other Resources.**

- § TEN 1-15; Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide; July 6, 2015
- § TEGL 37-14; Update on Complying with Nondiscrimination Requirements: Discrimination Based on Gender Identity, Gender Expression and Sex Stereotyping are Prohibited Forms of Sex Discrimination in the Workforce Development System; May 29, 2015
- § Americans with Disabilities Act (ADA)

## Transitional PY2016 – PY 2017 Local Plan

### Appendix C: Local Area WIOA Negotiated Performance Goals

Name of local workforce development area:

WIOA Performance Measures	Local Area PY15 Performance Goals
Employment (Second Quarter after Exit)	
Adult	%
Dislocated Worker	%
Youth	%
Employment (Fourth Quarter after Exit)	
Adult	%
Dislocated Worker	%
Youth	%
Median Earnings (Second Quarter after Exit)	
Adult	\$
Dislocated Worker	\$
Youth	\$
Credential Attainment Rate	
Adult	%
Dislocated Worker	%
Youth	%
Measurable Skill Gains	
Adult	Baseline
Dislocated Worker	Baseline
Youth	Baseline
Effectiveness in Serving Employers	
Adult	Baseline
Dislocated Worker	Baseline
Youth	Baseline

Baseline Indicator Explanation: Each State submitting a Unified or Combined 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 adjusted levels of performance for the indicators for each of the first two years of the plan.

To effect an orderly transition to the performance accountability system in Section 116 of the WIOA, the Departments will use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as “baseline” indicators in the first plan submission. A “baseline” indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on adjusted levels of performance. “Baseline” indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.