Driving Colorado Forward Together

Colorado's Combined Plan for Execution of Workforce Development Activities

Developed in accordance with the Workforce Innovation and Opportunity Act

Released for Public Comment on January 11, 2016

COLORADO

Colorado Workforce Development Council

NOTE: This state plan is being released for public comment prior to the submission to the US Departments of Labor, Education, and Health and Human Services. The contents are subject to change based on the comments received through this process. Comments will be accepted from January 11th – February 9th, 2016. Comments may be submitted electronically through the Colorado Workforce Development Council's online form or through the web site at www.colorado.gov/cwdc.

Comments may also be submitted in hard copy to:

Colorado Workforce Development Council
633 17th Street, Suite 1200
Denver, CO 80202

All comments, whether electronic or paper submissions, must be received by 5:00 pm mountain time on Tuesday, February 9th 2016 to be considered in the official review process. The CWDC is not responsible for submissions received after the deadline due to delays in mail delivery service.

Questions regarding this plan may be submitted to cwdc@state.co.us.

The development of this plan was a collaborative effort of local and state partners committed to excellence in serving the citizens of Colorado coordinated by the Colorado Workforce Development Council. Completion of this plan is due to the hard work of Thomas P. Miller and Associates; the Colorado Department of Education—Office of Adult Education Initiatives; the Colorado Department of Human Services- Office of Community Access & Independence and Office of Economic Security; the Colorado Department of Labor and Employment – Division of Employment and Training and Division of Unemployment Insurance.

The content was developed in partnership with the critical input of local workforce development boards and staff, businesses, adult education providers, and economic developers, along with staff members of the agencies listed above.

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Executive Summary

The Colorado workforce development system is one of the nation's leaders in designing and implementing strategies that connect businesses with the talent they need to remain competitive and individuals with opportunities to develop skills and qualifications for career success. There are always opportunities, however, to examine current practices and seek innovative solutions for continued success. The Workforce Innovation and Opportunity Act (WIOA) presents one such opportunity and Colorado has taken this opportunity to identify the goals and strategies that will ensure Colorado's workforce system continues to successfully connect the supply and demand for talent through a well-aligned system of partners and resources.

WIOA envisions a comprehensive workforce development system that leverages demand-driven strategies to offer client-centric and outcome-oriented services to Colorado businesses and individuals. The WIOA Combined State Plan outlines the goals of the Colorado workforce development system, the strategies identified to achieve these goals, and the operational plan for how workforce partners will collaborate and align services to support these goals over the next four years.

In developing the Combined State Plan, Colorado utilized an inclusive planning process, engaging various stakeholders through focus groups, surveys, interviews, a public town hall meeting for public comments, and multiple planning sessions. This process has resulted in a plan that is built on the successes of Colorado's workforce system and positions the state to continuously strengthen the services and outcomes for Colorado businesses and individuals.

The WIOA Combined State Plan is organized into five sections, including 1) Strategic Elements, 2) Operational Elements, 3) Coordination with Combined Plan Programs, 4) Program-Specific Requirements for Core State Plan Partners, and 5) Program-Specific Requirements for Combined State Plan Partner Programs. The vision, goals, and strategies identified for the Colorado workforce system, which are included in Strategic Elements, set the strategic direction for the system and are outlined below:

Colorado Workforce Development System's Vision and Mission

Vision: *Every Colorado business has access to a skilled workforce and every Coloradan has access to meaningful employment, resulting in statewide economic vitality.*

Mission: *To create and sustain a business-led Colorado talent system that appropriately integrates the work of economic development, education, training and workforce development to meet the needs of businesses, students, and job-seekers.*

COLORADO WORKFORCE DEVELOPMENT SYSTEM'S GOALS:

GOAL 1: Engage business and industry as a fulcrum to inform and align all elements of the demand-driven system

Strategy 1.1 Expand regionally-focused sector partnerships that are championed by business and industry to drive career pathways

Strategy 1.2 Develop and implement a full spectrum of work-based learning opportunities to be deployed broadly across sectors.

Strategy 1.3 Support collaboration between business and education to understand the value of stackable industry recognized credentials.

GOAL 2: Establish a customer-centric and holistic focus to increase coordination, effectiveness, and access through shared data, tools, and resources

Strategy 2.1 Enhance the alignment of business services across all partner programs.

Strategy 2.2 Adopt LEAN principles for the implementation of cross-partner strategies/services to increase efficiency, accessibility, and coordination of job-seeker services.

Strategy 2.3 Develop and implement a technology solution or other methods for data coordination and information sharing across program partners.

GOAL 3: Engage partner staff at every level for better system alignment

Strategy 3.1 Implement continuous professional development for staff from all partner programs to elevate internal expertise and professionalism and to equip them with the tools necessary to operate a comprehensive, holistic approach to talent development.

Strategy 3.2 Create opportunities for staff at all levels to engage in continuous improvement efforts, leveraging their first-hand experience and unique perspectives to inform the processes.

GOAL 4: Create and deliver a unified message for internal and external communication and connections

Strategy 4.1 Establish a brand for the Colorado workforce development system that represents the vision and strategies of the WIOA combined partners.

Strategy 4.2 Define the key messages and brand promise for target audiences.

Strategy 4.3 Explore ways to capture the Return on Investment (ROI) of the workforce system in order to promote the value of the system and all programs within it.

GOAL 5: Drive meaningful outcomes through innovation, alignment of metrics, and accountability

Strategy 5.1 Adopt system-wide outcome metrics to portray an accurate depiction of the workforce system, which will be used for planning and implementation of system services.

Strategy 5.2 Utilize partner relationships to implement meaningful pilot programs that foster an environment of innovation.

I. WIOA State Plan Type

Colorado is submitting a Combined State Plan that is inclusive of the programs listed below.

This plan includes:

- The Adult Program
- Dislocated Worker Program
- Youth Program
- Wagner-Peyser Act Program, inclusive of the Migrant and Seasonal Farmworkers Program
- Adult Education and Family Literacy Act Program
- Vocational Rehabilitation Program
- Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
- Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (Programs authorized under 38, U.S.C. 4100 et. seq.)
- Senior Community Service Employment Program (Programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

II. Strategic Elements

(1) Economic and Workforce Analysis

To meet the current and emerging workforce needs within Colorado, we need a thorough understanding of all factors affecting the current and emerging economy. The Colorado Talent Pipeline Report, presented to the Colorado State Legislature on October 15, 2015, was developed by the Colorado Workforce Development Council in partnership with Colorado Department of Education, Colorado Department of Higher Education, Colorado Department of Labor and Employment, and Colorado Office of Economic Development & International Trade. The report – which is produced annually – allows the Colorado workforce system to make data-informed decisions and plans. Much of this economic and workforce analysis has been guided by the Colorado Talent Pipeline Report which made the following recommendations:

- Continue expansion of concurrent enrollment and embed concurrent enrollment as a critical career pathways tool to align education, training and work based learning, so students and potential employees have a clear picture of what education and experience is necessary to pursue a specific career;
- Research policy and statutory barriers or perceived barriers to work-based learning, and provide resources and incentives to elevate and accelerate coordinated initiatives for the development of experiential learning partnerships between business and providers;
- Support policies to re-engage adults who lack appropriate skills and/or credentials in educational settings so that they can acquire the skills and credentials necessary to enter and to participate more fully in the workforce; and
- Strengthen cross-agency data sharing capabilities, so as to have access to critical information needed for better decision-making.[1]

As they are informed by data and thoughtful analysis, these recommendations were particularly impactful as goals and strategies were developed for the Colorado workforce development system over the next four years.

In addition to the research and analysis compiled in the Colorado Talent Pipeline Report, the following economic analysis and workforce analysis draws upon data from the Colorado Department of Labor and Employment (CDLE), Office of Labor Market Information (LMI) as well as data from Economic Modeling Specialists, Inc. (EMSI).

(A) Economic Analysis. The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-state regions and any specific economic areas identified by the State. This includes:

(i) Existing Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which there is existing demand.

(ii) Emerging Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which demand is emerging.

1 The Colorado Talent Pipeline Report, October 15, 2015

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

Economic Analysis

Existing Demand Industry Sectors and Occupations

The table below shows the preliminary distribution of current employment, not seasonally adjusted, by industry for Colorado for September, 2015. Trade, Transportation, and Utilities comprise the largest industry in Colorado, employing 435,600 individuals, accounting for 17.2% of total employment. Within this industry, Transportation and Material Moving occupations combine for 146,114 jobs statewide. The second largest industry in the state is Government, employing 417,500 individuals, accounting for 16.5% of total employment. Professional and Business Services combine to form the third largest industry sector in Colorado, employing 389,100 individuals, accounting for 15.4% of the state's total employment.

Industry	Employment
Total Nonfarm	2,531,200
Total Private	2,113,700
Goods Producing	332,500
Service-Providing	2,198,700
Private Service Providing	1,781,200
Mining and Logging	34,800
Construction	156,600
Manufacturing	141,100
Durable Goods	91,400
NonDurable Goods	49,700
Trade, Transportation, and Utilities	435,600
Wholesale Trade	100,100
Retail Trade	257,600
Transportation Warehousing and Utilities	77,900
Information	67,500
Financial Activities	157,200
Professional and Business Services	389,100
Educational and Health Services	315,700
Leisure and Hospitality	314,700
Other Services	101,400
Government	417,500

Source: Colorado LMI Gateway; Data sourced from CES Unit Transfer File

The top ten occupations by employment in the following table account for 66% of all jobs and total 1,868,379 jobs in Colorado. Office and Administrative Support Occupations employ 14% of total state population. Sales and Related Occupations as well as Food Preparation and Selling Related Occupations account for 11% and 9% of the state's employment respectively. The full listing of existing In Demand occupations can be found in Appendix B.

Employment by Occupation		
Description	2015 Jobs	2014 Avg. Hourly Earnings
Office and Administrative Support Occupations	404,319	$17.69
Sales and Related Occupations	301,268	$20.01
Food Preparation and Serving Related Occupations	246,634	$10.86
Business and Financial Operations Occupations	177,839	$34.85
Construction and Extraction Occupations	166,191	$19.88
Education, Training, and Library Occupations	153,574	$23.48
Transportation and Material Moving Occupations	146,114	$18.06
Healthcare Practitioners and Technical Occupations	136,515	$37.38
Management Occupations	135,926	$49.14
Building and Grounds Cleaning and Maintenance Occupations	111,948	$11.97

Source: EMSI

Emerging Demand Industry Sectors

The table below shows the top 10 industries with the highest annual percent change in Colorado for the 2014 - 2024 time period.

Industry	2014 Estimated Employment	2024 Projected Employment	204-2024 Annual Percent Change	Total Employment Change
Specialty Trade Contractors	92,737	139,861	4.2%	47,124
Social Assistance	49,507	72,810	3.9%	23,303
Construction of Buildings	26,388	38,627	3.9%	12,239
Ambulatory Health Care Services	112,552	161,952	3.7%	49,400
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	20,046	28,266	3.5%	8,220
Professional, Scientific, and Technical Services	196,364	275,842	3.5%	79,478
Beverage and Tobacco Product Manufacturing	6,363	8,822	3.3%	2,459

Heavy and Civil Engineering Construction	22,852	31,442	3.2%	8,590
Management of Companies and Enterprises	35,334	48,130	3.1%	12,796
Administrative and Support Services	146,353	195,851	3.0%	49,498

Source: Colorado Dept. of Labor and Employment, Labor Market Information

To assess the emerging demand industry sectors, a 10-year projection (2014-2024) was utilized. Over the next ten years, the top ten industries are expected to remain the same, however, several will have significant increases in projected statewide job availability. The five sectors with the largest gains in total projected employment are:

- Professional, Scientific, and Technical Services (+79,475)
- Administrative and Support Services (+49,498)
- Ambulatory Health Care Services (+49,400)
- Specialty Trade Contractors (+47,124)
- Social Assistance (+23,303)

Although not included in the top five for total expected employment change, Construction of Buildings and Securities, Commodity Contracts, and Other Financial Investments and Related Activities are expected to grow at significant rates of 3.9% and 3.5% respectively. The greatest expected growth of 4.2% will occur with Specialty Trade Contractors.

Emerging Demand Occupations

Using a ten year projection to assess emerging demand occupations reveals that similar to the year 2015 the top ten occupations remains the same for the year 2025. Outside of the top ten, significant job increases take place within the following occupations:

- Healthcare Support Occupations
- Healthcare Practitioners and Technical Occupations
- Computer And Mathematical Occupations

Emerging Occupations 2015-2025				
Occupation	**2015 Jobs**	**2025 Jobs**	**2015 - 2025 Change**	**2015 - 2025 % Change**
Office and Administrative Support Occupations	404,319	472,160	67,841	17%
Sales and Related Occupations	301,268	338,245	36,977	12%
Food Preparation and Serving Related Occupations	246,634	294,925	48,291	20%
Business and Financial Operations Occupations	177,839	210,064	32,225	18%
Construction and Extraction Occupations	166,191	197,667	31,476	19%
Education, Training, and Library Occupations	153,574	184,791	31,217	20%

Transportation and Material Moving Occupations	146,114	172,514	26,400	18%
Healthcare Practitioners and Technical Occupations	136,515	169,741	33,226	24%
Management Occupations	135,926	158,133	22,207	16%
Building and Grounds Cleaning and Maintenance Occupations	111,948	131,512	19,564	17%

Source: EMSI

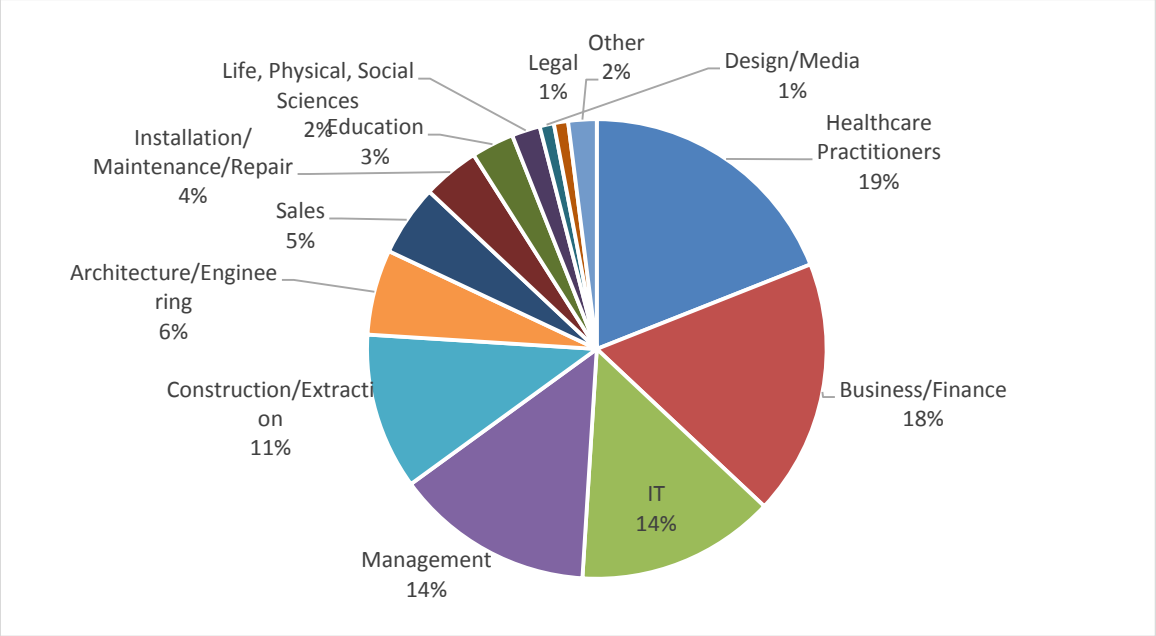
More specifically, the Colorado Talent Pipeline Report identified a Top Jobs list for Colorado based on three criteria,jobs that projected high annual openings, above average growth rates and those that offer a living wage.[2] While the resulting list from this analysis is extensive, it is not exhaustive. The full list – which includes 87 occupations – can be accessed at www.colorado.gov/pacific/cwdc/colorado-talent-pipeline-report. Regionally specific lists can also be accessed on the CWDC website. The Colorado Talent Pipeline Report includes the following summary:

> Much like the previous statewide Top Jobs list, occupations are largely concentrated in business/finance, skilled trades, information technology, and healthcare practitioners/technical occupations. Jobs that are new to the list include market research analyst/marketing specialists; industrial engineers, medical and clinical laboratory technologists, and earth drillers.

Selection of Occupations from the Top Jobs List	
Skilled Trades	**Business & Finance**
Electricians HVAC Mechanics and Installers Industrial Machinery Mechanics Plumbers, Pipefitters, Steamfitters	Accountants and Auditors Cost Estimators Management Analysts Personal Financial Advisors
Healthcare	**Information Technology (IT)**
Pharmacists Physician Assistants Radiologic Technologists and Technicians Registered Nurses	Computer Network Architects Computer User Support Specialists Software Developers Web Developers

2 Living wage is defined for a family with two adults (one working) and one child. In Colorado, the living wage for a family of this size is $21.18 per hour, according to www.livingwage.mit.edu. At the time of the analysis, above average growth included jobs at or above 24.4 percent growth and high projected annual openings included jobs with at least 40 annual average openings.

"Top Job" Opportunities by Field



Eighty-eight percent of the job openings in this list are for occupations that typically require some level of formal postsecondary education or training for entry, whether it is an employer-sponsored formal training program, apprenticeship, certificate or degree. Occupations on this list that require less than a bachelor's degree are primarily concentrated in the skilled trades and healthcare. Interestingly, when we do not filter for a minimum wage and focus on jobs that are simply projected to have above average growth rates, jobs in the trades and healthcare support increase dramatically, indicating that there are a number of high demand yet lower paying jobs in these fields many of which can serve as stepping stones to higher compensation. However, there are a large number of high demand jobs that don't meet the living wage target – such as administrative/office support, personal care services, or food preparation/serving. These occupations may not typically have clear pathways for earnings advancement, yet can still provide exposure to critical skills and industries.[3]

Employers' Employment Needs

For the occupations identified in Colorado's "Top Jobs" list, a majority require high levels of one or more STEM (Science, Technology, Engineering and Math) fields. In fact, when using Brookings Institution's definition of STEM occupations, the Colorado Talent Pipeline Report found that 62 percent of the occupations are STEM-related. Compared to the STEM jobs across the state's overall workforce – which is approximately 20 percent – this suggests STEM competencies will be in high demand from employers in Colorado.

In addition to STEM skills, the Colorado Talent Pipeline Report also identified certain skills that make employers more likely to promote individuals within their organizations. By reviewing

3 The Colorado Talent Pipeline Report, 2015

data available from LinkedIn, the skills of Coloradans who were promoted from entry-level to a more senior level position were identified. The top fifteen skill clusters include for these promoted workers include:

- Economics
- Social Media Marketing
- People Skills
- Statistical Analysis and Data Mining
- Software Revision Control System
- Software Applications
- Multilingual
- History, Archaeology, and Anthropology[4]
- Politics
- User Interface
- HR Recruiting
- Analytical and Problem Solving
- Software Development Skills (Other)
- Mobile Development
- Legal Skills (Other)

In summarizing the analysis of these skill clusters, the Colorado Talent Pipeline Report noted:

> Many of these skills are related to skills expected of high demand fields in the state (such as IT); this is exemplified by the vast number of technology-related skill clusters, such as software revision control system (e.g. competency using tools like Git or Subversion), software applications (e.g. expertise in Primavera or SharePoint), and user interface (e.g. expertise in WordPress or user experience design).
>
> Yet, what is also interesting about this list is that it is not limited to technical skills – interpersonal skills, language skills and problem solving can also play a role in progressing one's careers.[5]

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

(i) Employment and Unemployment. Provide an analysis of current employment and unemployment data and trends in the State.

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

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

(iv) Describe apparent 'skill gaps'.

Workforce Analysis

To gain a better understanding of the workforce trends in the State of Colorado, state level data was compiled to have a holistic view of the workforce. The FY 2014-15 Colorado Skills for Jobs Report and the Talent Pipeline Study were created to guide Colorado towards its workforce

4 The Colorado Talent Pipeline Report, data sourced from LinkedIn, 2015
5 Ibid

goals. These two documents, in addition to labor market data from the Colorado Department of Labor and Employment were used to create the workforce analysis.

Employment and Unemployment

According to the Colorado Talent Pipeline Report, the total civilian labor force (seasonally adjusted) for Colorado in August, 2015 was 2,806,992 of which 2,688,745 were employed and 118,247 were unemployed. As of September 2015 Colorado had one of the lowest unemployment rates in the country at 4.2 percent, according to the Colorado LMI Gateway. Unemployment levels in Colorado, however, vary substantially based on individuals' educational attainment. In 2014, unemployment in Colorado hovered at 4.4 percent for people with some college or an associate's degree and at 3.1 percent for an adult with a bachelor's degree or higher—lower than the unemployment rate for high school graduates (4.7 percent) and for those with less than a high school education (8.9 percent). Average earnings continue to be higher for those with higher levels of education.[6]

Unemployment Rate by Level of Education		
Educational Attainment	**Unemployment Rate**	**Median Earnings**
Less than high school graduate	6.4%	$23,004
High School graduate	4.8%	$30,568
Some college or associate's degree	3.8%	$35,329
Bachelor's degree	2.1%	$48,818
Graduate or professional degree	2.1%	$64,861

Source: Current Population Survey, 2015; U.S. Census Bureau, 2014 American Community Survey, 1-year Estimates

Colorado Unemployment by MSA	
Area Name	Unemployment Rate
Pueblo MSA	5.6%
Grand Junction MSA	5.4%
Colorado Springs MSA	4.5%
Greeley MSA	3.8%
Denver - Aurora MSA	3.6%
Boulder-Longmont MSA	3.2%
Fort Collins-Loveland MSA	3.2%

There are fluctuations in the unemployment rate by region of the state as well. A review of the unemployment rate for MSAs shows unemployment ranging from 3.2 percent (Boulder-Loungmont MSA and Fort Collins-Loveland MSA) to 5.6 percent in the Pueblo MSA.

Unemployment rates vary by workforce planning regions as well. The unemployment rates in Northwestern, Central, Eastern, Western and Southern Colorado are 2.3 percent, 2.2 percent, 4.5 percent, 2.7 percent and 2.6 percent respectively.

The 2015 Colorado Talent Pipeline Report explored the unemployment dynamics for special populations within the state's workforce. These populations include the following:

Youth Unemployment: The youth unemployment rate (ages 16 to 19) remained quite elevated throughout and following the Great Recession; more recently it has seen

6 Ibid

improvement. Over the previous 12-month period (August 2014 to July 2015), the youth unemployment rate stood at 13.3 percent; whereas, the year preceding it stood at 20 percent. However, the rate is still very high for black youth, in particular, at 34.5 percent (Current Population Survey, 2015). In Colorado, 11.8 percent of youth ages 16 to 24 are not in school and not working; the national rate is 14.1 percent.[7]

Long-term Unemployed: The long-term unemployed, (individuals out of work for 26+ weeks), face a unique combination of social, emotional, and skill deficiencies caused by the duration of their unemployment. These deficiencies require intensive "wraparound" services to address these issues effectively, while rapidly moving individuals to paid work experience and reemployment. Currently, there are 27,400 individuals considered long-term unemployed; during the same period the year before there were 54,000 individuals who were considered long-term unemployed.

The share of long-term unemployed out of all unemployed persons also continues to decrease: currently, the long-term unemployed make up nearly one-quarter of all unemployed (Current Population Survey, 2015). Credit for this drop can be attributed to Colorado's improved economy, as well as to concentrated public and private initiatives. For example, Governor Hickenlooper's Hire4Colorado Campaign challenged businesses to give the long-term unemployed an opportunity to prove themselves and also increased awareness of services available through workforce centers for long-term unemployed individuals. There have also been targeted efforts by a number of agencies and organizations to impact specific populations such as veterans, older citizens, youth and others with challenges to obtaining employment.[8]

Veterans: Unemployment rates for veterans are slightly elevated as compared to non-veterans (4.3 percent to 3.2 percent unemployment) although the gap has narrowed considerably, having been a 2.1 percent gap the year prior. Employment services for recently separated veterans play a critical role in the successful transition from military to civilian employment. The Colorado Department of Labor and Employment provides specialized services that are available only for eligible veterans, such as individualized job search assistance and case management for veterans with a service-connected disability or other barriers to employment, vocational and work-based training, as well as job fairs and hiring events specifically for veterans. Veteran-specific services are provided by Veteran Employment Representatives (VER)—highly trained staff who are themselves veterans, and understand many of the challenges that veterans face.

One considerable veteran-specific issue is that many transitioning veterans have training and expertise in critical skill areas, but lack the civilian credentials necessary to obtain employment in their career field. The Colorado Department of Labor and Employment, Department of Regulatory Agency and Department of Higher Education are working

7 Colorado Talent Pipeline Report, 2015
8 Ibid

together to identify military occupations that need civilian credentialing and licensing, compare military training with civilian requirements, and develop pathways to expedite the training and credentialing process. Initially, this collaboration will focus on healthcare occupations, specifically focusing on Certified Nursing Assistant (CNA), Licensed Practical Nurse (LPN), and Dental Hygienist.[9]

Individuals with Disabilities: Frequently the first, and most intractable barrier underemployed or unemployed Coloradans with disabilities face is an overemphasis on what is expected that he or she cannot, should not, or is not doing. The lack of balance between a focus on functional limitation rather than on the person's talent and ambitions is expensive and wasteful. The workforce development system in Colorado is committed to providing the high quality services necessary to prepare individuals with disabilities to compete for jobs and fully participate in Colorado's workforce.

The Division of Vocational Rehabilitation (DVR) leads the way by providing the full range of rehabilitation services, including one-on-one vocational guidance and counseling, necessary to understand and mitigate the ways a disability impedes the capacity to show and apply talent at work. In Fiscal Year 2014, DVR assisted 2,198 Coloradans with disabilities to secure, retain or regain employment. These workers earned an average of $11.61 an hour working 28.2 hours a week on average. DVR further works with employers and community partners to increase opportunities for employment, career advancement and economic gain for eligible Coloradans with disabilities.

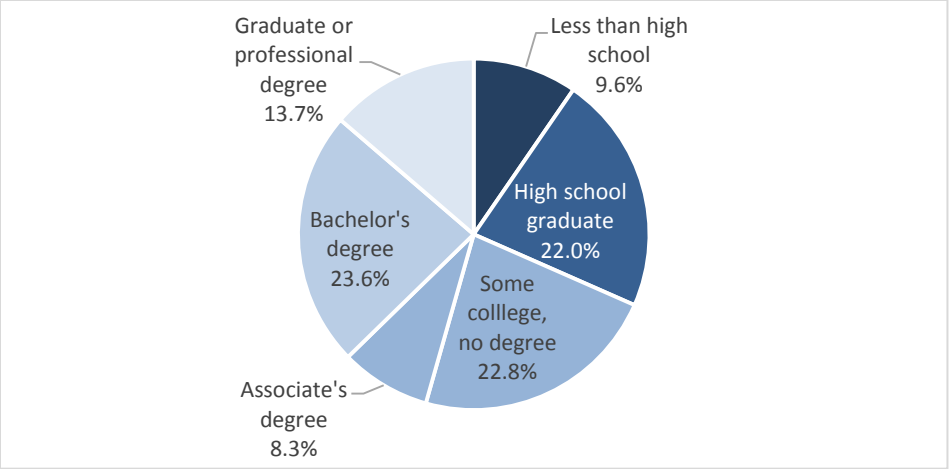
Individuals not only benefit from being productive members of the workforce, but the state benefits from a population that relies less heavily on social services; it is crucial to sustain a supply of capable workers that will continue to grow Colorado business while attracting others to the state. The following sections will focus on the fields that are experiencing strong growth and the strategies being employed to support the development of a workforce with aligned skill sets.

Education and Skill Levels of the Workforce

The FY 2014-15 Colorado Skills for Jobs Report notes that by the year 2020, it is estimated that 64 percent of all jobs, nationally, will require post-secondary education. In Colorado, however, 74 percent of all jobs statewide will require some level of post-secondary education or training by the year 2020, well exceeding the national average. Relative to the rest of the nation, Colorado has a highly educated adult population. It is estimated that 68 percent of adults have some college experience or a postsecondary credential, while 46 percent have an associate's degree or higher.[10]

Colorado Educational Attainment, Adults 25 Years and Older

9 Ibid
10 FY 2014-15 Colorado Skills for Jobs Report

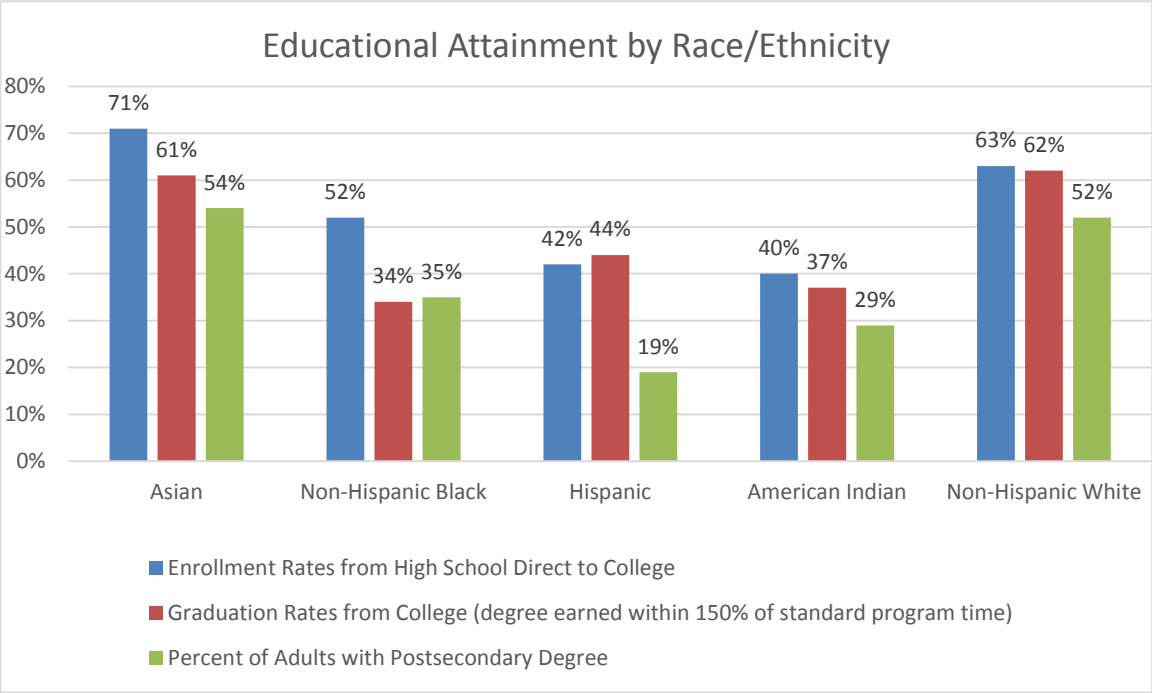


Source: U.S. Census Bureau; 2011-2013 American Community Survey, 3-year estimates

More jobs are expected to require higher levels of education in the coming years. To meet emerging employer demand, Colorado will need to increase postsecondary credential production by 2% per year or about 1,000 additional degrees/credentials annually, according to the FY 2014-15 Colorado Skills for Jobs Report, in order to meet the goal set by the Colorado Department of Higher Education of 66 percent post-secondary certificate or degree attainment level for Coloradans ages 25 to 34 by 2025.[11]

It is important to note that there are significant disparities in educational attainment by race ethnicity. Identifying these gaps is important in addressing overall workforce preparedness due to its impact on the development of the state economy. In Colorado, 19 percent of Hispanic adults have a college degree, whereas 53 percent of non-Hispanic white adults have a degree. By 2040, the non-white share of the working adult population (ages 25 to 64) is projected to be 43 percent. Due to these statistics, Colorado foresees needing additional support for those in underserved populations due to the impact of educational attainment on the long term sustainability of the workforce.[12]

11 FY 2014-15 Colorado Skills for Jobs Report
12 Ibid



Source: Colorado Department of Higher Education; U.S. Census Bureau

According to the Colorado Skills for Jobs Report, one variable that complicates analysis of a state's workforce supply are interstate migration patterns. On average, three-quarters of Colorado residents graduating from a public postsecondary institution are found in our workforce within the year following graduation. However, entry into the state's workforce varies based on residency status, program major and degree level. Some graduates will continue their education and delay entry into the workforce, some will pursue opportunities out-of-state, and some will leave and then return to the state for employment years later. Typically, people with higher levels of education tend to have higher levels of geographic mobility, so while Colorado may lose a portion of educated Coloradans to out-of-state opportunities, the state still attracts a large share of highly educated people. While Colorado has consistently been able to attract qualified talent from outside of Colorado, the state must also anticipate an increase in interstate and global competition for these workers as older skilled workers continue to retire in large numbers.

Skills Gaps

During the development of the Colorado Talent Pipeline Report, the Colorado Department of Education, Department of Higher Education, and the Colorado Workforce Development Council collaborated to identify the skills that will ensure Coloradans are prepared for work or education beyond high school. Through facilitated discussions with business and industry, education, higher education, non-profit organizations, government stakeholders, and students, core skills were identified for more than 100 established, industry-developed competencies

that are necessary for success beyond high school. These core skills are included below[13] and will be a focus on the workforce and education programs driven by sector partnerships and career pathways in the state.

Core Skills	
Entrepreneurial • **Critical thinking and problem solving** • **Creativity and innovation** • **Inquiry and analysis** • **Risk taking**	**Personal** • Initiative and self-direction • Personal responsibility and self-management • Adaptability and flexibility • Personal awareness • Learn independently • Perseverance
Civic/Interpersonal • **Core academic foundation** • **Collaboration and teamwork** • **Communication** • **Global and cultural awareness** • **Ethics and integrity**	**Professional** • Time management • Career literacy • Grit and resilience • Worth ethic; dependable and reliable • Self-advocacy

2) Workforce Development Education and Training Activities Analysis

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of –

(A) The State's Workforce Development Activities. Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and mandatory and optional one-stop delivery system partners.

Colorado's workforce development activities are coordinated through the following state agencies: the Colorado Department of Labor and Employment (CDLE), Colorado Department of Education (CDE), and Colorado Department of Human Services (CDHS). These agencies are responsible for all the core and non-core programs included in the combined state plan.

State Agency Program Responsibility

13 Ibid

Agency	Core Program	Non-Core Program
CDLE	– Adult (Title I) – Dislocated Worker (Title I) – Youth (Title I) – Wagner-Peyser (Wagner-Peyser Act, as amended by Title III) – Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV) as of July 1, 2016	– Trade Adjustment Assistance for Worker Program (Chapter 2, Title II Tract Act) – Jobs for Veterans State Grants (Title 38, Chapter 41) – Migrant and Seasonal Farmworker Program (Title I)
CDE	– Adult Education and Family Literacy (WIOA Title II)	
CDHS		– Senior Community Service Employment Program (Title V Older Americans Act) – Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)

The Colorado Workforce Development Council (CWDC) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. CWDC ensures that the state workforce activities are aligned with the efforts of economic development, education, workforce development, government, and business stakeholders at the local, regional, and state levels. This multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Coloradans.

Colorado's workforce system is driven from the bottom up though 10 local workforce areas including the Colorado Rural Workforce Consortium (CRWC), which is a comprised of 10 sub-areas. Each workforce area and sub-area has a board strategically directing the workforce activities at the community level and providing local guidance for implementation of workforce programs. With local guidance, workforce activities are often customized to fit the needs of individual customers -both businesses and jobseekers alike. The partnerships and atmosphere of collaboration guided by the state agencies and CWDC funnel to the local areas to create a fully integrated workforce system of not only core and non-core program partners, but community stakeholders that facilitate a system design to provide impactful services and activities throughout the state.

Colorado Workforce Centers

The Colorado Workforce Centers are at the forefront of the workforce activities, and represent Colorado's version of the American Jobs Center. There are 58 workforce centers spread across the state providing access to many Coloradans.[14] In addition to these locations, Colorado has partnered with several local stakeholders to establish 31 virtual workforce centers where customers can access staff members through technology. Another example of collaboration and an effort to provide additional access to as many customers as possible is an initiative led by the Colorado Rural Workforce Consortium. This initiative provides funding to establish 15 Library Partners where Coloradans can access basic career services including over-the-shoulder assistance with Connecting Colorado, the state job matching system. In all, Colorado has more than 100 physical locations where the unemployed, underemployed, and businesses can receive an array of workforce system information and services.

The Colorado Workforce Centers are overseen at the state level by the CDLE, and are managed locally by each of the local area and sub-area boards. Local boards are comprised of local businesses, labor, partner agencies, and other key stakeholders to create a diverse and functional group. The boards, in alignment with the States' vision, provide front line strategic implementation for state-wide initiatives in addition to their locally-determined priorities. State initiatives include sector strategies, career pathway development, and standardized business services delivery. Local priorities include lay off aversion, specific career pathway development, youth programs, targeted sector partnerships, work-based learning, and others.

Local boards are tasked with procuring a one-stop operator for the daily operation of their perspective center(s) in accordance with WIOA 121(d). These boards carry out workforce activities by partnering locally though Memorandums of Understanding (MOU) to implement core, non-core, and other partner programs. Colorado Workforce Centers are fully integrated with WIOA, Wagner-Peyser, Jobs for Veterans State Grant (JVSG), and Trade Adjustment Assistance (TAA); local partnerships and integration also exist in many areas with TANF, Supplemental Nutrition Assistance Program (SNAP), Adult Education and Family Literacy, Vocational Rehabilitation, and others.

With this foundation for service integration, Colorado Workforce Centers operate under the "no wrong door" philosophy, while local areas have developed their own customer flow strategies that are unique to their area. Typical customers entering the center are engaged by an intake process that is designed to identify the needs of the individual by gathering information and then utilizing the appropriate resources for those needs. In some cases, the resources are initiated by a referral to a partner program. Customers are given solutions and next steps to their questions, barriers, and issues by connecting directly with the appropriate workforce system partner as part of this philosophy. Because Colorado Career Centers are fully integrated and operate in close partnership with other workforce agencies, co-enrollment in

[14] https://www.colorado.gov/pacific/cdle/wfc

multiple programs is commonplace. Co-enrollment provides the customer with the ideal service plan while allowing the system to utilize its resources in an efficient manner.

Collaboration of Activities

Communication is vital in order to coordinate and align workforce services statewide. This communication starts with the CWDC which has representation from the CDLE, CDHS, CDE, Colorado Department of Higher Education, and Colorado Department of Corrections, and which encompasses all of the core, non-core, and partner programs providing workforce activities in the state. Communication is further enhanced by the collaborative efforts of local area workforce directors, who hold a monthly directors where partnerships, special initiatives, and ongoing efforts are discussed with one another and state partners.

The CDLE recognized that local areas needed assistance in collaboration and information sharing and created an online Knowledge Management Portal, e-Colorado, which manages virtual resources through a single, comprehensive, electronic interface developed for workforce stakeholders and partners, including businesses, workforce professionals, government, and others. This resource allows for all stakeholders within the workforce development system to readily access policies, best practices, and program information including eligibility criteria. The portal offers team rooms for front line staff to discuss services and coordinate workforce activities through online calendars. In addition to these features, the portal offers business tools that include Virtual Job Fairs and online fillable “smart” forms, and houses the Adobe Connect online meeting capability utilized by stakeholders, as well as Colorado’s Workforce Centers, to conduct webinars and other online meetings.

Connecting Colorado is the case management, data collection, and reporting system utilized by all of the Workforce Centers. The system provides the ability for Workforce Centers and their partners to track all WIOA, TAA, Veteran, Wagner-Peyser, state and local programs (approximately 60), plus discretionary grants in one common database. All reports generated from this system are “up to the minute,” thus allowing for better management of day-to-day activity and performance. Along with the federally-mandated reports, Colorado has developed a variety of locally-requested reports that allow staff to track their caseloads, correct data entry errors, and analyze performance at the state, local, and case manager level. In addition, the system is agile enough to allow the as-needed addition of reports, and program and service codes that will track new statewide initiatives supporting the state’s workforce strategies. Workforce partners may make use of this system through data sharing agreements with the state or the local workforce regions.

Through this planning and collaboration, Colorado Workforce Centers were able to provide a full range of workforce services to nearly 400,000 job seekers in PY14. In that same period, more than 25,000 businesses received services from the standardized business service team while more than 4,800 job seekers were provided training services to increase the talent pipeline and meet the needs of the state’s businesses in targeted sectors with high-growth

industries. To this end, Colorado met or exceeded all of the Workforce Investment Act (WIA) common performance measures in PY14.

Workforce System Services – Unemployed and Underemployed

Colorado Workforce Centers offer the full array of Career Services outlined in WIOA 134(c)(2) for unemployed and underemployed jobseekers.

Colorado Workforce Center Services	
Basic Career Services	• Determination of Eligibility • Initial assessment • Labor Exchange Information – Connecting Colorado • Labor Market Information – Colorado LMI Gateway • Unemployment Insurance Information • FAFSA Assistance • Referrals
Individualized Career Services	• Development of Individual Employment Plan • Group Counseling • Individual Counseling • Comprehensive and specialized assessments • Career Planning • Internships • Short-Term Pre-Vocational Services (soft skills such as communication, punctuality, and personal maintenance skills) • Workforce Preparation Activities (i.e., MS office, keyboarding, and Internet) • Financial Literacy
Follow-Up Career Services	• 12 months of follow-up

Career services available at the centers vary because of local area inflexion and needs of particular communities. Basic career services are available at over 100 locations throughout Colorado. Each center has computers, printers and copiers, printed resources, and staff to assist jobseekers.

Many of the services, including Connecting Colorado and Colorado LMI Gateway, can be accessed virtually though the internet via computer, smart phone, or tablet. Connecting Colorado is the state job matching system and is the virtual one-stop-shop where Coloradans

can centralize all their career search activities. It allows jobseekers to self-enter his/her resume(s) and job search 24/7. Jobseekers can set up virtual recruiters and receive an e-mail notification once a job is entered that matches their unique specifications. Connecting Colorado also provides access to a tool box of job search assistance links that has been customized for each workforce area. Links include direct access to the area's web page, career exploration, training resources, self-marketing tools, Unemployment Insurance information, and additional job banks. The built-in event calendar communicates upcoming hiring events, job fairs, and other workforce activities. Jobseekers can take advantage of free training though Connecting Colorado by accessing Universal Class, which offers courses that cover health and life, technical, and soft skills. Colorado LMI Gateway allows jobseekers to make informed data-driven career decisions. This labor market system provides a wide variety of regional labor market services, such as labor trends, statistics, economic, demographic, salary, and employer data. It allows jobseekers to set up a personal page for their career exploration data to be readily accessible.

Basic Career services also extend beyond the virtual world. After the initial assessment, customers—as appropriate—may be provided with direct linkages to additional workforce activities, including multiple education and training opportunities, across the workforce system though partner referrals. Many of these partners are housed within the workforce center, making customers unaware that they are participating in multiple programs due to the integrated service delivery.

Individualized Career Services

Individualized career services within the Colorado Workforce Centers vary across the state, but all the offices offer a full line of activities to prepare jobseekers for the modern workforce. They address many of the soft skill and technical skill training Colorado employers require such as:

- Complex Problem Solving
- Writing
- Critical Thinking
- Judgment and Decision Making
- Deductive Reasoning
- Information Ordering
- Coordination
- Interacting With Computers, and
- Analyzing Data or Information

Local areas work with employers to identify these needs and systematically create programs to provide the education and training needed. These types of services begin with the development of an individual employment plan to address the unique requirements of each customer. Professional staff in the workforce system work with the customer to create and implement their plan. Staff provide the customer with local labor market information including in-demand occupations, wage data, and employer requirements. The plan may include activities such as:

- Workshops – Job Search, Application, Resume Writing, Interviewing, Finical Literacy, etc.;
- Short-Term Pre-vocational Services – Career Readiness that includes soft skill training;

- Workforce Preparation Activities – Microsoft Office Training, Basic Computer, Keyboarding, KeyTrain, etc.;
- Career Exploration Inventories – CareerScope, COPS, My Next Move, etc.; and
- Comprehensive Assessments – SkillCheck, Prove It!, WorkKeys, Test of Adult Basic Education, etc.

By utilizing these services and successfully completing the appropriate assessments Coloradans are eligible to receive the CareerReady Certificate (CRC). The CRC is an assessment-based credential signed by the Governor that certifies a job seeker's skills. The certificate creates objective standards for employment readiness and demonstrates a job seeker's mastery of the work-applied skills employers are seeking. To earn a certificate, one must pass WorkKeys assessments in Applied Mathematics, Locating Information, and Reading for Information.

Training Services

Career services are not always enough to enable job seekers to obtain self-sufficient employment. In some instances, formal training is required. Colorado Workforce Centers offer multiple trainings services such as:

- Occupational skills training
- On-the job training (OJT)
- Apprenticeships
- Incumbent worker training
- Skill upgrading and retaining
- Entrepreneurial training, and
- Adult education and family literacy activities

Training services are funded through WIOA programs, Pell Grants, partner programs, and state and local grants. Local areas are responsible for establishing and implementing local polices for eligibility, Individual Training Account (ITA) limits, and the identification of in-demand sectors or occupations. Through multiple initiatives and projects, Colorado has focused training and career development activities on sector strategies/partnerships and career pathway development.

- **WORK Act** – The Skilled Worker Outreach, Recruitment, and Key Training Act (WORK Act) is a grant program administered by CDLE and an 11-member grant review committee that is made up of system partners and stakeholders. The grant enables recipients to reach a broader audience through recruitment and outreach activities, increase enrollment in and completion of their skilled worker training programs, and fill existing needs for skilled workers in the market. This allows for Colorado to address the middle skills gap by strengthening training programs and increasing participation.
- **Colorado House Bill 15-1274** – The legislation directs the CWDC to coordinate multiple state agencies and industries in the design of career pathways in growing and emerging sectors. The first pathways to be developed are in construction and skilled trades, information technology, and health care. Pathways are required to be posted online, allowing easy access for all Coloradans. These career pathways blend multiple learning experiences including internships, apprenticeships, and traditional training.
- **Colorado House Bill 15-1275** – This recent legislation has directed advisory boards made up of CDE, CDLE, community college systems, CWDC, and other stakeholders to

create recommendations that assist local education providers in creating cooperative agreements to include apprenticeships and internship programs in the available concurrent enrollment programs. In addition, the legislation creates a tuition assistance program for eligible students enrolled in short-term certification programs that Pell Grants do not cover. This allows low-income individuals to enter career pathways through short-term certification programs, helping Colorado grow the middle class.

- **Sector Partnership National Emergency Grant (NEG)** – The Sector Partnership NEG provides funding for the expansion or creation of new sector partnerships in multiple local areas. The partnership includes local community colleges or other educational institutions, county departments of human services, employers, and local area boards. The funding is also used for career services for dislocated worker training including OJT and other work and learn activities.
- **Displaced Homemaker Grant** – The Displaced Homemaker Grant provides Keep Envisioning Your Success (KEYS) Scholarship, and is a partnership between CDLE and the Community College of Denver (CCD) to provide reemployment services to individuals who lost their primary source of income and must re-enter the labor market. The program provides financial support to participants to earn their Certificate or Associate Degree with programs focused on in-demand careers in the areas of health care, computer science, human services, business, legal, and education. In addition, the program helps participants develop self-confidence, achieve academic success, and overcome barriers to employment.

The continued development of sector partnerships and career pathways allows Coloradans to understand the full potential of their participation in workforce activities. Non-traditional training such as work and learn programs including OJTs and apprenticeships offer a wide selection of training opportunities, at the same time enabling local areas to customize training to fit the needs of regional industry demands. This flexibility in training options provides the state with the opportunity to assist individuals in obtaining the technical skills demanded by employers as outlined above. At the state level, the Eligible Training Provider List (ETPL) has been updated pursuant to WIOA Sections 122 and 134. This list ensures that Coloradans are able to make informed decisions on training providers and programs based on accurate data including completion and placement rates, labor market information, and wage expectations.

Supportive Services

In order to assist job seekers in obtaining or retaining employment though career or training services, Colorado Workforce Centers offer a variety of supportive services. Local areas are responsible for establishing supportive service policy that outlines types, eligibility, limits, etc. Examples of supportive services include child care, transportation, needs-related payments, tools and equipment, uniforms, and other clothing. In addition to WIOA-funded supportive services, local areas have developed relationships with community partners that assist with utility payments, food, shelter, and other basic needs. Formal MOUs with workforce partners outlined below provide additional supportive services such as cash and food assistance to jobseekers.

Workforce System Activities: Business

The focal point of all workforce system activities is business and industry. Colorado has been a national leader in the development of sector partnerships and business services over the past several years. The workforce system created a statewide Business Service Team consisting of members across core partners. The team established eleven core services to present to employers. These activities are taking place statewide and include:

- **Access to facilities** – use of Workforce Center facilities by a business for a variety of purposes such as meetings, trainings, orientations, interviews, etc.;
- **Assessments** – Any test or assortment of tests used to measure the skills, interests and/or personality traits of a job seeker, potential employee, or current employee;
- **Business education** – Seminars, round tables, workshops, focus groups, etc.;
- **Business information** – Information given to a business pertaining to a variety of incentive programs or other information requested that provides a benefit to that business;
- **Hiring events** – A customized event for a single employer that assists with recruiting, interviewing, and hiring of one or more positions;
- **Job fairs** – Brick & Mortar is an event for multiple employers that assists with the recruiting, interviewing, and hiring of one or more positions; Virtual is an online "event" in which employers and job seekers each meet in a virtual environment, using chat rooms, teleconferencing, webcasts, training/workshop videos, webinars, employers online hiring sites, and/or email to exchange information about job openings and/or resources;
- **Job postings** – Staff-entered or web-entered job orders approved by staff;
- **Labor market information** – Information on state and local labor market conditions; industries, occupations, and characteristics of the workforce; area business identified skills needs; employer wage and benefit trends; short and long-term industry and occupational projections; worker supply and demand; and job vacancies survey results;
- **Rapid Response** – A variety of services to businesses that are facing restructuring and downsizing including onsite workshops for employees in transition; job placement assistance; and information on unemployment benefits;
- **Screening** – Any service that involves the initial evaluation of applications or resumes that assists the employer in the recruiting process; and
- **Training and retraining** - Any service provided to a business that involves the training or retraining of current or future employees including OJTs, Work Experiences, Incumbent Worker Training, etc.

This collaboration among local areas is reinforced at the annual Business Service Summit where Business Services Representatives (BSR) from across the state work to ensure activities and strategies align system wide.

Workforce System Partners and Activities

Job Corp

Colorado has one Job Corps location in Collbran, Colorado. Job Corps is a federally-funded program under WIOA that provides free education and training to young adults (16-24 year olds). Eligible youth are able to earn a high school diploma or high school equivalency diploma and receive life, soft, and occupation skills training. The Job Corps partnership with Colorado's workforce system is statewide and comprehensive. Staff of the Collbran Job Corps Center and their outreach and recruitment contractor, CHP International, have a long history of participation in the state and local youth councils. Youth from the Collbran Job Corps Center also become members of local youth councils on a regular basis. Job Corps regularly participates in local youth job and career fairs. The strong relationship between the Colorado Workforce Centers and Job Corps is solidified by MOUs to provide Job Corps and their contracted vendor with access to Connecting Colorado. Collbran youth register with Connecting Colorado to search for jobs once they have completed their coursework and are transitioning back to the community. They benefit by posting a résumé, applying for a specific job, or completing a self-directed job search. A formalized process for referring Job Corps participants to local WIOA youth programs is in place with each workforce area and provides youth with access to more career services that they may need to meet their educational and employment goals.

YouthBuild

YouthBuild is an education, career-training, and leadership program for young adults without a high school diploma or equivalent. The program provides skill building and preparation for participants to obtain their diploma while simultaneously providing work and learn programing in a variety of in-demand occupations. Students are exposed to soft skill training throughout the program and build the foundational career skills needed to succeed in the modern workplace. Upon completion of the program, students are assisted with career or post-secondary education placement and receive 12 months of follow-up services. With two active grantees in Colorado, YouthBuild program information and referrals are available through the workforce centers nearest these programs.

Migrant and Seasonal Farm Workers Program

CDLE administers the Migrant and Seasonal Farm Workers Program (MSFW), ensures that program information is available at all workforce centers, and that eligible participants receive proper referrals. Colorado is designated as a significant MSFW state and six centers have been determined as significant MSFW Workforce Centers (Brighton, Greeley, Lamar, Monte Vista, Delta, and Rocky Ford). These centers administer a bilingual (English/Spanish) outreach program through workforce centers to ensure that equitable services are provided to all MSFW clientele, including:

- Job search assistance and placement registration assistance
- Assistance with Unemployment Insurance

- Testing
- Counseling
- Training opportunities
- Referral to supportive services
- Job development
- Referrals to other organizations that serve migrant and seasonal farm workers
- Complaint resolution, and
- Farm worker rights and labor law information

MSFW programs coordinate with Colorado Workforce Centers and many times customer are co-enrolled, which allows them to access the full array of workforce system programs.

Employment First

Colorado operates its Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) and optional Workfare program under the title Employment First. The Colorado Department of Human Services administers the Employment First Program, which is run through local county human service departments in 45 counties statewide. Counties procure their own service providers, and may coordinate activities with local workforce centers. Local level collaboration provides customers an opportunity to apply for and receive SNAP assistance to help overcome barriers to employment, as well as allowing SNAP participants to access additional resources in their employment search.

The mission of Employment First is to increase employment for food assistance recipients though support, referrals, accountability, and community work. Participants may engage in a variety of employment-oriented activities through the Employment First program, including:

- English Language Acquisition
- Literacy
- Adult Basic Education
- Employability Education
- Working
- WIOA –Funded Programs
- Vocational Training
- Business
- Vocational Rehabilitation, and
- Post-Secondary Education

Colorado Works

Colorado's Temporary Assistance for Needy Families (TANF) is known as Colorado Works and is administered at the state level by the Colorado Department of Human Services, and is locally administered by county departments of human/social services. In some local areas, agreements are in place to establish partnerships between human service agencies and the workforce centers. In other areas, the workforce center may fall underneath the broader umbrella of the county human service department. While human service offices exist in all of Colorado's 64 counties, workforce centers are not always accessible within every county. In these areas, partnerships take the form of regional collaboration or virtual services.

All applicants for Colorado Works are given an assessment within 30 days of application that focuses on identifying what services and assistance will best support the family in achieving economic stability. Often times these assessments lead to referral(s) to WIOA and other workforce partner services as a priority population. In many counties, workforce development activities associated with Colorado Works are administered through the workforce center via a local level agreement or contract for services. Participants may engage in a variety of employment-oriented activities through the Colorado Works program, including:

- English Language Acquisition
- Adult Education and Family Literacy
- Post-secondary and Vocational Education
- Work Experience/Interships
- Community Service
- WIOA – Funded Programs
- Job Readiness Training
- Employment

Adult Education and Family Literacy

CDE's Office of Adult Education Initiatives (AEI) administers the federally-funded Adult Education and Family Literacy Act (AEFLA) grant program under Title II of WIOA, as well as the state-funded Adult Education and Literacy Act of 2014 grant program. AEI provides oversight for programs across the state, and services are provided locally by sub-grant recipients. As a combined plan core partner, and consistent with the focus of WIOA, adult education and family literacy services are essential to the workforce system. In many cases, meeting adult education and family literacy needs is the first step in a job seeker's career pathway. Adult education and family literacy services include adult basic and secondary education and english language acquisition focused on career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty, and building stronger local areas within Colorado.

Senior Community Service Employment Program

Senior Community Service Employment Program (SCSEP) is administered by the Division of Aging and Adult Services, Department of Human Services. SCSEP promotes useful, part-time employment opportunities in community service activities for persons with low incomes who are 55 years of age or older and have multiple barriers to employment. Priority is given to individuals who are: veterans, age 65 plus, live with a disability, have limited English proficiency and/or low literacy skills. The program is designed to foster individual economic self-sufficiency and increase the number of people in unsubsidized employment.

SCSEP participants are placed in non-profit or government agencies called, "Host Agencies." Host agencies agree to provide employment training through community service activities, upgrading the participants' employability skills. Participants are provided minimum wage, skill enhancement or acquisition of skills, personal and employment counseling, and assistance in obtaining un-subsidized employment. Approximately 1,000 individuals throughout Colorado are served annually through SCSEP.

Vocational Rehabilitation

Vocational Rehabilitation Programs fall under the authority of CDLE though the Division of Vocational Rehabilitation (DVR), beginning July 1, 2016. DVR's positioning within CDLE, creates natural and meaningful partnerships with other WIOA services to better serve Coloradans with disabilities who have previously struggled to participate in the workplace, including those with disabilities for whom employment has remained completely out of reach, as well as other groups such as youth, recently discharged veterans, and the long-term unemployed. The DVR mission is to assist persons with disabilities to succeed at work and to live independently. DVR accomplishes this mission with a variety of employment and training activities including:

- Evaluation and diagnostic services provided to determine eligibility and the services needed for the individual to become employed;
- Vocational rehabilitation counseling and guidance provided directly by a vocational rehabilitation counselor during the individual's plan of services;

- Physical and mental restoration services which may be provided to correct or substantially modify an individual's physical or mental condition;
- Training services, when necessary to become employed, including vocational training, academic training, personal and vocational adjustment training, job coaching, on-the-job training, job-seeking skills training, and books, tools, and other training materials;
- Specialized services for individuals who are blind, deaf, and deaf-blind, including interpreter services, note-taking services, and reader services;
- Rehabilitation technology services, including assistive technology devices, assistive technology services, and rehabilitation engineering services to address barriers encountered by an individual in attaining or retaining employment;
- Placement services provided to assist an individual with a disability to find adequate and suitable employment in his/her chosen career; and
- Supportive services, such as maintenance, transportation, personal assistance services, and services to family members may also be provided if necessary for the individual to utilize the services identified above.

Post-employment services may be provided to previously rehabilitated individuals when needed to maintain or regain suitable employment.

- Pre-employment transition services provided to students with disabilities, including: job exploration and counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy.

- Technical assistance, training, outreach and other supportive services provided to small, medium, large, Federal and Federal contracting employers for the purpose of increasing employment opportunities for job seekers with disabilities.

Trade Adjustment Assistance

Trade Adjustment Assistance is overseen by CDLE and is part of the integrated services team in the Colorado Workforce Centers. TAA provides enhanced reemployment benefits designed to help workers adversely affected by foreign trade obtain suitable employment. Benefits include occupational training, job search and relocation allowances, Reemployment Trade Adjustment Assistance (RTAA), reemployment case management services, Trade Readjustment Allowance (TRA), and extended unemployment insurance benefits. TAA customers are co-enrolled into Title I-B programs and are referred to other workforce system activities as needed.

Jobs for Veterans State Grant

Jobs for Veterans State Grant (JVSG) programs are administered by CDLE, and are co-located and fully integrated within the Colorado Workforce Centers. JVSG funds two positions: Disabled Veterans Outreach Specialist (DVOP) and Local Veterans Employer Representative (LVER). Customers entering the career center are screened for eligibility and referred to JVSG staff as appropriate. In most cases, JVSG participants are co-enrolled in Title I-B programs. DVOPs are

charged with providing case management and careers services to young veterans aged 18-24, eligible spouses, and veterans with Significant Barriers to Employment (SBEs) as outlined in Veterans Program Letter (VPL) 03-14 and 04-14, which include:

- Special Disabled or disabled veteran,
- Homeless veteran,
- A recently-separated service member – who at any point in the previous 12 months has been unemployed for 24 or more consecutive weeks,
- An offender,
- Veteran lacking a high school diploma or equivalent certificate, or
- Low-Income as defined by WIOA.

DVOPs provide a range of services including career planning and counseling, comprehensive assessments, individual employment plan development, short-term pre-vocational services, and other career services within the Colorado Workforce Centers. LVERs operate on the local area business service team providing an array of business services such as planning and participating in job fairs, employer outreach, job development, and assisting in the education of workforce system partners on veterans programs.

JVSG grant staff also serve other populations of veterans in the State through MOUs. Those populations include:

- National Guard and Reserve members returning from Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF). In particular, Virtual Job Fair Technology is being utilized to assist this group with veterans resource sites, accessed while they are still overseas, and actual virtual job fairs when they return to this country;
- Service-connected disabled veterans, who are targeted and identified through various Veterans Service Organizations (VSO), as well as outreach activities at Veteran Centers and Veterans Administration Medical centers;
- Recently separated veterans, who are targeted through Colorado's College Campus Outreach pilot program and through job fairs and hiring events;
- Wounded and injured veterans, who are identified through the REALifelines program that staff coordinates, and through relationships established with the Wounded Warrior Program located at Fort Carson, Colorado;
- Incarcerated veterans, who are identified and contacted through "in-reach" activities conducted within correctional facilities managed by the Colorado Department of Corrections. Veteran representatives will also work in partnership with the Veteran Offender initiatives described in detail below under Ex-Offenders; and
- Homeless Veterans - Veteran Employment Specialists work with the Homeless Veteran Reintegration Program (HVRP), providing one-on-one employment assistance and supportive services to homeless veterans to include, but not limited to, resume and interviewing preparation, employment workshops, job search assistance and job referrals.

Unemployment Compensation Programs

Unemployment Insurance Division (UI) programs are operated by CDLE and work with both Workforce Development Program staff and Colorado Workforce Center staff. UI provides benefits to qualified dislocated workers to assist them with their financial needs during their work search. UI staff have partnered with system leaders to cross train workforce staff on the UI benefits systems, which allows for better distribution of information to jobseekers. In addition, UI operates the Reemployment Services and Eligibility Assessment (RESEA) and Links to Reemployment which focuses on engaging UI claimants within the first 5 weeks of their first UI Benefit payment by getting them physically into the workforce centers. This proactive strategy provides earlier workforce engagement and increased services to help expedite workforce reentry.

(B) The Strengths and Weaknesses of Workforce Development Activities. Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

Strengths

Colorado's workforce system has many strengths. Colorado has transformed its workforce system into a business and industry driven model. The services and activities to unemployed, underemployed, and businesses outlined above are designed with the intent to meet local and statewide industry demands. Through initiatives including sector partnerships, career pathway development, data analysis, system collaboration, and work and learn programing, the workforce system has fully embraced the key principles of WIOA. Colorado has aligned business services though the statewide business services team and maintained a customer-centric approach for both jobseekers and businesses.

The vital element to this success is the understanding that workforce development is truly a multi-faceted approach harnessing workforce, education, economic development, and business. Examples of statewide and local collaboration among partners exist throughout Colorado. Alignment of resources and locally-specific co-location of services have allowed Colorado to have a flexible and proactive approach to workforce development by being able to create programs from the bottom up. Throughout Colorado there are numerous examples of "home grown" best practices that are shared through the e-Colorado online portal. Examples include:

- Board member and workforce partner staff engagement program where they participate in a half day immersion program at the workforce center to receive a firsthand understanding of the customer flow and services available;
- Onsite child care facilities and family friendly resources areas where customers can concentrate on skill building and career enhancement while their children and dependents are in a safe and secure environment;

- Partnerships with K-12 education to assist schools with career exploration and providing information to the next generation of the workforce, enabling them to make educated and informed career decisions based on data and workforce demand; and
- Collaboration with local media outlets such as radio and print media to market services and disseminate other workforce information.

Another key strength of Colorado's workforce development system is its alignment with the Colorado Office of Economic Development & International Trade (OEDIT). In 2011, the Colorado Blueprint was adopted as the state's economic development plan. The Blueprint featured 6 core objectives:

1. Build a Business-Friendly Environment
2. Retain, Grow, and Recruit Companies
3. Increase Access to Capital
4. Create and Market a Stronger Colorado Brand
5. Educate and Train the Workforce of the Future
6. Cultivate Innovation and Technology

Core objective five is led by the CWDC and tasks the CWDC to:

- Align the efforts of education, workforce training, and economic development across state agencies and stakeholders;
- Create a demand-driven workforce system matching Colorado's talent pool to upcoming needs of business;
- Prepare Colorado youth for full participation in the increasingly demanding and competitive economy; and
- Increase awareness of the availability of quality entrepreneurial training.

With this plan, CWDC and its partners have increased sector partnerships through their leadership. A Sector Steering Committee was established in 2011 and fostered the State's sector partnership philosophy. In 2013, the State held its first Sector Summit followed by another in 2014. The summit and committee's work supported 13 business-led sector partnerships statewide. A tool kit was created to assist local areas in the creation and retention of partnerships. Finally a step-by-step guide was released to outline how to create a data-driven and well-planned career pathway from inception through implementation.

Weaknesses

There is room for improvement in all things and the workforce system in Colorado is no different. Through stakeholder engagement, opportunities for enhancement were identified. These opportunities provide a platform for future initiatives and strategies. Opportunities include:

- Data Sharing - Connecting Colorado allows access to some system partners but it does not function as the data management system across the board for all core, non-core,

and system program partners. Additionally, not all labor market information, asset mapping, and other data is available statewide because of local area resources.

- Public Awareness – The workforce system suffers from a lack of name recognition with both jobseekers and business. The lack of a unified language makes it difficult for the system to communicate its message to the public.
- Professional Development – Workforce system staff need continuous professional development to be educated on current market conditions, as well as the latest initiatives and strategies. In addition, cross agency staff training would allow for increased knowledge of partner programs, creating a more holistic system.
- Consistency in Service Delivery –There are opportunities to establish more consistency around elements of the service delivery strategies so customers can more easily navigate services within the system. Many examples of local best practices and successful strategic implementation exist, but there is a need to take these best practices and identify how, or if, they can be appropriately implemented in consistent ways throughout the state.

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

Colorado has implemented a workforce system designed to increase capacity to serve more customers. Led by the strategic vision set by Governor Hickenlooper and the Colorado Workforce Development Council, the functional design of the Colorado workforce system starts with housing five of the core programs in one state agency, allowing for optimal coordination in both strategic planning and operation execution. The recent addition of Vocational Rehabilitation under CDLE serves to further increase capacity and extend the alignment of the system to a broader and more diverse population of jobseekers across the state. A streamlined customer experience through referrals from and to core, non-core, and program partners coordinates workforce activities and increases the capacity of each partner by allowing specialized services to function optimally and assist in the elimination of the duplication of services.

Furthermore, in an effort to reach more customers, partnerships were developed with libraries to increase capacity, especially in rural areas across the state. Beyond bricks-and-mortar, Colorado utilizes technology to increase access; examples include virtual job fairs, videoconferencing throughout the Colorado Workforce Centers, especially in rural areas, and resources available through Connecting Colorado.

(b) STATE STRATEGIC VISION AND GOALS

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

(1) Vision. Describe the State's strategic vision for its workforce development system.

As the entity charged with aligning the efforts of economic development, education, workforce development, government and business stakeholders at the local, regional and state levels, the Colorado Workforce Development Council has worked to ensure that the statewide strategic vision not only exists, but is actively used to drive the Colorado workforce development system's goals, strategies, staff, partners, and decisions. Our vision is that ***every Colorado business has access to a skilled workforce and every Coloradan has access to meaningful employment, resulting in statewide economic vitality.***

CWDC ensures the strategic vision for the workforce system remains relevant by convening partners, leveraging resources and working to remove communication and regulatory barriers in order to help businesses create jobs, retain jobs and access a highly competitive workforce. It is CWDC's mission ***to create and sustain a business-led Colorado talent system that appropriately integrates the work of economic development, education, training and workforce development to meet the needs of businesses, students, and job-seekers.***

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

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

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

GOAL 1: ENGAGE BUSINESS AND INDUSTRY AS A FULCRUM TO INFORM AND ALIGN ALL ELEMENTS OF THE DEMAND-DRIVEN SYSTEM

The Colorado workforce development system has built a strong foundation for itself in sector partnerships that have been launched, expanded, and sustained throughout the state. From this base, it is now time to increase business engagement within the system to an even greater level. Our first goal is to see sector partnerships taken to the next level with businesses buying-in – with their time, in-kind contributions, and financial resources – to inform relevant, demand-driven career pathways in Colorado. In designing or redesigning career pathways informed by our sector partnerships, we recognize that we need a better understanding of the value placed upon industry-recognized credentials by Colorado businesses. In understanding this, we will then be able to embed, stack, and ultimately promote these credentials in career pathways in a more resounding way. We also recognize that the career pathways informed by our sector partnerships must include work-based learning opportunities in order to remain relevant to business needs and will incorporate these strategies in career pathways and skill development programs.

GOAL 2: ESTABLISH A CUSTOMER-CENTRIC AND HOLISTIC FOCUS TO INCREASE COORDINATION, EFFECTIVENESS, AND ACCESS THROUGH SHARED DATA, TOOLS, AND RESOURCES

In order to derive significant value from our system, our business and jobseeker customers must be able to access an array of services and resources through a seamless experience. Our second goal is to establish a system that embraces a “no wrong door” philosophy at all levels. We have made progress on this front in business services; Colorado businesses can now experience the same eleven common services no matter where they are located in the state. We will apply the same LEAN process improvement approach we used to define the business services strategy to our jobseeker and youth services to understand where resources can be aligned, efficiencies can be gained, and opportunities to increase access can be seized.

We know, however, that further integration and alignment of services must be supplemented by increased coordination among data systems and tools. We will explore opportunities, for example, to streamline Connecting Colorado and increase partners’ access to information.

GOAL 3: ENGAGE PARTNER STAFF AT EVERY LEVEL FOR BETTER SYSTEM ALIGNMENT

Throughout the process of developing goals and strategies for this plan, there was significant engagement and collaboration among state-level program leaders. It was also clear through focus groups throughout the state that there is strong collaboration and coordination among local decision makers. But, we need to engage more staff from all partner programs in system alignment efforts. From state-level leadership to front-line staff in the Colorado Workforce Centers, the third goal for Colorado’s WIOA Combined State Plan focuses on including all levels of staff in efforts toward system alignment. This will include a heavy emphasis on professional development and cross-education on all programs, but will also include providing more opportunities for staff within the system to provide input and insights gained through their first-hand experiences with customers.

GOAL 4: CREATE AND DELIVER A UNIFIED MESSAGE FOR INTERNAL AND EXTERNAL COMMUNICATION

As the Colorado workforce development system becomes more and more aligned, we have identified the need to increase the consistency in internal and external messaging about the value and benefits of the system. Goal 4 is focused on defining the Colorado workforce development system’s “brand promise” for both internal stakeholders and external stakeholders. We will identify strategic messages targeted toward specific internal and external stakeholders and also explore ways to promote the return-on-investment of workforce programs.

GOAL 5: DRIVE MEANINGFUL OUTCOMES THROUGH INNOVATION, ALIGNMENT OF METRICS, AND ACCOUNTABILITY

In focus groups throughout the state and in planning sessions with state leaders, we identified that the innovation within the workforce development system is often stifled by limited resources and/or misaligned measurements of success. Colorado’s final goal is to create a workforce development environment that embraces innovation and achieves meaningful outcomes for businesses and individuals. We will look to launch pilot programs to test new

strategies while measuring the effectiveness of these strategies. We will also focus on looking beyond our WIOA common measures and identify additional indicators of system-wide success (see Governor's Vision 2018 described below).

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

Performance measurements are negotiated annually with the US Departments of Labor and Education. Colorado is awaiting final guidance from these departments on the process for establishing expected levels of performance. Proposed measures will be developed after guidance is received and will be published through www.colorado.org/cwdc prior to the start of the 2016 program year.

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

During the first program year of this state plan, assessment plans will be developed by the CWDC in partnership with all system programs. The assessment plans will include measureable goals, progress benchmarks, and specific indicators that will be used to monitor progress. Through ongoing WIOA Implementation Team meetings strategies will be assessed for their performance and the implications of that performance on the system overall in relationship to the overarching goals and specific program performance measurements.

State Strategy

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

(1) Describe the strategies the State will implement, including sector strategies and career pathways, as required by WIOA section 101(d)(3)(B), (D).

(2) Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, mandatory and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to gaps identified in the State's workforce analysis.

Goal 1: Engage business and industry as a fulcrum to inform and align all elements of the demand-driven system

Strategy 1.1 – Expand regionally-focused sector partnerships that are championed by business and Industry to drive career pathways

Strategy 1.1(a) - Cultivate ownership from business and industry to leverage influence and resources; and

Strategy 1.1(b) – Design and disseminate multiple career pathways that enable Coloradans to have a clear roadmap for success.

Rationale
Since 2011, Colorado has been a national leader in creating and sustaining a state-wide sector strategy driven by regional sector partnerships. To date, however, there have not been *systemic* connections between career pathways offered by education and training providers and the sector partnerships in Colorado that are identifying skill needs and workforce trends. Over the next four years, we will encourage sector partnerships to focus on their role in informing career pathway development for youth, adults, and individuals facing barriers to education and employment by promoting a recently developed framework and offering tools, resources, and technical assistance. Furthermore, while industry continues to come to the table for this sector partnership work, we need them to "set the table" and truly drive the agenda of each partnership. This means more buy-in from business and industry – whether that is through commitments of time, in-kind contributions, or financial resources. This will be another priority as we expand sector partnerships throughout Colorado.

Strategy 1.2 – Develop and implement a full spectrum of work-based learning opportunities to be deployed broadly across sectors.

Rationale
We hear more and more from businesses that they need talent with the necessary knowledge and skills as well as the ability to *apply* those skills. Work-based learning opportunities provide students and working learners exposure to the workplace, where they can not only utilize the knowledge and skills they are developing or have previously developed in the classroom but also develop employability skills. For these reasons, and because we also know that work-based learning opportunities facilitate connections between Colorado companies and Colorado talent, we believe a full spectrum of work-based learning opportunities ranging from short-term externships to structured on-the-job training to formal apprenticeships should be available. Over the next four years, we will develop a framework for different models of work-based learning and corresponding tools needed by employers and/or educators to implement these models widely throughout the state and across multiple sectors.

Strategy 1.3 – Support collaboration between business and education to understand the value of stackable industry recognized credentials.

Rationale
As professionals in the workforce system, we fully believe in the value of industry-recognized

credentials and their importance within career pathways. However, our business and industry partners are not consistently familiar with the knowledge, skills, and abilities these credentials represent. Moving forward, we will leverage the state's sector partnerships to understand the currency industry-recognized credentials hold within the Colorado labor market and identify strategies to increase businesses' awareness of them so they become embedded within hiring practices.

Goal 2: Establish a customer-centric and holistic focus to increase coordination, effectiveness, and access through shared data, tools, and resources

Strategy 2.1 – Adopt LEAN principles for the implementation of cross-partner strategies/services to increase efficiency, accessibility, and coordination of job-seeker services.

Rationale
In identifying common business services, the statewide Business Services Team utilized LEAN principles to identify opportunities for improvement and efficiency. We will adopt this methodology as partner agencies and programs work toward greater system alignment with particular attention toward job-seeker services. As with business services, we will convene a working group with representatives from all partners included in this plan to first identify general areas of opportunity for more coordinated services/strategies and then apply LEAN principles to these topic areas. Of particular interest, in addition to key customers, will be identifying ways technology can be streamlined and/or leveraged to increase access to services and how it can improve individuals' experience in the system.

Strategy 2.2 – Enhance the alignment of business services across all partner programs.

Rationale
One of the Colorado workforce development system's recent successes has been the intentional focus on streamlining the services available to businesses throughout the state. The identification and local implementation of eleven common business services signals strong collaboration among partners; but, more partners can be engaged. Currently, the statewide Business Services Team is incorporating the WIOA core partners and the services they represent. By expanding a consistent business services strategy to partners from other programs and agencies, the services offered to businesses will be more comprehensive.

Strategy 2.3 – Develop and implement a technology solution or other methods for data coordination and information sharing across program partners.

Rationale
The current array of data systems that are used by partners do not lend themselves to the information sharing and transparency that are needed for true system alignment. While data

sharing agreements exist as a starting point, we will explore ways to integrate data systems and/or share information more effectively to eliminate duplication of services, dual data entry, and customer frustrations. In doing so, however, we will be cognizant of the various program requirements, confidentialities, and previous investments made by partners and look for ways to build upon and/or link existing infrastructures rather than create new ones.

Goal 3: Engage partner staff at every level for better system alignment

Strategy 3.1 – Implement continuous professional development for staff from all partner programs to elevate internal expertise and professionalism and to equip them with the tools necessary to operate a comprehensive, holistic approach to talent development.

Rationale
In order to have a customer-centric workforce system, staff within the workforce development system must 1) understand and buy-in to the "no wrong door" philosophy and 2) be equipped with the knowledge, information, and tools to guide customers through the system. This will require cross-education of staff on the different programs, resources, and processes that exist to support business and individual customers. We will ensure staff at all levels – from front-line staff to program managers to executive level leadership – are well-versed in the services the system offers and we will launch an intensive professional development effort aimed at elevating their professional skills and simultaneously promoting a collaborative, "no wrong door" philosophy.

Strategy 3.2 – Create opportunities for staff at all levels to engage in continuous improvement efforts, leveraging their first-hand experience and unique perspectives to inform the processes.

Rationale
As mentioned in Strategy 2.1 and 2.3, we will look for opportunities to expand the business services strategy to additional partners and apply LEAN principles to uncover opportunities for improvement and/or alignment within our services to individual customers. In doing so, we will actively engage staff at all levels within the system to gather input and ideas from those working first hand with customers. We will also establish a method for staff at all levels to participate in the ongoing continuous improvement efforts of Colorado's workforce development system. Whether they are identifying improvements that need to be made or offering solutions to common challenges, staff will have opportunities – either virtually or perhaps via in-person forums – to share their ideas and be a part of the solution.

Goal 4: Create and deliver a unified message for internal and external communication

Strategy 4.1 – Establish a brand for the Colorado workforce development system that represents the vision and strategies of the WIOA combined partners.

Rationale
With this WIOA Combined State Plan, the Colorado workforce development system finds itself on the verge of transformation. The goals and strategies within this plan position the

system to engage new partners, become more aligned through a "no wrong door" approach (Strategies 2.1, 2.2, and 2.3), test new ideas (Strategy 5.2), upskill its staff (Strategy 3.2), and truly understand its value (Strategy 4.3). Singularly, these changes would be significant. Together, they will result in a new workforce development system. The system's brand needs to reflect these changes so customers, as well as internal and external stakeholders, recognize the value they are able to derive by engaging with Colorado's workforce system.

Strategy 4.2 – Define the key messages and brand promise for target audiences.

Rationale

As the Colorado workforce development system defines its brand, we will also define key messages for target audiences of the system. As the system transforms, there will be both internal audiences and external audiences that need to be aware of and bought-into the new philosophy and brand promise. These audiences are outlined below.

Internal audiences:

- Workforce Development Board members
- State-level program administrators
- Local-level program administrators and sub-grantees
- Program-specific staff
- System-wide front-line staff
- Federal workforce partners

External audiences:

- Businesses
- Adult job seekers
- Youth
- Individuals with barriers to employment
- Elected officials and policy makers
- Education and training providers
- Economic development organizations

Strategy 4.3– Explore ways to capture the Return on Investment (ROI) of the workforce system in order to promote the value of the system and all programs within it.

Rationale

Workforce professionals see every day the value the system brings to our customers and our communities. We know that for every tax-payer dollar spent, there is significant return. But, we need to understand the actual return-on-investment of the workforce system if we are to promote its value to external stakeholders such as economic development partners, business and industry, elected officials, funders, and the like. We will look to learn from other states, communities, and government programs that have calculated their programs' return on investment as a starting point. We will then explore methodologies that will capture

Colorado's unique system.

Goal 5: Drive meaningful outcomes through innovation, alignment of metrics, and accountability

Strategy 5.1 – Adopt system-wide outcome metrics to portray an accurate depiction of the workforce system, which will be used for planning and implementation of system services.

Rationale
While our core programs are held accountable to the common measures, each partner has nuanced definitions of success beyond these measures. We will seek to understand the ways each partner defines success for their program and largely for the workforce system by first mapping the metrics for each partner and identifying opportunities for alignment. With this foundation, we will work toward consensus on system-wide outcome measures to which each partner program can contribute. As described in this report, Governor Hickenlooper has established a Workforce and Education Scorecard in his Vision 2018 plan that can provide a starting point for system-wide outcome metrics.

Strategy 5.2 – Utilize partner relationships to implement meaningful pilot programs that foster an environment of innovation.

Rationale
In order to improve and also keep pace with the changing economy, the Colorado workforce development system must encourage innovation and new ways of doing business. Untested ideas, however, can be risky when not managed responsibly. In order to mitigate risks, we will develop ways to engage our system partners and other external partners from economic development, higher education, and community-based organizations to conduct pilot projects to test innovative ideas and new strategies. These pilot projects will emphasize evaluation and outcome measurement to truly understand the impacts on our customers, communities, and the system itself. Those that prove successful will provide our system with models that can be scaled or replicated in other areas.

III. Operational Elements

III. (a)(1) State Board Functions

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

The Colorado Workforce Development Council (CWDC) comprises business, workforce, and government representatives from throughout the state who represent key industries and programs instrumental in the successful implementation of the public workforce development system in Colorado. The CWDC is administratively housed within the Colorado Department of Labor and Employment and works closely with the state departments of Education, Higher Education, Economic Development and International Trade, Human Services, Corrections, and Local Affairs. All members are appointed by the governor to a three year term and per bylaws members can serve two terms.

The full council meets in person three times a year to discuss and approve strategy and policies, observe successful initiatives in action in various locations across Colorado, and generate solutions to issues facing the system. The CWDC has an active executive committee, which meets four times per year, as well as an Industry Comittee, an Education & Training Committee, and an Advocacy Committee that meet throughout the year. A list of all board members can be found on the CWDC web site.

The CWDC is supported by an executive director and a staff of 10 people that are involved in day-to-day implementation of key initiatives. On an ongoing basis, staff members develop and implement workplans that operationalize the required functions of the state board. Information is brought to the CWDC at regular meetings for action and to the Executive Committee as appropriate. Information is communicated to the public through quarterly newsletters and regular updates to the CWDC's web site (www.colorado.gov/cwdc).

III. (a)(2) Implementation of State Strategy

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

III. (a)(2)(A) Core Program Activities to Implement the State's Strategy

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

Colorado has a long history of coordinated implementation as a result of the Governor's 1996 Executive Order to integrate employment and training services in local One-Stop Delivery

systems. All state policies that have followed have been designed to ensure that the local workforce areas and key partners are aligned with the strategic direction of USDOL, the Governor, and the Colorado Workforce Development Council. Colorado has excelled as one of three demonstration states for devolving Wagner-Peyser services to locally administered merit systems, fully embracing the key principles of the Workforce Innovation and Opportunity Act. This has allowed our statewide network of locally operated workforce centers to achieve total integration of Workforce Investment Act, Wagner-Peyser, veterans, and Trade Act employment and training programs, as well as launch state and local partnerships with TANF, SNAP, Adult Education and Family Literacy, Vocational Rehabilitation, and other required partners for the one-stop system.

With the implementation of WIOA, specific strategies have been utilized to align the work of core and required partners at both the state and local level. Leadership from the one-stop partner programs comes together monthly as an Implemenation Team to provide guidance on the work and make commitments to specific actions necessary for moving forward. MOUs between agencies will be implemented as needed to support the alignment of efforts and activities.

Over the next four years, several tactics will be deployed to achieve the ambitious goals outlined in this plan. Businesses are engaged in the talent development system through sector partnerships and through our statewide business services team. To continue the excellent work that has been done over the past three years, one-stop partner programs will be included in the business services team and common procedure manuals will be developed to align the work of multiple agencies. The roles of partners and the resources they can provide are brought to the table to serve businesses through our overall sector strategy approach.

By providing intensive technical assistance to focus the workforce areas on the key industries that drive their local and regional economies and provide the spark for increasing economic vitality, Colorado has taken the next step in implementing its long-term sector strategy approach to system transformation. The local boards will convene local decision makers and respond to the recruitment and retention issues of these industries. Successful sector partnerships are aligned with career pathways strategies and the Colorado Community College System, and designed to address the skill upgrade needs of low-skilled adults. Sector strategies serve as the driver for all discretionary initiatives funded by the Colorado Workforce Development Council, as well as those that will be funded with Dislocated Worker 25% dollars.

Further, Colorado is one of five states participating with the Office of Career, Technical, and Adult Education's project to advance career and technical education (CTE) in state and local career pathways systems, which are designed to prepare students to transition into careers and college. The initiative builds on the U.S. Department of Labor's (DOL) Career Pathways Technical Assistance Initiative, and is designed to help states integrate CTE programs of study into broader career pathways system development efforts already underway. Colorado's state

team worked with a coach to help them develop and implement their action plan and achieve their goals.

Focus will also be placed on the supply side of talent development to enhance the services provided to job seekers. A LEAN process will be implemented to examine how individuals are served across the system and how coordinated efforts will help reduce duplication and streamline the customer experience. Additionally, an effort will be launched to examine the intake processes and procedures of all programs and lay the groundwork for a common referral system and common intake system.

Through this strategic planning process the clear need for staff development for all system partners has been made apparent. Therefore, Colorado will develop training toolkits and implement cross-agency training to ensure that all of the resources of the system can be funneled appropriately to customers. The expertise of specific partners will be utilized, such as having adult education and family literacy programs provide training on assessment delivery to workforce center staff and using DVR's expertise to provide disability awareness and etiquette to core and combined partner staff.

Additionally, a commitment to innovation exists throughout Colorado and a framework will be developed for pilot projects that will allow for adequate, reliable, and safe experimentation to take place. Partner programs are also committed to scaling successful innovations and the necessary structures, guides, and training will be deployed to ensure that it is feasible to broaden successful programs.

While all of these initaitives will enhance the services that existing customers and those who are funneled to programs receive, the full vision of WIOA cannot be realized unless the system overall is understood as an asset and utilized as a resource by a much broader base of businesses and jobseekers. All of the agencies responsible for programming under this combined plan are committed to the branding initiatives that will take place and will appoint the right staff with communications expertise to collaboratively achieve this goal. The Advocacy Committee of the Colorado Workforce Development Council will provide the vehicle to launch these efforts and will support the implementation of awareness strategies throughout the state.

III. (a)(2)(B) Alignment with Activities outside the Plan

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

The CWDC serves as the convener of all partner agencies, both state and local, that compose the Talent Development System in Colorado. Regardless of a program's status in regards to this combined plan, all entities are invited to strategic conversations on implementation through the WIOA Implementation Team as well as through the regular CWDC meetings. Specific initiatives are in place to support sector partnerships and career pathways and the events and committees are open to all interested parties.

As the activities detailed above are implemented, all partners will be invited to the table and efforts will be coordinated with existing initiatives and meeting schedules to ensure that a fair opportunity has been created for the involvement of other agencies. As discussed above, all one-stop partner programs will be invited to participate in the job-seeker services LEAN process and on the statewide business services team to focus on coordination and duplication reduction.

III. (a)(2)(C) *Coordination, Alignment and Provision of Services to Individuals*

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

Job seekers in Colorado are served by the statewide network of workforce centers as well as by the myriad government, education, and nonprofit organization locations of one-stop partner programs. All comprehensive workforce centers offer the full range of WIOA Title I-B, Wagner-Peyser, Veterans, and TAA services in a co-located model, and many local areas across the state have other partners co-located as well.

Regardless of location, customers of the public workforce system receive high-quality services designed to meet their specific needs. In a number of offices, the first question a customer hears is "What brings you in today?", which creates a welcoming environment and sets up staff members to serve the highest need of the customer in the fastest amount of time. Within the parameters of each statutorily defined program, Colorado has implemented special initiatives to provide comprehensive, customized and coordinated services to targeted populations with barriers to employment.

UI Claimants, Long-Term Unemployed, Under-Employed, Dislocated Workers, Trade Displaced Workers, Displaced Homemakers

- **Workforce Development Programs/UI Strategic Partnership** – The Colorado Department of Labor and Employment, Workforce Development Programs and the Unemployment Insurance Division have a long-standing partnership with co-location of staff members to coordinate reemployment initiatives for claimants and the long-term unemployed. The two

programs work closely to strategically plan and support implementation of initiatives designed to benefit their shared customers. The largest joint endeavors include:

- *Development of a strategic plan for reemployment initiatives:* State and local stakeholder input was obtained on ways to improve communications and partnerships between the workforce and UI systems. The information was used to develop annual and long-term goals to promote reemployment and a more seamless customer experience. These goals included reducing and maintaining the average duration of UI benefits from 15.2 weeks to 12 weeks by June 30, 2017, through enhanced data sharing between the UI and workforce databases, and implementation of the revised UI profiling system (renamed Links to Reemployment) and Colorado's first Reemployment Eligibility Assessment grant.
- *Design and Implementation of Reemployment Services and Eligibility Assessment (RESEA) and Links to Reemployment:* Links to Reemployment and RESEA focus on engaging Unemployment Insurance claimants within the first 5 weeks of their first UI Benefit payment, and provide earlier workforce engagement and increased services to help expedite their return to work. RESEA will be implemented in January 2016.

- **Hire for Colorado Long-Term Unemployed Initiative** – In January 2015, Governor John Hickenlooper announced Hire for Colorado, a $3 million comprehensive reemployment program, to address the needs of the long-term unemployed while rapidly moving individuals back into the workforce. The new program utilizes many resources already offered through the state's workforce centers, but also reaches out to the business community to make a pledge to hire the long-term unemployed. Hire for Colorado is being implemented through a tightly coordinated effort among CDLE, the Office of Economic Development and International Trade (OEDIT), employers, and local areas. Outreach to employers, employer pledges, and a regionalized marketing approach to job seekers comprise the major strategies of this program, which will serve a minimum of 300 long-term unemployed job seekers by December 31, 2016.
- **Sector Partnership National Emergency Grant** – Colorado was awarded a $5 million Sector Partnership National Emergency Grant (SPNEG) in 2015 to temporarily expand capacity to serve dislocated workers and meet the increased demand for employment and training services with the goal of quickly reemploying laid off workers and enhancing their employability and earnings. This grant will utilize sector strategies to advance and complement the more integrated and comprehensive dislocated worker services envisioned by WIOA. The specific activities targeted by this grant, which continues through 2017, include regional sector planning and strategies, enhanced career services to dislocated workers, and work-based training opportunities.
- **Displaced Homemaker Program** - In addition to services available through Wagner-Peyser and the WIOA Dislocated Worker formula programs, State funds are utilized to provide employment and training services to eligible displaced homemakers who, through divorce, separation, widowhood, or ineligibility for other public assistance, have lost their source of economic support. The "Keep Envisioning Your Success (KEYS)" Scholarship is a partnership between Workforce Development Programs (WDP) and the Community College of Denver (CCD) to provide reemployment services to individuals who lost their primary source of

income and must re-enter the labor market. Services include tuition scholarships, job training, career assessment, supportive services, personal and vocational counseling, and job development and placement. WDP has provided additional funding to enable CCD to increase KEYS Scholarships for summer students to help them achieve their educational goals faster and move towards successful employment, and this successful partnership will continue going forward.

Low-Income Individuals

- **WIOA Adult Priority of Service** – The state and all local workforce areas have adopted an adult priority of service policy that targets public assistance recipients, other low income individuals, and those who are basic skills deficient. This new WIOA requirement will ensure that the majority of Colorado's WIOA Adult customers will come from these priority populations.
- **Colorado Works**—Within the parameters of Federal regulation and State policy and rules, county human service departments have considerable flexibility in operating their Colorado Works program, particularly around the programming for those considered "work-eligibles". Many counties have found that robust partnerships with the one-stop center in their community is a natural fit that leverages the resources and employer-base available through the workforce development system for the benefit of Colorado Works participants. In several workforce development areas, the workforce system resides within the umbrella of the county human service department, and in some instances, full integration of these two systems is the norm for service delivery. This is the case in the Mesa county workforce development area, which shares boundaries with Mesa county, and is embedded into the county human service department in that area. One shared facility serves both WIOA customers as well as those seeking and receiving public assistance, and operations are fully integrated. In other areas, particularly in metropolitan communities, while workforce may sit outside the county human service governance structure, MOUs or contracts have been established for the provision of career services to Colorado Works participants within the workforce system. An example of this structure can be found in Larimer county, where human services and workforce are both county operated, but reside in different departments. The Larimer County Workforce Center has long operated the Colorado Works program through a MOU with the county human service department, to notable results in employment entry for Colorado Works' participants. In both instances, human service agencies benefit from strong relationships to the employer, economic development, and resource base of the workforce system.

  However, dozens of counties in the state of Colorado do not have a physical one-stop location, and the ability to conveniently access services is a critical one, particularly for customers who may lack transportation resources. In these areas, connection with the workforce development system may take the form of participation on the local workforce board, or informal referrals and relationships. Colorado's large geographic area, as the 6th largest state in the country, poses challenges to rural communities. The Colorado Rural Workforce Consortium has established innovative approaches to help bridge these gaps

through technology, and rural human service counties will be learning more about these approaches in the coming year, building upon successful models for rural areas. One example of new partnership is in Park County, which is part of the Upper Arkansas sub-area within the Rural Consortium, where informal relationships have segued into participation on the local workforce development board, and a new contract for services for Colorado Works participants within the main county human service office. While there is not a physical workforce center within the county limits, partnership and innovation has found a way for the resources of workforce to meet the needs of low-income job seekers.

Youth

- **Governor's Summer Job Hunt (GSJH)** – The GSJH is a statewide program that assists Colorado's youth, ages 14-21, with career exploration and interest-based job search. During Calendar Year 2014, the GSJH served 39,466 youth, with a 48% employment rate, and revised and relaunched the GSJH program website, https://www.colorado.gov/gsjh to provide a more effective calendar of statewide events and to promote key resources, such as youth labor laws information, links to the apprenticeship page at the US DOL website, and several others. The GSJH will continue to utilize successful strategies such as:
  - **GSJH Facebook page**: Utilized to promote local job fairs and workshops, state events, and partner events. https://www.facebook.com/govsummerjobhunt
  - **Think Big Youth Forum**: An annual statewide youth service provider conference that typically includes over 250 people from the state and local workforce system, education and higher education systems, the Division of Vocational Rehabilitation, local youth councils, and many other state and local organizations.
  - **Teen Jobline 9:** Colorado has a successful partnership with Denver NBC affiliate 9News TV station to host Teen Jobline 9 features staffed by representatives from the state and Denver metro area workforce centers to answer phone calls from parents, grandparents, guardians, and youth with questions about summer employment opportunities.
  - **Industry tours** (Career Road Trips) targeted at growth industries, and hosted for youth, parents, and teachers.
  - **Entrepreneurial training and competitions**
  - **STEM focused career awareness events and forums**
  - **Sector partnership-based workshops,** followed up with industry specific job fairs
  - **Focused partnerships with Foster Care and Youth Corrections** in conjunction with work based experiences.

Individuals with Disabilities

Division of Vocational Rehabiliation (DVR)— The focus of the DVR program is to provide individualized and customized services and supports to individuals with disabilities. DVR staff are subject matter experts who will commit to work with the staff of core and combined plan program partners to support their efforts to provide effective services to individuals with disabilities. DVR will strive to coordinate individualized DVR plans for employment with the

plans developed for individuals by other core and combined plan partners, and assure that the DVR plan is complementary to these other plans, whenever feasible.

Coordination between programs will be supported by working and, as appropriate, formal partnership agreements with state community partners to create referral processes and jointly deliver services to customers, including customers from unserved and underserved populations. At the local level, DVR will work with core and combined plan partners as well as other community resources, to reach out to unserved and underserved populations. Particularly, DVR will focus efforts on underserved youth (youth from the foster care, juvenile justice, and mental health systems), homeless individuals, and individuals with limited education. Finally, DVR will seek to coordinate and improve partnerships with Colorado's American Indian Vocational Rehabilitation Programs, the Ute Mountain Ute Tribe and the Southern Mountain Ute Tribe.

Adult Learners

As the entity responsible for management and oversight of Title II funds, the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will work collaboratively with partners within the Combined State Plan to ensure effective and efficient career pathways for Coloradans.

First, AEI will host regular Adult Workforce Partnerships Advisory Committee meetings with representation from core partners in Colorado's talent development system. During these meetings, opportunities for collaborative planning and information sharing will occur. AEI will also host regional assessment trainings for adult education and family literacy providers and workforce and vocational rehabilitation partners to help ensure consistency of assessment efforts.

AEI will coordinate and promote activities that bring together adult education and family literacy providers with workforce, including equity trainings focused on support of nontraditional careers for individuals with barriers to employment, and implementation/utilization of integrated career pathways utilizing materials designed for Adult Career Pathways.

AEI will develop and provide technical assistance for adult education and family literacy providers funded through Title II to establish a baseline for partnership engagement, develop goals for growth and improvement of partnership, and progress monitor growth and improvement of partnership for high-quality, streamlined customer-centered service.

Veterans

Colorado will continue its strong tradition of promoting the training, hiring and retention of veterans, plus ensuring veterans priority of service in all USDOL funded programs. This will be accomplished through close working relationships with workforce system partners to make

sure that veterans are represented to potential employers and business owners as qualified and professional employees who bring a unique set of skills to the workplace. The state workforce system delivers the full array of labor and employment services to Colorado veterans at all 77 of its State and County-run full-service Workforce Centers and satellite offices around the state. Employment Specialists at the centers provide veterans with employment services such as job matching and referral to posted job openings, vocational and career guidance, labor market information, plus workshops on resume preparation and conducting effective job searches. Staff also refer eligible and qualified veterans to appropriate WIOA-funded training programs and discretionary initiatives, as well as registered apprenticeship programs throughout the state.

In addition to State and County workforce center employees, who provide career services to all veterans, CDLE currently employs 29 full-time Disabled Veteran Outreach Program (DVOP) Specialists and 9 full-time Local Veteran Employment Specialists (LVER) assigned to workforce areas around the state. These positions are funded through a USDOL Veterans Employment and Training Service (VETS) grant and fulfill all responsibilities mandated by the grant programs, including the provision of case management services to Special Disabled Veterans, Disabled Veterans, economically or educationally disadvantaged veterans, and veterans with other barriers to employment, especially homelessness. ***The Jobs for Veterans State Grants Plan is included under Section VII.***

Veterans grant staff also serves other populations of veterans in the State through Memoranda of Understanding (MOUs). Those populations include:

- **National Guard and Reserve** members returning from Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF). In particular, Virtual Job Fair Technology is being utilized to assist this group with veterans resource sites, accessed while they are still overseas, and actual virtual job fairs when they return to this country.
- **Service-connected disabled veterans**, who are targeted and identified through various Veterans Service Organizations (VSO) as well as outreach activities at Veteran Centers, Veterans Administration Medical Centers, and Community Based Outpatient Clinics (CBOCs.)
- **Recently separated veterans**, who are targeted through the College Campus Outreach pilot program, and through job fairs and hiring events
- **Wounded and injured veterans**, who are identified through the REALifelines program and through relationships established with the Wounded Warrior Program located at Fort Carson, Colorado.
- **Incarcerated veterans**, who are identified and contacted through “in-reach” activities conducted within correctional facilities managed by the Colorado Department of Corrections. Veteran representatives will also work in partnership with the Veteran Offender initiatives described in detail below under Ex-Offenders.
- **Homeless Veterans** - Veteran Employment Specialists work with the Homeless Veteran Reintegration Program (HVRP) to provide one-on-one employment assistance and

supportive services to homeless veterans including, but not limited to, resume and interviewing preparation, employment workshops, job search assistance and job referrals. The supportive services provided include, but are not limited to, rent assistance, food, and transportation funding. CDLE's HVRP Employment Representative is an active member of the Governor's state homeless committee that seeks out innovative ways to solve the shortage of temporary housing and resolve issues with permanent housing placement.

Older Individuals

- **SCSEP**—Most of the SCSEP participants have been out of school for over 40 years and have limited work history or a history of unskilled labor. Those who have been out of the workforce for some time may not be aware of what is acceptable and unacceptable in the workplace; so workplace etiquette and customer service training is provided to give the participant the tools to ensure successful participation. Additionally, employer preferences have been trending toward computer/technology competencies as among the most-in-demand job skills. This preference is also observed consistently among SCSEP staff across project locations. Participants who have computer/technology skills, or are willing to develop these skills, are able to obtain unsubsidized employment faster and often with a higher wage. Many host agency supervisors commented that the participants need to have already obtained some basic computer skills prior to starting the Community Service Assignment (CSA) at the host agency. The host agency satisfaction surveys identify similar sentiments. Project staff have also found that participants with basic computer skills are more confident in their abilities and are more valuable to employers.

  Through the additional training and supportive services provisions, the State of Colorado will be able to ensure a more widespread adoption of computer/technology training efforts. Training and supportive services will ensure barriers to employment have been mitigated to the greatest extent possible and develop participants who are more confident, computer literate, and have greater access to opportunities. Participants will be more marketable due to their newfound confidence in handling modern technologies. Greater confidence with technology will aid participants beyond employment as they become masters of simple yet oftentimes intimidating technologies that create barriers in their life, such as point-of-sale (POS) machines, ATMs, and tablet-based forms increasingly used in healthcare and medical facilities.

  Colorado SCSEP will take advantage of the unique resources available through the Colorado Department of Labor and Employment, and its statewide network of Workforce Centers (WFC), by utilizing WFC staff to assist in creating training and employment opportunities for participants of SCSEP. CDLE and the statewide network of workforce centers continue to work with and support the efforts of the Senior Community Service Employment Program (SCSEP) under the Colorado Department of Human Services: Aging and Adult Services, through participation on the Older Worker Task Force, which promotes connections between the SCSEP service providers, their participants and the workforce centers. In

addition, workforce centers have older worker specialists, who provide workshops and employment services that are customized for this targeted group, and have developed MOUs with the Title V Older Worker service providers.

Colorado will continue to place SCSEP participants at WFC locations and collaborate with other WFC partners such as Veteran Services and the Division of Vocational Rehabilitation to maximize participant referrals and optimize participant training.

To assist SCSEP participants in the development of their on-line and computer literacy skills, the WFCs e-Colorado has a multitude of on-line options pertaining to career exploration, education and employment. Since SCSEP participants are required to enroll with a WFC, they will attend WFC classes that enhance/upgrade their skills. The WFCs play a pivotal role in training the participants and improving their opportunities for employment.

Moving forward with WIOA a system wide State training plan will be implemented to assure job seekers receive the best possible information regarding programs that may benefit them to achieve gainful employment. **The complete SCSEP plan is included under section VII** and further describes the initiatives for serving this population.

Migrant and Seasonal Farmworkers

The Wagner-Peyser Agricultural Outreach Plan **(see the complete plan under Section VI)** sets policies, and objectives with regard to providing services to the agricultural community, specifically Migrant and Seasonal Farm Workers (MSFWs). The Colorado Department of Labor & Employment (CDLE) provides these services through the statewide network of workforce centers to ensure that MSFWs receive the full range of employment, training, and educational services on a basis which is qualitatively equivalent and quantitatively proportionate to the services provided to non-MSFWs.

During the next five program years, the six significant workforce centers will continue to provide quality employment services and referrals to appropriate agencies as part of their assistance to the MSFW population. The contracts with each workforce area will contain provisions to ensure that MSFWs receive the full range of employment and training services offered to the general public. CDLE will continue to provide technical assistance to the local areas in their planning activities to help ensure that the needs of MSFWs are addressed, and that the workforce development system is in full compliance with the Judge Ritchie court order and federal rules and regulations.

Individuals with Limited English Proficiency

Colorado is now on the tenth year of a special task force to address the needs of Limited English Proficient (LEP) clients. The group started out as the LEP taskforce and is now called “Colorado Workforce Speaks.” This effort was designed based on President Clinton’s Executive Order

13166 mandating that all agencies receiving federal funding must make their services available to limited English proficient clients. The task force has accomplished the following:

- Surveyed workforce center staff and identified the different languages that staff speaks on a statewide basis.
- Created an "I Speak" poster and provided them to all workforce centers throughout the state. The poster says "I Speak" in eleven different languages; for example, a Spanish speaker can point to the "Yo Hablo Español" section of the poster to request assistance from staff who speak their language.
- Established a format for local Language Assistance Plans that are updated annually as part of the WIOA and Wagner-Peyser annual local planning process.
- Stored all of the Colorado Workforce Speaks materials electronically in the e-Colorado.org Colorado Workforce Speaks team room. Topics include career planning, employment, education and training, emerging technologies, employer resources, workforce professional resources, high growth initiatives, legislation and policies, promising practices and supportive services.
- Colorado provides training for workforce center staff and outreach workers on how to access the team room information and apply it to the MSFW population.

Ex-Offenders

Over the past several years, CDLE has designed, implemented and managed several highly successful ex-offender employment and training programs in collaboration with multiple state and local agencies. Among these were the "Stop the Revolving Door" and "Motherhood" initiatives, which provided employment and training services to 839 participants, and achieved a 71% entered employment rate as well as a 9% recidivism rate during the first year of post-program follow-up.

- **Workforce Development Programs/CDOC Strategic Partnership–**Workforce Development Programs has a long-standing partnership with the Colorado Department of Corrections (CDOC). Among the initiatives that are being developed and implemented as a result of this partnership are the following:
    - **Road to Work Pilot Program** – The Road to Work Program provides rapid turn-around employment and training services to increase livable wage employment placement and retention opportunities for Parolees under the supervision of CDOC. Through a collaborative agreement between the Colorado Department of Labor and Employment (CDLE) and CDOC, the Road to Work Program creates an employment team comprised of the designated CDLE Road to Work Program

      Coordinator, the Local Area Workforce Case Manager, the Community Parole Officer, the employer, and other identified partners to assist the Parolee in achieving successful re-entry into society.
    - **Re-entry Employment and Training Navigators** – Through state legislation, CDOC has established four employment and training navigators that work with businesses to develop employment opportunities for parolees. Through the WDP/CDOC partnership, these staff have access to Connecting Colorado for tracking employer contacts and they

will be integrated into the Business Services teams in the appropriate workforce centers to coordinate employer outreach.

- **Connecting Colorado for Incarcerated Offenders -** As a demonstration project, CDLE provided access to the statewide Connecting Colorado self-service job matching system inside one set of prisons during June 2012, allowing inmates to register for employment. In order to safeguard the workforce system's employers, inmate registrations will not be activated until release; however, they will have the ability to search for job possibilities and learn about the job requirements as part of their preparation for transition into the labor market. Upon release they can update and fully complete their registrations and have them activated by CDOC staff, who have been trained in Connecting Colorado administrative functions. Connecting Colorado will continue to be available statewide to all public and private prisons under the jurisdiction of CDOC.

The Veteran-specific curriculum to be created will be a complementary blend of programs developed by Veterans for Veterans, like the family reintegration curriculum developed by the U.S. Army for solders discharging from the military with the TAP (Transition Assistance Employment Program), and evidenced-based psycho-social programs developed by experts in the field. The 16-week specialized curriculum will also include a "Speaker's Series" designed to increase releasing Veterans' knowledge of essential life skills topics. Colorado's current Incarcerated Veterans Transition Program will be integrated into this initiative and will also be involved in providing mentoring services to participants. The staff and instructors for this program will be Veterans themselves – Veterans teaching Veterans.

Since employment is paramount to success, incarcerated Veterans will have the opportunity to expand their skills through vocational programs designed for this special population. The collaborating agencies are also working with the local workforce system to leverage funds for specialized on-the-job trainings, work experiences and internships to better prepare Veterans for employment, as well as help them utilize and transition the skills they learned in the military. CDOC is considering creating a Veteran-specific parole officer position to support Veteran offenders upon release from prison. This position will provide a continuation of services, attitude and expectations for the Veteran offender.

Workforce Assessments for Jobseekers

During 2014-15, the Workforce Assessment Redevelopment Team, comprised of staff from several workforce centers and facilitated by CDLE Workforce Development Programs, designed a new Colorado Employment Skills Certificate. One component of the certificate will be the Workforce Readiness Credential (WRC), a soft skills online assessment tool developed by the Conover Company that measures attitude, communication, planning and organizing, critical thinking, interpersonal/social skills, teamwork, professionalism and media rules.

Seven local workforce areas are currently participating in a six month pilot study to determine feasibility of the WRC tool, accompanying learning modules, and the processes associated with administration. Quantitative and qualitative data from the participating regions will be combined in December, 2015, for analysis. Plans for future use of the WRC in 2016 include additional training for case managers and test administrators, and identification of other targeted populations such as youth and young adults, employers, veterans, and increased numbers of Title I-B and Wagner-Peyser clients. The database and qualitative criteria developed for the feasibility study will be expanded and refined to enable increased sophistication in evaluating user groups and allow a variety of comparisons of those groups in the context of soft skills assessment and associated learning modules. The WRC tool will be rolled out to all local areas in Colorado depending on the results of the feasibility pilot.

III. (a)(2)(D) Coordination, Alignment and Provision of Services to Employers

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

Statewide Business Services Alignment Initiative

In June 2011, business development services teams from workforce centers across the state began a dialogue that evolved into part of the workforce system's strategic effort to address gaps in serving businesses across all workforce programs. The vision of the Statewide Business Services Alignment Initiative is "to provide seamless access to business development for all employers and produce positive economic return for business/industry and our communities." The areas of focus have expanded and are addressed by workgroups comprised of Business Development Representatives and charged with the mission of standardizing business practices. The key topic areas addressed by workgroups under this initiative include:

- Technology
- Developing partnerships under WIOA
- Marketing/outreach
- Communications
- Staff development, and
- Enhancing the talent pool available to employers.

These areas of focus are embedded in a plan of action, approved by the State's local workforce directors, to create an integrated system that responds rapidly to Colorado business needs through easy to use technology and services that result in ready access to a skilled and competitive workforce.

This initiative is a key element in the implementation of the *Colorado Blueprint* to align services, and is supported by the Colorado Workforce Development Council, CDLE's Workforce Development Programs and the local workforce areas. As part of the initiative, representatives from the business services teams and subject matter experts from CDLE created a comprehensive job order and business services policy to establish statewide standards regarding services to businesses. The Business Services Team and CDLE expanded this guidance to include the use of metrics to track the 11 primary services provided to Colorado's employers. It is based on the current job order policy, which was expanded and enhanced to reflect national best practices. In addition, the Connecting Colorado database will see continued enhancements to the tracking and reporting of business services activities. After piloting the new uniform metric tool to track key services provided to businesses, it was fully implemented in PY14. Colorado will continue to use the business service metrics reports to track business services and show that the workforce system is able to meet the business community's need for qualified workers.

A priority for PY15 is to develop partnerships that enhance service to Colorado businesses while reducing redundancy and silos. The statewide Business Services Team will expand to engage additional staff from the required one-stop partner programs. Efforts have already begun to integrate and align DVR's internal Business Outreach Specialist Program with the statewide team as well as Job Navigators from the Department of Corrections Division of Adult Parole. Other partners will be engaged in the next two years and these partnerships will be leveraged to create one primary public point of contact for an employer while also connecting the business with a broad pipeline of workers across programs and agencies.

DVR has had a long history of providing services to employers and, in addition to collboartion with the Business Services Team, will adapt its strategies to maximize the benefits of a demand-driven system. Specifically, DVR will update the Disability Awareness Training Tool Kit and make these materials, including DVR staff subject matter expertise, available to core and combined plan partners to meet the needs of Colorado employers and promote a diverse workforce. DVR will use the resources and tools that are available through the local business services programs and through local sector partnerships to train local DVR staff. That training will encompass the adoption of common terminology among one-stop partners, how to use labor market information to educate individuals with disabilities about opportunities, and the language and culture of business and the private sector. Finally, pre-employment transition services will be provided to students with disabilities, including work experiences, to assure that youth and young adults are better-prepared for the services they will receive through other core and partner programs.

While five of the six core programs have experience working with businesses, serving employers is a new concept for adult education and family literacy. Therefore, AEI will provide guidance and support for programs so that they can incorporate employer feedback to ensure effective and efficient programming. Further, AEI will develop and provide technical assistance for adult education and family literacy providers funded through Title II on utilization of new or

existing business and industry advisory committees to ensure that necessary workplace readiness skills are integrated into curriculum so that adult education and family literacy clients are prepared to transition to post-secondary education and training to increase wage-earning capability.

Finally, SCSEP has always been a demand-driven program that supports on-going communication and continual feedback with employers and workers. The State collaborates with the WFCs, community college system and local employers to maximize unsubsidized employment opportunities for SCSEP participants. SCSEP job developers work with regional chambers of commerce, labor unions, community colleges and local employers to identify employment positions available and training needs, and these efforts will also be integrated into the Statewide Business Services Team.

Efficient services to businesses across all partners requires data integration, and system alignment efforts between the Colorado Benefits Management System (CBMS) and the State's labor exchange and workforce case management system, Connecting Colorado, have been under way for nearly 2 years. This improved system integration will enable users of both systems to serve customers more fluidly across workforce and human service programs, thus reducing duplicate effort and data entry, and will support business service staff in both systems through the ability to better understand and match participants to employer need. Human service staff who specialize in business development will be invited to participate in the business services alignment group through the workforce system.

Moving forward, the Business Services Team, inclusive of one-stop partner staff, will be the primary vehicle for alignment of efforts and coordinated services to employers. CDLE will continue to hold annual Business Services Summits to provide a forum for business services staff to discuss ways to improve statewide branding, service delivery and performance outcomes, and develop new innovations and strategies.

III. (a)(2)(E) Partner Engagement with Educational Institutions

(A) Describe how the State's Strategies will engage the State's education and training providers, including community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system.

For several years the CWDC has convened a Policy and Legislation Committee consisting of legislative liaisons and policy experts from multiple state agencies, including the Department of Higher Education and the Department of Education. This body meets regularly throughout the year to discuss legislative solutions to issues facing our education and training system as well as to coordinate efforts in the implementation of new legislation. In addition to this committee, an agency data sharing group has been convened for the past two years that specifically looks at opportunities to leverage information contained within one agency for the benefit of multiple programs and customer bases. This data sharing group played a critical role in the development

of the first and second *Talent Pipeline Report*, which highlights critical gaps in our talent development system and recommends solutions. Recommendations from the first report spurred several pieces of state legislation in 2015 that create new tactics for system alignment. Through state law, the CWDC will add an Education Liaison and a Training Liaison in 2016, who will work together to ensure that K-12, community colleges, CTE programs, community-based training providers, and four-year institutions are plugged into career pathways and understand how to use established pathways as a resource for students.

III. (a)(2)(F) Leveraging Resources to Increase Educational Access

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

Since taking office in 2011, Governor Hickenlooper has focused on improving the efficiency and effectiveness of state government. Strong collaboration and engagement across agencies is critical to acheiving those goals, and there is a shared commitment within state agencies, the Governor's office, and the state legislature to ensure collaboration works to achieve the best outcomes for Coloradans.

Since 2013, multiple bills have passed the state legislature that focus on sector partnerships and career pathways and create new funding streams to support demand-driven workforce development activities.

Colorado House Bill 13-1165, Development of a Manufacturing Career Pathway, required that the State Board for Community Colleges and Occupational Education (SBCCOE) collaborate with the Department of Higher Education (DHE), the Colorado Department of Education (CDE), and the Colorado Department of Labor and Employment (CDLE), to design a career pathway for students seeking employment in the manufacturing sector.

Senate Bill 14-205 required that the Colorado Workforce Development Council (CWDC) within the CDLE work with the DHE, the CDE, and the Office of Economic Development and International Trade (OEDIT) to create a talent pipeline infrastructure for use in creating career pathways for students.

Colorado House Bill 15-1274, Creation of Career Pathways for Students for Critical Occupations in Growing Industries, requires the CWDC, in collaboration and consultation with its partners (including state agencies, Superintendents of local school districts, local Workforce Centers, and industry partners), to design integrated career pathways for growth industries. The designed career pathways must focus on critical occupations in growth industries that do not currently have clearly articulated career pathways. The bill requires partnerships with industry (through regional sector partnerships) and trade associations to inform and drive the development of each pathway. Industry partners must also review each career pathway annually to ensure the pathway remains

relevant to the industry and to provide input for ongoing adjustments to the pathway to meet workforce needs.

Colorado House Bill 15-1230, Innovative Industries Workforce Development Program, directs the Colorado Workforce Development Council (CWDC) to enter into agreement with one intermediary* per innovative industry to work with the CWDC and its statewide partners on the following: Facilitate outreach to employers; Market the program; Inform the development of intern curriculum; Identify work experience opportunities for individuals; and work with the CWDC and the Colorado Department of Labor and Employment's Employment and Training Division (CDLE E&T Division) to determine what businesses should be pre-approved if more businesses apply than funding is available. *"Intermediary" means an association or industry group that represents an innovative-industry sector that has entered into agreement with the Colorado Workforce Development Council.

Colorado HB 15-1170 Increasing Postsecondary and Workforce Readiness creates the position of Postsecondary and Workforce Readiness Statewide Coordinator (position shall be named the Education Liaison) to work under the CWDC in the Colorado Department of Labor and Employment (CDLE). The Education Liaison will work with secondary school districts, area vocational schools, Community Colleges, the CDE, the Department of Higher Education (DHE), and the career and technical education division within the community college system to raise the level of PWR achieved by high school graduates.

Collectively, these bills fund new staff positions within CWDC, CDE, and the Community College System as well provide financial resources to the community that are in direct support of the vision laid out in WIOA to assure self-sufficient wages and career paths to all Coloradans.

III. (a)(2)(G) Improving Access to Postsecondary Credentials.

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

Several initiatives are currently underway in Colorado that support the performance measure in WIOA for attaining postsecondary credentials. The initiatives work with employers, educational institutions, and training providers in unique ways to accomplish this goal.

Colorado's sector strategies include the implementation of skill panels that are designed to unpack what employers need when they often require a specific credential in a job posting. After the skills are uncovered, educational institutions can work with sector partnerships to adjust, customize, or design new industry-recognized credentials relevant for key industries in the state.

In order to raise awareness of the value and availability of training programs that lead to industry-recognized credentials, the WORK Act was passed in 2015. Starting in January 1, 2016, the program accepts applications for matching grants from public and private providers of qualified skilled worker training programs. Qualified grant recipients offer training for skills that are needed in the workplace, with a credential or other evidence of achievement awarded at the completion of training.

Applications received by the CDLE are transmitted to a 13-member grant review committee composed of representatives of certain government agencies, including CDLE, the Office of Economic Development and International Trade (OEDIT), the Department of Higher Ed (DHE), the Colorado Workforce Development Council (CWDC) in CDLE, as well as representatives from employers and industry. The bill sets forth guidelines for the review of applications by the committee, and the committee is directed to establish formal criteria and rank applications. The committee's recommendations and rankings are submitted to the executive directors of CDLE, DHE, and OEDIT. These directors then jointly determine grant recipients and amounts. Each grant recipient is required to submit an annual report to the committee, and the committee must, by May 1, 2017, and each May 1 until 2019, submit an annual report to the Governor and the General Assembly's business committees.

A growth opportunity has also been identified for concurrent enrollment programs, and Colorado **HB 15-1275, Measures to Support Concurrent Enrollment in Career and Technical Education Programs**, clarifies that a local education provider (secondary school) may include course work related to apprenticeships and internships in the programs that are available for concurrent enrollment with post-secondary Career and Technical Education programs. It also directs the Concurrent Enrollment Advisory Board to assist education providers with creating cooperative agreements with providers of internships and apprenticeships.

Finally, the Business and Experiential Learning Commission was launched in 2015 to assist in the development and scaling of work-based learning programs that directly tie high schools to a wide variety of employers. This group is exploring the feasibility of replicating the Swiss Apprenticeship Model in Colorado, and a team has traveled to Zurich to learn about the model. The first pilot is being launched in partnership with Denver Public Schools and it will engage students as early as ninth grade with career exploration activities, and by a student's senior year they will be spending multiple days per week on a job site.

III. (a)(2)(H) Coordinating with Economic Development Strategies

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

The CWDC works closely with the Colorado Office of Economic Development and International Trade (OEDIT) as well as with the Economic Develompent Council of Colorado (EDCC). OEDIT has led the development of an original and an updated *Colorado Blueprint* that creates six

statewide goals for economic development. One of the goals relates directly to workforce development and the CWDC serves as the owner of that goal. The executive director of OEDIT is a voting member of the CWDC and is a member of the executive committee as well to ensure the alignment of efforts and strategies. Additionally, the CWDC works with the Governor's Workforce and Education Cabinet work-group which includes the cabinet members from economic development, workforce development and higher education, and ensures alignment of shared goals across the agencies and the state. The EDCC is a professional organization dedicated to strengthening Colorado's economy, and the majority of its members are local economic developers. As a member of EDCC and its policy committee the CWDC is in tune with objectives and tactics being implemented and has a forum to bring workforce issues to this body on an ongoing basis.

State Operating Systems and Policies

III. (b)

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

III. (b)(1)

(1) The State operating systems that will support the implementation of the State's strategies. This must include a description of–

III. (b)(1)(A) Description of:

(A) State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.).

Connecting Colorado Data/Reporting System: This is the case management, data collection, and reporting system that Colorado developed for statewide use in all of the Workforce Centers. The system provides the ability for Workforce Centers and their partners to track all WIOA Title I-B, TAA, Veteran, Wagner-Peyser, state and local programs (approximately 100), plus discretionary grants in one common database. All reports generated from this system are "up to the minute," thus allowing better management of day-to-day activity and performance. Along with the federally-mandated reports, Colorado has developed a variety of locally requested reports that allow staff to track their caseloads, correct data entry errors, and analyze performance at the state, local, and case manager level. In addition, the system is agile enough to allow the as-needed addition of reports, and program and service codes that will track new statewide initiatives supporting the state's workforce strategies. Workforce partners may make use of this system through data sharing agreements with the state or the local

workforce areas. This system will be updated to reflect all WIOA changes and requirements over the life of this four-year combined plan.

Connecting Colorado Self-Service – Connecting Colorado allows job seekers and employers to self-enter their work registration, resume, or job order data directly into the statewide database via the Internet, as well as search for jobs or qualified applicants. Colorado uses a skill based job matching system that focuses on experience, skills, and education level in addition to O*Net job titles, as well as allowing the upload of applicant resumes. All job listings are automatically searched after entry based on the employer's requirements and in compliance with veterans priority of service. Job seekers can search for new jobs at any time or receive an e-mail notification once a job is entered that matches their specifications. Likewise employers may run applicant searches on demand or rely on the automated searches. Connecting Colorado also provides access to a Tool Box of job search assistance links that has been customized for each workforce region. Links include direct access to the local area's web page, career exploration, training resources, and self-marketing tools, Unemployment Insurance information, and additional job banks. Colorado is in the process of developing a mobile application that will allow customers to access these resources on smart phones and other portable devices.

State Financial Reporting System – This system was developed to track all Federal and state funds disseminated to the statewide system of local workforce areas, who are sub-recipients of the state. Such funds include the allocations for WIOA Title I-B, Wagner-Peyser, and TAA, JVSG, national, and state discretionary grants. It provides on-line access to state financial and program staff, as well as sub-recipient staff, to report expenditures and run real-time on-demand reports for budget monitoring purposes. Data from this system feeds the federal 9130 fiscal reporting formats that are required by USDOL. The software also embodies the payment system for the Trade Readjustment Assistance (TRA) program and generates reports covering TRA payment data. This system will be modified to incorporate all WIOA changes and requirements over the four-year life of this combined plan.

Virtual Job Fair (VJF)—Developed in-house by CDLE staff and Beta-tested September 2011 in Pueblo, CO, the VJF has been rolled out to all local workforce areas statewide, and staff have been trained on how to create and maintain their own local VJFs. To date more than 83,000 job seekers have participated in VJFs statewide.

- The purpose is to reduce costs of job fairs and other services, and increase access to workforce services for job seekers and businesses statewide, especially in the rural areas of the state.
- Local workforce areas, other service providers and businesses can partner to target a job fair to a particular business sector or population of job seekers.
- This system has been used to provide resources and job information to National Guard troops before their return from Afghanistan.
- Features include:

- Job listings, on-line workshops and career exploration resources
- On-line presentations by employers and access to their websites
- On-line real-time job interviews
- Run more than one job fair simultaneously
- Automatic upload of data to Connecting Colorado to track services and outcomes
- Site usage reports

CDLE Knowledge Management Portal – e-Colorado

Link: https://e-colorado.coworkforce.com

The CDLE Knowledge Management Portal, e-Colorado, is designed to manage virtual resources through a single, comprehensive, electronic interface developed for workforce stakeholders and partners including business customers, workforce professionals, government, and others. The portal provides documents, team rooms, calendars, and more. e-Colorado provides improved services and tools which include the Virtual Job Fair and online fillable "smart" forms. In addition, it houses the Adobe Connect on-line meeting capability utilized by CDLE and Colorado's workforce centers to conduct webinars.

e-Colorado was successfully migrated from Northern Illinois University to the Colorado Department of Labor & Employment servers on August 30, 2013. From September 2013 – November of 2015, the e-Colorado team has been working on re-designing e-Colorado. e-Colorado will be on a new content management system: Adobe Experience Manager (AEM) Sites, which will enhance the user experience and provide options for the addition of new features over the next four years. The re-design project will be completed by December 2015

LMI Gateway

The Colorado LMI Gateway is a powerful labor market information system designed to meet the needs of workforce professionals, job seekers, and businesses, as well as economists, economic development organizations, and the media. Examples of LMI Gateway features include:

- A wide variety of regional labor market services, such as labor trends, statistics, economic, demographic, salary, and employer data
- Tools to chart and analyze labor market data
- Career exploration data
- A personal home page that allows a registered used to save items that fit their needs
- Recruitment Services: find qualified candidates and access a wide variety of information designed to help a business succeed
- Education and Training Resources: Find a suitable training or education program, as well as information on training providers and schools. This is also known as the Eligible Training Provider List for the Workforce Investment Act programs.

III. (b)(1)(B) Description of:

(B) Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.

All Colorado local workforce areas are required to use the state-developed common database (Connecting Colorado) to track all USDOL or CDLE funded programs provided through workforce centers including Wagner-Peyser, WIOA, TAA, and Veterans Employment and Training Services, as well as discretionary grants and locally funded programs. All labor exchange services delivered by the local areas are performed using this system, resulting in a true statewide labor exchange system. Data reporting to USDOL also derives directly from the statewide system, allowing real time reporting and tracking of results at the statewide, regional, local, and individual client level.

State policies and procedures related to data integrity and data validation are reflected in the structure of the Connecting Colorado system and are currently based on the standards set in TEGL 17-05: Common Measures Policy, but will be updated according to the final WIOA standards issued by USDOL. Colorado has also issued an updated, comprehensive set of data collection policies and processes that cover the entire participation cycle including enrollments, exits, participation services, and data entry standards. This document is titled Program Guidance Letter (PGL) 12-06-WIA: Guidance on Data Integrity and the Customer Participation Cycle for WIA and TAA Programs and is available for review at: https://www.colorado.gov/pacific/cdle/pgl

This policy will be updated to reflect the reporting requirements of WIOA when final guidance is provided. In addition, Colorado has issued fully WIOA compliant procedures for eligibility and has updated Connecting Colorado accordingly. The WIOA Eligibility PGL 15-09-WIOA is also available at the link provided above.

III. (b)(2) The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes).

The CWDC and CDLE's Workforce Development Programs review, update, and create policy guidance on an ongoing basis as needed to support the strong implementation of activities throughout the state. Policies have been created to update local board membership and responsibilities, regional and local planning, one-stop certification, priority of service, and program eligibility. Specific guidance is being developed for all one-stop partners to clarify the requirements for access in the system so that one-stop operators and all partners have a mutual understanding of what is required. We expect to institute a training system that provides sufficient cross-training to all system staff so that the system can function effectively and meet the needs of customers across physical locations and entry points.

CDLE encourages local workforce areas to co-enroll participants into other programs that are appropriate for the individual participant's needs. Co-enrollment can offer the opportunity to

access additional program services and funds to help address a participant's specific barriers to employment and/or education. When co-enrollments occur, case managers must include a case note of justification in the participant file explaining why the co-enrollment is appropriate. Participants must meet the eligibility requirements of each program and will become part of each program's performance outcomes. In addition to state policies, any local co-enrollment policies must also be followed. Going forward, CDLE will be working with the core and required One-Stop partners to update relevant policies and to develop a process for cross-agency policy development to address the new opportunities for integration as a result of WIOA. The most current CDLE policies are available at https://www.colorado.gov/cdle/pgl.

III. (b)(3)(A) State Agency Organization

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

Colorado's workforce programs are state administered and operated locally, allowing the needed customization to meet the unique needs of businesses and job seekers throughout Colorado. Therefore, each of the core programs and required one-stop partners function differently at both the state and local level. CDLE has administrative responsibility for Title I-B Programs, Wagner-Peyser, TAA, JVSG, MSFW activities, and the Division of Vocational Rehabilitation (as of July 1, 2016). Title I-B and Wagner-Peyser funds are distributed to the ten local workforce development areas in Colorado. JVSG and DVR are state-run programs, and state employees are based at workforce centers and DVR offices throughout Colorado to deliver services. The Colorado Department of Education has administrative responsibility for Title II funds and conducts a competitive process to award grants to providers. Colorado Works is administered through CDHS and is also county-run. Therefore the county department of human or social services is responsible for delivering services in each of Colorado's 64 counties. Many counties choose to contract portions of Colorado Works to the local workforce center or another provider. The SCSEP program is administered by CDHS and is competitively bid to a single operator for statewide operations. An infographic depicting the relationships of programs can be found on the CWDC web site.

III. (b)(3)(B) State Board.

(A) Provide a description of the State Board, including---(i) Membership Roster. Provide a membership roster for the State Board, including members' organizational affiliations.; (ii) Board Activities. Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

The Colorado Workforce Development Council serves as the State Board for Colorado and, through executive order, was updated to be fully compliant with the requirements of WIOA in 2015. A list of board members with affiliations can be viewed on the CWDC's web site. All new board members are provided with an orientation on the background, purposes, and activities of the council. Staff are responsible for developing work plans to ensure that all required activities

are being met. The committee structure described previously supports both staff and board members in completing tasks and effectively carrying out all required functions.

III. (b)(4) Assessment of Programs and One-Stop Program Partners

III. (b)(4)(A) Assessment of Core Programs

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

Adult, Dislocated Worker, Youth, and Wagner-Peyser

In accordance with Colorado's philosophy of local control, each local area designs and conducts its own evaluation. Additionally, the Colorado Department of Labor and Employment (CDLE) evaluates each local area's outcomes by utilizing the Common Measures of performance for adults, dislocated workers, and youth programs, as outlined in TEGL 17-05, and is preparing to utilize the performance accountability measures described in 116(b) of WIOA by updating its Connecting Colorado on-line reporting system. CDLE provides tools to each local area that enable them to track their performance on these measures as the year progresses and to track the impact on performance of each of their participants.

In addition to local performance evaluation, CDLE uses a variety of assessment tools to evaluate and track program effectiveness and to promote a culture of continuous improvement, including:

Connecting Colorado Data/Reporting System – Connecting Colorado enables local workforce areas and their partners to track WIOA Title I-B, TAA, Veteran, Wagner-Peyser, state and local programs, and discretionary grants in a single database. Reports generated from this system are "up to the minute," which allows better management of daily activities and performance. In addition to federally-mandated reports, CDLE has developed a variety of locally requested reports that allow staff to track caseloads, correct data entry errors, and analyze performance at the state, local and desk level. The reports measure levels of service and outcomes by program or targeted groups, provide the ability to measure the impact of outreach programs and specialized initiatives on performance, and can be easily adapted to add new reports and coding to accommodate new programs and initiatives. Core programs and required partners may access and use the system through data sharing agreements with the state or the local workforce areas.

In PY 14, Connecting Colorado added new modules to track and report on employer-focused activities. These modules link employer services with system-generated surveys to obtain information on customer satisfaction, effectiveness and service outcomes. The new reporting capability was recognized in a White House Paper, "Ready to Work: Job-Driven Training and American Opportunity," as a best practice.

Program Monitoring - CDLE's comprehensive monitoring guide, recognized as a model by the US Department of Labor (USDOL), is the result of an ongoing monitoring and technical assistance process that has built a strong working relationship between the state and local workforce areas. Quarterly, the State Monitoring team from CDLE meets with the local areas to review client service levels, program expenditure rates, and performance outcome results. Through these reviews, staff identifies areas that may require additional technical assistance and training to identify risk areas and rectify any deficiencies prior to the start of the annual state compliance monitoring. In PY16, CDLE will implement a new tiered risk assessment policy specifically for discretionary grants that will determine the criteria for compliance issues and draw on promising practices in grants management to prevent performance issues.

Return on Investment (ROI) - The CWDC, CDLE Labor Market Information and Workforce Development Programs sections, and the local workforce areas have used economic impact evaluations for several years to determine the economic benefits and fiscal contribution of individuals who receive services through the workforce system, obtain employment, and are working six months later. Colorado will explore strategies to enhance the model to improve its effectiveness, expand it to include partner programs, and explore other ROI measurements such as the cost and benefits derived from reduced reliance on various forms of public assistance (e.g. Unemployment insurance, Colorado Works).

Continuous Improvement Management System (CIMS) - The CWDC has worked in partnership with the local boards and USDOL to develop a performance incentive system for workforce areas that meets the needs of the local area and ensures a high level of quality and continuous improvement across the state. The Continuous Improvement Management System (CIMS) is aligned with the Colorado Blueprint and CWDC strategic initiatives, and rewards local areas for pursuing:

- A dual customer approach that emphasizes a focus on business needs
- Strategies/partnerships to utilize industry sectors as the platform for increasing the number and level of training and educational opportunities, as well as for increasing the number of credentials achieved
- Partnership initiatives with economic development, chambers of commerce, and small business organizations
- Participation in the Key Industry Taskforce with the Governor's Office of Economic Development and International Trade
- Participation in the Statewide Business Services Alignment Initiative

CWDC and CDLE's Workforce Development Programs develop the local planning guidelines for workforce areas and review the local plans submitted each year. The alignment of all strategic planning efforts combined with implementation of continuous

improvement efforts helps maintain an effective and efficient statewide workforce system that embodies innovation and excellent customer service.

Evidence Based Practice and Program Evaluation - CDLE is developing new policies and procedures to facilitate ongoing evaluation and research on current and new programs, including state initiatives, and to identify best practices that have the potential to become evidence based practice. This includes the development and use of logic models to establish benchmarks and outcome measures. CDLE will scale pilots that show promise to a statewide basis, or replicate the pilot through partner agencies who serve similar participants; similar evaluation methods will be used to determine whether the program warrants consideration as an Evidence Based Practice. Evaluation will also help identify and address areas such as gaps in services, program inefficiencies, duplication of effort, etc.

Data Coordination and Information Sharing – CWDC, CDLE and program partners will develop ways to share information across programs that take into account the federal and state rules that govern data collection and sharing and the release of information for each program. Colorado will then develop and implement the most effective and efficient solution for data coordination and information sharing, and use the resulting data to facilitate core program evaluations.

Adult Education and Family Literacy

As the entity responsible for management and oversight of Title II funds, the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will develop and implement assessment consistent with the goals of the Colorado State Plan to emphasize quality, effectiveness, and improvement of programs at the provider level. The assessment of adult education and family literacy programs in Colorado will help to ensure that programs will continue to demonstrate their effectiveness.

Assessment of adult education and family literacy providers funded through Title II will include performance consistent with the negotiated performance measures for adult education and family literacy. Additionally, programming will be assessed based on effective utilization of evidence-based practices associated with teaching learning, as documented in local provider proposals or applications for grant funding, for career pathways and family literacy purposes. AEI will design a rubric to be used for programmatic assessment that will account for quality of instructional design and delivery, effectiveness of practices, and continuous improvement. In the competitive grant process, applicants will be required to submit plans for implementing evidence-based instructional design and continuous improvement, which will be used for consideration of funding under Title II.

Adult education and family literacy providers funded through Title II will be required to file comprehensive annual performance reports detailing both quantitative and qualitative results.

Annual statistical reports from the information management system will track numbers of adult learners, demographic data such as sex and race/ethnicity, level of education, educational functioning level, and most importantly, progress at the local provider level.

The instructional performance measures will focus on continuous improvement of adult education and family literacy activities and are evaluated annually by core indicators including:

- Measurable Skill Gains – demonstrated improvements in literacy skill levels in reading, writing, and speaking the English language; numeracy, problem-solving; and English language acquisition.
- Credential Attainment – receipt of a high school equivalency diploma and/or placement in, retention in, or completion of postsecondary education and training, unsubsidized employment, or career advancement

Throughout the program year, AEI state leadership staff will conduct mid-year reviews to determine progress to date on program goals and objectives related to the Colorado State Plan and referenced in the proposals or application for grant funds. AEI will provide technical assistance both on a universal level and customized for individual programmatic needs, as deemed necessary based on mid-year reviews.

Further, AEI will continue to require adult and literacy providers funded through Title II to submit annual performance reports, addressing Colorado State Plan goals and content from the grant proposal or application. Based on those programmatic reports, AEI will prepare a state report, which will assess programmatic performance and state leadership in meeting quality, effectiveness, and improvement initiatives to be submitted to the Department of Education Office of Career Technical and Adult Education.

Vocational Rehabiliation

DVR reviews the program's performance each federal fiscal year based on the Standards and Indicators measures. Beginning in PY 2016 these criteria will be replaced with the performance measures outlined in WIOA section 116. The performance reports can be run on a statewide, regional, or local basis to provide a robust picture of performance throughout the state. To help inform the overall quality of the services being delivered, a quarterly client satisfaction survey is implemented and reviewed to guide work moving forward. Finally, a Comprehensive Statewide Needs Assessment is conducted every three years, which includes a survey of all staff members, to provide ongoing information and data points about service delivery.

III. (b)(4)(B) Assessment of One-Stop Program Partner Programs

Describe how other one-stop delivery system partner program services and Combined State Plan partner program included in the plan will be assessed each year.

At a minimum, workforce delivery system partner program services, and the partner programs included in this Combined State Plan, will be assessed using performance measures they have in common, in addition to other performance accountability measures required by each

program's funding source(s) and grants. Performance will be reviewed at both the state and the local workforce area level.

SCSEP

SCSEP has operational reporting requirements set by the US Department of Labor (DOL). The SPARQ (SCSEP Performance and Results Quarterly Progress Report) system is used for data collection and data reporting. The SPARQ system includes the Web Data Collection System (WDCS), which is an application that allows users to enter, store and manage SCSEP participant data.

The data is stored directly into the DOL SCSEP National Database via the Web. This Web-based system provides access to participants' information. The data entered into SPARQ is used to monitor enrollments, placements, follow-ups, data quality and other key data. SPARQ performs the calculation of the SCSEP performance measures and generates the Quarterly Progress Report (QPR) and Data Quality Report (DQR). The DOL analyzes data performance to determine if SCSEP is meeting annual performance goals each program year (July 1st through June 30th).

The performance measures include: Entered Employment; Employment Retention; Average Earnings; Most In Need (average number of barriers per participant); Community Service; and Service Level. The performance measures are reviewed annually and targets are adjusted based on the economic conditions of Colorado

Colorado Works

Through the Federal TANF program, the state is held accountable to the Federal Work Participation Rate (FWPR). This rate is calculated by the Federal Administration of Children and Families within US Health and Human Services, and states are expected to meet or exceed performance targets set on an annual basis. The performance rate is established through the analysis of CBMS data for countable participants, and their ability to meet the federally required hours of participation in countable activities. This information is reviewed and managed by county and state human service staff, and may also be a performance indicator for workforce development sub-contractors who have a formal agreement for service provision through the local human service department in their area.

Colorado has further promoted employment entry as a meaningful outcome for program participants, and implemented system changes to enable the tracking of employment nearly three years ago. A target rate for employment entry has been established in the Colorado Department of Human Services' 5-Year Strategic Plan, and is expected to be 35% or better for the current performance year. The rate is calculated through the attainment of certain outcomes identified in CBMS. This goal is tracked monthly through the Department's performance management system, known as C-Stat, and progress has been ahead of schedule

toward the goal. County human service departments and their workforce development partners or sub-contractors are held accountable to this rate.

TAA

With the passage of the Trade Adjustment Assistance Reauthorization Act of 2015, the TAA program will report performance under the common measures used by core and partner programs. The TAA program currently reports all performance measures via the USDOL mandated quarterly Trade Act Participant Report (TAPR). As implemented by USDOL, the TAA program will utilize the new reporting PIRL report mechanism that is replacing TAPR to report data and evaluate the program.

In addition to the TAPR report, USDOL has implemented the TAA Data Integrity (TAA DI) report card that compares the financial and performance measures reported on the TAPR and the ETA 9130. If a state has any discrepancies between the two reports or any objectives that are not met, then the state must respond in writing on why the objective was not met and how it will be improved or fixed. The TAADI report card has provided areas of opportunity for improvement with the TAA program and will guide continued efforts in the future.

All case files at the local workforce center are monitored on an annual basis by CDLE's Workforce Development Programs Regional Services Team. The TAA program utilizes the monitoring reviews to discover trends within the program and provide additional training to the regional case managers. In addition to annual monitoring, TAA files are verified by USDOL's annual Data Integrity review.

Jobs for Veterans State Grant

The demonstration of Priority of Service is the responsibility of American Job Center (AJC) staff. It is also the responsibility of the state and county leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance and monitoring accomplished by the Local Veteran Employment Representative (LVER), CDLE Monitors, State Veterans Program Coordinator and Assistant Coordinator, CDLE Regional Directors, and Veteran Program Managers. Methods and means used to verify whether or not Priority of Service is being provided will be the following but are not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

CDLE and USDOL/VETS monitor and review the provision of services to veterans at the state and local levels at least annually, and provide the Executive Director, local directors, and the local workforce center manager with the findings, recommendations and/or corrective actions.

LVERs will be brought together once a quarter for Priority of Service overview and training. An invitation to AJC staff in need of Priority of Service training will be extended but will not be paid out of JVSG funds. A Priority of Service Power Point will become an attachment and sent out to the each AJC region. This Power Point, in the absence of a LVER, can be used for training purposes of AJC new hires. As a condition of receiving JVSG funds for housing grant-funded staff, local areas must agree to provide Priority of Service to veterans and covered persons. This annual agreement is a contract between the State of Colorado and the local areas. The contract must be signed by both the state and local areas as a condition to receive all US Department of Labor funds.

MSFW

The MSFW programs, as required by US Department of Labor (DOL) regulations, work closely with partner agencies to provide information and referrals to our shared customer base. Each significant office hands out MSFW packets to migrants during outreach activities. These informational packets include resources for English as a Second Language (ESL), Migrant Education Program (MEP) and training opportunities available through the WIOA 167 provider. The agency Memorandas of Understanding (MOUs) have provided a way to track some of our referrals between agencies. MOUs have been in place with three of our close partners. The Connecting Colorado (CC) data base is used in part to collect data from referrals that have been made by Workforce agencies and outreach workers. The data entered in CC is used for monitoring purposes to ensure qualitative and quantitative proportionate referrals provided to the MSFW population

The overall program performance measures include: Entered Employment; Employment Retention; Average Earnings; Community Service referrals; and referrals to educational services and organizations. These performance measures are reviewed quarterly and targets are adjusted based on the economic conditions of Colorado. MOU referrals are also reviewed on a quarterly basis and discussed in meetings with our partners for reporting and evaluation purposes.

Additionally, CDLE will work with partner programs to develop additional forms of evaluation for joint initiatives, such as the CDLE-CDOC Road to Work pilot project targeting high-risk parolees. In addition to looking at the percentage of participants who obtain and maintain employment, and their average wage at placement, the pilot will also identify and evaluate which service strategies are the most effective at helping participants meet their goals at each stage of the process (e.g. assessment, training, credentialing, parole, etc.)

III. (b)(4)(C) Previous Assessment Results

(A) Provide the results of an assessment of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner program included in the plan during the preceding 2-year period. Describe how the State is adapting its strategies based on these assessments.

CDLE applied its WIA statewide activities waiver allowing suspension of evaluation activities and did not conduct any formal statewide evaluations during PY14. However, it continued to track performance electronically. CDLE met or exceeded all of its PY 14 performance goals for the WIA Adult, Dislocated Worker, Youth, Wagner-Peyser, MSFW, Wagner-Peyser Veterans, and JVSG DVOP Programs.

It is worth noting that participants in the Adult and Dislocated Worker programs had significantly better outcomes than individuals who only received services through Wagner-Peyser, suggesting that WIOA individualized services may result in better outcomes for job seekers. However, further evaluation that controls for differences in participant characteristics and the types of services provided is needed before a more definitive assertion can be made.

CDLE will continue to conduct ongoing assessments of its programs, work with its partners to enhance and expand the use of ROI and other strategies to conduct economic impact evaluations of workforce related programs, and use evaluation as part of statewide continuous improvement activities. CDLE will also work with its partners to increase program integration and coordination to ensure a customer-focused seamless service delivery system that effectively addresses participant needs and enables all of the core programs to meet their common measures.

A necessary part of ongoing assessments will be the development of universal output and outcome measures to use in addition to the Federal performance standards. This will entail the development of mechanisms to coordinate data and information sharing between programs, and developing a common set of terminology and definitions to ensure that assessments yield reliable and valid results and allow for accurate comparisons between programs.

Vocational Rehabilitation

DVR will use the results of the most recent Federal Fiscal Year (FFY) Standards and Indicators measures, and the results of the September 2015 triennial Comprehensive Statewide Needs Assessment (CSNA), to improve partnership and coordination with the core and combined plan partner programs. As a part of the CSNA, questions were added about the accessibility of the greater workforce development system. Based on these results, DVR will provide technical assistance and education services to workforce development system partners in an effort to improve services to individuals with disabilities across all programs. These results will also be used to determine benchmarks and measures for the six required performance measures.

DVR will address areas of deficiency from our recent FFY Standards and Indicators measures to improve the employment outcomes of individuals with disabilities in Colorado. Specifically, DVR will strive to increase the number of individuals who are employed and the wages of those individuals. Additionally, DVR commits to monitor and evaluate the implementation of the new performance measures, and will use findings from DVR's long-standing Standards and Indicators in this endeavor.

SCSEP

Performance is monitored on a quarterly basis to determine if interventions are necessary. US DOL considers a program acceptable if it meets 80% of the goal and above. If a program falls below the 80% the State develops an action plan to improve performance. In 2014 the State did not meet the goals of entered employment and average earnings. The State SCSEP Administrator is working with the sub-grantee to develop opportunities for participants to become employed in unsubsidized employment.

In Program Year 2015 a monitoring guide was created for Colorado's SCSEP. On-site and desk monitoring of the State program will occur annually. The scope of the review will include: a host agency review; participant review and a file review. There will be interviews with staff and participants and the State will review the activities and timelines associated with participant services.

Below are the Assessment results for SCSEP for program years 2013 and 2014.

ASSESSMENT RESPORTS FOR PROGRAM YEAR 2013			
DESCRIPTION	**GOAL**	**ACTUAL PERFORMANCE**	**GOAL ACHIEVED**
Entered Employment	34.7%	41.7%	119%
Retention	72.3%	60%	82.9%
Average Earnings	$7,465	$6,191	82.9%
Most In Need	2.5%	2.27%	90.7%
Community Services	75%	76.8%	102.4%
Service Level	150%	140.2%	93.55%

ASSESSMENT RESPORTS FOR PROGRAM YEAR 2014			
DESCRIPTION	**GOAL**	**ACTUAL PERFORMANCE**	**GOAL ACHIEVED**
Entered Employment	41.8%	24.3%	58.1%
Retention	69.7%	62.5%	89.7%
Average Earnings	$7,314	$4,122	56.3%
Most In Need	2.52%	2.45%	97%
Community Services	80.7%	68.4%	84.7%
Service Level	150.4%	145%	96.4%

Adult Education and Family Literacy

To adhere to federal reporting guidelines as well as best practice for continuous program improvement, the CDE's Office of Adult Education Initiatives (AEI) regularly tracks performance data for program core indicators. In addition to measuring educational gains learners make, AEI also tracks key outcome measures such as the percentage of learners who obtain a high school equivalency diploma or secondary school diploma; the percentage of learners who, upon exit from an adult education and family literacy program, enter and retain employment; as well as the percentage of learners who enter post-secondary education or training after completing an adult education and family literacy program. These performance data are collected and reported by local programs through the state data management system. Additionally, programs submit an annual performance report. In this narrative, programs are asked to reflect on their local data and discuss successes, barriers and next steps for continued program improvement. AEI closely reviews all data and reports submitted by local programs and uses this information to inform targeted technical assistance, professional development opportunities, training, and other supports for the field.

In program year 2013, Colorado did not meet any of the eleven performance measures set by the U.S. Department of Education for educational gains. Level completion performance declined at seven levels, increased at one level, and remained unchanged at three levels. Overall level completion was 31%, down from 34% in FY13. While the data is still being analyzed for program year 2014, it again appears that Colorado did not meet the performance targets as set by the U.S. Department of Education for educational gains. Educational level completion performance declined at eight levels, increased at one level and remained unchanged at two levels. It should be noted that while the state as a whole has not met targets, there have been successes in meeting and exceeding targets for some local programs. AEI acknowledges significant variation in programs across the state: many smaller, rural and/or geographically isolated programs have different challenges recruiting instructional staff and retaining students, for instance. Staff turnover and student retention have been named as challenges for some local programs, limiting their ability to meet performance targets. At the same time, AEI has observed local programs flourishing, even in the face of limited resources and capacity.

AEI experienced a significant staff turnover between program years 2014 and 2015. As new personnel have transitioned, there have been significant changes made to the state's service and support delivery model. This has included updating monitoring and compliance expectations for local programs as well as reviewing and revising, state policy and procedures as needed. AEI has an unwavering commitment to high performance and use of data to inform technical assistance, and is working to address barriers local programs may face. AEI has already begun implementing new strategies in PY15 designed to better support programs as they work toward the PY15 performance targets. Some of these strategies include: a revamped staffing model with designated regional specialists as contact persons for all programs; new workgroups comprised of program stakeholders to evaluate current policies and procedures; regular virtual office hours to share critical information, best practices and guidance with programs; and more frequent in-person contact with local programs. Many of these strategies have been implemented with the goal of creating a paradigm shift for local programs. AEI

believes that if it can strengthen communication and professional relationships with local programs, there will be increased opportunities to troubleshoot issues, identify continuous improvement strategies and monitor progress.

Colorado Works

All states are held accountable to a unique target rate for the Federal Work Participation Rate, on an annual basis. This remains unchanged since the inception of TANF in 1996. The tracking of employment entry through CBMS data has evolved since inception in 2012, and performance has increased year-over-year, as a part of improved data entry and programmatic efforts. The process for measuring employment entry has not been changed.

TAA

The TAA program utilizes a variety of resources to access the program effectiveness and guide improvements. The TAA program and associated case management is monitored each year by CDLE's Regional Services team. The monitoring reports are utilized by the TAA administrative team to access the program case management practices and adherence to policies. The TAA administrative team has trained local area case managers on data validation, case management practices and the TAA and TRA law. The training has been provided one on one, in small groups and at the Annual TAA Conference. This practice has improved the program quality and minimized findings in the annual monitoring reviews. CDLE program data validation was reviewed by USDOL in 2014 and received a positive review with many best practices cited.
The TAADI report card has revealed areas of opportunity for improvement within the program, specifically, in the area of Rapid Response integration. During the last program year the TAA administrative team has worked to improve the integration and data collection with the Rapid Response unit. This has resulted in better communication between the units, shared data, and a coordinated response to layoffs in Colorado. This will remain a focus in the coming years to ensure that Colorado citizens are able to make use of all the benefits of the workforce development system that includes TAA and the dislocated worker program. CDLE will continue to monitor and improve the integration of partner programs and encourage local areas to leverage program co-enrollments, where appropriate, to maximize the benefits to dislocated workers.

MSFW

Colorado met all of its PY13 and PY14 performance measures. In addition, CDLE and RMSER, the WIOA 167 Grantee, have had an MOU in place since 1995. This MOU includes, but is not limited to, co-location and collaboration in communities where both agencies have a presence. It also ensures that the needs of MSFWs that do not have access to the One Stop Centers are met. CDLE also entered into an interagency cooperative agreement with Migrant Education in all six significant office areas. This interagency cooperative agreement was to establish and demonstrate effective coordination of outreach and to increase registration activities for all service providers. Based on previous assessments this interagency agreement will be expanded to include all offices statewide. Assessments will continue on a quarterly basis and adjustments will be made accordingly upon agreement from partner agencies.

These cooperative ventures between CDLE, RMSER, and Migrant Education have generally improved the operational knowledge of outreach staff, and reinforce principles and strategies. This successful partnership has provided the vehicle to better serve and expand the range of services available to the MSFW population.

Jobs for Veterans State Grant (JVSG)

To adhere to federal reporting guidelines as well as best practices for continuous program improvement, the State Veterans Coordinator has regularly tracked performance data for program core indicators. For PY13 and PY14, Colorado met all performance indicators. In addition, local areas were in compliance with veterans priority of service requirements. The state closely reviews all data and reports submitted by local areas and uses this information to inform targeted technical assistance, professional development opportunities, training, and other supports for the field.

III. (b)(5) Distribution of Funds for Core Programs.

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

III. (b)(5)(A) Distribution of Funds

(A) For Title I programs, provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

III. (b)(5)(A)(i)

(i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),

Youth funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii). The formula is based on three components, with each component having a weight of 1/3. The components are the relative number of unemployed individuals in areas of substantial unemployment, the relative excess number of unemployed individuals in each state compared to the total excess number of unemployed individuals in all states, and the relative number of youth living in poverty. A hold harmless calculation is applied each year so that no local area receives less than 90% of the average amount received during the previous two years. A process is established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

III. (b)(5)(A)(ii)

(ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),

Adult funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii). The formula is based on three components, with each component having a weight of 1/3. The components are the relative number of unemployed individuals in areas of substantial unemployment, the relative excess number of unemployed individuals in each state compared to the total excess number of unemployed individuals in all states, and the relative number of adults living in poverty. A hold harmless calculation is applied each year so that no local area receives less than 90% of the average amount received during the previous two years. A process is established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

III. (b)(5)(A)(iii)

(iii) Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

Dislocated worker funds are formula allocated to local areas based on a formula developed in partnership by the state agency, the CWDC, local elected officials, and local workforce areas. The determing factors and their weights are: 1) Share of insured umemployment (20%), Share of number served (20%); Share of percentage of expenditures (15%); Share of declining industry (10%); Share of farm/ranch in crisis (5%); Share of unemployment insurance claims open longer than 15 weeks (25%); and Share of federal fiscal year unemployment (5%). A hold harmless calculation is applied each year so that no local area receives less than 90% of the average amount received during the previous two years. A process is established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

III. (b)(5)(B): For Title II

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

The competitive grant process for local adult education and family literacy providers will include a request for models associated with customer-centered services, including adult basic and secondary education and English language acquisition within career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty and build stronger local areas within Colorado.

Funds will be available for multi-year cycles for the development and implementation of adult education and family literacy programs that support strengthening of local areas. After successful development and implementation of a program, a provider may apply on an annual basis for continuation of financial support through Title II funding.

Proposal Process

As a critical component of the Colorado talent development system, providers are encouraged to expand and improve the current system of delivering adult education and family literacy services and to encourage the establishment of adult education and family literacy programs that will:

- Build career pathways providing adults with basic and secondary education to enable them to earn a high school equivalency diploma, transition into postsecondary education or training, and/or gain or advance in employment in order to achieve self-sufficiency;
- Provide parents and guardians with sufficient skills to become full partners in the educational development of their children.

AEI will establish a work group of core partners and Combined State Plan partners to develop the Request for Proposal and indicators of successful performance in providing adult education and family literacy services as part of the Colorado talent development system. Demonstrated effectiveness will be included in the indicators of successful performance. Effectiveness will be based on improving the literacy of eligible individuals and the program's proposed ability to meet the Colorado levels of performance.

AEI will seek the best possible combination of agencies, organizations, and institutions to implement the goals and objectives within the Colorado State Plan and allowed through the WIOA. AEI will provide for annual applications. Local programs may be approved for multi-year funding, contingent on funding availability and CDE approval.

Proposals will be read and reviewed by a Review Team selected from the following areas:

- Core partners
- Combined State Plan partners
- Business and industry
- Civic organizations
- CDE representation
- Educational leadership
- School district personnel
- Non-profit agencies
- Local Workforce Development Boards (for alignment with local area plans)

The Colorado Department of Education (CDE) Office of Competitive Grants will oversee the Request for Proposal and competition process.

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

The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of trained reviewers and AEI staff.

In order to provide adult education and family literacy services, AEI will establish a work group of core partners and Combined State Plan partners to develop a communications/outreach plan to announce, inform, and provide technical assistance to eligible providers across Colorado. Written proposals are solicited through a formal Request for Proposal (RFP) which provides application procedures and forms to be completed by applicant organizations. RFP information will continue to be provided throughout the year to all persons on the AEI provider email distribution list and to others with an interest in adult education and family literacy. The announcement will also be placed on the CDE web site, communicated through the official CDE newsletter, and in the public notices sections of the state's largest newspapers.

The entire RFP and related documents will be posted each year on the CDE web site in a format that allows local providers to download and print them.

Efforts will be made to solicit proposals from each of the ten federally designated workforce development areas to ensure adult education and family literacy services for Coloradoans in each local area.
AEI will accept proposals from:

- Local educational agencies;
- Community-based organizations or faith-based organization;
- Volunteer literacy organizations;
- Institutions of higher education;
- Public or private nonprofit agencies;
- Libraries;
- Public housing authorities;
- Nonprofit institutions that are not described in any of the above that have the ability to provide adult education and family literacy activities to eligible individuals;
- Consortia or coalitions of the agencies, organizations, institutions, libraries, or authorities described above; and
- Partnerships between an employer and an entity described above.

Description of Steps to Ensure Direct and Equitable Access

1. AEI will accept Requests for Proposals from all eligible providers.
2. In order to assure equitable access, all applicants will received identical Requests for Proposals, have the same amount of time to prepare and submit said proposals, and be evaluated using the same criteria and process.
3. Eligible providers will submit proposals directly to the CDE Office of Competitive Grants, and funded providers will receive payments directly from the CDE as approved.

Some eligible providers may choose to be subcontractors, in which case the subcontractor's proposal much be incorporated into the eligible provider's proposal. Subcontractors are subject to the same process described in detail above, as well as instituting and maintaining procedures to meet all accountability, intensity, duration, and continuous improvement factors for providing services to adult learners.

III. (b)(5)(C) For Title IV

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

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

III. (b)(6)(A) (A) Data Alignment and Integration.

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

III. (b)(6)(A)(i)

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

Colorado recognizes the opportunities that exist to streamline and enhance services and reporting procedures through data sharing. Activities are taking place at multiple points along the spectrum that runs from complete isolation in data systems to full integration across partners. To support these efforts, all partners are supportive of education and training on specific systems and are willing to advocate for policy changes as needed to establish data sharing agreements.

A project has begun to share data between the Connecting Colorado system and the Colorado Benefits Management System (CBMS) used to track the Colorado Works and SNAP programs. This will allow workforce center staff to track services given to work ready participants in these programs in Connecting Colorado. Those services will then automatically move to the Human Services systems for Federal reporting. This prevents any need for double data entry between

these systems. Data sharing capabilities will continue to be expanded over the four-year life of this combined plan.

The Eligible Training Provider list is being moved to the Colorado Department of Higher Education (CDHE) and Colorado Unemployment Insurance Wage data is being shared with this Department. This will allow CDHE to calculate the performance metrics directly for schools using data they currently report regularly to CDHE. In addition, this will allow CDHE to assist the Adult Education and Family Literacy program with WIOA-required reporting. This will also solve the issue of confidentiality under FERPA rules because CDHE will receive the student data from all the training providers and run the wage data matches on their system.

The Division of Vocational Rehabilitation is moving from CDHS to CDLE on July 1st, 2016. This will facilitate linkages between their reporting systems and Connecting Colorado both for better service to customers and to more easily meet WIOA reporting requirements. Data sharing initiatives will begin after this move.

III. (b)(6)(A)(ii)
(ii) Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.

The state has a comprehensive system of on-demand reports, utilizing data from its statewide Connecting Colorado database, that allows state and local staff to view outcome data at the state, regional, local, and case manager level for Wagner-Peyser, WIOA Title I-B, TAA, and Veterans Employment and Training Services. These reports provide mechanisms to measure levels of service and outcomes by program or targeted groups such as individuals with disabilities, veterans, etc., providing a better measure of the impact of outreach programs or specialized initiatives on performance. All reports are available to run anytime by any staff person, and all data, with the exception of wage data contained in the report, is up to the minute (wage data is updated quarterly). In addition, all performance reports have a breakout of how individual clients fit into each performance measure, whether positive, neutral or negative. This allows staff to better find errors and improves analysis by revealing the source of the data down to the individual level. Supplemental data that hasn't yet been obtained is tracked on a report that allows the case manager to obtain a list of clients that should be contacted during any given quarter.

Colorado provides ongoing technical assistance and training to its local workforce areas to ensure their understanding of performance measures and the impact of program strategies on performance outcomes. Monthly meetings are held between state and local staff to ensure good communication on performance and other related issues. These meetings also serve as the point of discussion on enhancements to Connecting Colorado that will further support performance accountability. The programs use the same set of services whenever possible so a service should only need to be entered once for a customer who is enrolled in multiple

programs. This also helps in establishing integrated service plans for customers served by more than one program.

The WIOA required partners at the state and local levels have engaged in initial discussions regarding ways to streamline intake and service delivery and will incorporate their agreements in their regional and local plans, as well as their MOUs and cost-sharing agreements. Finalization of these plans and agreements will trigger a broad-based initiative to determine how data systems can be integrated or data can be shared across the various data systems of all the required partners that participate in the workforce system over the next four years.

III. (b)(6)(A)(iii)

(iii) Explain how the State board will assist the governor in aligning technology and data systems across mandatory one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals

The CWDC supports data sharing and alignment at the state level by convening a data sharing group across state agency partners and at the local level through the design of local and regional plans and the Continuous Improvement Management (CIMS) Process. The CWDC is supportive of education and training on specific systems and will advocate for policy changes as needed to establish data sharing agreements. Most recently, The Eligible Training Provider List has been transferred to CDHE to create better data reports and to more easily track performance of providers.

Moving forward, as highlighted in strategic goal 2, a LEAN process will be conducted for job seeker services across the entire system. A component of this process will include process mapping of the intake steps that each individual program utilizes. This intake mapping effort will serve as an exploratory step in the examination of the feasibility, value, and customer experience benefits in pursuing a common intake system.

III. (b)(6)(A)(iv)

Describe the State's plans to develop and produce the reports required under section 116, performance accountability system (WIOA section116(d)(2)).

Once the report requirements are finalized by USDOL, Colorado will contract with the Connecting Colorado system vendor to produce the PIRL and other required reports. System changes have already been completed to gather new required information and to calculate eligibility based on the proposed rules. These will be modified if needed to match the final regulations, but the changes were needed to allow WIOA-compliant enrollments. There are many other reports that will require changes based on the new WIOA performance and tracking requirements that are designed to provide information specifically for local boards.

Adult education and family literacy providers will request and collect data at client in-take and will input into the AEI information management system. Through state agency data agreements, a data match will be conducted for employment, median earnings, credential attainment, and measurable skill gain for individuals served through adult education and family literacy as part of the Colorado talent development system.

DVR will work closely and collaboratively with the electronic case management vendor to produce necessary reports. Resources will be committed to support upgrades and maintenance of data collection and reporting—including the addition of new data tables, data fields and reports—to collect data on and assess new WIOA data requirements and performance standards. DVR will participate with the agency's vendor as part of a multi-state test environment to determine the functionality of the data collection and reporting applications and will provide feedback to the vendor.

III. (b)(6)(B) Assessment of Participants' Post-Program Success

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

Colorado will use UI wage data to track job retention and wages across the core programs and Colorado Works through interagency agreements. For Colorado Works, the information is utilized to corroborate data collected through CBMS, and to inform any gaps between what is reported in the CBMS system and formal earnings records. Alignment projects between CBMS and Connecting Colorado are currently underway, and it is expected that upon completion, local areas as well as the state will be able to better understand the outcomes associated with Colorado Works customers served through the workforce system through comparison to other program codes already available. Further strategies between UI reports and CBMS integration will be pursued to eliminate manual data entry and reduce errors on human service programs.

Case management follow-up services will be used to assess the progress of participants exiting to jobs and post-secondary education. These approaches will be enhanced through the local MOU service agreements that are being developed with the required one-stop partners. At the state level Colorado will also work with its state partners to share data and develop methods to evaluate outcomes for participants served through their respective programs. DVR, specifically, will explore opportunities to work with core, combined plan and other partners to collect and share data, including Annual Performance Report Indicator (APR) data required by the Individuals with Disabilities Education Act. DVR will also work closely with its electronic case management system vendor as the vendor develops and modifies their program in order to collect WIOA-mandated post-secondary and employment outcome data.

In addition, Colorado will incorporate evaluation strategies into all of its programs and initiatives, and develop additional outcome measures, such as wage progression, to help determine the effectiveness of strategies such as sectors and career pathways.

For Adult Education and Family Literacy programs, data about the progress of participants exiting the adult education and family literacy program into post-secondary education and training and employment will be analyzed annually as part of the program annual performance report process and the grant continuation application process. Data about advancement will be used by AEI in development of targeted technical assistance and promotion of best practices. Overall state assessment of participants' post-program success will be included in the statewide annual performance report submitted to the Department of Education Office of Career Technical and Adult Education.

III. (b)(6)(C) Use of Unemployment Insurance (UI) Wage Record Data

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

All data needed to calculate and analyze performance for continuous improvement resides in Connecting Colorado. Wage records are uploaded quarterly to Connecting Colorado from the Unemployment Insurance data system, and currently Connecting Colorado maintains a file of wage data extending back to January 1996. This file is used in a variety of on-demand Connecting Colorado reports that track wage-based performance for Wagner-Peyser, WIOA Title I-B, TAA, and Veterans Employment and Training Services. Workforce areas and their partners with data sharing agreements have direct access to these reports (or can be provided these reports by the local workforce areas), which contain aggregated wage record information. Unemployment Insurance has formal data release agreements with the local workforce areas for their direct access to individual wage records available through the Colorado Unemployment Benefits System (CUBS).

III. (b)(6)(D) Privacy Safeguards

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

Connecting Colorado utilizes masked individual identifiers for on-line customer records and reports to ensure that the SSN is not shared. In addition, Connecting Colorado provides a multi-level system of access to data that is controlled by state and local administrators of the system. The level of access granted determines which screens and which data can be viewed by staff and whether individual staff has read only or data entry permissions. Industry standard encryptions ensure that data transfers between agencies are secure.

CDLE is in the process of moving the Eligible Training Provider list to the CDHE to allow more efficient calculation of the individual program's performance levels. CDHE is able to receive student information under FERPA (20 U.S.C. 1232g referenced above) as an educational entity that CDLE cannot. CDHE can then combine that student data with the wage records provided to easily calculate performance for training programs in Colorado.

This process will allow the schools to drop expensive surveys they have been forced to perform for any program that had to be on the Eligible Training Provider list in order to gather results for the "All Students" section. In addition, it will make the performance results much more consistent, since the results will all be based on Colorado Unemployment Insurance Wage data.

DVR will maintain adherence to federal regulatory requirements around confidentiality and state requirements around personally identifiable information (PII) through staff training related to confidentiality of customer information. Additionally, DVR has and will continue to maintain processes and procedures that support the HIPAA level of confidentiality within its electronic case management system.

Within SCSEP, the privacy of participants, host agencies and employers is protected and stored in locked files that are not accessible to anyone other than authorized personnel. Data that is transmitted via the internet is sent encrypted, and only authorized personnel have access to the electronic files. Participants are given the option of providing their social security numbers for administrative purposes, and they are also asked to sign a consent form allowing release of information for the purpose of enhancing and marketing SCSEP.

The Colorado Department of Education (CDE) takes seriously its obligation to protect the privacy of data collected, used, shared, and stored. In compliance with the Family Educational Rights and Privacy Act (FERPA), CDE does not disclose PII from student records unless the disclosure is for one of the limited purposes outlined in FERPA, 34 CFR § 99.31, including the following:

- Student Transfer and Enrollment: Student information may be disclosed, subject to the requirements of FERPA, 34 CFR § 99.34, to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for purposes related to the student's enrollment or transfer and the student's former district has provided prior notification of this service through its annual FERPA notification letter.
- Educational Studies: Student information may be disclosed to organizations conducting studies for, or on behalf of, CDE to: (1) develop, validate, or administer predictive tests; (2) administer student aid programs; or (3) improve instruction. Disclosures for the purposes of such studies must ensure that the study is conducted in a manner that does not permit personal identification of parents and students by individuals other than representatives of the organization that have legitimate interests in the information, the information is destroyed when no longer needed for the purposes for which the study

was conducted, and CDE enters into a written agreement that meets the requirements outlined below.

- Audits or Compliance Activities: Student information may be disclosed to authorized representatives of CDE in connection with an audit or evaluation of Federal or state supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. Disclosures for the purposes of such audits, evaluations, or compliance activities must ensure that CDE uses reasonable methods to ensure that its authorized representative: (1) uses personally identifiable information only to carry out an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements related to these programs; (2) protects the personally identifiable information from further disclosures or other uses, in accordance with FERPA; (3) destroys the personally identifiable information in accordance with FERPA; and (4) CDE enters into a written agreement that meets the requirements outlined below.

Pursuant to CDE policy, prior to sharing personally identifiable student information for purposes of audits, evaluation, or compliance monitoring, CDE must enter into a written agreement or contract that meets the following requirements:

- Designates the individual or entity that will serve as the authorized representative. If an entity is designated, the agreement must specify the individuals directly responsible for managing the data in question;
- Specifies the purpose for which the personally identifiable student information from education records is being disclosed and state specifically that the disclosure is in furtherance of an audit, evaluation, or enforcement or compliance activity. The agreement must specify the student information to be disclosed and must include a description of how the student data will be used. The agreement must describe the methodology and why disclosure of personally identifiable student information is necessary to carry out the audit, evaluation, or enforcement or compliance activity;
- Requires the authorized representative to use personally identifiable information only to meet the purpose of the disclosure as stated in the written agreement and not for commercial purposes or further disclosure;
- Requires the authorized representative to destroy the personally identifiable information from the education records when the information is no longer needed for the purpose specified and must be clear about how the education records will be destroyed. The agreement must identify a specific time period for destruction based on the facts and circumstances surrounding the disclosure and study. The parties to the written agreement may agree to amend the agreement to extend the time period if needed, but the agreement must include a time limit. The agreement shall require the authorized representative to provide written confirmation to CDE when the education records have been destroyed, per the terms of the agreement;
- Documents appropriate technical, physical, and administrative safeguards to protect personally identifiable student data at rest and in transit. Examples of this include

secure-file transfer protocols ("SFTP") and hyper-text transfer protocol over secure socket layer ("HTTPS");

- The agreement establishes policies and procedures to protect personally identifiable student information from further disclosure and unauthorized use, including limiting use of personally identifiable information to only the authorized representatives with a legitimate interests in the audit, evaluation, or enforcement or compliance activity; and
- Includes a plan for how to respond to any breach in security, including the requirement that any breach in security must be reported immediately to CDE.

In addition to all of the precautions addressed above, any data sharing agreement or contract shall also address the following assurances to protect personally identifiable information from further disclosure and unauthorized use:

- CDE shall verify that the authorized representative has a sound data security program to protect data at rest and in transmission. This may be addressed through language in the data sharing agreement that states what data security provisions are required, including requirements related to encryption, where the data can be hosted, transmission methodologies, and provisions to prevent unauthorized access. CDE may require the authorized representative to provide a certification indicating that an independent vulnerability or risk assessment of this data security program has occurred. CDE shall also maintain the right to physically inspect the authorized representative's premises or technology used to transmit or maintain data;
- CDE shall verify that the authorized representative has in place a data stewardship plan with support and participation from across the organization that details the organization's policies and procedures to protect privacy and data security, including the ongoing management of data collection, processing, storage, maintenance, use, and destruction. CDE may also wish to verify that the authorized representative has a training program to teach its employees about FERPA and how to protect personally identifiable information from education records.
- If applicable, CDE shall verify that the authorized representative has appropriate disciplinary policies for employees that violate FERPA, including termination in appropriate instances;
- CDE shall maintain the right to conduct audits or other monitoring activities of the authorized representative's data stewardship policies, procedures, and systems. If, through these monitoring activities, a vulnerability is found, the authorized representative must take timely appropriate action to correct or mitigate any weaknesses discovered; and
- CDE shall maintain the right to review any data prior to publication and to verify that proper disclosure avoidance techniques have been used and shall maintain the right to approve reports prior to publication to ensure they reflect the original intent of the agreement.

An individual may file a written complaint with CDE regarding an alleged violation of a data sharing agreement or contract. A complaint must contain specific allegations of fact giving reasonable cause to believe that a violation of a data sharing agreement or contract has occurred. CDE will investigate all reasonable and timely complaints. CDE may also conduct its own investigation when no complaint has been filed or a complaint has been withdrawn, to determine whether a violation has occurred.

As required by FERPA, if an authorized representative that receives data to perform evaluations, audits, or compliance activities improperly discloses the data, CDE shall deny that representative further access to personally identifiable data for at least five years. In addition, CDE may pursue penalties permitted under state contract law, such as liquidated damages.

Colorado Works is guided by CCR 3.609.94: Protections to the Individual, which specifies that all information concerning an applicant or recipient is confidential and the exclusive property of the state and county departments of human services. Unless disclosure is specifically permitted, no information will be released to other agencies or individuals.

By signing the application for assistance, clients agree to allow county departments to get and share information with any of the following agencies: Social Security Administration, Internal Revenue Service, United States Customs and Immigration Services, Colorado Department of Labor and Employment, financial institutions, child support agencies, employers, courts or other law enforcement agencies. Information may also be shared with county, state and federal auditors and individuals executing the Income and Eligibility Verification System (IEVS).

Permission to release information to advocate agencies that apply for, or act on behalf of, an individual is implied, as long as the county department is reasonably sure the confidential nature of the information will be preserved.

All other disclosure of information to agencies or individuals not listed above requires a formal, written release from the applicant/recipient.

County departments of human services are expected to provide privacy during client interviews and are instructed to set up facilities in a way that ensures information is not inadvertently revealed. County workers must also use discretion outside the office, by not mentioning department business or any other confidential information.

Storing of county records is located at 3.603, Case File Maintenance and outlines the responsibility for county departments to provide a location to store files in a safe place in order to prevent accidental disclosure of confidential information.

III. (b)(7) Priority of Service for Veterans

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

CDLE currently employs 25 full-time Disabled Veteran Outreach Program (DVOP) Specialists and 13 full-time Local Veteran Employment Specialists (LVER) assigned to Workforce Regions around the state. These positions are funded through the Jobs for Veterans State Grant (JVSG) and fulfill all responsibilities mandated by the grant programs, including the provision of case management services to Special Disabled Veterans, Disabled Veterans, economically or educationally disadvantaged veterans, and veterans with other barriers to employment, such as homelessness.

Colorado updated and revised Policy Guidance Letter (PGL) #14-07-V, "Priority of Service for Veterans and Eligible Spouses" in June 2015 to reflect the required changes in priority of service required under WIOA. All policies are available at https://www.colorado.gov/cdle/pgl.
Priority of service is monitored both electronically and through on-site visits. During on-site views, the state monitors ensure that local workforce centers have appropriate signage informing veterans of their rights, and that local staff are trained and understand the importance of priority of service, who qualifies for priority of service under the law, and how to appropriately screen and refer veterans to DVOP staff for assistance.

In addition to addressing the requirements for priority of service, PGL #14-07-V also established the Colorado Veterans Employment and Training Committee (CVET), which consists of representatives from each local workforce area. The purpose of the committee is to improve employment services for transitioning service members, Guard and Reserves, veterans, and their spouses in Colorado by providing a regional voice to address policies, special initiatives, issues/concerns, and best practices that impact veterans. The local representatives are not JVSG-funded staff, and are expected to serve as an additional advocate for veterans within their local area.

The referral process for veterans with significant barriers to employment is outlined in PGL #14-08-V, Refocused Roles and Responsibilities of the Jobs for Veterans State Grant (JVSG) Funded Staff; Veterans Triage/Outreach Responsibilities for Non-JVSG Staff, was issued in October 2014. The policy delineates the triage and referral process for veterans with employment barriers to DVOP specialists, and clarifies the respective roles and responsibilities of DVOP specialists, Local Veterans Employment Representatives (LVER) and non-veteran staff.

Colorado has a strong tradition of promoting the training, hiring and retention of veterans, and ensuring veterans priority of service in all USDOL funded programs. The state workforce system

delivers the full array of labor and employment services to Colorado veterans in all of its State and County-run full-service Workforce Centers and satellite offices around the state. Employment Specialists at the centers provide veterans with employment services such as job matching and referral to posted job openings, vocational and career guidance, labor market information, plus workshops on resume preparation and conducting effective job searches. Staff also refers eligible and qualified veterans to appropriate Workforce Innovation and Opportunity Act (WIOA) training programs and discretionary initiatives, as well as registered apprenticeship programs throughout the state.

III. (b)(8) Addressing the Accessibility of the One-Stop Delivery System.

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

Colorado has a rich history of going above and beyond the compliance requirements of Section 188 of the Workforce Investment Act (which are now incorporated in Section 188 of WIOA), and the American's with Disabilities Act of 1990. Over the life of the Workforce Investment Act, Colorado's one-stop system was governed by a comprehensive set of state policies regarding non-discrimination and accessibility that are in the process of being updated with the most current requirements. These policies include a robust system of monitoring to ensure that one-stop center programs practice non-discrimination and that centers accommodate the needs of those with disabilities. In addition, Colorado served as a lead state in the national Disability Navigator initiative between 2002 and 2009, providing technical assistance to other states and participating in the national evaluation process. During that time, the one-stop system partnered with Assistive Technology Partners, who worked with staff on the purchase of assistive technology and trained staff in its use.

Colorado expects to build upon its past successes by strengthening its partnership with the Division of Vocational Rehabilitation, which will become part of the Colorado Department of Labor and Employment as of July 1, 2016. As the leases for local DVR offices come up for renewal, there will be an effort to co-locate with one-stop centers. DVR staff is also preparing to provide ongoing training to their one-stop colleagues within the core programs and assist with the procurement and installation of more current assistive technology. Colorado's one-stop certification policy includes the following criteria related to accessibility:

Physical and programmatic accessibility - ADA Guidelines:

- *In compliance as shown by an inspection, audit, or review within last 3 years*

IV. Coordination with Combined State Plan Programs

Efforts to coordinate the development of a combined state plan began in January 2015 with the creation of a WIOA Implementation Team. This team includes representatives from required one-stop partner programs and it has met on a monthly basis during 2015. The Implementation Team assisted in the design of the strategic planning process and helped to develop the input process that was undertaken across all partner programs. Focus groups and surveys were conducted throughout Colorado to identify the strengths and weaknesses and opportunities for the system. This data was synthesized by the Implementation Team to develop the strategies outlined in section II of this plan. Combined plan partners reviewed draft versions of the goals and strategies and worked together on the development of section III. Each program had the opportunity to review and comment on these sections of the plan prior to the publication for public comment.

V. Assurances

		STATEMENT	**REFERENCES**	**DOCUMENTATION and COMMENTS**
☑	1.	The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	• CWDC By-laws and policies • WIOA Sec. 101(f)	The state assures compliance with this requirement as evidenced through the CWDC Bylaws and conflict of interest policy signed annually by all members.
☑	2.	The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	• CWDC By-laws • WIOA Sec. 101(g)	The state assures compliance with this requirement as evidenced through the CWDC Bylaws.
☑	3.	The lead State agencies with responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	• WIOA Sec. 102(b)(2)(E)(iii)(I)	As the lead State agencies, the Colorado Department of Labor and Employment (CDLE), oversaw the development of the Colorado Combined State Plan. The plan was vetted by Director-level department staff from core and non-core

				partners to ensure that all WIOA identified populations are appropriately served by the Combined Plan.
☑	4.	(a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	• WIOA Sec. 102(b)(2)(E)(iii)(II)	The Colorado Workforce Development Council (CWDC) coordinated multiple input opportunities for stakeholder engagement throughout the planning process. These engagements consisted of 17 focus groups held across the state with participants that included business and industry, workforce system leadership and staff, local board directors and staff, local and state board members, education, labor, and others. Beyond focus groups CWDC conducted multiple interviews and meetings with key stakeholders which included Local Elected Officials, state agency leadership, and local board directors and chairs. CWDC utilized an online survey tool open for all Coloradans to provide input on goals, strengths, opportunity for

				improvements, and planning. The CWDC provided an opportunity for all state and local board members, state agency leadership (i.e., Colorado Department of Labor and Employment and Colorado Department of Human Services), and Local Elected Officials to review and comment on the Combined Plan. The CWDC posted an electronic copy of the Combined Plan on their website and provided a public comment period. A town hall style session was conducted to provide a public forum for questions and feedback. An online tool was utilized to provide an opportunity for all Coloradans to comment on the Combined Plan.
☑	6.	The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for adult, dislocated worker, and youth programs to carry out workforce investment activities under chapters 2	• 2CFR 200 and 2 CFR 2900 • WIOA Section 116(i) • WIOA chapters 2 and 3 of subtitle B	The State assures that all fiscal control and accounting procedures are in place to ensure proper disbursement of and accounting for all WIOA Title I funds to carry out the

		and 3 of subtitle B;		workforce investment activities for the respective programs under chapters 2 and 3 of subtitle B
☑	7.	The State has taken the appropriate action to be in compliance with WIOA section 188, as applicable;	• WIOA Section 188	• The State assures that appropriate action has been take to be in compliance with Section 188, including the issuance of Policy Guidance Letters and periodic monitoring of one-stop centers.
☑	8.	The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	• 2 CFR 200 and 2 CFR 2900 • WIOA (PL 113-128) - all titles • WIOA proposed regulations • USDOL TEGLs and US Dept. of Education policy guidance	The State assures that its core program funding, administered by the Colorado Department of Labor and Employment, and the Colorado Department of Education, will be expended only for activities authorized under each of the respective core programs.
☑	9.	The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	• WIOA Section 116	The Colorado Department of Labor and Employment and the Colorado Department of Education, the administrators of the six core programs, assure that they will propor-tionately share the costs of

				carrying out the performance accountability and evaluation requirements of WIOA section 116.
☑	10.	The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	• WIOA Section 101(d)(6), 121(e), and 121(g)	• The CWDC has issued and implemented Policy Guidance Letter 15-05-WIOA: One-stop Certification Criteria that ensures accessibility in compliance with the ADA of 1990
☑	11.	Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	•U.S.C. Title 38 Chapters 41 and 42, as amended specifically: 4103A, 4104, 4211-4215 • Public Law 107-288 - Jobs for Veterans Act. • Training and Employment Guidance Letter No. 19-13: Jobs for Veterans' State Grants (JVSG) Program Reforms and Roles and Responsibilities of American Job Center (AJC) Staff Serving Veterans • Training and Employment Guidance Letter No. 20-13: Designation of Additional Population of Veterans Eligible	• CDLE has issued and implemented Policy Guidance Letter 14-08-V available at: Responsibilities of JVSG and AJC Staff • This requirement is referenced in the funding provisions of the bilateral grant agreement utilized with sub-recipients of the State and is monitored by the State to ensure compliance. All sub-recipients are required to ensure that state policies are implemented by service providers, who are their subcontractors, through

			for Services from the DVOP Specialist	monitoring of subcontractors.
☑	12.	The State will conduct evaluations and research projects on activities under WIOA core programs; that such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, that the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.	• WIOA Sec. 116(e) • WIOA Sec. 129(b)(1)(A) • WIOA Sec. 134(a)(2)(B)(vi)	The State assures compliance with this requirement and will utilize a portion of the Title I Governor's set aside funds each year to accomplish this activity. In addition, the State will require an evaluation component in each WIOA discretionary grant it receives and will set aside grant funds for this purpose.

VI. Core Programs

Adult, Dislocated Worker and Youth Services:

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

(a) General Requirements

(1) *Regions and Local Workforce Development Areas*.

(A) Identify the regions and the local workforce development areas designated in the State.

Colorado's seven planning regions, accessed through this link, consist of contiguous counties that share a common labor market. They are as follows:

1. Central – Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Gilpin, Jefferson, and Larimer Counties
2. Eastern – Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Morgan, Phillips, Sedgwick, Washington, and Yuma Counties
3. Northwestern – Eagle, Garfield, Grand, Jackson, Lake, Moffat, Pitkin, Rio Blanco, Routt, and Summit Counties
4. Pikes Peak – El Paso and Teller Counties
5. Southern – Alamosa, Baca, Bent, Prowers, Chaffee, Conejos, Costilla, Crowley, Custer, Fremont, Huerfano, Kiowa, Las Animas, Mineral, Otero, Park, Pueblo, Rio Grande and Saguache Counties
6. Weld County
7. Western – Archuleta, Delta, Dolores, Gunnison, Hinsdale, La Plata, Mesa, Montezuma, Montrose, Ouray, San Juan, and San Miguel Counties

Colorado's ten federally-recognized local workforce areas, accessed through this link, are as follows:

1. Adams County
2. Arapahoe and Douglas Counties
3. Boulder County
4. City and County of Denver
5. Larimer County
6. Mesa County
7. Pikes Peak Workforce Area- El Paso and Teller Counties
8. Tri-County Workforce Area- Jefferson, Gilpin and Clear Creek Counties
9. Weld County
10. Colorado Rural Workforce Consortium – consisting of 51 counties divided into 10 sub-areas:
    - City and County of Broomfield

- Eastern Sub-Area – Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Morgan, Phillips, Sedgwick, Washington, and Yuma Counties
- Northwest Sub-Area – Grand, Jackson, Moffat, Rio Blanco, and Routt Counties
- Pueblo County
- Rural Resort Sub-Area – Eagle, Garfield, Lake, Pitkin, and Summit Counties
- South Central Sub-Area – Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache Counties
- Southeast Sub-Area – Baca, Bent, Crowley, Huerfano, Kiowa, Las Animas, Otero, and Prowers Counties
- Southwest Sub-Area – Archuleta, Dolores, La Plata, Montezuma, and San Juan Counties
- Upper Arkansas Sub-Area – Chaffee, Custer, Fremont, and Park Counties
- Western Sub-Area – Delta, Gunnison, Hinsdale, Montrose, Ouray, and San Miguel Counties

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

Process for Designating Local Areas:

The Colorado Workforce Development Council (CWDC) consulted extensively with local officials, local boards, partner agencies, and community organizations to assist with the identification of locally designed and supported areas consistent with the articulated needs of the communities. The CWDC determined the procedures for requesting initial and subsequent designation of local areas and the requirements each area must meet in state Policy Guidance Letter 15-04-WIOA. The local areas were required to detail in their request and operating plan how the requested local area would meet the criteria identified in the law for performed successfully and sustained fiscal integrity. The designation process began with the prior designated areas that operated under the Workforce Investment Act. All local officials reviewed the labor market areas and their ability to deliver WIOA services and then submitted their requests for designation as a local area to the Council and Governor. Meetings were held with county officials, one-stop operators and local boards for discussions. The nine original local areas requested initial designation, plus Mesa County requested separation from the Rural Consortium as an independent local area. All requests for initial designation were approved by the Governor.

Procedures for Determining Performed Successfully and Sustained Fiscal Integrity:

Each local area seeking designation is required to submit documentation for the following items to the CWDC for its review and recommendations to the Governor for final approval:

1. Evidence that the area, in the two program years for which data is available prior to the request, met or exceeded the adjusted levels of performance for primary indicators of performance or the Common Measures for Title I and Title III programs and was not subject to the sanctions process resulting from missing the same measure two years in a row, as applicable.
2. Evidence that during the two program years prior to the request, the U.S. Secretary of Labor, or the State in place of the Secretary, has not made a formal determination that the grant recipient or administrative entity for the local area has misspent funds due to willful disregard, gross negligence, or failure to comply with accepted standards of administration, as applicable.

Process for Designating Regional Planning Areas:

The CWDC convened a workgroup of local workforce partners that was chaired by a local area director and the Director of the CWDC. This group reviewed existing regional maps that had been developed by various partner agencies for purposes of delivering program services. In addition, the workgroup examined worker commuting patterns, locations of key industries and the presence of existing partnerships that cut across geographic boundaries. The resulting map that was developed took these factors into consideration, as well as the existing local workforce areas and the regions identified by the Governor's Economic Blueprint initiative. Local Elected Officials reviewed the map and had the opportunity to request changes to best meet the needs of each local area.

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

The following is excerpted from Colorado's Policy Guidance Letter 15-04-WIOA regarding the designation of local areas:

APPEALS PROCESS POLICY:

An area or areas seeking to be designated or re-designated, as a Local Workforce Development Area, which has requested but has been denied its request for designation or re-designation as a Local Area, may appeal the decision to the Colorado Workforce Development Council.

1. An appeal must be in writing and filed with the Colorado Workforce Development Council within fourteen (14) days after notification of the decision. Submit the appeal to the Chairperson of the Colorado Workforce Development Council (CWDC) and to the Director of the CWDC by sending an email to cwdc@state.co.us.
2. The appeal must contain a specific statement of the grounds upon which the appeal is

sought.

3. The State board will have 60 days to review the appeal and make a recommendation to the Governor. The review will take into account the information in the original request and supplemental information provided in the appeal to determine if the criteria set in this policy has been met.
4. The final decision rests with the Governor.
5. If the appeal is connected to a request for initial or subsequent designation under section V. A. or section V. B. of this policy, and if the appeal does not result in designation, the entity may request review by the Secretary of Labor to determine if procedural rights were granted or if the minimum criteria of WIOA Section 106(b)(2) or Section 106(b)(3) were met. This second level of appeal must be sent within 14 days to:

   Assistant Secretary of Employment and Training
   U.S. Department of Labor
   200 Constitution Avenue, N.W.
   Washington, DC 20210
   A copy of the appeal must be simultaneously provided to the:
   ETA Regional Administrator
   U.S. Department of Labor
   525 S. Griffin Street
   Dallas, TX 75202

   In addition, a copy must be sent to the CWDC at cwdc@state.co.us.
6. If the final decision of any appeal reverses the prior decision, it will become effective July 1st of the following year.

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

Colorado anticipates using an appeal process for infrastructure funding that is similar to that described above for the designation of a local area.

(2) Statewide Activities.

(A) *Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.*

Statewide Policies and Guidance: Colorado has established a public website that contains the Policy Guidance Letters for the workforce development system, which address both the programmatic and administrative requirements for utilization of state funds for workforce development activities. All policies can be accessed at: www.colorado.gov/cdle/pgl

Currently Colorado is in the process of updating existing policies to become WIOA compliant and adding policies that provide guidance regarding new items such as work-based learning opportunities, infrastructure funding options, and other aspects of WIOA not previously

required by the Workforce Investment Act. The policy development process involves the participation of key state and local partners on cross-functional teams that provide critical input regarding content of the policies. A final draft of each policy is also distributed to state and local partners for comment prior to publication on the website. Policy modifications can be made as additional guidance is received from federal departments or specific needs are identified by one-stop system providers and partners.

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

Use of Governor's Set Aside Funding: Colorado expects to utilize 5% of the Title I set aside funds for the administrative purposes allowed under Sections 128 and 133 of WIOA, and the remaining portion of the set aside for both the required statewide activities, as well as the allowed statewide activities that support the strategic goals set forth in this four-year Combined Plan, as follows:

- Expand regionally-focused sector partnerships that are championed by business and industry to drive career pathways
- Develop and implement a full spectrum of work-based learning opportunities to be deployed broadly across sectors.
- Collaborate with business and industry to understand and promote the value of stackable industry recognized credentials.
- Enhance the alignment of business services across all partner programs.
- Adopt LEAN principles for the implementation of cross-partner strategies/services to increase efficiency, accessibility, and coordination of customers' services.
- Develop and implement a technology solution or other methods for data coordination and information sharing across program partners.
- Implement continuous professional development for staff from all partner programs to elevate internal expertise and professionalism and to equip them with the tools necessary to operate a comprehensive, holistic approach to talent development.
- Create opportunities for staff at all levels to engage in continuous improvement efforts, leveraging their first-hand experience and unique perspectives to inform the processes.
- Establish a brand for the Colorado workforce development system that represents the vision and strategies of the WIOA combined partners.
- Define the key messages and brand promise for target audiences.
- Explore ways to capture the Return on Investment (ROI) of the workforce system in order to promote the value of the system and all programs within it.

- Create and adopt universal output and outcome metrics to depict accurate descriptions of the workforce system, which will be used for planning and implementation of system services.
- Utilize partner relationships to implement meaningful pilot programs that foster an environment of innovation.

Use of Rapid Response Funds: The State Rapid Response Team uses a variety of approaches and strategies to avert and respond to layoffs. These include the early identification of at-risk industries and companies through utilization of a variety of data including labor market analyses, layoff trends, and policy analysis including the impact of federal, state and local policies and regulations on businesses and industries. State unemployment insurance company layoff data is used to identify layoff trends and specific companies that are approaching WARN levels. These data are used to conduct outreach activities to businesses whose employees might benefit from Rapid Response services.

The State Rapid Response Team has formed collaborative partnerships to identify and design appropriate interventions. Partnerships include Colorado's local workforce areas and Workforce Development Boards, the U.S. Department of Commerce's Trade Adjustment Assistance program for firms, Chambers of Commerce, Small Business Development Centers, State agencies such as the Office of Economic Development and International Trade, the Public Health Department, and Vocational Rehabilitation, community-based organizations and quasi-governmental organizations such as Connect for Health Colorado (Colorado's healthcare exchange). Rapid Response early interventions may include a variety of services tailored to the needs of the company and its employees and may include onsite or virtual workshops, onsite registrations, orientations and intakes for WIOA and TAA, and onsite "reverse" hiring events at which dislocated workers are connected with companies hiring for similar positions.

(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.

In the event of a natural or other disaster, the state initiates an emergency protocol, and the Rapid Response team mobilizes and convenes an emergency team. If the disaster has affected operations of the workforce agency itself, an established Continuity of Operations plan and communication protocol is initiated. The emergency team coordinates with FEMA, local entities, and partners to identify the impact of the disaster, the demographics, and the needs of those affected and the resources available to conduct outreach and deliver needed services to impacted individuals. Assistance includes access to UI or disaster unemployment assistance, support for mobile one-stop units, demographic information gathering for potential emergency grant applications and coordination with FEMA, Red Cross or other disaster response organizations. State and local area rapid response providers work closely

with other state and local agencies and other critical partners through an established strategic planning process to ensure effective and immediate responses.

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

Early Intervention is provided to worker groups through a coordinated and tightly integrated response team consisting of TAA and Rapid Response Coordinators from both the state and local levels, who are cross-trained in both programs. Cross training improves access to services and ensures that TAA filings are complete and accurate for investigations and determinations. Response coordination is reciprocal. When receiving a WARN letter from a company affected by foreign trade, the State Rapid Response team immediately notifies the TAA team and includes TAA personnel in the early planning stages with the company to identify the needs and the services required to meet those needs. Services delivered to the company include, but are not limited to, joint Rapid Response/TAA workshops at the customer location to provide information on TAA/TRA services and benefits, onsite workforce registrations and TAA/WIOA orientations, and one-on-one meetings with TAA Counselors and other professionals as needed. Workshops also include Unemployment Insurance Benefit information as well as information on other employment and training services and grants available to employees.

The State Rapid Response team also routinely monitors TAA petitions and certifications to determine if Rapid Response services have been previously delivered. If not, the Rapid Response team works closely with the TAA team as part of the planning process and collaborates to deliver services. As TAA petitions become certified, the TAA Coordinator immediately notifies the Rapid Response Coordinator. Outreach and dissemination of TAA and Rapid Response information may occur via email, direct mail, press announcements and articles, websites including partner websites, radio and television public service announcements, flyers posted at the workforce centers as well as You Tube sites, Facebook, Twitter and other social media. Rapid Response and TAA teams also collaborate with partners to conduct workshops, present at conferences, trade shows, professional associations, Chambers, clubs and other outreach events.

(b) Adult and Dislocated Worker Program Requirements

(1) Alternative Training Models. If the State is utilizing alternative training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized

training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

Work-based learning is a critical component of the education and training that Coloradans will need for the jobs of the future. Targeted efforts for the long-term unemployed are utilizing a variety of alternative training models to address the unique combination of social, emotional and skill deficiencies caused by the duration of their unemployment while rapidly moving individuals to paid work experience and reemployment. Governor Hickenlooper's Hire for Colorado program challenged businesses to give the long-term unemployed an opportunity to prove themselves and also increased awareness of services available through workforce centers for long-term unemployed individuals. In 2016, the program will be moving both long-term unemployed individuals and dislocated workers into work-based training opportunities.

The $5 million Sector Partnership National Emergency Grant awarded in 2015 will include regional sector planning and strategies and work-based training opportunities for dislocated workers. A new "think tank" has been established as part of the grant implementation that will be looking at how to improve or enhance our work-based training opportunities to make them more user-friendly for businesses and job seekers.

A new work-based training program is being developed in 2016 and will provide veterans an opportunity to "learn and earn" through apprenticeships and on-the-job training.

Colorado's H-1B Technical Skills Training Grant, which ended in December 2015, utilized incumbent worker training as a key strategy and there was an overwhelming demand for this funding from Colorado's business community. Building on the successful partnerships developed through the grant, incumbent worker training may be utilized going forward to move up skilled workers and create lower-level vacancies that the workforce system can help to fill.

CDLE is implementing a piece of workforce legislation passed in the 2015 state legislative session that will provide work-based learning opportunities. HB15-1230, Innovative Industries Workforce Program, will provide support for creating a common collaborative structure for paid internships with businesses.

Colorado is also exploring the new opportunities presented by WIOA for transitional jobs. Hire Colorado was a successful subsidized employment program in 2009-10 that resulted in a 75% permanent employment rate for the 1,721 participants. Any

new transitional jobs strategies going forward will build on this successful model and the lessons learned.

(2) *Registered Apprenticeship. Describe how the State will incorporate Registered Apprenticeship into its strategy and services.*

Colorado recognizes that Registered Apprenticeships (RAs) are an important component of potential training and employment services that the workforce system can provide to its customers. Local service providers will be expected to utilize RA as a career pathway for job seekers and as a job-driven strategy for employers and industries. Regional and local plans will address the inclusion of RAs in sector strategies and ensure that RAs are an integral part of the work based learning options that WIOA customers may access. The state will provide training, technical assistance and access to USDOL's RA resources to encourage and foster the use of existing programs, as well as the development of new RAs. Local workforce boards will be expected to develop local policies and procedures to implement RAs, which may include the use of pre-apprenticeships, Individual Training Accounts and On-the-Job Training awards to customers who wish to start an apprenticeship or complete an apprenticeship in progress.

(3) *Training Provider Eligibility Procedure. Provide the procedure for determining training provider eligibility, including Registered Apprenticeship programs (WIOA Section 122).*

Colorado has captured the full procedure for determining training provider eligibility in Policy Guidance Letter 15-10-WIOA available at www.colorado.gov/cdle/pgl.

In summary, the PGL provides guidance on the following items:

- The initial eligibility online application process, to include data regarding:
    - A description of each program of training services to be offered;
    - Information on cost of attendance, including costs of tuition and fees;
    - Whether the training program leads to an industry-recognized certificate or credential, including recognized post-secondary credentials;
    - Whether the provider has developed the training in partnership with one or more businesses (and the names of the businesses);
    - Which in-demand industry sectors and occupations best fit with the training program;
    - A description of the prerequisites or skills and knowledge required prior to the commencement of training; and
    - Social security numbers for all students residing in Colorado, regardless of funding source.

- The continued eligibility online application process, to include updates to the initial eligibility data and the following information:
    - The total number of participants enrolled in the program;
    - The total number of participants completing the program;
    - The total number of participants exiting the program;
    - Information on recognized post-secondary credentials received by program participants;
    - Information on the program completion rate for such participants;
    - Description of how the provider will ensure access to training services throughout the State, including rural areas and through the use of technology;
    - Description of how the providers provide training services to individuals who are employed and/or individuals with barriers to employment;
    - Information reported to State agencies on Federal and State training programs other than programs within WIOA title I-B; and
    - Social security numbers for all participants in Colorado for the two previous years, regardless of funding source, which will be used to calculate the performance measures
- Process for WIA approved training providers to transition to WIOA approved training providers
- The roles of the three entities involved in the determination of training provider eligibility:
    - The Colorado Department of Labor and Employment establishes the eligibility criteria and approval process, as well as takes enforcement actions against providers that provide false information or violate the requirements of WIOA.
    - The Colorado Department of Higher Education hosts the ETPL website, reviews applications for minimum eligibility and/or performance requirements, and notifies local boards and CDLE regarding new requests for initial or subsequent eligibility once online applications are completed and reviewed. They also mark programs eligible for WIOA funding that have been approved by Local Boards and remove programs that don't meet required criteria or performance standards.
    - Local Workforce Development Boards may identify local eligibility criteria in addition to those set by the state, plus they will review initial and subsequent applications and either approve or disapprove programs according to state and local standards. The decision of each local board determines whether a program may be utilized in its respective local area. Local boards may also request the removal of a program for cause based on local and state standards.
- Registered Apprenticeships: In partnership with USDOL's Denver Office of Registered Apprenticeship, all active apprenticeship programs have been and

will continue to be invited to be listed on the state's ETPL, a process that will be ongoing as new apprenticeships are added. Registered apprenticeship programs will not be subject to the same application or performance reporting requirements as other training providers because they go through a detailed application and vetting procedure to become a Registered Apprenticeship program sponsor with USDOL. Any apprenticeship program may remain on the ETPL as long as it wishes if it remains registered by the USDOL Office of Registered Apprenticeship.

Youth Program Requirements

(c) *With respect to youth workforce investment activities authorized in section 129 of WIOA, —*

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

Colorado is a local control state that, to the extent practicable, devolves policy-making authority to local boards. In the case of local grant awards for youth workforce investment activities, local boards have been directed to adhere to the requirements within WIOA, develop additional local requirements as appropriate, and utilize their local procurement policies to create detailed statements of work for incorporation in competitive requests for proposals and the awards and contracts that result. Such RFPs, awards, and contracts are expected to set standards for achieving the WIOA Section 116 performance indicators, when organizations take on full sub-recipient responsibilities and require documentation of successful achievement of outcomes. These service providers are to be required to demonstrate past success in delivery of services and commit to successful outcomes for any contracted services. In all cases, the local boards are responsible for ensuring that all sub-recipients and contractors are monitored for quality of services and achievement of performance standards.

(2) *Describe how the State will use funds to carry out Youth Program elements described in WIOA section 129(c)(2).*

Local Boards in Colorado are expected to make all 14 youth program elements available within their one-stop centers through a competitive process established under local procurement policies that are as strict, or stricter, than federal procurement standards in the OMB Uniform Guidance. Local boards will maintain a list of providers of these services that case managers can utilize to ensure that youth participants have ready access to the services needed to successfully achieve the objectives of their individual service strategies. Colorado expects to submit a request to waive the competitive procurement requirement for three of the fourteen youth program elements – work experiences, supportive services, and follow-up. Through a WIA waiver for these same elements, one-stop center staff has developed the

expertise to deliver these services in-house and utilize the cost savings to provide additional services to the youth population. If granted the waiver, Colorado anticipates the expansion of business services activities to develop additional work experience and work based learning opportunities for older and disconnected out-of-school youth.

(3) *Provide the language contained in the State policy for "requires additional assistance to complete an educational program, or to secure and hold employment" criterion specified in WIOA sections 129(a)(1)(B)(iii)(VIII) and 129(a)(1)(C)(iv)(VII).*

Colorado is a local control state that, to the extent practicable, devolves policy making authority to local boards. The State policy for WIOA eligibility (PGL 15-19-WIOA) contains the following guidance for local boards to establish their definition of "requires additional assistance:"

NEEDS ASSISTANCE – An individual (including a youth with a disability) who requires additional assistance to complete an educational program or to secure and hold employment. Because the State has not chosen to issue a policy that defines "additional assistance" as relates to WIOA Youth program eligibility, each local area has the responsibility for determining its own definition of this eligibility category. A local policy should be developed that specifies what conditions must be met for a youth to require additional assistance and what documentation is needed to demonstrate this eligibility category.

The State policy also provides examples of appropriate documentation such as the WIOA application, the Individual Service Strategy, or case notes.

(4) *Provide the State's definition of "alternative education."*

Colorado Definition of Alternative Education Campuses

Each school wishing to be designated as Alternative Education Centers by the Colorado State Board of Education must meet the following eligibility criteria:

- Has a specialized mission to serve special needs or at-risk populations
- Is an autonomous public school, meaning that the school provides a complete instructional program that allows students to proceed to the next grade level or to graduate
- Has an administrator who is not under the supervision of an administrator at another school
- Has a budget separate from any other public school
- Has nontraditional methods of instructional delivery
- Has a public process to ensure accountability
- Serves one of the following student populations (at the time of the state testing window):

- All students have severe limitations that preclude appropriate administration of the assessments administered pursuant to section § 22-7-409, C.R.S.;
- All students attend only on a part-time basis and come from other public schools where the part-time students are counted in the enrollment of the other public school; or
- More than 95% of students either have an Individualized Education Program (IEP) pursuant to § 22-20-108, C.R.S. and/or meet the definition of a "high-risk" student.

For purposes of Alternative Education Campus designation, "high-risk" students include the following students:

- With Individualized Education Programs (IEPs)
- Who have been committed to the Department of Human Services following adjudication as juvenile delinquents or who are in detention awaiting disposition of charges that may result in commitment to the Department of Human Services
- Who have dropped out of school or who have not been continuously enrolled and regularly attending any school for at least one semester prior to enrolling
- Who have been expelled from school or who have engaged in behavior that would justify expulsion
- Who have documented histories of personal drug or alcohol use or who have parents or guardians with documented dependencies on drugs or alcohol
- Who have documented histories of personal street gang involvement or who have immediate family members with documented histories of street gang involvement
- Who have documented histories of child abuse or neglect
- Who have parents or guardians in prison or on parole or probation
- Who have documented histories of domestic violence in the immediate family
- Who have documented histories of repeated school suspensions
- Who are under the age of twenty years who are parents or pregnant women
- Who are migrant, as defined in Section 22-23-103 (2), CRS
- Who are homeless, as defined in Section 22-23-102.5 (2), CRS
- Who have a documented history of a serious psychiatric or behavioral disorder, including but not limited to an eating disorder, suicidal behaviors, or deliberate, self-inflicted injury
- Who are over traditional school age for their grade level and lack adequate credit hours for their grade level

(5) *Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define "not attending school" or "attending school," indicate that is the case.*

The State policy for WIOA Eligibility (PGL 15-09-WIOA) contains the following definitions, which incorporate provisions of the state statute regarding compulsory school attendance, and guidance from the Colorado Department of Education:

OUT-OF-SCHOOL YOUTH *– an individual is an out-of-school youth if they are:*

A. ***Not attending any school*** *(as defined under State law) -* ***must meet one of the following:***

1. ***Colorado Department of Education Secondary Out-of-School Definition:*** *Out-of-school means youth up through age 21, who are entitled to a free public education in the State but are not currently enrolled in a K-12 institution. This could include students who have dropped out of school, youth who are working on a high school equivalency diploma outside of a K-12 institution, and youth who are "here-to-work" only.*
2. ***CDLE Post-Secondary Out-of-School Definition:*** *Under the WIOA youth program eligibility requirements the term "school" refers to both secondary and postsecondary school. Therefore, an individual attending either postsecondary school is considered an ISY, and any individual not attending a postsecondary school is considered to be out of school.*
3. ***Additional Out-of-School Categories:***
   a. ***Adult Basic Education and Family Literacy:*** *WIOA youth programs may consider a youth to be out-of-school youth for purposes of WIOA youth program eligibility if they are attending Adult Education and Family Literacy provided under title II of WIOA, YouthBuild, or Job Corps.*
   b. ***SWAP:*** *Youth participating in the School to Work Alliance Program,* ***who are no longer enrolled in secondary school,*** *would be considered out-of-school. These individuals may have dropped out, aged out at 21, or obtained their diploma or certificate of completion.*
   c. ***High School Equivalency Preparation Classes:*** *Youth enrolled in high school equivalency preparation classes outside of the K-12 system would be considered out-of-school.*

IN-SCHOOL YOUTH *– an individual is an in-school youth if they are:*

A. ***Attending school*** *(as defined by State law) –* ***must meet one of the following:***

1. ***Colorado Department of Education Secondary In-School Definition:*** *Youth up through age 21, who are entitled to a free public education in the State and are currently enrolled in a K-12 institution, or meet one of the following exceptions to compulsory school attendance:*
   a. *Home-schooled (consisting of at least 172 hours of class time per year, averaging 4 hours per day, with course transcripts developed)*
   b. *Completing an online high school curriculum (consisting of at least 90 hours of class time per semester)*
   c. *Attending a private secondary school*
2. ***CDLE Post-Secondary In-School Definition:*** *Under the WIOA youth program eligibility requirements the term "school" refers to both secondary and postsecondary school.*

Therefore, an individual attending a postsecondary school is considered an ISY.

3. ***Attending an alternative education program:*** *(per WIOA definition that an individual attending an alternative education program is not considered to be a dropout and is in-school.)*
4. ***SWAP:*** *Youth participating in the School to Work Alliance Program,* ***who are still enrolled in secondary school,*** *up to age 21, would be considered in-school.*
5. ***Transition Programs:*** *Youth that are in transition programs ("receiving 18-21 services") are considered in-school. They are still obtaining Free Appropriate Public Education, until the age of 21, or until their exit prior to age 21.*

(6) *If utilizing the portion of the basic skills deficient definition contained in WIOA Section 3(5)(B), include the specific State definition.*

The State policy for WIOA Eligibility (PGL 15-09-WIOA) contains the following definition for basic skills deficient:

BASIC SKILLS DEFICIENT*) - is an individual—*

A. *Who is a youth, who has English reading, writing, or computing skills at or below the 8th grade level – no higher than 8.9 on a generally accepted standardized test; or*
B. *Who is a youth or adult, who is unable to compute or solve problems,*
   or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. This may also include lack of computer literacy.

Note on Standardized Tests: *When using formal assessment tests to determine basic skills deficient, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. In addition, if a standardized test is used to assess basic skills, the test should include reading, writing, or computing skills. Lacking soft skills or specific skills needed for a particular job may not be used to assess otherwise high-functioning individuals as basic skills deficient. As a result, tests such as Prove-It are generally not appropriate for determining basic skills deficient or computer literacy as they are focused on occupational skills rather than basic skills.*

Acceptable Documentation for Basic Skills Deficient:

___*Standardized assessment test*
___*School records*
___*Case manager observation and case notes*
___*Adult Basic Education program referral or records*
___*Other*_____

(d) Single-Area State Requirements: N/A

(e) Waiver Requests: Colorado submitted two waiver requests to USDOL in December 2015 as a modification to its existing WIA five-year plan. Should these waivers be approved, Colorado is seeking an extension of these waivers through the four-year duration of this WIOA Combined Plan.

Waiver of Youth Program Element Procurement1. Statutory Provisions to be Waived: WIOA Sec. 123 - Eligible providers of youth workforce investment activities: requirement to competitively select providers of the 14 youth program elements described in section 129(c)(2)(C),(G), and (I). USDOL previously granted this waiver to the majority of the states during the 15-year life of the Workforce Investment Act.

This waiver would allow elimination of the competitive selection of providers for three of the fourteen youth program elements, as follows:

- Follow-up services for not less than 12 months after the completion of participation, a required WIOA service for all youth participants
- Supportive services
- Paid and unpaid work experience, including:
    - Summer employment opportunities and other employment opportunities available throughout the school year
    - Pre-apprenticeship program
    - Internships and job shadowing
    - On-the-job training opportunities

2. State or Local Statutory Regulatory Barriers: There are no state or local statutory or regulatory barriers to implementing the proposed waiver. State Workforce Development Board and CDLE policies are currently in compliance with Federal guidelines. However, upon notification of approval of this waiver request, CDLE policies will be amended as appropriate to comply with the terms of the waiver.

3. Goals and Programmatic Outcomes to be Achieved by the Waiver:

- Allow one-stop center case managers, who have developed this expertise over the last 15 years, to provide follow-up and supportive services to improve continuity of case management services; achieve a more efficient, effective and seamless one-stop service delivery system that can provide excellent customer service to jobseekers, and successfully implement the WIOA focus on services to disconnected/out-of-school youth.
- Allow one-stop center business services staff and partner agency counterparts to serve as the primary developers of all the types of work experience opportunities allowed for youth as an expansion and enhancement of Colorado's nationally-recognized Business Services Alignment Initiative; to provide a customer-centered one-stop system where businesses drive workforce solutions; and to effectively track outcomes for the potential

WIOA performance measure on effectiveness of services to businesses.

- Avoid additional administrative costs and utilization of staff resources to conduct the procurement of the three elements, which in-house staff currently have the expertise to deliver; avoid the additional overhead costs associated with sub-contracting the three elements to outside entities, which in turn is expected to result in a higher cost-per for these services and a decrease in the number of youth participants that can be served by the WIOA youth programs across the state.

4. Follow-Up and Supportive Services:

The case management relationship with participants, which has been honed over the last 15 years of WIA, is based upon a thorough knowledge of the youth, their employment plan, expected outcomes, and barriers. Colorado's youth program operates on the premise of long-term participation during which time a strong relationship is formed. This is particularly critical to the success of disconnected youth, who require a strong support system to overcome barriers to the achievement of educational and occupational goals. When the youth exits the program and enters into the follow-up period, the requirement that follow-up services be provided by a different organization secured through a competitive process is likely to render services less effective. The established relationship with staff will not exist with a new organization contracted to do follow-up. A youth would be less likely to respond to follow-up contacts and therefore less likely to take advantage of available services that lead to more stability and longer retention. By allowing the local workforce case manager to continue their established relationship with the participant during the follow-up period, there will be greater effectiveness in quickly identifying the needs of the youth and offering assistance. A new third party conducting the follow-up would have to gather additional information and establish a relationship of trust and communication. This process would be more time intensive and costly than building upon an established relationship between the youth and the case manager.

Likewise, by allowing local workforce center case managers to identify and authorize payment for support services, the continuity of service stays intact. When a youth has to be referred to a third party to secure a support service, not only is there an additional party to whom the youth must expose confidential information, but it is a less efficient way to expedite the issuance of a voucher, purchase order, bus pass or other method for disbursing assistance. Due to the relatively small youth allocations for Colorado local areas, support services are generally limited and are used to provide help for transportation, clothing, eyeglasses, tools, physicals, and other small purchases. Those specific services may be a sole source purchase, such as in the case of bus passes, or based upon vendors who are willing to do business through purchase orders. Where there is a choice of vendors, multiple bids are gathered. This youth practice would be consistent with the way adult and dislocated worker services are provided through the one-stop centers. By creating a separate service provider for this youth program element, the delivery system becomes fragmented and less holistic for the participant, and more costly for the system.

Work Experiences:

The Business Services Alignment Initiative is a grassroots, locally driven initiative supported by state and local one-stop partners and the Colorado Workforce Development Council. Its charge is to provide a streamlined and more responsive, demand-driven approach to serving the business community in Colorado, as well as to develop job and work-based training and learning opportunities (including work experiences, pre-apprenticeships, internships, job shadowing, OJTs, and summer employment) for the one-stop customer base. Since its inception in 2011, this initiative has worked to streamline and standardize the business services efforts across the state's one-stop centers and to utilize technology and virtual tools to capture and report data on business services and its outcomes. It is currently poised to expand its efforts to include the business services programs of the key local partners in the one-stop system, including TANF, Vocational Rehabilitation, Adult Basic Education, and community based youth services organizations.

One of the team's most significant contributions has been the creation of a robust business services measurement system that tracks staff-assisted services to businesses, and monitors their effectiveness. The team's efforts have received national attention in the White House Paper, "Ready to Work: Job-Driven Training and American Opportunity," which identified Colorado as a leader in creating and implementing standardized reporting measures. In addition, Colorado has submitted this measurement system to USDOL through the NPRM comment process as a possible model for defining and implementing the "effectiveness in serving business" performance measure for WIOA.

The WIOA requirement to procure the development of work experiences and all types of work based training and learning opportunities has the potential to fragment and undermine the efforts underway to align business services in the state and effectively manage the tracking and reporting of business services outcomes. At the same time, because businesses consistently demand a single point of contact for all their service needs, the contracting of this segment of business services to outside organizations is expected to lead to decreased customer satisfaction, a critical aspect of performance. Additionally, as with the procurement of follow-up and supportive services, it has the potential to render business services on behalf of youth participants less effective, both in terms of cost and consistency of services to the youth, with the potential to reduce the number of businesses that can be served.

Cost Effectiveness:

Colorado's one-stop delivery system consists of 10 designated local areas, 9 of which are county operated while one is administered by the state, and locally delivered through state and county entities. In almost every local area, procurement of these services will require the use of additional administrative and staff resources to conduct the competitive process for three youth program elements that have been delivered by in-house staff under the WIA waiver. This redirection of resources will increase the cost-per-participant for work experiences, follow-up, and supportive services. In addition, because supportive services are already being purchased through an internal procurement process, subcontracting this element would mean paying outside staff to duplicate processes already in place, adding a layer of bureaucracy and

complicating access to this critical service. Finally, because these services are the most commonly utilized youth program elements, the cost-per-participant is expected to increase and the number of youth served is expected to decrease, lowering overall cost-effectiveness.

In Summary:

The greater flexibility resulting from this waiver will allow workforce centers to

- Improve the continuity of services to youth;
- Implement a more cost-effective and integrated service delivery system; and
- Develop stronger ties with work experience host agencies and employers.

In the same manner, this waiver is expected to

- Promote the rapid implementation of the out-of-school youth focus of the Workforce Innovation and Opportunity Act of 2014;
- Facilitate the tracking and reporting of outcome data for the WIOA business services performance measure;
- Allow Colorado to continue achieving efficiencies in the delivery of all youth services;
- Keep the administrative costs of competitive procurement processes at a minimal level; and
- Direct more funds to program activities that will allow Colorado to serve a larger number of youth participants and lead toward performance improvement.

5. Individuals Impacted by the Waiver:

- Local boards needing to minimize administrative costs and redirect those funds to additional program activities that assist youth participants and lead to performance improvement, as well as the development of comprehensive one-stop centers in alignment with TEGL 4-15: Vision for the One-Stop Delivery System under WIOA.
- Older, out-of-school, low-income and disconnected youth, who have demonstrated the need for intensive youth program services and supports, most commonly work experiences, supportive services, and follow-up, the latter required by WIOA.
- Community Based Organizations: In some parts of the state, the procurement process will continue as before, where most or all of the services are contracted out to CBOs. In other parts of the state, community organizations seeking to partner with workforce boards will have the opportunity meet the needs of disconnected youth populations and the business community that their current resources alone cannot address.
- One-Stop Partners seeking to align their service delivery to youth and businesses with the one-stop system and leverage resources to meet customer needs.

6. Process Used to Monitor Progress in Implementing the Waivers: CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and

service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite utilizing outcome reports generated from CDLE's statewide databases. Should this waiver request be granted, CDLE will ensure regular review of WIOA programs and discretionary grants to monitor the outcomes and impacts of this waiver authority.

> Specifically, Colorado has issued Program Guidance Letter #15-13-WIOA: PY15 Waiver Policy that contains the following waiver oversight process:*Waiver Monitoring and Accountability:*
>
> *In TEGL 26-09, USDOL stated its intent to enhance its oversight and monitoring of waivers to determine what impacts waivers have on performance outcomes, gain insight into how states are using waivers, and to ensure that the integrity of the waiver guidelines are maintained. To address the same areas, CDLE will be adding the monitoring of waivers to its quarterly and annual monitoring processes in order to track how waivers have changed the activities of the local areas and directly or indirectly affected local area performance, and to insure compliance with waiver guidelines. CDLE will utilize the following mechanisms to track and monitor the use of waivers in each local area:*
>
> - *Local plans*
> - *Expenditure Authorizations for WIOA and Wagner-Peyser formula programs that issue funding and serve as modifications to grant agreements*
> - *Local policies*
> - *Activity and performance reports*

6. Process for Notice of Local Boards and Opportunity to Comment: The waiver request will be published for a period of three weeks on the public websites maintained by the Colorado Department of Labor and Employment and the Colorado Workforce Development Council, allowing for public comment on its content and potential impact. In addition, a copy of the waiver will be available for public inspection at CDLE offices, and electronic copies of the waiver will be sent via e-mail to local boards and one-stop operators. The waiver requests and any comments received will be submitted to the US Department of Labor.

Waiver of Limits on Employer Reimbursement for On-the-Job Training

1. Statutory Provisions to be Waived: WIOA Section 134(c)(3)(H)(i) provides reimbursement to the employer for On-the-Job Training (OJT) of up to 50 percent of the wage rate of the participant, and for the extraordinary costs of providing for the training and additional supervision related to the training. It also allows up to 75% reimbursement of the wage rate if a local board approves this policy and identifies the size or type of employers receiving each level of reimbursement.

Colorado is proposing a sliding scale of reimbursement to the employer of up to 90% of the wage rate and extraordinary costs defined by the law, based on the following criteria:

- Up to 90%: Employers with 50 or fewer employees
- Up to 75%: Employers with 51-250 employees
- Up to 50%: Employers with more than 250 employees

2. State or Local Statutory Regulatory Barriers: There are no state or local statutory or regulatory barriers to implementing the proposed waiver. State Workforce Development Board and CDLE policies are currently in compliance with Federal guidelines. However, upon notification of approval of this waiver request, CDLE policies will be amended as appropriate to comply with the terms of the waiver.

3. Goals and Programmatic Outcomes to be Achieved by This Waiver

- Maximize the flexibility needed to ensure speedy implementation of work-based learning opportunities that WIOA encourages for both formula and discretionary grants;
- Increase business usage of the workforce system and thereby achieve greater access to employment opportunities for youth job seekers;
- Provide greater incentives for employers to retain and retrain current employees to avoid layoffs; and to create new jobs;
- Create additional opportunities for new workers, and for unemployed and underemployed workers to speed their return to full-time employment;
- Support Colorado's small business and entrepreneurial start-up economy; and
- Address skills gaps within Colorado's middle skills occupations to increase the talent pipeline needed for expanding and relocating businesses, and for sector partnerships.

Multiple factors impact Colorado's request to expand the OJT sliding scale to 90% of the hourly wage:

- Colorado is a small business state with over 96% of its companies employing 50 or fewer employees. This translates to 240,048 of the 249,356 businesses registered with the Unemployment Insurance tax system, with only 8,277 employers having 51-250 employees and 1,031 having more than 250 employees. At the same time a June 10, 2013, article in Forbes Magazine highlighted the "entrepreneurial renaissance" in Colorado by quoting the 2012 Colorado Start-up Report, which states that Colorado launches a new startup company every 72 hours, or over 120 per year. The Kaufman Index for 2015, which is based on research conducted by the Kaufman Foundation in partnership with the US Census Bureau, indicates that Colorado is ranked as 4th among the states regarding the number of startup businesses per 100,000 of population. (A startup is defined as a business less than 1 year old that has at least one employee.) Together startups and established small businesses account for the vast majority of job growth within the state, but have limited resources to train staff.

- Although Colorado's overall economy has demonstrated a sustained pattern of growth during 2015, there are still pockets of double-digit unemployment, particularly in the rural parts of the state. This is in contrast to the chief complaint that local business services representatives hear from employers across the state: they are unable to find qualified employees with the skill sets they need. Colorado's recently published 2015 Talent Pipeline Report states that the "skills gap" identified by employers correlates directly to educational achievement levels, with the lowest achievement levels attributable to racial minorities and low income populations. These individuals represent a significant segment of the groups with barriers to employment that WIOA sets as a priority for enrollment in both the youth and adult programs.
- From 2009-2010, with the state unemployment rate reaching 8.8%, Colorado launched the Hire Colorado initiative with TANF reserve funds made available through the federal Recovery Act, and targeted to unemployment insurance claimants meeting TANF income requirements. This highly successful program focused on work-based learning strategies including OJTs and transitional jobs, serving 1,122 employers and resulting in a 75% entered employment rate for the 1,721 participants. In addition, participating businesses provided overwhelmingly positive feedback to customer satisfaction surveys conducted during the project. In support of WIOA's focus on work-based learning and effectiveness in serving businesses, Colorado is seeking to expand OJT opportunities to both formula and upcoming discretionary initiatives, utilizing the successes of the Hire Colorado model.

In Summary:

Increasing the maximum sliding scale reimbursement for OJT to 90% will allow local areas to expand their OJT programs to address the needs of Colorado's small businesses and serve those with barriers to employment. It will also allow the state and local areas to model OJT initiatives after proven work-based learning strategies. CDLE will issue policy guidance, with input from the local workforce areas, regarding implementation of the sliding scale, which will adhere to the principles of training workers in high-demand occupations and ensure accountability on the part of local boards and service providers.

4. Individuals Impacted by the Waiver

- Unemployed and underemployed workers who do not have transferrable or marketable skills, including transitioning military service members and long-term unemployed veterans;
- Individuals entering the workforce for the first time;
- Disconnected out-of-school youth who are unable to compete for limited job openings;
- Businesses, particularly small businesses and entrepreneurial startups, needing to retain current workers, and/or hire additional workers to sustain or expand their productivity, who do not have immediate resources to do so; and
- Local boards needing greater flexibility for timely implementation of grants and initiatives that can offer work-based learning opportunities.

5. Process Used to Monitor Progress in Implementing the Waivers: CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite utilizing outcome reports generated from CDLE's statewide databases. Should this waiver request be granted, CDLE will ensure regular review of WIOA programs and discretionary grants to monitor the outcomes and impacts of this waiver authority.

Specifically, Colorado has issued Program Guidance Letter #15-13-WIOA: PY15 Waiver Policy that contains the following waiver oversight process:

> *Waiver Monitoring and Accountability:*
> *In TEGL 26-09, USDOL stated its intent to enhance its oversight and monitoring of waivers to determine what impacts waivers have on performance outcomes, gain insight into how states are using waivers, and to ensure that the integrity of the waiver guidelines are maintained.*
> To address the same areas, CDLE will be adding the monitoring of waivers to its quarterly and annual monitoring processes in order to track how waivers have changed the activities of the local areas and directly or indirectly affected local area performance, and to insure compliance with waiver guidelines. CDLE will utilize the following mechanisms to track and monitor the use of waivers in each local area:
>
> - Local plans
> - Expenditure Authorizations for WIOA and Wagner-Peyser formula programs that issue funding and serve as modifications to grant agreements
> - Local policies
> - Activity and performance reports

6. Process for Notice of Local Boards and Opportunity to Comment: The waiver request will be published for a period of three weeks on the public websites maintained by CDLE and the Colorado Workforce Development Council, allowing for public comment on its content and potential impact. In addition, a copy of the waiver will be available for public inspection at CDLE offices, and electronic copies of the waiver will be sent via e-mail to local boards and one-stop operators. The waiver requests and any comments received will be submitted to the US Department of Labor.

TITLE I-B ASSURANCES

		STATEMENT	REFERENCES	DOCUMENTATION and COMMENTS

☑	1.	The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of career and training services to individuals who are low income, public assistance recipients or basic skills deficient;	•Title I of the WIOA of 2014, Sections 3, 134(c)(3)(E). •TEGL 3-15: Guidance on Services Provided through the Adult and Dislocated Worker Program under WIOA and Wagner-Peyser, and Guidance for the Transition to WIOA Services.	The State has issued and implemented Policy Guidance Letter 15-12-WIOA: WIOA Title I Adult Priority of Service
☑	2.	The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	•U.S.C. Title 38 Chapters 41 and 42, as amended specifically: 4103A, 4104, 4211-4215 • Public Law 107-288 - Jobs for Veterans Act. • TEGL No. 19-13: Jobs for Veterans' State Grants (JVSG) Program Reforms and Roles and Responsibilities of American Job Center (AJC) Staff Serving Veterans • TEGL No. 20-13: Designation of Additional Veterans Eligible for Services from the DVOP Specialist	The State has issued and implemented Policy Guidance Letter 14-08-V: Responsibilities of JVSG and AJC Staff
☑	3.	The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	• Title I of the WIOA PL 113-128 – July 22, 2014; WIOA Sections 107, 111(b), and 121(c),(d), (g), and (h); • TEGL 27-14: WIOA Transition Authority for Immediate Implementation of Governance Provisions	The State has issued Policy Guidance Letter 15-07-WIOA: Local Workforce Development Board Policies
☑	4.	The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA	WIOA Section 107(c)(2)	The Colorado Workforce Development Council last certified boards for a two-year period ending June 30, 2016. The existing Policy

		section 107(c)(2);		Guidance Letter (PGL 14-06-WIA) will be updated to ensure that the next local board certification process will take place by July 1, 2016.
	5.	Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	N/A	N/A
☑	6.	The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Colorado Revised Statutes: 8-83-223	State statute defines the process for consultation with chief local elected officials for determining within-state distributions. CRS 8-83-223
☑	7.	The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	• WIOA section 181(b)(7)	• The State assures compliance at the state level through Internal monitoring. • This provision of WIOA is referenced in the funding provisions of the bilateral grant agreement utilized

				with sub-recipients of the State and is monitored by the State to ensure compliance.
☑	8.	The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	• WIOA Section 127(b)(1)(C) and (b)(2), (3) • WIOA Sec. 128(b)(1), (2), (3) • WIOA Sec. 132(b)(1)(B), (b)(2) • WIOA Sec. 133(b)(1), (2) & (3)	• The State assures that all within state formulas contain the 90% hold harmless factor so that no local area suffers significant shifts in funding
☑	9.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	• WIOA Title IV • 34 CFR Part 361	The Colorado Division of Vocational Rehabilitation (DVR) administers the relevant state laws for Colorado, and assures cooperation with the Colorado Department of Labor and Employment, who oversees the WIOA Title I and III programs. DVR will be transferred to CDLE effective 7-1-2016.
☑	10.	Priority of Service for covered persons is provided for each of the Title I programs; and	• Public Law 107-288 - Jobs for Veterans Act. • U.S.C. Title 38 Chapters 41 and 42, as amended specifically: 4103A, 4104, 4211-4215	The State assures priority of service for covered persons is provided in each of the Title I programs. CDLE has issued and implemented Policy Guidance Letter 14-07-V available at Priority of Services for Veterans and Eligible

				Spouses
☑	11.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	• WIOA Sec. 101 (d)(10) • WIOA Sec. 116(d) • WIOA Sec. 189(i)	Should the State be granted any WIOA waivers, the State assures that it will report on the impact and outcomes of such waivers in its WIOA Annual Report.
☑	12.	The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	• WIOA Sec. 184(a)(3) • 2 CFR 200 and 2 CFR 2900	The State assures that financial and program monitoring of all sub-recipients (local areas) will occur on an annual basis to ensure compliance. The State has issued and implemented two Program Guidance Letters available at: • 15-01-WIA Performance and Compliance Review Process • 15-11-F Revised Audit and Debt Collection Procedures

Wagner-Peyser Employment Services

(a) Employment Service Professional Staff Development.

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

Colorado is developing a comprehensive plan to address the professional development of Employment Service staff, as well as core partner staff within the statewide system of one-stop centers. Major components of the plan will include:

- Access to the National Association of Workforce Development Professionals (NAWDP) workforce professional certification courses
- Annual Think Big Youth Forum, which provides workshops on services to youth customers for all workforce partners
- Monthly Operators Training Webinars covering a wide range of topics related to WIOA implementation and partner program requirements
- Spring 2016 Statewide Training Conference open to all WIOA partners and focusing on WIOA implementation and partner program requirements
- Annual Business Services Summit for business services representatives across the statewide one-stop system.

Additional ongoing training strategies will be incorporated to address elements of the WIOA regulations once they are published and to assist with the implementation of each state policy that is issued to support the transition to a comprehensive one-stop system under WIOA requirements.

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

CDLE's Workforce Development Programs (which administers the Title I and Title III WIOA core programs) and the Unemployment Insurance Division formalized their long-standing partnership in early 2012 with the co-location of Workforce Development representatives at the Unemployment Insurance offices to coordinate reemployment initiatives for claimants and the long-term unemployed. The two divisions work closely to strategically plan and support implementation of initiatives designed to benefit their shared customers. These initiatives have included the:

- Cross-training of approximately 120 UI staff on the roles of the workforce centers
- Cross-training of approximately 70 workforce center staff on the Unemployment Insurance benefits system and UI eligibility issues

- Joint issuance of state policies to the workforce system regarding reemployment services such as Links to Reemployment (UI Profiling) and approved training status
- Joint development of online resources targeted to the reemployment of UI customers

This system of cross-training and joint communications will be expanded to include the Title II Adult Education and Family Literacy and Title IV Vocational Rehabilitation core partners. Initial steps have been taken to include these partners in all aspects of cross-training and awareness initiatives, including UI eligibility issues.

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

Workforce representatives throughout the statewide network of workforce centers are trained to provide general assistance and information to customers who have questions about filing a claim for unemployment compensation. This includes assistance other general unemployment insurance questions. Questions that require specific UI expertise are referred to UI for responses.

Colorado provides direct phone line access to a UI representative in 30 workforce center offices across the state (UI hot line). These phone lines bypass the main call center phone lines and expedite the resolution of any outstanding unemployment insurance questions. In addition, UI merit staff members are physically present in two of our high volume offices to address UI specific concerns. Additionally, UI has developed a Call Back form that allows claimant customers to receive a contact back from a UI representative based on the most convenient time and method. Workforce representatives complete this for and provide details about the claimant's question in order for the UI representative to be prepared to assist this customer in a timely and effective manner.

Colorado strives to continually improve upon existing processes and will expand upon what is already in place to include more workforce center offices throughout the state. As the need for additional access increases, enhanced technology, such as online chat, will be considered to meet the UI expertise access requirements of WIOA. The workforce system will continue to evaluate the triage process for referring claimant customers to UI expertise to ensure that questions specific to an individual's claim are referred to UI.

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

In 2014, Colorado established a strategic plan for reemployment initiatives that outlines the state's direction for the year and future years, with the goal of reducing the average

duration of weeks on unemployment compensation from 15.2 weeks to 12 weeks by June 2017. The plan contains components to analyze data, research state and national initiatives for integration, and enhance customer messaging, and it continually evolves due to fluctuating market conditions. In support of the plan:

- The statewide network of workforce centers provides reemployment services to all customers, including UI claimants. Reemployment services include basic labor exchange, orientations to workforce services, the provision of labor market resources and information, workshops, one-on-one services, and referrals to jobs.
- Additionally, Colorado administers Links to Reemployment, formerly known as Worker Profiling and Reemployment Services, to claimants who have recently received a first benefit payment. Colorado recently made technological enhancements to improve the efficiency of the program and will continue to evaluate the program effectiveness for additional process improvements.
- Colorado is currently preparing for the administration of the Reemployment Services and Eligibility Assessment initiative for UI claimants. This is scheduled to begin in January 2016.
- UI partnership initiatives are established for STC, TAA, TRA, ATAA, and RTAA. This includes recruitment efforts for special populations, such as Veterans and long-term unemployed customers.

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

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

Wagner Peyser funds support the basic labor exchange services and all career services that are made available to all workforce center customers, including UI claimants. Relevant information about a claimant's status, and the completion of reemployment activities is securely shared between the two agencies' databases through a file transfer process.

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

Colorado law requires claimants to register for work with the State employment service after filing a UI claim. Workforce Center representatives review the work registration status and determine the appropriate number of job contacts that must be made each week, as appropriate.

(3) *Administration of the work test work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and provision of referrals to and application assistance for training and education programs and resources.*

UI claimant customers must register or reactivate their registration with the state's online labor exchange system, called Connecting Colorado, unless they have been excused to register due to a job attachment or are participating in approved training. The administration of the work test generally occurs during the registration process or through mandated claimant orientations or appointments. Workforce center representatives have been trained on basic UI eligibility requirements and how to identify and refer "Able and Available" or A&A issues to UI merit staff. To strengthen the partnership between UI and the workforce system, training on identifying and referring A&A issues to UI will be readily available to the statewide network of workforce centers. Customers have access to job openings and job placement services both online and in-person. Workforce representatives are available to assist with in-person referrals and recommendations on work-search strategies.

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

During workforce center orientations, customers receive information regarding workforce services, programs and partner resources. This includes information about internal and external training and educational programs, including referrals to WIOA. Customers have access to resources and handouts. Online, customers may research information about different training programs within their community, statewide, and nationally. Workforce center representatives provide individualized information and resources that assist the customer in making the most informed choice.

Wagner-Peyser Agricultural Outreach Plan (Migrant and Seasonal Farm Workers Program)

Summary of Submission Requirements

The Agricultural Outreach Plan (Ag Plan) sets policies, and objectives in providing Wagner-Peyser (WP) services to the agricultural community, specifically Migrant and Seasonal Farm Workers (MSFWs). The Colorado Department of Labor & Employment (CDLE) provides these services through the One-Stop Career Center system to ensure that MSFWs receive the full range of employment, training, and educational services on a basis that is qualitatively equivalent and quantitatively proportionate to the services provided to non-MSFWs. This Ag Plan presents the following information:

- **Assessment of need:** An assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State to include employment, training, and housing. A review of the resources available and their effectiveness is included.
- **Outreach activities:** A description of ways the State will ensure that MSFWs have equal access to employment opportunities. A description of the State's proposed outreach activities including strategies on how to contact farmworkers who are not being reached by the normal intake activities conducted by the employment service offices to include numerical goals and amount of full time staff.

- **Services provided to MSFWs through the One-Stop Delivery System:** A description of ways the State will ensure that MSFWs have equal access to employment opportunities. Coordinating outreach efforts with WIOA Title I section 167 grantees and other public and private community service agencies and MSFW groups. These outreach activities will include the explanation of services available at the one-stop centers, explanation of their basic rights and the marketing of the employment services complaint system.
- **Services provided to agricultural employers through the One-Stop Delivery System:** A description of how the State will promote and provide labor exchange services and identify agricultural employers expected to employ MSFWs.
- **Review and comment from key stakeholders**

Assessment of Need:

The charts below are divided by region and address the following plan requirements:

A. Review of the previous year's agricultural activity in the state.
B. Review of the previous year's MSFW activity in the state.
C. Projected level of agricultural labor employed in each of the crops identified. Estimate of the number of MSFWs involved in each, and indication of crop areas that experienced labor shortages.
D. Projected level of agricultural activity expected in the state in the coming years, including any changes from last year's crop activities.
E. Projected number of MSFWs in the state in the coming years, including any changes in number of MSFWs involved in each crop activity.

Most of the data was compiled from "Colorado Agricultural Statistics 2014," supplemented by employer interviews to obtain information on smaller crops; it should be noted that some of the interviewed employers stated that they either reduced, or do not plan to expand, their acreages due to increasing labor and supply costs, and land and water shortages.

Northern Colorado (Brighton and Greeley)

Review of 2015 Agricultural Activity										
Crop	**Onions**	**Beans**	**Sugar Beets**	**Carrots**	**Potatoes**	**Lettuce**	**Cabbage**	**Spinach**	**Broccoli**	**Corn Sweet Corn, Silage, Grain**
Acreage	17,000	18,000	11,200	1,200	800	785	1,010	135	380	241,050

Labor										
Pre-harvest	200	100	100	30	0	150	150	40	20	60
Harvest	900	50	50	100	100	330	300	160	60	300
Months of Heavy Activity	Mar–Nov	Aug-Sep	May-Oct	Aug–Sep	Aug–Sep	Mar-Oct	Mar-Nov	June	Apr-Nov	July-Sep
Total Agricultural Job Openings Received (including H2A) = 305										

Review of 2015 MSFW Activity										
Crop	**Onions**	**Beans**	**Sugar Beets**	**Carrots**	**Potatoes**	**Lettuce**	**Cabbage**	**Spinach**	**Broccoli**	**Corn Sweet Corn, Silage, Grain**
Labor Estimate	1,050	100	100	130	100	330	470	120	80	520
MSFWs Involved	900	50	50	85	60	200	360	80	60	340
Labor Shortages	No	No	No	No	No	No	No	No	No	No
						HIGH	**LOW**			
Est. Local Seasonal Population			750	Migrant Worker Influx		700	200			
MSFWs Registered			240	Est. MSFWs in the Area		1,500	800			

Projected Level of Agricultural Activity for 2016-2020										
Crop	**Onions**	**Beans**	**Sugar Beets**	**Carrots**	**Potatoes**	**Lettuce**	**Cabbage**	**Spinach**	**Broccoli**	**Sweet Corn, Silage, Grain**
Acreage	9,550	18,000	11,600	1,400	800	825	1150	155	220	220,000
Labor Needs	1,000	100	100	100	100	350	400	130	40	300
Projected Agricultural Openings = 400 per year										
Projected Number of MSFWs in the Area = 1,600 per year										

No major changes are anticipated in agriculture productivity for northern Colorado over the next four years. Major crops, with the exception of sugar beets and corn, will be planted and harvested using hand labor. Area crew leaders will handle most of the hand labor work for this area, and H2A workers will be utilized when U.S. Workers are not found. Seasonal growers in

the northern Colorado area stated during interviews that crop production will remain the same, barring unforeseen events.

Weld County farmer Rod Weimer of Fagerberg Farms received the Precision Ag Farmer of the Year Award, a national recognition, for his Sub-Surface Drip Irrigation System. The system is fully automated, can be used to apply fertilizer as well as water, and can be controlled by a smart phone from remote locations. It reduces water usage by up to 40% and nitrogen by at least 30% less nitrogen, and helps prevent downstream groundwater contamination. It also prevents soil erosion in the onion fields through the use of cover for crops as protection for seeded onions.

Arkansas Valley (Lamar and Rocky Ford)

Review of 2015 Agricultural Activity		
Crop	**Onions**	**Melons**
Acreage	720	1185
Labor Used		
Pre-harvest	180	200
Harvest	300	300
Months of Heavy Activity	Apr-Sep	Jun-Sep
Total Agricultural Job Openings Received = 100		

Review of 2015 MSFW Activity		
Crop	**Onions**	**Melons**
Labor Estimate	630	315
MSFWs Involved	400	175
Labor Shortage	YES	YES

				HIGH	**LOW**
Est. Local Seasonal Population	600	Migrant Worker Influx		600	33
MSFWs Registered	132	Est. MSFWs in Area		500	N/A

Projected Level of Agricultural Activity for 2016-2020			
Crop	**Onions**	**Melons**	**Mixed Vegetables**
Acreage	1,000	1,482	1,385
Labor Needs	250	400	300
Projected Agricultural Openings = 250			

Projected Number of MSFWs in the Area = 600

In 2014, southern Colorado ranked 8th in the nation in cantaloupe production, dropping from 4th place in 2010 as a result of the 2011 listeria outbreak that was traced back to a Colorado farm which significantly impacted the Rocky Ford cantaloupe industry. In response, Colorado formed the Rocky Ford Growers Association and changed its cantaloupe growing practices. The Rocky Ford cantaloupe industry is slowly regaining its trust among consumers and is gradually increasing its acreage year to year. According to the association, more than 2,000 acres of cantaloupes were planted this year; however, some growers reported a 45% loss of production due to severe flooding and hail damage in southern Colorado.

San Luis Valley (Monte Vista)

Review of 2015 Agricultural Activity					
Crop	Potatoes	**Lettuce**	**Spinach**	**Carrots**	**Cabbage**
Acreage	73,000	1,300	800	2,000	300
Labor Used					
Pre-harvest	600	400	5	50	15
Harvest	2,200	600	20	50	15
Months of Heavy Activity	Sep-Oct	Jul-Sep	May-Oct	Aug-Sep	Aug-Sep
Total Agricultural Job Openings Received = 300					

Review of 2015 MSFW Activity					
Crop	Potatoes	**Lettuce**	**Spinach**	**Carrots**	**Cabbage**
Labor Estimate	2,900	1,200	800	100	30
MSFWs Involved	850	400	20	50	10
Labor Shortages	N0	No	No	No	No

				HIGH	**LOW**
Est. Local Seasonal Population		2,000	Migrant Worker Influx	2,000	100
MSFWs Registered		406	Estimated MSFWs in Area	2,000	N/A

Projected Level of Agricultural Activity for 2016-2020					
Crop	**Potatoes**	**Lettuce**	**Spinach**	**Carrots**	**Cabbage**
Acreage	52,000	900	550	1,000	200
Labor Needs	2,000	450	50	150	20
Projected Agricultural Openings = 2,600					
Projected Number of MSFWs in the Area = 1,300					

Western Colorado (Delta)

Review of 2015 Agricultural Activity								
Crop	**Onions**	**Corn (Sweet)**	**Lettuce**	**Beans**	**Cherries (Sweet)**	**Cherries (Tart)**	**Peaches**	**Apples**
Acreage	750	470	100	2,100	240	280	550	3,400
Labor								
Pre-harvest	75	30	35	5	0	0	15	75
Harvest	200	150	100	10	12	50	80	300
Months of Heavy Activity	Jul-Oct	Jul-Sep	Jun-Sep	Aug-Nov	July	Jul-Aug	Aug	Sep-Oct
Total Agricultural Job Openings Received = 45								

Review of 2015 MSFW Activity								
Crop	**Onions**	**Corn (Sweet)**	**Lettuce**	**Broccoli**	**Cherries (Sweet)**	**Cherries (Tart)**	**Peaches**	**Apples**
Labor Estimate	275	180	135	70	25	35	45	325
MSFWs Involved	275	150	135	70	25	35	30	250
Labor Shortages	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

			HIGH	**LOW**
Estimated Local Seasonal Population	60	Migrant Worker Influx	350	50
MSFWs Registered	60	Estimated MSFWs in Area	800	N/A

Projected Level of Agricultural Activity for 2016-2020								
Crop	**Onions**	**Corn (Sweet)**	**Lettuce**	**Beans**	**Cherries (Sweet)**	**Cherries (Tart)**	**Peaches**	**Apples**
Acreage	750	470	100	2,100	240	280	550	3,400
Labor Estimate	275	180	135	70	25	35	45	325
Projected Agricultural Openings = 65								
Projected Number of MSFWs in the Area = 600								

Colorado ranks 1st in the nation in proso millet production, which is primarily used in bird feed but is increasingly used in health food due to the lack of gluten. Proso millet generated an annual value of $27,552,000 for the 210,000 acres planted in 2014. Proso millet is popular because it has a short growing season and needs little water.

Colorado ranked 2nd in the nation for sheep production for 2014 with approximately 195,000 head of sheep. Wages will increase significantly over the next two years due to the new H2A Special Procedures in Herding and Range Production of Livestock regulations, which could decrease sheep production and increase the prices for lamb, sheep and associated products to increase.

One of Colorado's largest crops is potatoes. Colorado ranks 6th in potato production. Projected acres for the 2016 planting season will remain stable.

Assessment of resources:

Colorado has migrant coalitions throughout the state that enable outreach workers to collaborate, learn about services available to the MSFWs, and coordinate services. The Colorado Migrant and Rural Coalition (State Coalition) includes representatives from Rocky Mountain Service Employment Redevelopment (the NFJP 167 program,) Migrant Head Start, Migrant Education, Colorado Legal Services, Catholic Charities, Food Banks, Migrant Health, Colorado Department of Agriculture, Environmental Protection Agency, Civil Rights, Workforce Centers, Farm Labor Housing and other agencies.

Affordable housing for farm workers is a critically needed resource in Colorado, as it is in most states, because farmworkers have a difficult time finding housing that does not require a long term lease and is affordable. The Community Resources & Housing Development Corporation plans to build farmworker housing in the Adams County area, but this project is in the initial planning stage.

Outreach Activities Plan for Program Year (PY) 2016 - 2019

A. **Introduction**

1. During PY16-PY19, the six significant workforce offices (Brighton, Delta, Greeley, La Junta, Lamar, and Monte Vista) will continue to provide quality employment services and referrals to appropriate agencies for assistance to the MSFW population.

2. Colorado is designated as a significant MSFW state, with a predominantly Spanish-speaking MSFW population. The Colorado Department of Labor and Employment (CDLE) will continue to administer its outreach program with bilingual (i.e. English/Spanish) staff.

3. CDLE entered into an on-going statewide Memorandum of Understanding (MOU) with Rocky Mountain Service Employment Redevelopment (RMSER) and Migrant Education for inter-agency referrals and data sharing. These MOUs help facilitate effective coordination of outreach and increase registration activities for all service providers.

4. The State's workforce development system is state-administered and locally-controlled. The contracts with each workforce area will contain provisions to ensure that MSFWs receive the full range of employment and training services offered to the general public. CDLE will continue to provide technical assistance to the workforce areas to help ensure that the needs of MSFWs are addressed, and that the workforce development system is in full compliance with the Judge Richey court order and federal rules and regulations.

5. Colorado's strategies to identify the number of MSFWs the State will reach through outreach include the following:
   - Each of the six significant offices will address outreach in their area plan. Planning requirements have been detailed in a Policy Guidance Letter **(PGL 09-05-P)** available for review at:

     http://www.coworkforce.com/PGL/pgl/externalpgl.htm

     The local outreach plans allow the State Monitor Advocate to track the six significant offices and their unique issues.
   - Colorado will increase the MSFWs' ability to access career services in the One-Stop centers through partnerships with other agencies that target the same population. Some of these agencies include: RMSER, Migrant Education, the local migrant health clinics, faith- based migrant community associations and Colorado Legal Services.
   - The State Monitor Advocate will continue to regularly attend the migrant coalitions in La Junta, Monte Vista, Greeley, Denver, Pueblo, and Delta and explain how other agencies can partner with CDLE to help their clients access the full range of services offered by the six significant One-Stop centers. The outreach workers in each of these areas will continue to actively participate in local migrant coalition activities.

B. Proposed Outreach Activities

In accordance with 20 CFR 653.107(i-p), MSFW outreach efforts will be conducted through personal contacts with MSFWs, employers and other agency staff; public meetings; and distributing pamphlets and other relevant printed materials. MSFW outreach workers will maintain records of their outreach efforts in a daily outreach activities log, and use the information to prepare and submit monthly reports to the State Monitor Advocate during periods of peak agricultural activity. MSFW outreach staff will make a concerted effort to provide agricultural employers with pertinent information regarding the procedures for the intra/interstate recruitment of temporary agricultural workers. All six significant offices will continue to recruit and hire Outreach

Workers who are bilingual and have a migrant background or experience working with the migrant farmworker population when vacancies occur.

Outreach Activities

1. Colorado will ensure that the six significant offices continue to employ bi-lingual/bi-cultural outreach workers to meet the needs of MSFW clients, and to employ outreach workers full time during the peak season as mandated by 20 CFR Part 653.107(h)(3)(i).

2. Colorado will maintain 6.0 FTE staff positions assigned to outreach activities with no reductions.

3. Colorado will maintain its cooperative agreement with RMSER, Colorado's federal 167 provider. All six significant offices will continue to collaborate with RMSER in order to meet the needs of MSFW clients. Colorado has migrant coalitions in Denver, Greeley, Delta, La Junta, and Monte Vista. Coalition partners include 167 providers Board of Cooperative Educational Services (BOCES), RMSER, migrant education representatives, migrant housing representatives, food bank representatives and various other representatives from the non-profit sector. The State Monitor Advocate will continue to attend migrant coalition meetings on a regular basis, and MSFW outreach workers will continue to develop new ways to partner with members of the coalition to increase services for the MSFW population.

4. In the six significant offices, non-MSFW outreach staff has been cross-trained on how to take Employment Services (ES) related complaints; refresher training will be provided on an as-needed basis, including full cross-training for all new staff. A policy guidance letter **(PGL 09-06-P)** is in place to address all ES complaint requirements and procedures, and will be revised and updated on an as-needed basis. Each workforce center will continue to prominently display complaint posters and complaint fliers for customer's ease of information and provide information about the complaint system during outreach contacts. The complete document is available on-line for review at:

   http://www.coworkforce.com/PGL/pgl/externalpgl.htm

5. Several agencies also employ MSFW outreach workers in addition to the CDLE program:

RMSER (167 provider), Migrant Education Board of Cooperative Educational Services (BOCES), RMSER Migrant Head Start and also migrant health providers. The CDLE MSFW outreach workers will continue to routinely conduct co-outreach activities with their counterparts in these agencies. Plaza del Sol and Plaza Milagro in Greeley routinely conduct a migrant information evening share MSFW services providers set up a tent and inform the MSFW agencies about their programs and requirements and also provide information to the migrants that are in attendance.

Each of the six significant offices will continue to develop and utilize customized handouts that describe the services offered by the Workforce Centers, and share them with migrant outreach workers in other organizations. CDLE MSFW outreach workers and the State Monitor Advocate will continue to work together with the migrant coalitions in Greeley, Monte Vista, and La Junta to organize and host a migrant appreciation picnic at the end of each season. The picnics will provide an opportunity for coalition members to work together to meet the needs of the MSFW population. The Delta area will continue to host an annual health fair for the farmworker community.

6. Colorado will continue to work with the non-agricultural employers through Colorado Workforce Speaks (formerly: Limited English Proficiency (LEP) taskforce.) and provide a venue to help non-agricultural employers recruit and hire LEP clients, many of whom are MSFWs. CDLE will continue to provide resources for Colorado Workforce Speaks through its e-Colorado website: https://e-colorado.coworkforce.com/.

7. CDLE will continue to promote labor exchange services to the agricultural employers by participating in agricultural conferences. The State Monitor Advocate will maintain a very close working relationship with the Colorado Department of Agriculture and identify developing agricultural trends as well as current employer needs. Planned activities include joint training sessions for outreach workers and Agricultural employees on issues such as the Worker Protection Standard, pesticide safety training, revised regulations, and the range of services available for agricultural employers and workers through the local workforce centers.

8. Colorado will continue to utilize annual growers' meetings to help identify agricultural employers expected to hire MSFWs, and to provide information to the growers regarding changes regarding to housing, pesticide protection and H2A regulations. The Agricultural recruitment system will continue as a resource to bring migrant workers to the state of Colorado. The State Monitor Advocate will continue to maintain close working relationships with the State Monitor Advocates from Texas and New Mexico (Colorado's labor supply states) to ensure equal opportunity for U.S. migrants for Colorado jobs.

C. Numerical Goals

The following chart shows the annual performance goals for each of the MSFW significant offices, including the number of MSFW outreach contacts and the number of staff days (based on eight hour days) that will be devoted to outreach.

Local Office	Outreach Contacts	Staff Days
Brighton	500	60
Delta	150	60
Greeley	300	60
Lamar/Rocky Ford	200	120
Monte Vista	150	60
TOTAL	1,250	360

In addition, 300 MSFWs will be contacted by other agencies through cooperative arrangements, and 700 MSFWs will be registered by outreach workers. An estimated 100 agricultural employers will be contacted by outreach staff to obtain job orders, conduct job development and provide assistance. It is estimated that Colorado will contact a total of 100 agricultural employers per year, as many of the agricultural employers routinely list job postings with the six significant offices, and these employers come back to utilize our services year after year.

Services Provided To MSFWs Through The One Stop Delivery System

1. MSFW outreach functions will be carried out by 6.0 FTE during PY16-PY20, with occasional backup from bilingual staff in significant offices with multiple bilingual staff. Workforce center staff will utilize approximately 360 staff days to provide MSFW outreach services to the farm worker community. Career services required under WIOA Title I will be provided to the MSFW clients by the six bilingual MSFW Outreach workers employed in the six significant offices. Colorado will utilize its statewide electronic registration, Connecting Colorado, to capture data on Migrant and Seasonal Farm Workers, including an explanation of how they qualify as a MSFW. The system will also be used to provide job referrals and enroll MSFWs into WIOA services. The MSFW outreach workers and workforce staff will inform Migrants of training opportunities to improve their skills, and provide informational packets that include resources for English as a Second Language (ESL), Migrant Assistance Program (MAP) and training opportunities available through the WIOA 167 provider.

2. CDLE and RMSER, the WIOA 167 grantee, have had an MOU since 1995, and are currently updating it to comply with the new WIOA requirements. The MOU includes, but is not limited to, co-location and collaboration in communities where both agencies have a presence, and helps ensure that the needs of MSFWs that do not have access to the One Stop Centers are met. CDLE and Migrant Education have an interagency cooperative agreement that covers the six significant office areas to establish and demonstrate effective coordination of outreach and increase registration activities for all service providers; the agreement will be expanded to include all offices statewide.

These cooperative ventures between CDLE, RMSER, and Migrant Education have generally improved the operational knowledge of outreach staff, and reinforced principles and strategies. This successful partnership has provided the vehicle to better serve and to immediately expand the range of available services to the MSFW population.

Services Provided To Agricultural Employers Through The One-Stop Delivery System

1. The Migrant and Seasonal Farm Worker Program is designed to enhance and expand services to meet the needs of the agricultural industry. Colorado will provide services to agricultural employers by effectively providing information about services available through the workforce development system and obtain sufficient information about the employer's needs to provide appropriate services. Outreach workers will continue to conduct meetings with large growers and farm labor contractors to facilitate the exchange of information and maximize the effectiveness of the program. Staff will promote the use of the workforce centers to recruit workers by helping employers assess their labor needs and making appropriate referrals to their job openings.

2. Services to agricultural employers will be provided by MSFW outreach workers and other workforce center staff through planned personal visits and promotional telephone contacts with the employer.

3. CDLE will continue to conduct pre-occupancy housing inspections to growers who provide housing to MSFWs, or to nonimmigrant aliens admitted to the United States under the H-2A Temporary Labor Certification program. Colorado continues to experience a shortage of agricultural workers and the number of H2A applications has remained constant for the last two years, although the Adverse Effect Wage Rate (AEWR) changes on a yearly basis.

4. Outreach workers will continue to develop and maintain productive relationships with agricultural employers, who are identified in several ways, including knowledge of the local labor market, incoming job orders, employer associations, and

word-of-mouth. Colorado will continue to utilize existing processes to link available MSFWs with employers, including ongoing collaborative efforts by workforce centers and local community-based organizations that provide services to MSFWs.

5. Each workforce region with an MSFW significant office will continue to actively promote all aspects of labor exchange services available to agricultural employers through a variety of venues such as attending in meetings for employer associations and farm labor contractors, and participating in MSFW sponsored meetings and conferences.

6. State and local workforce center staff will provide information on local labor market conditions and intrastate and interstate temporary agricultural worker recruitment requirements (including information on the Alien Labor Certification process). Information will also be provided on the Migrant and Seasonal Agricultural Worker Protection Act (MSPA) and how it affects agricultural employers and migratory workers.

Other Requirements – Monitor Advocate:

The State Monitor Advocate will continue to write and comment on the four year Agricultural Outreach Plan.

Other Requirements – Affirmative Action Plans (AAP):

States with designated significant affirmative action local offices are required to submit an AAP in accordance with 20 CFR 653.111.

Colorado is not represented in the top 20% of MSFW activity nationally, and therefore does not fall within the Affirmative Action category, nor is it required to have an Affirmative Action plan for its significant MSFW offices.

There is no imbalance in the racial or ethnic group in the six significant local offices. Each of Colorado's significant offices employs Outreach staff who is bilingual and bicultural reflecting the needs of the Spanish speaking MSFW population in the state of Colorado. Colorado has developed a plan to meet the needs of potential Non-Spanish speaking MSFW populations. The plan is available on https://e-colorado.coworkforce.com/ in the "Colorado Workforce Speaks" team room

Review of Public Comment:

This plan will be shared with Chief Executive Officer of Rocky Mountain SER, Colorado's 167 provider, Colorado Department of Education Migrant Education Program and with the Colorado Department of Agriculture, and will be published on CDLE's public website for a period of no less than 30 days to garner public comments prior to submission to USDOL. All comments will be compiled and sent to USDOL with the plan.

WAGNER-PEYSER ASSURANCES

		STATEMENT	REFERENCES	DOCUMENTATION and COMMENTS
☑	1.	The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));	• WIOA sec 121(e)(3) • 20 CFR 652.215 • WIOA proposed regulations at 652.215	Colorado has been granted Wagner-Peyser demonstration state status. As such, the WP Employment Service is delivered by state and county merit staff that also delivers WIOA services. This allows full integration of the WP program, a step beyond co-location.
☑	2.	The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers;	• 20 CFR 653.111	Colorado assures that the State agency is complying with the referenced staffing requirements in its six significant MSFW one-stop centers.
☑	3.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	• WIOA Title IV • 34 CFR Part 361	The Division of Vocational Rehabilita-tion (DVR) administers the relevant state laws for Colorado, and assures cooperation with the Colorado Department of Labor and Employment, who oversees the WIOA Title I and III programs. DVR will be transferred to CDLE effective 7-1-2016.
☑	4.	State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in	• 20 CFR 652.215 • WIOA proposed regulations at 652.215	• Colorado has been granted Wagner-Peyser demonstration state status. As such, the WP

		accordance with Department of Labor regulations.		services are delivered by state and county merit staff. Colorado assures that merit-based public employees at the state and county level provide WP funded services in accordance with USDOL regulations.

Adult Education and Family Literacy

In June 2015, in an effort to better reflect the needs of adult learners in Colorado and to integrate services within the Colorado talent development system, the Colorado Department of Education reorganized the form and function of the team working with adult education and family literacy to form the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI). This reorganization began with revisioning adult education in Colorado with partners from workforce, labor and employment, policy advocates, higher education, community-based organizations, and the state's adult education professional organization. As a result of this effort, the following became the focus of the work of the revisioned AEI office in order to best meet the needs of Coloradans and effectively and efficiently contribute to the talent development system:

- Support a culture of change
- Engage in work groups across the state to move WIOA work forward
- Leverage funding by partnering
- Strengthen connections to livable wage, employability, postsecondary education and/or licensure
- Address barriers for transition through the system

Since the revisioning, adult education and family literacy providers and the AEI office have committed to learning more about the Colorado talent development system, to actively engaging in dialogue at local, regional, and statewide levels, and to building partnerships to best use public dollars and support the needs of Coloradans. Adult education and family literacy representatives have participated in focus groups to guide the work under the Workforce Innovation and Opportunity Act (WIOA), including identification of gaps and generation of solutions for service integration.

Additionally, adult education and family literacy representatives are engaged in work groups focused on partner alignment, service alignment, state legislative policy, and implementation. Further, adult education and family literacy representatives have been welcomed as members of local workforce development boards, which has initiated dialogue at the local level about the talent development system utilization and function.

(a) <u>Aligning of Content Standards</u>

In 2014, Colorado began a standards-based instruction initiative to promote the quality of adult education and family literacy outcomes to prepare learners for success in adult education, postsecondary education, employment, and the educational advancement of their children. The AEI office officially adopted the College and Career Readiness Standards (CCRS) as a framework to prepare Adult Education and Family Literacy Act (AEFLA)-funded programs for the new demands of high school equivalency exams. This adoption also signifies alignment with Colorado Academic Standards.

In support of this standards-based initiative Colorado joined the Standards-in-Action (SiA) national initiative in order to guide a statewide scale-up and sustainability plan of the CCRS. Statewide adoption of the CCRS promotes the explicit goal to equip students with the skills and knowledge needed for success in postsecondary education,

employment, and beyond. Colorado has developed a sustainability plan to outline the professional development model, stakeholders, goals, strategies, tactics, and resources necessary to accomplish the goal of statewide implementation by July 1, 2017.

(b) Local Activities

The Colorado Department of Education (CDE) AEI office is the State's Eligible Agency for oversight of funding provided through the Adult Education and Family Literacy Act grant. AEI is responsible for administering funds to eligible providers and providing program management. AEI will provide technical assistance and guidance to programs originally funded under the Workforce Investment Act to prepare for continuation for 2016-2017. For 2017-2018, AEI will provide funding to eligible providers at the local level for the provision of adult education and family literacy services as a component of the Colorado talent development system through a competitive Request for Proposal (RFP) process. The competitive grant process for local adult education and family literacy providers will include a request for models associated with customer-centered services, including adult basic and secondary education and English language acquisition within career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty, and building stronger local areas within Colorado.

Funds will be available for multi-year cycles for the development and implementation of adult education and family literacy programs that support strengthening of local areas. After successful development and implementation of a program, a provider may apply on an annual basis for continuation of financial support through Title II funding.

AEI will accept proposals from:

- Local educational agencies,
- Community-based organizations or faith-based organization,
- Volunteer literacy organizations,
- Institutions of higher education,
- Public or private nonprofit agencies,
- Libraries,
- Public housing authorities,
- Nonprofit institutions that are not described in any of the above that have the ability to provide adult education and family literacy activities to eligible individuals,
- Consortia or coalitions of the agencies, organizations, institutions, libraries, or authorities described above, and
- Partnerships between an employer and an entity described above.

Eligible individual means an individual (1) who has attained 16 years of age and who is not enrolled or required to be enrolled in secondary school under State law (CRS 22.33.104) and (2) who is basic skills deficient; does not have a secondary school

diploma or its recognized equivalent, and has not achieved an equivalent level of education; or is an English language learner.

The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of trained evaluators and AEI staff.

AEI will establish a work group of core partners and Combined State Plan partners to develop a communications/outreach plan to announce, inform, and provide technical assistance to eligible providers across Colorado. Written proposals will be solicited through a formal Request for Proposal (RFP) which provides application procedures and forms to be completed by applicant organizations. RFP information will continue to be provided throughout the year to all persons on the AEI provider email distribution list and to others with an interest in adult education and family literacy. The announcement will also be placed on the CDE web site, communicated through the official CDE newsletter, and in the public notices sections of the state's largest newspapers.

The entire RFP and related documents will be posted each year on the CDE web site in a format that allows local providers to download and print them. Efforts will be made to solicit proposals from each of the ten federally designated workforce development areas to ensure adult education and family literacy services for Coloradans in each local area.

As a critical component of the Colorado talent development system, providers will expand and improve the current system of delivering adult education and family literacy services through evidence-based practices and continuous improvement in order to:

- Build career pathways providing adults with basic and secondary education to enable them to earn a high school equivalency diploma, transition into postsecondary education or training, and/or gain or advance in employment in order to achieve self-sufficiency.
- Provide parents and guardians with sufficient skills to become full partners in the educational development of their children.

In accordance with legislation, eligible providers may receive adult education and family literacy funding for the delivery of any of the following adult education and family literacy activities:

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;

- English language and acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that:
  1. Provides adult education and literacy activities, concurrently and contextually, with both workforce preparation activities and workforce training for a specific occupation or occupational cluster, and
  2. Is for the purpose of educational and career advancement.

(c) Corrections Education and other Education of Institutionalized Individuals

The Colorado Department of Education Office of Adult Education Initiatives (AEI) will use no more than 20 percent of the 82.5 percent of the state grant that must be allotted to local programs for activities under Section 225. Colorado adult education and family literacy sub-grant recipients use funds, as allowable, to provide educational programs for criminal offenders in correctional institutions and other institutionalized individuals. The AEI office will give priority to programs serving individuals who are likely to leave the correctional institution within five years of participation in the program. Local activities include adult basic education, workplace adult education and literacy activities, family literacy activities, and/or English language acquisition.

(d) Integrated English Literacy and Civics Education Program

The Colorado Department of Education Office of Adult Education Initiatives (AEI) will promote, support, and operate an Integrated English Literacy and Civics Program by offering a competitive RFP process designed specifically for Integrated English Literacy and Civics. This program will address the needs of Colorado's large and growing immigrant population and other English language learners.

AEI will award Integrated English Literacy and Civics grants to eligible providers that will prepare adults who are English language learners for unsubsidized employment within in-demand industries and occupations that lead to economic self-sufficiency and will integrate with the local workforce development system and its functions to carry out the activities of the program. English literacy, defined as instruction designed to help English language learners achieve competence in the English language, will be provided in the context of civics education, defined as an educational program that emphasizes contextualized instruction on the rights and responsibilities of citizenship, naturalization procedures, civic participation, and U.S. history and government to help students acquire the skills and knowledge to become active and informed parents, workers, and community members.

Through the competitive RFP process, eligible providers will be asked to describe models for career pathways for eligible individuals, including professionals with degrees and credentials in their native countries. AEI will continue to support sub-grant

recipients and connections with training and employment through evidence-based practices.

(e) State Leadership

State Leadership will focus on the following priorities:

1. Providing purposeful leadership by serving as thought partners with stakeholders and refining and developing thoughtful, consistent policies and procedures for program performance;
2. Promoting growth and success focused on student outcomes by designing and conducting effective monitoring focused on continuous improvement and building capacity by gathering and sharing best practices;
3. Delivering high quality, responsive support to the field by continually gathering feedback for needs, offering meaningful technical assistance, and providing purposeful professional development; and
4. Supplying current, transparent, and useful information by providing accurate and timely communication with providers in the field.

Based on these strategic priorities, AEI will designate State Leadership funds to effectively and efficiently provide support and service to the field. In accordance with section 223 of WIOA, funds for State Leadership will continue to support local programs in their integration of services with core partners, development of career pathways, and ultimately, to benefit Coloradans. Colorado began this work through passage of the Adult Education and Literacy Act of 2014. This legislation began the work of aligning adult education and family literacy activities with the core programs of WIOA and one-stop partners. In alignment with WIOA, Colorado State Plan goals, and strategic priorities for the AEI office, State Leadership projects will include:

1. Alignment of adult education and family literacy activities with other core programs and community partners for consistency of service, building on the work piloted through the Colorado Adult Education and Literacy Act of 2014, through talent development system integration events, statewide work group participation, a LEAN process event, ongoing technical assistance efforts, and sharing best practices already in existence across local areas;
2. Establishment of high quality professional development programs to improve instructional and programmatic practices, including statewide self-assessment of professional development needs of educators; state, regional, and local level in-person professional development; regularly scheduled webinars dedicated to professional development; online communities of practice to support collaboration and local implementation of new practices; and regional specialist support to continually improve quality of adult education and family literacy services;
3. Delivery of consistent technical assistance to local programs through regional specialists and subject-matter experts, including providing updated research on evidence-based practices in reading, writing, mathematics, English language

acquisition programs, employability skills, digital literacy, distance education, career pathways, partnership development, and local workforce board representation;

4. Monitoring and evaluation of the quality of, and the improvement in, adult education and family literacy services focused on learner outcomes;
5. Supporting development of content and models for contextualized bridge programs, integrated education and training and career pathways to align with postsecondary education and training programs within the Colorado Community College System and workforce;
6. Development and implementation of distance education for both learners and educators to enhance digital literacy, increase learning opportunities and access to professional development training;
7. Continued implementation of College and Career Ready Standards across the state;
8. Other strategic priorities to further enhance collaboration with core partners and the role of adult education and family literacy in the Colorado talent development system.

AEI staff also conduct regular phone calls with program staff and annual meetings for program administrators to address challenges, gather information, provide feedback, and share best practices. Further, the AEI staff hold quarterly, all-program webinars to discuss key topics of interest, including what is working in the field and to provide peer mentoring opportunities.

(f) Assessing Quality

The Colorado Department of Education Office of Adult Education Initiatives (AEI) will assess the quality of sub-grant recipients through ongoing program monitoring and oversight. In order to empower adult education and family literacy providers to effectively serve individuals and communities, the AEI office will develop a matrix of quality indicators, based on evidence-based best practices. This tool will provide a framework to determine strengths as well as the level and type of support each sub-grant recipient needs from the AEI office. To assist in building stronger adult education and family literacy programs in Colorado, the AEI office will conduct ongoing programmatic and data reviews, plus quarterly and annual evaluations with sub-grant recipients based on this matrix. Quality will be evaluated through monitoring visits, performance reports, and on-site program reviews. Additionally, assessment will measure the effectiveness of the state and local providers in achievement of core indicators and levels of student improvement as negotiated with the U.S. Department of Education Office of Career, Technical, and Adult Education (OCTAE).

Programs must provide student progress measures obtained from all students who have attended at least 12 hours of instruction. Documented progress of student performance measures must include at a minimum:

- Literacy skill level improvements in reading, writing, and speaking the English language, problem solving, numeracy, and other literacy skills
- Placement in, retention in, or transition into postsecondary education, training, unsubsidized employment, or career advancement

- Attainment of a secondary school diploma or its equivalent.

All programs are required to maintain individual student records for all students who have attended 12 hours of instruction. Each record must contain the following:

1. Student identification and demographic information;
2. Attendance rates
3. Years of schooling and placement level at program entry
4. Initial learning goals
5. Specified pre- and post-testing student information
6. Entry and update records
7. Other specified information necessary.

Additionally, all sub-grant recipients are responsible for maintaining the privacy of the data for learners of all ages who participate in their programs.

The AEI team will meet quarterly, at a minimum, to evaluate the overall viability of all sub-grant recipients – both from fiscal and programmatic perspectives. The AEI team will compare trends in data and determine necessary technical assistance and next steps. The AEI team will also develop assistance plans for programs struggling to meet goals and objectives, and those plans will be used for service and support to providers.

If a sub-grant recipient fails to meet performance goals or other programmatic requirements, the AEI office will take specific action to assist the program in improving the quality of the program. AEI will use the following two plans to take action to improve the quality of the adult education and family literacy activities.

1. Performance Improvement Plan (PIP) - A PIP will be required for programs which are identified as low-performing when compared to the State performance on federal or State benchmarks. The PIP will include specific action steps related to performance. AEI will provide support and assistance to programs, which may include targeted professional development, one-on-one training in specific areas of challenge, and technical assistance visits by AEI staff to address particular issues.
2. Corrective Action Plan (CAP) – A CAP will be implemented with programs that are out of compliance with State and/or federal policies. AEI will provide technical assistance throughout the corrective process, and by the end of a designated timeframe, programs should be able to correct the identified issues and end their respective CAP.

As a part of both plans, the AEI office will provide ongoing technical assistance, professional development, and other support until the required steps of the plans are completed. The type of technical assistance, professional development, and other support will be based upon the specific area(s) of deficiency or need for the individual program.

Quality Assessment Review Activities

Through the evaluation and monitoring process, AEI will, through its staff and/or representatives, pay close attention to the goals and objectives for achieving adult learner growth, transitions within the Colorado talent development system, advancement into post-secondary programs or training, and/or employment. The following activities are part of the AEI Quality Assessment Review process:

1. Ongoing Desktop Monitoring - Ongoing monitoring will include monthly data validations through the information management system conducted by regional specialists within the AEI team.
2. Quarterly Data Review - Programs will submit quarterly data review reports whereby programs reflect on progress to date on performance measures and program goals, identify areas of strength and challenge, and note areas of needed technical assistance.
3. Annual Performance Review – Programs will submit an annual performance report on the effectiveness of adult education and family literacy activities of all sub-grant recipients based on the performance indicators, goals and objectives of individual programs.
4. Self-Evaluation – Programs will self-evaluate the effectiveness of adult education and family literacy activities at least once annually by using a uniform self-evaluation. The program must use data collected in the self-evaluation process to develop goals and objectives for improvement in achieving the goals set forth on learner outcomes, professional development plans as well as any other areas of weakness as may be found in the evaluation process. This must be developed and implemented in consultation with AEI.
5. On-Site Review – AEI will conduct on-site reviews of 25% of sub-grant recipients each year. Program order for On-Site Review will be based on levels of risk. Programs determined to be higher risk will receive on-site reviews first. Risk is determined based on an analysis of factors, including size of award amount, timeliness of data entry, “newness” of the program or key program staff, and expenditure amounts.
6. Peer Review – AEI will coordinate and conduct a peer review process focused on quality improvement. The Peer Review process will happen in conjunction with the On-Site Review.

Adult Basic Education and Literacy Programs Certifications and Assurances

1. The plan is submitted by the State agency that is eligible to submit the plan;

2. The State agency has authority under State law to perform the functions of the State under the program;

3. The State legally may carry out each provision of the plan;

4. All provisions of the plan are consistent with State law;

5. A State officer, specified in title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;

6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;

7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and

8. The plan is the basis for State operation and administration of the program.

The Colorado Department of Education assures that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions);

2. The eligible agency will ensure that these is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services, or activities related to family literacy activities, as defined in section 203(9) of WIOA; and

4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

Vocational Rehabilitation

(A) *Input of the State Rehabilitation Council and the Response of the Designated State Unit*

The Colorado Division of Vocational Rehabilitation (DVR) has had a State Rehabilitation Council (SRC) for more than twenty-seven years. The SRC mission statement is:

> "The Colorado State Rehabilitation Council provides individuals with disabilities a strong, substantive role in shaping the programs and services established to support their employment goals and aspirations and to provide clients of vocational rehabilitation services a mechanism to influence at the systemic and policy level the direction of vocational rehabilitation programming."

The SRC meets every other month and has a yearly retreat. The SRC has three subcommittees: Membership; Quality Assurance; and Planning, Performance and State Plan (PPSP). Minutes are maintained of all SRC meetings, subcommittee meetings and retreats. Minutes summarize the advice and recommendations provided to DVR by the SRC. DVR continues to work closely with the SRC to share and discuss information on finances, personnel, services to clients, agency policies, state rules, federal standards and indicators, customer satisfaction, the wait list, and any other items that impact the extent, scope and effectiveness of rehabilitation services.

One significant event that has the potential to impact DVR services is the transfer of DVR to the Colorado Department of Labor and Employment (CDLE). On May 8, 2015, Governor John Hickenlooper signed SB15-239, requiring that this transfer take place in two phases, and no later than July 1, 2016. The first phase transfers DVR staff and programs to CDLE and the second phase, through a bill that will be introduced into the Colorado 2016 legislative session, addresses program administration, alignment of services, and compliance with state and federal rules and regulations. SB15-239 directs CDLE and DVR to "engage, involve and seek the advice of DVR's many interested stakeholders, including the State Rehabilitation Council, in developing detailed programmatic and budget recommendations and plans for a smooth and effective transfer of vocational rehabilitation programs and functions to CDLE". To this end, the SRC worked closely with DVR and CDLE to establish a stakeholder committee. The committee developed the following goals:

- Engage stakeholders with an open, honest and transparent approach and commitment to building a strong foundation within DVR as it moves to CDLE;
- Create a strategy that includes as many advocates, service providers, staff and clients as possible;
- Provide multiple opportunities and methods for input; and
- Establish trusted relationships with stakeholders for an ongoing dialogue on potential improvements, modifications, corrections, etc. to DVR even after the July, 2016 transfer is completed.

The SRC has been, and will continue to be, instrumental in the ongoing activities of the stakeholder committee. The stakeholder committee hosted ten in-person meetings across the state in the summer and fall of 2015, and used an online and fully accessible feedback form to

capture feedback from individuals who were unable to attend the meetings. The stakeholder committee presented an initial report to the Colorado Joint Budget Committee on September 21, 2015 and completed their initial stakeholder outreach activities on October 21, 2015. The outcomes of the stakeholder outreach activities included six common themes suggesting areas for improvement within DVR. These themes were developed into three key areas that DVR and CDLE, together with the SRC and the stakeholder committee, will begin to address as the agencies move toward the second phase of the merger. These three areas are: youth and transition services; blind services; and continuous stakeholder engagement. These areas, and the full results of the stakeholder outreach meetings, were a key component of Colorado DVR's comprehensive statewide needs assessment (CSNA), and were incorporated into DVR's goals, priorities and strategies within the vocational rehabilitation section of Colorado's Combined WIOA State Plan.

DVR participates with the SRC in the quarterly conduct of customer satisfaction, via electronic surveys, focus groups and public meetings. Surveys ask about satisfaction with DVR staff, rehabilitation services, available resources and employment outcomes. Results of customer satisfaction information, and guidance from the SRC, are used to drive more effective and efficient vocational rehabilitation services for customers. Quarterly customer satisfaction results are one data element of DVR's CSNA, and as such are used to develop the state plan.

DVR regularly seeks the advice of the SRC on pertinent issues, including the development and implementation of the state plan. To this end, DVR and the SRC jointly developed and conducted the 2015 DVR triennial comprehensive statewide needs assessment to determine the rehabilitation needs of individuals with disabilities in Colorado. The SRC and DVR established the goals of the CSNA and developed a plan for dissemination. Results were analyzed to determine findings which were then used to develop potential strategies. The SRC used the results of the CSNA to make recommendations to DVR that informed the state plan's goals, priorities and strategies. Additionally, the SRC and DVR will continue to conduct public hearings in person, by telephone and electronically to obtain comment on the DVR state plan and on potential policy changes that are a part of the state plan.

As a result of the 2015 CSNA and the SRC's related activities, the SRC makes the following recommendations to DVR for the upcoming state plan period:

SRC RECOMMENDATION #1

The Colorado Division of Vocational Rehabilitation will increase numbers served. This will be done by encouraging and welcoming new applicants with disabilities that are in need of services in order to obtain employment. Offices will be open and friendly. New materials will be developed that focus on the successes of DVR and the website will reflect this. Unserved and underserved populations will be targeted and some of these include individuals with criminal histories, individuals with limited education, people with mental illness, homeless individuals, individuals with intellectual and multiple disabilities and others. Outreach to community partners to generate referrals and educate them will be crucial. Some of these partners will include workforce centers, employers, educators, parents, and others. As

outreach is provided, technical assistance will be given to educate all communities about the Colorado Division of Vocational Rehabilitation.

DVR RESPONSE
Colorado DVR agrees with this recommendation. The intent to increase the number of individuals served by DVR is incorporated, inclusive of strategies identified in this SRC recommendation, within the majority of the agency's state goals and priorities as indicated in section (L).

SRC RECOMMENDATION #2
All DVR staff will receive ongoing training in order to provide effective and high quality services to their consumers. An inter-disciplinary approach may be employed where counselors and others with expertise work with staff to build skills. Training areas may include development of excellent customer service skills for office staff, counseling and guidance, specific disability trainings with resources available, work incentive training, assessment, cultural competence, or job development. Training may also include best practices for implementation of the key elements of WIOA, including customized employment, using "discovery" as part of the assessment process, or person-centered planning practices.

DVR RESPONSE
Colorado DVR agrees with this recommendation. Increasing the skills of DVR staff is incorporated into section (L), where a DVR goal is to increase the skill set of DVR staff through professional development that results in a comprehensive, holistic approach to talent development. As DVR employees become employees of the Colorado Department of Labor and Employment (CDLE), all staff will participate in the development of individualized Employee Quality and Excellence Plans (EQEP). The EQEP contains specific coaching and development activities to assist staff in polishing their existing skills and gaining new ones in order to provide effective and high quality services to DVR consumers. Additionally, DVR staff will participate with WIOA core program staff in the learning and cross-training of a core curriculum across WIOA partner programs.

SRC RECOMMENDATION #3
Vendors working with Colorado DVR shall receive training so that they will have a clear understanding of the rehabilitation process and will be effective and qualified to work with counselors and their consumers for the consumers' success. Training topics should include specifics on the rehabilitation process, increased cultural competence, clear understanding of disability issues, supported employment, use of interpreter and translation services, and more. Training may also include best practices for implementation of the key elements of WIOA, including customized employment, using "discovery" as part of the assessment process, or person-centered planning practices. Job coaches must be trained in order to provide effective services.

DVR RESPONSE

Colorado DVR concurs with the SRC that vendors should exhibit high quality skills and provide excellent services to DVR consumers. DVR is unable to require mandatory training of DVR vendors. However, the agency has purchased and plans to implement tools to assess vendor performance: the Vendor Contribution Assessment (VCA) and the Vendor Quality Assurance module. The VCA analyzes vendors through the application of advanced analytics to vocational rehabilitation services and outcome data. The Vendor Quality Assurance module collects consumer and counselor feedback on vendor usage and outcomes. Data from these tools will empower and educate staff and consumers to use only effective vendors. Additionally, DVR can make available to vendors a variety of resources and education opportunities, including the rehabilitation process, disability awareness, cultural competence and others. Also, DVR commits to explore tiered rates for vendors who provide job coaching and customized employment, based on levels of training and credentials. Finally, DVR intends to make customized employment a topic of education for DVR staff and vendors so all are aware of and educated about this key emphasis within federal act and proposed regulation.

SRC RECOMMENDATION #4

Colorado DVR will create an active plan to provide innovative and effective transition services to youth with disabilities across the state of Colorado. This will include work with all stakeholders including the Colorado Department of Education, special education teachers, parents, workforce centers, and youth with disabilities. Stakeholders will have a clear understanding of DVR's role, will understand the referral process and know when and how to make referrals. DVR should develop policies in order to collaborate with schools and workforce centers to provide pre-employment transition services to younger youth prior to their referral to vocational rehabilitation.

DVR RESPONSE

Colorado DVR agrees with this recommendation. The expansion of transition services to Colorado's youth with disabilities, including pre-employment transition services to Colorado's students with disabilities, is an agency goal and is incorporated into Section (L). Additionally, DVR will explore the utilization of services to groups of individuals, as identified in 34 CFR 361.49, as a mechanism for providing transition services to youth with disabilities and students with disabilities who may not have yet applied or been determined eligible for vocational rehabilitation services.

SRC RECOMMENDATION #5

Colorado Division of Vocational Rehabilitation shall decrease avoidable delays in services to DVR applicants and consumers. Examples of delays identified in the comprehensive statewide needs assessment include long waits for intake meetings, long waits for meetings with DVR counselors, long waits for assessment services, delays due to lack of assistive technology in rural communities, and delays due to lack of skilled vendors especially in the areas of job development and placement. Other areas identified include long waits for job maintenance services and lack of updated technology for rehab consumers and for DVR staff.

DVR RESPONSE
Colorado DVR agrees with this recommendation and incorporates within section (L) a strategy of process improvement to identify and address avoidable service delays in the delivery of rehabilitation services. DVR anticipates tackling this area as an activity of our merger with CDLE. Over the next several years, in partnership with CDLE and using the Colorado Lean process, DVR will strive for continuous improvement by applying Lean principles and tools to identify and eliminate avoidable service delays and improve the delivery of rehabilitation services. DVR intends for this effort to support the Colorado Combined State Plan goal of establishing a customer-centric and holistic focus to increase effectiveness.

SRC RECOMMENDATION #6
Colorado DVR shall actively work closely with the executive and legislative branches of Colorado government to fully utilize Colorado's share of Rehabilitation Services Administration matching funds. In order to create effective and far reaching success in the employment of people with disabilities in Colorado, the full allotment of funds must be available. Ongoing communication with the legislature will focus on the success that Colorado DVR is having in all areas of operation.

DVR RESPONSE
DVR supports the carryover of this recommendation from the most recent state plan and agrees that legislative and state-level funding is essential to the continuity and growth of vocational rehabilitation services throughout Colorado. The agency anticipates greater opportunity and support for increased state-level funding as DVR merges with CDLE. DVR looks forward to the participation and support of the SRC in this endeavor and the opportunities to collaborate and advocate within the advancement of this recommendation.

Section (B) Request for Waiver of Statewideness

Colorado is not requesting a waiver.

Section (C) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

The Colorado Division of Vocational Rehabilitation (DVR) has cooperative relationships with an extensive number of public and private agencies and programs, including community mental health centers and other mental health programs, community colleges, universities, county human services agencies, community centered boards serving persons with developmental disabilities, the corrections system, and other agencies. The Division's employees are integral members of many interagency teams and regularly collaborate with agencies and programs to facilitate the provision of services to its primary clients. In all of the coordination activities throughout the State, the goals are to reduce the duplication of services, maximize services to clients, and increase opportunities to obtain employment within clients' chosen vocational goals.

County Human Services Agencies

DVR cooperates with County Departments of Human/Social Services at both the state and the local levels to enable human services recipients with disabilities to reduce their dependency on public assistance through employment. Counselors and supervisors have increased efforts and activities with county social service agencies in working with recipients of services, who have disability related employment issues. In several counties, DVR staff participate on county human services advisory boards. Local DVR offices have working partnerships with county human services agencies. The partners have developed referral processes to and from county human service agencies and collaborate to obtain necessary services for DVR clients that DVR is unable to provide, including Medicaid, food stamps, Temporary Assistance to Needy Families (TANF), child care assistance and the Special Supplemental Nutrition Program for *Women, Infants, and Children (WIC).*

Community Centered Boards

Community Centered Boards (CCB) serving persons with intellectual and developmental disabilities are important partners in DVR's effort to assure the availability of quality vocational rehabilitation services throughout the state.

Currently, DVR has one counselor whose office is co-located on site at the local CCB office. In the other areas of the state, DVR counselors and supervisors meet frequently with CCB staff to coordinate service delivery. These counselors focus on promoting successful community employment outcomes for individuals with developmental disabilities who have been determined eligible and are recipient of services through the CCB system. In addition, the Coordinator of Supported Employment for DVR meets regularly with the Home and Community- Based Services HCBS-DD and HCBS-SLS Supported Employment Coordinator at the Division for Intellectual and Developmental Disabilities (DIDD) to discuss issues impacting services.

The collaboration between DVR and the CCBs is especially evident in DVR's delivery of supported employment services. For DVR clients who meet CCB eligibility for service delivery, the CCB works cooperatively with DVR counselors to ensure the provision of extended ongoing support services and the success of the individual's supported employment outcome. DVR staff, working together with CCB staff, assist and facilitate each client's expression of choice in service delivery options, employment outcomes, and providers of services through networks of "approved service agencies". DVR staff attend board and committee meetings to facilitate an effective working relationship between our agencies.

On November 1, 2014 DVR implemented changes to the Fee Schedule to increase rates for job placement and job coaching services, including supported employment. These changes are intended to attract additional quality job placement vendors and increase individual employment outcomes.

DVR has a full-time Coordinator of Supported Employment Services. This person serves on the Developmental Disabilities Planning Council representing DVR. In addition, DVR has lead DD counselors to help more effectively coordinate and provide quality services for individuals with

developmental disabilities. These counselors serve as regional liaisons, providing training, guidance and support to all counselors in their areas to establish standards of practice with the local CCBs. In addition, their duties include functioning as the expert and serving as a liaison between the CCB and the local DVR offices as well as various community partners, vendors and independent contractors. These individuals also work as a team in conjunction with the Supported Employment Program Coordinator to identify emerging trends and issues, develop new and or unique services in the community and evaluate existing programs for persons with developmental disabilities.

The HCBS-DD waiver and Supported Living Services (SLS) Supported Employment Coordinator for DIDD and the Coordinator of Supported Employment for DVR conducted meetings at all twenty CCBs in Colorado during 2014-15. Attending these meetings were CCB Case Managers, vocational service providers, and DVR counselors and supervisors. The purpose was to learn what is working and areas that may need improvement. The site visits were written up and distributed to all attendees.

In the summer and fall of 2014, DVR along with the Division for Intellectual and Developmental Disabilities (DIDD) provided regional training in four areas of the state bringing together direct service provider staff from CCBs, DVR and local service providers. The trainings featured information on providing smooth and seamless referrals to DVR, individualized employment and a variety of other subjects. These regional trainings will be offered again in the spring of 2016.

The State of Colorado is a member of the State Employment Leadership Network (SELN). This membership is sponsored by DIDD. The HCBS-DD, HCBS-SLS, and Coordinator of Supported Employment for DIDD and the Supported Employment Coordinator for DVR meet monthly with SELN to discuss strategies to increase individual supported employment opportunities to people with Developmental and Intellectual Disabilities. Discussions will include opportunities for Youth with Disabilities to obtain education and employment outcomes.

The Corrections System

DVR understands that many individuals who are involved with the Colorado corrections system are also individuals with disabilities. Colorado's correctional system is complex, with separate departments serving adults, youthful offenders and youth. Additionally, there are regional and local jurisdictions as well as state and private correctional facilities and providers. DVR's recent CSNA indicated that individuals with criminal histories are a demographic of the disability population that DVR underserves. DVR is committed to increasing the number of applicants from this demographic. To this end, local DVR staff have developed, and will continue to develop, working partnerships with probation offices, parole offices, and diversion programs, as well as working directly with many of the youth and adult correctional institutions in the state. For individuals who meet DVR eligibility, staff work to coordinate timely referral processes and services that complement release plans that are mutually developed by the individual with the disability and the correctional program to which they are attached. DVR's Promoting Readiness of Minors in Supplemental Security Income (PROMISE/ASPIRE) demonstration project is

partnering with the Colorado Department of Law to develop and implement a financial literacy curriculum for youth and young adults who are involved with the juvenile justice and youthful offender systems.

Colorado AgrAbility

The Colorado AgrAbility Project promotes success in agriculture for people with disabilities or other physical challenges and their families. Colorado AgrAbility is part of a nationwide network of United States Department of Agriculture (USDA) programs begun through the 1990 Farm Bill. Colorado AgrAbility works in collaboration with Colorado State University and Goodwill Industries of Denver. The goal of the National AgrAbility Project is to inform, educate, and assist farmers, ranchers, farm workers, and their families with disabilities, so they can continue to have successful careers in agriculture. DVR counselors who serve clients within Colorado's rural communities work closely with the AgrAbility Project to assist individuals in maintaining successful agricultural employment. Jointly, DVR and AgrAbility staff assess agricultural work sites and tasks, determine and explore adaptive equipment and other services, provide services to clients, and train and follow up with individuals to assure their success. Additionally, DVR and AgrAbility jointly provide information, including workshops, to farmers, ranchers and family members with disabilities and other pertinent individuals who would benefit from this information.

Traumatic Brain Injury (TBI) Program Initiatives

Colorado is fortunate to have a Traumatic Brain Injury (TBI) Trust Fund. In 2002 Colorado passed legislation that allows for the collection of surcharges on certain traffic violations such as driving while ability impaired, driving under the influence and speeding. The surcharges collected from these convictions go into the Colorado TBI Trust Fund which is administered by the Colorado Brain Injury Program housed within the Colorado Department of Human Services (and within DVR until June 30, 2016). The statute requires the following three program areas: services for children/youth and adults with brain injury (specifically case management); research regarding the care and treatment of brain injury; and education to increase the awareness and understanding of brain injury.

Through the TBI Trust Fund, case managers partner with DVR to help counselors understand how brain injury may be impacting the individual's ability to work and/or follow through with vocational planning. The program also works to provide education and consultation to DVR on a broader level. Finally, the program works across agencies and divisions to ensure policies and practices are inclusive of individuals with brain injury ultimately to ensure access to support for individuals with brain injury.

The Colorado Brain Injury Program strives to not only provide supports to individuals with brain injury and their families but to also provide support to the "systems" that individuals with brain injury and their families interact with to obtain support. The program has a strong partnership with many entities and the Division of Vocational Rehabilitation is one of them.

BOND (Benefit Offset National Demonstration) Project

DVR is in the fourth year of a seven year partnership with Abt Associates and Ability Connection Colorado (formerly known as CP of Colorado) implementing the Benefit Offset National Demonstration (BOND) project in Colorado and Wyoming. Funded by the Social Security Administration (SSA), BOND is operating in ten different locations across the United States. Using a rigorous study design, the intent of the BOND project is to explore and evaluate the effectiveness of a variety of service levels and work incentives that, when offered to Social Security Disability Income (SSDI) beneficiaries, result in the beneficiaries obtaining and maintaining successful employment outcomes.

Within the BOND Project, DVR provides work incentive counseling, service coordination, and information and referral services to SSDI beneficiaries who have been randomly selected and enrolled in the Project. When these beneficiaries return to work, DVR assures that the beneficiary receives financial incentives not available to other SSDI beneficiaries. DVR's participation in the Project will enable DVR to be on the cutting edge of new approaches and strategies for service delivery that are intended to improve the effectiveness of services provided to SSDI beneficiaries supporting a return to work and a better quality of life for the beneficiaries.

Colorado Work Incentive Coordinators

For the past several years, DVR has supported the on-going and statewide availability of work incentives and benefits consultation. DVR, through an annual purchase order, assures that Ability Connection Colorado (ACC) – the grant recipient of the Work Incentives Planning and Assistance (WIPA) – has adequate funding to provide personnel necessary to cover all parts of Colorado. DVR works with ACC program management to assure that DVR applicants and eligible individuals, as appropriate, receive work incentives consultation and that an effective and efficient statewide referral process is in place.

ASPIRE

The Colorado Division of Vocational Rehabilitation entered into the six-state consortium, Achieving Success by Promoting Readiness for Education and Employment or ASPIRE, in September 2013 as one of the six Promise Initiatives. Arizona, South Dakota, Montana, North Dakota, Colorado and Utah comprise ASPIRE. Utah State Office of Rehabilitation is the lead state agency and the recipient of the grant. Over the course of five years, 1,000 teens and families will be randomly selected into the ASPIRE services program and will receive additional case management, benefits counseling, financial capability training, career and work-based learning experiences, and parent information and training.

ASPIRE Colorado completed the enrollment process of 400 youth and families in August of 2015. 201 youth and families are in the intensive ASPIRE services group and 199 are in the Usual Services group. ASPIRE Colorado is active in 17 counties; Adams, Alamosa, Arapahoe,

Boulder, Delta, Denver, El Paso, Fremont, Garfield, Jefferson, Larimer, Logan, Mesa, Montrose, Morgan, Pueblo and Rio Blanco.

ASPIRE Colorado has contracted with Peak Parent Center to provide Self-Determination and Parent training and Ability Connections Colorado is providing WIPA services to our ASPIRE youth and families. Financial training is provided by internal state partners.

Through Case Management services, ASPIRE Colorado is collaborating with existing local and state community partners to provide assistance to the ASPIRE youth and families with application and eligibility processes within the public and private sectors. The goal is to better serve families and youth with disabilities by increasing education attainment and employment opportunities in order to decrease the dependency on public benefit.

The ASPIRE youth employment interventions include career assessments, career exploration, and preparation. The expectation is that the interventions will lead to a paid employment experience for the youth by the end of the grant, which is September 2018.

Rocky Mountain ADA Center

DVR is a strong partner with the recently renewed Rocky Mountain ADA Center based out of Colorado Springs. This organization provides technical assistance and information to a six state region. Ten DVR staff members were a part of the center's ADA Network, until this network ended last year. Still, these staff members, primarily DVR Business Outreach Specialists, received advanced training on the ADA and the Amendments Act and are available for training upon request. The Rocky Mountain ADA Center is committed to on-going training and collaboration holding bi-monthly network calls, annual national training sponsorships, and regular educational opportunities.

Colorado Institutions of Higher Education

A significant number of DVR clients attend post-secondary education. In Colorado, there are more than 470 institutions of higher education. These include publically supported institutions, private accredited schools, area technical schools and private occupational schools.

Local DVR offices work closely with the many offices dedicated to support students with disabilities at each institution. This assists DVR clients in the completion of their areas of study and enables them to move more successfully into their chosen employment outcome.

At the state level, DVR has a representative who is a member of the Colorado/Wyoming Consortium of Support Programs for Students with Disabilities (the Consortium). The Consortium was created at least two decades ago through an establishment grant awarded by DVR. The Consortium's membership consists of individuals from post-secondary disability services offices, DVR and the Colorado Department of Education (CDE). The Consortium supports communication between the community colleges, universities, CDE and DVR in areas related to networking, accommodation, professional development, collaborative agreement development, national conference presentations, and other related topics. The Consortium

creates guidance documents, such as Colorado's Best Practice Documentation Guidelines for Post-secondary Institutions. The Consortium also participates in the development and renewal of memorandums of understanding between DVR and the six public post-secondary system boards in Colorado. These MOU agreements detail the collaborative provision of services to students with disabilities who are in an institution of higher education and who are also recipients of services through DVR.

Faith-Based Collaborative Partnerships

Several local DVR offices collaborate with community faith-based organizations. Southern and western Colorado offices work closely with Catholic Charities Diocese of Pueblo to obtain home stability, immigration, crisis and educational readiness services for DVR clients. The Boulder DVR office staff work with the Sister Carmen Community Center to obtain advocacy, case management, education, mental health and emergency services for clients. Clients are also able to receive work-based learning and vocational readiness services through this Center. DVR's Colorado Springs and eastern Colorado offices work with Ecumenical Social Ministries to receive emergency resources including food, shelter, clothing and job placement assistance. DVR's Denver-metro offices partner with Lutheran Family Services to share referrals and collaboratively provide services leading to employment.

Collaboration with American Indian Vocational Rehabilitation Services

Colorado has two American Indian Vocational Rehabilitation Services (AIVRS) Program Grant Awardees. The Southern Ute Indian Tribe and the Ute Mountain Ute Indian Tribe are located in the southwestern part of Colorado, and the Ute Mountain Ute Reservation extends into New Mexico and Utah. DVR has a long history of partnership and collaboration with both AIVRS programs. However, with significant changes in the administrative and field services staff of all three programs over the last several years, collaborative activities have declined.

Colorado DVR and the two AIVRS programs are addressing this issue in a variety of ways. A southwestern Colorado DVR supervisor has been assigned to work as a liaison to interface with representatives of both tribes to strengthen the partnerships and develop formal cooperative agreements. Representatives from both tribes were invited to the area's October 19, 2015 stakeholder meeting, which was intended to engage, involve and seek the advice of DVR's stakeholders in developing the plans for a smooth and effective transfer of DVR's programs into the Colorado Department of Labor and Employment.

Following the local stakeholder meeting, DVR's liaison and representatives from both AIVRS programs scheduled a series of meetings to develop and formalize the partnerships between DVR and the two AIVRS programs. Staff of all three programs will provide cross-training between DVR and the AIVRS programs, and the Southern Ute program has invited local DVR program staff to participate in cultural awareness activities offered through their Cultural Center.

Additionally, DVR is working with both AIVRS programs to attend one-another's staff meetings, develop a process for identifying and sharing data, and determine how referrals and

information will be shared between the entities to assist in the eligibility determination and provision of vocational rehabilitation services to American Indians. Once determined, all collaborative processes and procedures will be developed into a separate cooperative agreement between DVR and each AIVRS program. The cooperative agreements will be used to guide the collaborative, effective and efficient provision of vocational rehabilitation services to American Indians who are individuals with disabilities, including mutual clients of the programs. The agreement will also be used to cross-train new staff within the DVR and AIVRS programs, and will be reviewed and updated regularly.

Collaboration with the State Independent Living Council, the Centers for Independent Living and the Older Individuals who are Blind Program

DVR administers two programs mandated by Title VII of the Act:

- The Colorado State Independent Living Services (SILS) program and
- The Older Individuals who are Blind (OIB) program.

SILS programs are currently run out of Colorado's statewide network of ten Centers for Independent Living (CIL), which provide services to individuals with significant disabilities who face barriers to living self-directed lives in their communities. The OIB program is provided through a competitive process every three years for contracts. Currently seven of Colorado's CILs and one Community Rehabilitation Program are awarded contracts on a three year cycle.

Under the SILS program, Centers provide independent living skills training, individual and systems advocacy, peer counseling, information and referral, transition services for people leaving nursing homes and for youth moving into adult responsibilities, assistance with social security applications, transportation, housing and many other services that support clients to set and achieve their goals of living independently in their community. This diverse and extensive list of service types allows Centers to provide the holistic support that many clients with significant disabilities may need.

DVR's local offices evidence close working partnerships and collaboration with all ten Centers. Together the partners share referrals, develop collaborative plans with clients, communicate to avoid duplicative service provision, and meet regularly to strengthen their relationships and cross-educate one another.

The OIB program serves people who are 55 and older who are blind or have impairments to their vision. Clients tend to be people who are experiencing vision loss from age-related factors and who are concerned about losing independence, either in their home or in their community. The OIB program helps clients learn new skills and identify community resources that will support their participation in full, independent lives.

Other Collaborative Partnerships

Colorado's western slope offices have a collaborative arrangement with the Marillac Clinic where clients can access medical, mental health, vision and dental care. Marillac Clinic is also a DVR provider for clients who do not meet the guidelines to receive these services as a

comparable benefit. Northwestern Colorado DVR offices work closely with the Yampa Valley Medical Center and the Yampa Valley Autism Program to share referrals and collaboratively provide services. DVR has one rehabilitation counselor assigned solely to Craig Hospital in Denver. Jointly, DVR and Craig provide rehabilitation services, in-patient and out-patient medical treatment, rehabilitation engineering, adaptive driving and community reintegration to individuals who have acquired a spinal cord injury or a brain injury.

Colorado DVR's eastern plains offices, Boulder offices, and Denver locations work with local homeless programs to obtain emergency shelter, transitional housing, and case management services that are available specifically for individuals with disabilities. DVR's Jefferson County office works closely with the Women's Bean Project, whose mission is to provide self - sufficiency to women through social enterprise.

The Denver metro DVR offices partner with Colorado Refugee Services to make and receive referrals of refugees with disabilities and to coordinate with Jewish Family Services and the African Community Center to collaboratively provide services leading to employment.

Section (D) Coordination with Education Officials

Background

Since 1985, the Division of Vocational Rehabilitation (DVR) has partnered with the Colorado Department of Education (CDE), and with local school districts and Boards of Cooperative Education (BOCES), in supporting a comprehensive transition planning and service delivery process for youth with disabilities. DVR has organized a Youth Services and Transition Unit within Administration. The Unit is responsible for assuring the provision of high quality vocational rehabilitation services to Colorado's youth with disabilities.

Interagency Agreement between the Division of Rehabilitation and the Department of Education

DVR continues to monitor and implement the state-level agreement between DVR and CDE. This agreement promotes flexible and collaborative planning and service delivery among DVR, local education agencies, local school districts, and other state and community agencies for youth who are transitioning from school to work and/or post-school activities which lead to employment. The agreement promotes accessible, timely and uniform vocational rehabilitation services for all Colorado students who have a disability and require vocational rehabilitation services. Additionally, the agreement encourages education agencies to develop, implement and promote pre-vocational services and career exploration for students with disabilities prior to their referral to DVR for services. Finally, the agreement assures that vocational rehabilitation services complement the transition services provided by education agencies and that the Individualized Plan for Employment (IPE) for students who are eligible for vocational rehabilitation services will be developed and approved before these students leave the school setting (or if Colorado DVR is operating under an order of selection, before each eligible student able to be served under the order leaves the school setting). The key tenets of the agreement have been developed into a desktop guide, updated annually and entitled the "CDE/DVR

Cooperative Services Handbook for Youth in Transition". Thousands of these handbooks are distributed each year to youth, parents, educators, rehabilitation counselors and community-based agency providers.

Currently, DVR is partnering with CDE to update the interagency agreement and the accompanying handbook. The update will incorporate changes within WIOA and vocational rehabilitation regulation, upon their finalization. Once complete, the interagency agreement will guide local interagency operating procedures.

Interagency Collaboration

Through collaboration with education officials, DVR provides consultation and technical assistance to assist educators, as early as possible in the transition process, in the planning and provision of services that facilitate the movement of students with disabilities from school to post-school activities. DVR also collaborates with educators to reach out to and identify students with disabilities who might benefit from vocational rehabilitation services. Meeting these needs remains a challenge, particularly within the rural and mountainous areas of Colorado. Innovative opportunities are being tested that utilize technology to increase collaboration within large rural geographic areas. One education partnership recently acquired the HD electronic conferencing system Vidyo. This allows education and DVR partners to meet with students using the internet and to provide case management when inclement weather is a factor, or time is of the essence. Additionally, DVR's computer lease offers the capacity to video chat. This is successfully and widely used with young adults and the agencies and families who support them. Additionally, the DVR Youth Services and Transition Unit is using technology, including a Go-To Meeting account, to provide technical assistance, support and training to education and DVR partners simultaneously on topics that support partners as they strive to meet the ever growing need of Colorado's youth with disabilities who are preparing for career entry.

Many school districts in Colorado are now using IPads with staff and students. Staff are expected to be functional in the use of this technology for day to day operations, effective communications, and presentations. DVR staff are also learning and using this newer technology. One example of its successful use is within Colorado's isolated mountainous areas and rural regions. It is often difficult for educators and vocational rehabilitation counselors to come together to meet with students and their families. The use of IPads provides flexibility for face to face meetings. Additionally, the IPads compatibility with multiple technology systems, and its ability to create and share content, leverage data bases and promote social networking technology, increase collaboration and communication to support transitioning youth. DVR plans to continue to learn about and explore this new tool, with the intent to share apps with education and with DVR staff about supporting post-school outcomes, including career preparation, connecting activities, youth development and leadership.

As DVR moves under the Colorado Department of Labor and Employment (CDLE) and begins to use the technology that will be available through that merger, DVR intends to explore social media and other electronic means of communication that have not been readily available to

staff, but that young adults commonly utilize. DVR believes that using this technology will improve client engagement and rapport with youth.

Colorado is exploring with education partners how to best provide students with pre-employment transition services and skills training when appropriate, in order to make a positive contribution to the IEP outcome. DVR will update our interagency agreement to include: the provision of services under the new direction identified within WIOA; the redefinition of the transition responsibilities of DVR and of education; assurance of access to services for youth; and ongoing support of effective and efficient working relationships between partners.

Colorado strives to assure that system coordination for the benefit of all students is an ongoing process. This is accomplished at the local level through the organization of periodic meetings that enhance regular contact and allow for annual and mid-year updates on potential referrals. DVR staff seek opportunities to educate young adults and families about DVR services and how to access these. Collaboratively with education partners, these activities take place during family nights, resource fairs, transition series, etc. Additionally, DVR and educators make DVR literature available in common areas of school such as libraries and career centers. These efforts align with the Colorado Exceptional Children's Education Act (ECEA).

Each year the Youth Services and Transition Unit and its CDE partners work to include DVR and education staff in activities to promote a seamless transition for youth exiting from education into education and employment. As the state-level partnership moves forward, the team is examining their practices and methods with a new focus on pre-employment transition services. Taking into consideration feedback from stakeholders from public hearings held between August and October 2015, data collected from the Comprehensive Statewide Needs Assessment and less formal inquiries, the team intends to improve existing partnerships and create new ones where they are absent at the local levels, for the purpose of increasing appropriate referrals to DVR and successful employment outcomes for transitioning youth that are competitive, integrated and relevant to Colorado's industry sectors.

Time was spent this year mediating partnerships at the local level between DVR and districts/BOCES due to a high number of staff turnover, lost connections and frustration with the DVR wait list. Focused training in a number of areas of the state included cross training. Training will continue to be a priority as DVR and CDE work with local partnerships to identify promising practices that can be replicated statewide to promote pre-employment transition services and skills for students. Pre-employment transition services will expand on work experience opportunities. Additionally, services to groups of students with disabilities will be considered as a mechanism for the delivery of pre-employment transition services.

DVR plays an integral role in annual institutes facilitated by CDE for local secondary education teams. The intent of DVR's involvement with the institutes is to elevate awareness and expand DVR's presence within education. The purpose of the institutes is to improve the quality of services in the area of secondary special education and transition at the local level through knowledge, capacity building, dissemination and outreach. The institutes, and the action plans which result from them, are supported and overseen by the National Secondary Transition

Technical Assistance Center (NSTTAC). Institute efforts focus on improving indicator outcomes that lead to effective transition practices for youth with disabilities both at the state and local levels. DVR commits content experts, presenters, DVR counselors, and technical assistance to local institute teams.

Together with CDE, DVR takes an active role in state youth groups and committees to ongoing collaboration between community agencies in the provision of comprehensive transition services. Participation in groups such as the Advisory Committee on Homeless Youth, the State Youth Council, Colorado 9-25, the Mental Health Advisory Council/Under 26 Workgroup, the TBI Trust Fund, and the Colorado Ad Hoc Autism Group promote better coordination of services and shared resources at both the state and local levels. Participation and involvement allows DVR to participate in the development of processes, procedures, guidelines and practices for more effective transitioning planning and services throughout Colorado's multiple areas and systems.

This year, CDE took the lead in assembling a new group of agencies and stakeholders who have an interest in serving transition age youth. DVR is an active partner in this endeavor. Colorado's Transition Community of Practice (CoP) was a result of a recent NSTACC gathering and recommendation. This group is formulating goals and objectives and is working to incorporate components of WIOA. The CoP has extended invitations to representatives from WIOA core partners.

School to Work Alliance Program (SWAP)

DVR has 36 School to Work Alliance Program (SWAP) sites. These sites involve approximately 130 of Colorado's 178 school districts. SWAP serves over 2,500 youth annually, and is a collaborative initiative between DVR and local school districts, supported by CDE. The purpose of SWAP is to provide new patterns of service, increased community linkages and successful employment outcomes for youth with disabilities who are applicants and eligible VR clients. Ways to collaboratively involve SWAP in the provision of pre-employment transition services to students with disabilities will be explored in the near future.

Workforce Development System Partnership

DVR maintains membership on the Colorado State Youth Council (SYC), which is a subcommittee of the Colorado Workforce Development Council. One goal of the SYC is to identify and support existing strategies, practices and projects that demonstrate success, and to augment and introduce other successful practices throughout Colorado. Each year, local communities are invited to submit local promising practices to the SYC that effectively address the needs of youth who are transitioning into adulthood. Submissions are scored against the National Center on Workforce and Disability's (NCSD) evidence-based Design Guideposts for Success. These are: school preparation; youth development and leadership; career preparation; connecting activities; and family involvement and supports.

The SYC recognizes selected promising practices every other year at the Think Big Youth Forum. The Think Big Youth Forum is sponsored by the SYC, the Colorado Department of Labor, the

Office of Workforce Development, the Colorado Department of Education and DVR. The Youth Forum brings together statewide youth practitioners from vocational rehabilitation, education and workforce development for two days of professional development. The promising practices recognized at the Forum are highlighted and recognized. The SYC continues to coordinate their efforts to work more closely with local youth councils using Colorado's Blue Print, a bottom-up economic development planning initiative. These benefit the youth we serve by moving them towards employment outcomes in the various industry sectors.

Results from DVR's recent comprehensive statewide needs assessment survey showed a greater need to expand work based learning activities for Colorado's youth with disabilities. Districts in Colorado are not adequately equipped to serve students in this manner, although there is a shared opinion that young adults who have the opportunity to participate in a work experience have greater success after exiting the secondary education system. DVR intends to address this need through the promotion of work experiences at the local level through partnerships with employers, districts/BOCES, DVR and the work force centers. DVR will examine those areas that have demonstrated success in creating work experiences to determine if there are common themes that other areas of the state can learn and use or if practices can be replicated.

At the local level, DVR counselors participate in resource fairs, back-to-school nights, and parent teacher conference nights. They present information about DVR at residential treatment centers, residential childcare facilities and at teacher in-service events. DVR will continue these types of outreach, education and consultation activities with our school partners for the purpose of providing consultation and technical assistance to support transition planning from school to post-school services. Counselors contribute to the classroom by identifying gaps relevant to pre-employment and transition services which they can assist education partners with. This contributes to an effective and consistent referral process for youth between agencies at the local level.

In collaboration with the State Rehabilitation Council (SRC), the Youth Services and Transition Unit is working to identify ways in which DVR can improve services to transitioning youth and ensure that all stakeholders have a clear understanding of DVR's role, the referral process and when and how to make referrals. DVR will re-examine policies around collaborating with the districts/BOCES and workforce centers to provide pre-employment transition services to younger students prior to their referral to vocational rehabilitation.

Between August and October of 2015, more than 200 DVR stakeholders including clients, vendors, staff and advocates attended a total of 10 in-person meetings across Colorado. These meetings were held by DVR and CDLE to solicit input about how DVR can better serve Colorado's individuals with disabilities, in preparation for the move of DVR into the Colorado Department of Labor and Employment. Several transition-related themes were identified during these public forums. As a result, DVR is committed to identifying a better way to align DVR resources to ensure delivery of transition services that are more focused, provide the best leverage of DVR and Colorado Department of Education (CDE) resources associated with the School to Work Alliance Program (SWAP) and are fully compliant with the 15% set-aside

mandated in Workforce Innovation and Opportunity Act (WIOA). We expect this alignment to include a restructuring of the Youth Services and Transition Unit, which will report to the DVR Director.

Colorado was chosen to participate in Transition Grant awarded by the United States Department of Labor and Employment's Office of Disability Employment Policy (ODEP), entitled Employment First State Leadership Mentoring Program (EFSLMP). This grant will provide mentoring, intensive technical assistance and training from a national pool of subject matter experts and peer mentors to core states as they transform existing policies, service delivery systems, and reimbursement structures to reflect an Employment First approach; facilitate virtual training and knowledge translation on effective practices; facilitate dialogue on shared experiences related to effectuating Employment First policies and practice; link participating states with current Federal initiatives that are focused on promoting state-level systems-change conducive to Employment First objectives; and evaluate the impacts of the investments in state Employment First systems change efforts over time to identify common challenges faced by State governments and validate innovative strategies and effective practices that lead to the successful implementation of Employment First objectives.

Colorado's transition goals under EFSLMP include:

- SWOT analysis of Colorado's current School to Work Alliance Program (SWAP)
- Develop policy implementation components related to implementing improvements indicated by the SWOT analysis
- Implement transition improvements indicated in the SWOT analysis including strengthening capacity of existing SWAP contracts by providing direct TA to CDE/DVR contractual partners in the implementation of effective practices that lead to sustained competitive integrated employment options for youth with disabilities
- Assessment Report to State with comprehensive analysis of SWAP program and recommendations for improvements.
- Policy outputs agreed upon between facilitator and the state.

Section (E) Cooperative Agreements with Private Non-Profit Organizations

The Colorado Division of Vocational Rehabilitation (DVR) values the partnerships that have been developed with private non-profit organizations in Colorado. DVR has developed partnerships at the state and local levels.

Project Search

Project Search is a business-led program and internationally trademarked model that leads to year-round employment in an integrated setting for youth with a variety of developmental disabilities. The vision, direction and leadership for Project Search is provided by the Children's Hospital of Cincinnati, where the project began more than twenty years ago. The success of Project Search is dependent upon the active involvement of multiple partners within a community, including business, secondary education, post-secondary education, vocational rehabilitation, community rehabilitation providers, ongoing support agencies, families and

social security. Over the past few years, Project SEARCH has operated in four Colorado communities; Boulder, Aurora, Fort Collins and Jefferson County. Host business sites include Boulder Community Hospital in Boulder, Children's Hospital of Colorado in Aurora, Columbine Health Systems in Fort Collins and the United States Department of the Interior at the Denver Federal Center. DVR is an active partner within Colorado's Project Search sites and has entered into partnerships with the above-identified agencies to support the success of the program. Through braided resources, DVR collaborates with the multiple Project Search partners to assure the seamless and successful delivery of transition services leading to integrated employment at minimum wage or higher. DVR responsibilities within Project Search vary from site to site, and include program development, employer education and technical assistance, participant referral and selection, assessment, job coaching, transportation training, work experience, job seeking skills training and job placement assistance. Typically, local Project Search partners enter into a written working agreement to support the success of the program and the young job seekers involved in the program.

PEAK Parent Center

DVR has a long-standing partnership with PEAK Parent Center. PEAK, founded in 1986, is a nonprofit that works to ensure that all people with disabilities are fully included in their neighborhood schools, communities, employment and all walks of life. PEAK offers an array of free and low-cost services to families of children with disabilities and advocates, including self-advocates, across the state. Additionally, PEAK collaborates with education, early childhood, rehabilitation and medical communities to create systems change and offers fee-for-service opportunities, workshops and customized training for school districts, community groups and agencies. DVR acts as a sponsor for PEAK's annual conference on inclusive education. DVR staff present at PEAK community and online workshops, and PEAK staff present at DVR workshops and training events. For example, historically, DVR, PEAK and the Colorado Department of Education typically collaborate to support the dissemination of transition best practices to educators, families, vocational rehabilitation counselors and community agency staff throughout the state. Within the past year, DVR's Director of Community Access presented a PEAK-sponsored workshop entitled "Finding Support and Resources for Meaningful Employment". DVR's "Achieving Success by Promoting Readiness for Education and Employment" or ASPIRE program contracts with PEAK to provide self-determination and parent training to youth and families involved with the ASPIRE demonstration project. Additionally, a key member of the PEAK leadership staff has maintained long-standing and active membership on the executive committee of the State Rehabilitation Council.

Ability Connection Colorado

For 70 years, Ability Connection Colorado (ACCO) has been providing innovative and exceptional services, helping individuals and families thrive. Building on the legacy established in 1946 by nine mothers who were determined to help their children with disabilities lead productive lives, ACCO today serves 40,000 Coloradans a year by providing inclusive early childhood and charter school education for children of all abilities, pathways to employment for those with developmental and intellectual disabilities, and family support programs that include guardianship and conservatorship services. Additionally, ACCO operates the Colorado

Work Incentive Planning and Assistance (WIPA) program and the Colorado Benefit Offset National Demonstration Project (BOND). The WIPA program receives funding from Social Security to provide Social Security Disability Income (SSSDI) and Supplemental Security Income (SSI) beneficiaries with no-cost access to work incentives planning and assistance. BOND is a project created to help SSDI beneficiaries return to work through the use of a benefit offset. ACCO is the only nonprofit approved to provide benefit counseling services through the Social Security Administration Program. DVR collaborates extensively with ACCO to implement both the WIPA and BOND programs. DVR partners with ACCO to contractually support the WIPA program's ongoing and statewide availability of workforce incentive and benefits counseling. DVR is in the fourth year of a seven year partnership with ACCO implementing the BOND project in Colorado and Wyoming and receives funds from BOND and ACCO to provide work incentives counseling, service coordination and information and referral services to SSDI beneficiaries who are randomly selected and enrolled into BOND.

The Salvation Army

The Salvation Army, an international movement, is an evangelical part of the universal Christian Church. The Salvation Army provides adult rehabilitation, housing, hunger relief, homelessness services, and veterans' services to individuals. In several local communities in Colorado, DVR partners closely with the local Salvation Army programs. Through these local collaborative endeavors, referrals of individuals with disabilities who are in need of vocational rehabilitation services are made to DVR and referrals from DVR to the Salvation Army are made to obtain emergency services and services DVR is unable to provide.

Colorado Community Centered Boards

Colorado has twenty local community centered boards (CCB), which are responsible for the provision of case management services that assist individuals with developmental and intellectual disabilities in accessing necessary services and supports to meet their needs. Community centered boards are not-for-profit organizations. Collaboration between DVR and the CCBs is especially evident in DVR's delivery of supported employment services, discussed in depth elsewhere in this State Plan. Additionally, DVR and CCB partners collaborate to cross-train at the local level and develop referral systems and processes to coordinate individualized client plans for habilitation and vocational rehabilitation that complement one another and eliminate duplication of services.

Community Mental Health Centers

Community Mental Health Center services include psychiatric services, individual and group therapy, peer services, support groups, medication management, intensive case management, educational opportunities and employment services including supported employment. Partnership between DVR and local Mental Health Centers is evidenced through the Mental Health Supported Employment Program, which operates under a third-party program formalized agreement between DVR and The Office of Behavioral Health (OBH) and involves local level supported employment agreements with twelve (12) Community Mental Health Centers. Services consist of job development, job seeking skills, job coaching, and on-going support. The purpose of this project is to enhance employment opportunities for individuals

with severe and persistent mental illness or persons in recovery. The project has resulted in increased integrated employment opportunities for individuals and is discussed in depth elsewhere in this State Plan.

Private Non-Profit Vendors

Private non-profit vocational rehabilitation service providers have been and continue to be a long-standing resource used by DVR to obtain services for DVR clients. Examples of private non-profit vendors with which DVR partners:

- The Colorado Center for the Blind (CCB). The CCB is a world-renowned training center located in Littleton, Colorado. The CCB provides innovative teaching techniques and philosophy that has far-reaching effects on the lives of individuals with blindness. Services purchased by DVR include: independence training for adults, year-round and summer employment, education and independent living services for youth; college preparation; and senior services.
- Goodwill Industries of Denver and Discover Goodwill Southern and Western Colorado. These programs work with both teens and adults to help them get the education and training they need to obtain and sustain meaningful employment and improve their lives. Services purchased by DVR include services offered within Goodwill areas of focus, including: youth career development at the secondary level; job skills training and placement for adults; work options for individuals with disabilities within Goodwill; retail employment; and recycling.
- Bayaud Enterprises. Since 1969, Bayaud has changed the lives of thousands of individuals in the Denver community by providing employment training, assessment, coaching, placement, work incentives counseling and retention services. DVR purchases all of these services from Bayaud. Executive level Bayaud staff have long held active membership on the SRC.

Cooperative relationships between DVR and providers of vocational rehabilitation services, including not for profit providers, are formalized through a written Provider Agreement. The Provider Agreement process is designed to assure adherence to three procurement requirements:

1. That all qualified vendors have the opportunity to compete for business with DVR if they choose, and
2. That all vendors will be treated equitably and will be paid for their services in accordance with a standard method of rate setting procedures, and
3. That there will always be a written contract in place when annual expenditures to any vendor reach $25,000, as required by State Law, while assuring continuity of service provision to clients.

This effort has resulted in a consistent structure for establishing working relationships with service providers throughout the state and at the same time helps assure equitable payment across providers for the same types of services at the least possible cost.

Our provider agreement system is market-based, meaning that services are purchased based on competitive market rates instead of provider costs. The procedures require a vendor to complete the DVR Provider Agreement form that serves to register them as potential provider of specific services. Subsequent services purchased by DVR are limited to those identified on the agreement for which the vendor is registered.

Execution of the Provider Agreement obligates vendors to meet certain qualifications related to standards that have been developed by DVR for the provision of specific services. Vendors also agree to abide by the established payment procedures and rates for each service DVR might purchase. Registration as a DVR vendor does not obligate vendors to provide services to DVR clients nor does it obligate DVR to purchase services from any given vendor.

Initial approval of the Provider Agreement, once signed by the vendor, is done at the local DVR field office. Approval then goes to DVR's staff authorized to sign provider agreements under contract waiver H1115. This method encourages the DVR field office and the service provider to establish a strong understanding of each other's roles and responsibilities in the provision of services to clients. It also puts the responsibility on the DVR field office supervisor to review the agreement for consistency between services offered and appropriate compliance with standards and credentials prior to their approval. Specific services identified on the Individual Plan for Employment are authorized by DVR counselors.

DVR believes that these procedures help ensure that adequate contracting procedures are used and certify that:

- Purchases of services and goods maximize the efficient and effective use of public funds;
- Services and goods will only be purchased from qualified providers;
- All vendors who wish to provide services to DVR clients have the opportunity to do so and are subject to a consistent set of terms and conditions; and
- Most importantly, DVR's clients will have a wide range of options to choose from when selecting service providers.

Section (F) Evidence of Collaboration Regarding Supported Employment Services and Extended Services

The Division of Vocational Rehabilitation (DVR), Office of Workforce Development, the Developmental Disabilities Council (DDC), Mental Health Service Organizations, Division for Intellectual and Developmental Disabilities (DIDD), Office of Behavioral Health (OBH), the Behavioral Health Planning Council, and employers have an extensive history of collaborative and cooperative efforts to provide supported employment opportunities in Colorado for individuals with the most significant disabilities. The DVR Coordinator of Supported Employment serves on the Developmental Disabilities Council and the Behavioral Health Planning Council.

The Workforce Innovation Opportunity Act of 2014 (WIOA) further emphasizes the need for state agencies and other entities to develop innovative cooperative agreements as a strategy to leverage State/Federal dollars and encourage inter-agency cooperation. The Colorado Division of Vocational Rehabilitation believes that expansion of supported employment to all individuals needing supports to maintain competitive, integrated employment cannot be accomplished without such collaborative efforts. DVR is in the process of developing new inter-agency agreements with our partner agencies.

Office of Behavioral Health, Department of Human Services

The Office of Behavioral Health (OBH) and the Division of Vocational Rehabilitation (DVR) have maintained a formal intra-agency agreement to provide vocational services to individuals with the most significant mental health disabilities. This agreement represents a collaborative effort to increase access to quality vocational services and to ensure the availability of supported employment opportunities for individuals with the most significant disabilities due to mental illness.

The agreement stipulates collaborative planning and coordination of services by the local mental health centers, private agencies, and rehabilitation offices to eliminate duplication of services and maximize available resources. It also contains provisions for purchase of supported employment services, including transitional employment services. Such services are only purchased from vendors approved by both OBH and DVR, such as mental health centers, and community-based programs. However, the rehabilitation counselor and client are responsible for determining the appropriate services and developing the supported employment Individualized Plan for Employment. Service providers must be registered with DVR to provide supported employment services under the DVR/OBH cooperative agreement. DVR and OBH are developing a new inter-agency agreement to comply with the provisions of WIOA and reflect the changes needed due to DVR's move to the Colorado Department of Labor and Employment (CDLE) as of July 1, 2016.

Improvements have been realized in interagency planning, training, information sharing, and resolving mutual programmatic and procedural concerns. There has been ongoing cooperation at the State level between DVR and OBH. OBH has included funding for on-going supports as part of its contracts with mental health centers. OBH has hired a full time Individual Placement and Support (IPS) trainer to assist Mental Health Centers that have adopted this service provision model.

In Colorado, collaboration among relevant state agencies, private nonprofit organizations and other community resources for the provision of extended ongoing support services takes many forms, ranging from informally established local cooperative working relationships between direct providers and clients of supported employment services to formally negotiated statewide agreements among state agencies. Informal working agreements are developed to coordinate activities such as transition from intensive supported employment services to extended services, the types of extended services to be provided, identifying qualified individuals to

provide extended support, and referral to the Division of Vocational Rehabilitation (DVR) for post-employment services.

The primary entities involved in these types of collaborative efforts are local rehabilitation offices, local school districts, Workforce Centers, independent living centers, local community rehabilitation programs, mental health centers, developmental disabilities service providers, community centered boards and other available service providers, including advocates, family members and private vendors. Although supported employment depends on these informal collaborative efforts, more efforts are needed to enhance the availability of extended support services following completion of intensive supported employment services authorized under WIOA.

In state fiscal year 2016, DVR had 15 Mental Health Supported Employment Programs around the state to provide services to participants eligible for supported employment and there will be 15 sites in state fiscal year 2017. The process involves billing for services for individual eligible participants according to their needs. For participants living in areas where there is not an available program, DVR will utilize vendors for the time limited services and the mental health centers have agreed to provide extended services.

A comprehensive program evaluation has been completed on all mental health sites participating in the DVR Mental Health Supported Employment Program contract this year including site visits to the mental health centers as well as discussions with DVR counselors about how the program is working, what is working well and what improvements might help the program. Program Evaluation Reports were shared with our partners.

Section (G) Coordination with Employers

DVR has 10 Business Outreach Specialist (BOS) positions throughout Colorado. The BOS positions create and sustain important employer relationships with DVR's small, medium, large, Federal and Federal contracting employers. BOS staff work with DVR's pool of "ready" job seekers and partner with private job developers and job development programs to increase opportunities for individuals with disabilities.

BOS staff members determine beneficial memberships at the local level to include Chambers of Commerce, Society of Human Resource Management chapters, and economic development groups. BOS staff partner with local Workforce Center business services staff to work with local employers and conduct job fairs. Through the efforts of the BOS and other DVR staff, the Division is regularly called upon for Disability Awareness Training, job fairs, and other opportunities to exhibit and provide disability employment information.

Section 503 of the Rehabilitation Act brought many Federal Contractors to DVR for information and employment opportunities. BOS staff have received training on the 503 changes, have met with the Office of Federal Contractor Compliance Programs, and have responded to Federal contractor inquiries for information on compliance and Affirmative Action planning. BOS staff

are conducting Disability Awareness Training for Federal Contractors and providing information on how these Federal Contractors can best meet the requirements of the 503 changes within their companies.

BOS staff have introduced the Talent Acquisition Portal (TAP) throughout all DVR offices in Colorado. All counselors are trained in accessing TAP and participant resumes are regularly being created via this valuable resource. Private job developers also have access to TAP to assist participants in creating resumes and accessing corporate jobs in TAP.

Section (H) Interagency Cooperation

Division for Intellectual and Developmental Disabilities (DIDD), Health Care, Policy, and Financing

DVR and DIDD continue to work in collaboration to effectively plan and coordinate the provision of supported employment services to individuals with the most significant developmental disabilities by the DIDD community services agencies and DVR to avoid duplication of services thereby, maximizing available resources. As a result of this collaboration, much has been achieved in making community-based, integrated employment available for persons with developmental disabilities.

Within this collaborative relationship, DVR is responsible for the provision of supported employment services including, but not limited to, job coaching. However due to the expertise and proven history of DIDD in training individuals with the most significant developmental disabilities, the local DIDD community service provider is typically used by the rehabilitation counselor to provide such training and other supported employment services.

The DIDD community service provider must be registered with DVR to be able to provide supported employment services to DVR clients. Services are purchased in accordance with DVR's fee schedule and service providers must meet the standards and credentials as required for the provision of specified supported employment services. Systems have been designed to encourage local level development of supported employment strategies between all DVR field offices and DIDD supported employment service providers.

Colorado has joined the State Employment Leadership Network (SELN). SELN brings together state Developmental Disability agencies for sharing, educating and providing guidance on practices and policies around employment to its members. DVR collaborates with the Division for Intellectual and Developmental Disabilities on activities with SELN and as part of this, DIDD has a staff person dedicated to spending at least fifty percent of her time focused on employment for persons with developmental disabilities. SELN is currently conducting webinars on topics identified at last summer's roundtable meetings.

Colorado DVR partnered with the Division for Intellectual and Developmental Disabilities and held regional roundtables this last year to create discussions about issues faced by persons with developmental disabilities looking for competitive employment. Attendees included DVR staff,

vendors, family members and Community Center Board provider staff. These roundtable meetings included presentations by DVR and DIDD staff as well as breakout sessions in which groups reviewed and discussed relevant topics such as on-going support, individual supported employment, and line of sight supervision.

There are twenty Community Center Boards (CCBs) in the State of Colorado. Community Center Boards are organizations designated in statute as the single entry point into the long-term service and support system for persons with developmental disabilities. Each Community Center Board is responsible for intake, eligibility determination, service plan development, arrangement of services, delivery of services, case management, monitoring, and other functions.

DVR continues to have lead counselors who work specifically with individuals with developmental disabilities to help more effectively coordinate and provide quality services for these clients. These counselors serve as regional liaisons, providing training, guidance and support to all counselors in their region to establish standards of practice with the local CCB's. In addition, their duties include functioning as a subject matter expert and serving as a liaison between the CCB and the local DVR office as well as various community partners, vendors and independent contractors. These individuals will also work as a team in conjunction with the Supported Employment Program Coordinator to identify emerging trends and issues, develop new and or unique services in the community as necessary and evaluate existing programs for persons with developmental disabilities.

DVR is in the process of developing an interagency agreement with Health Care Policy and Financing, including the Division of Intellectual and Developmental Disabilities. This is scheduled to go in effect July 1, 2016.

Mental Health Programs

The Mental Health Supported Employment Program operates under a formalized agreement between DVR and the Office of Behavioral Health (OBH) and involves local level supported employment agreements with twelve (12) Mental Health Centers, one (1) non-profit organization, and two (2) private vendors throughout the State. Services provided through the agreements consist of job development, job seeking skills, job coaching, and on-going support. The purpose of this project is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. This program has resulted in increased integrated employment opportunities for these individuals.

A comprehensive program evaluation was completed on all mental health sites participating in the program in 2015, including site visits to the mental health centers as well as discussions with DVR counselors about how the program was working, what was working well and what improvements might help the program. Final reports indicated program strengths, common themes found across all programs, regional differences in service delivery and training needs.

Throughout the regions the DVR offices work with the community mental health centers serving the area. Counselors and supervisors provide orientation and training sessions for mental health center staff and their clients. Where the community mental health centers have established vocational and supported employment programs, DVR often partners with these centers to meet the needs of our mutual clients.

OBH joined the Dartmouth Collaborative in 2013. Dartmouth developed the Individual Placement and Support Model (IPS) and the Collaborative serves as a mechanism for training and support for those states (19) and countries (3) implementing this approach to job development for people with serious mental illness.

In moving forward with Mental Health Supported Employment, increased emphasis will be placed on serving Youth with Mental Health Disabilities in employment and education.

Section (I) Comprehensive System of Personnel Development

The Colorado Division of Vocational Rehabilitation (DVR) has a strong commitment to employing and retaining an adequate workforce of qualified vocational rehabilitation personnel, both professional and paraprofessional.

Collection and Analysis of Data

DVR currently has access to three existing data systems that identify the number of persons employed by DVR by personnel category. The primary one is maintained by the Department of Human Services' (DHS) Personnel Office. This is the database that maintains payroll information on employees including their dates of hire, official job classifications, and home addresses. An additional spreadsheet is maintained internally within DVR by the Human Resources Liaison. It contains information on offices and regions to which staff are assigned, functional job titles, and other information about the position. Finally DVR's electronic case management system, CO-AWARE, also contains staff information about positions to which employees are assigned. DVR uses a combination of these three data systems as well as supervisory records to continuously gather and analyze information about the qualifications of the 229.7 full time equivalencies (FTEs) assigned to DVR staff. As DVR transitions from DHS to the Colorado Department of Labor and Employment (CDLE) by July 1, 2016, both Departments are working together to ensure a seamless transition of all relevant personnel data. DVR will continue to have access to needed personnel data through the CDLE Human Resources office.

Currently, 105 of the 229.7 positions are vocational rehabilitation counselors. The remaining 124.7 positions consist of 28 administrative assistants, 2 office managers, 19 district and regional supervisors, 11.5 orientation/mobility & vision rehabilitation therapists, 10 business outreach specialists, 7 Business Enterprise Program professionals, 2 assistive technology specialists, 8.5 rehabilitation technicians, and approximately 36.7 central office managerial and infrastructure staff.

In addition to these positions, DVR also has the following federally or "other" funded program positions:

- BOND program has 1 rehabilitation counselor and .20 supervisor
- ASPIRE Program has .25 central office management staff, 2 central office professional staff, and 8 case managers located in field offices.

DVR continues to work to develop a business plan that outlines necessary staffing levels. At the current point in time, DVR has the following vacancies: 10 rehabilitation counseling positions; 2.5 administrative assistant positions, 3 business outreach specialist positions, and 5 central office professional staff positions.

The ratio of the number of vocational rehabilitation counselors to the number of clients currently being served in applicant and active statuses is approximately 1 vocational rehabilitation counselor for every 75 clients. The ratio of vocational rehabilitation counselors to field support staff is approximately 3.5 to 1.

Projections of the number of individuals to be served including those with significant disabilities are based on projected increases for the general population and incidence rates for disabilities, using Colorado census data and state demographics. These projections, in combination with DVR attrition and retirement rates, are used to predict personnel needs for the next five years.

The rate of attrition of DVR staff averages about 10-12%, or approximately 25-30 staff per year. It is projected that DVR will need to recruit approximately 30 new rehabilitation counselors during the next three years. In addition, DVR anticipates the need to continue to recruit high quality support staff; approximately 10 during the next three years given the average attrition rate for the agency.

Personnel Standards

Colorado does not have state-approved or state-recognized certification, licensing or registration requirements for any of the personnel classifications used by DVR, specifically rehabilitation counselors. In collaboration with Colorado's Department of Personnel and Administration, DVR works to ensure all counselors are fully qualified and possess an appropriate Master's level degree, experience working with individuals with disabilities, and whenever possible, are eligible to obtain the appropriate nationally recognized certification. DVR does not anticipate changes to current personnel standards as a result of the Workforce Innovation and Opportunity Act, as all professional staff positions include minimum qualifications that meet or exceed new legislative requirements. However, DVR will continue to monitor guidance published by RSA and will respond accordingly to ensure ongoing compliance.

When circumstances prohibit DVR from hiring a fully qualified rehabilitation counselor, DVR does maintain a rehabilitation counselor intern classification. If an individual is hired as a rehabilitation counselor intern, he or she is required to complete necessary coursework or

accrue necessary employment experience to fully meet the minimum qualifications of a rehabilitation counselor within 5 years of the date of hire. In these situations, a training plan is developed with the individual identifying specific educational or experiential requirements that must be completed and the timeline for completion. DVR maintains partnerships with several universities offering financial assistance through RSA administered long-term training grants. DVR seeks to connect rehabilitation counselor interns with these funding sources to the extent possible when graduate coursework is required. This classification is used only infrequently when efforts to recruit fully qualified rehabilitation counselors have been unsuccessful. However, it is a useful tool, particularly in rural areas of the state and to ensure a diverse workforce.

Offices located near the state border have the added flexibility of being able to recruit qualified personnel who currently reside outside of Colorado. DVR also has the option to request a waiver to recruit out of state when unable to identify qualified personnel within Colorado. As needed, DVR works with the Department of Personnel Administration to secure a residency waiver allowing for this expanded recruitment.

DVR believes that the private sector is another good resource for recruiting experienced, competent staff. Through its relationships with various professional associations for counseling and other disciplines, DVR maintains a network for recruiting vocational rehabilitation counselors who have experience in the private sector. DVR ensures availability of accommodations necessary for qualified individuals with disabilities to successfully compete for and perform their job when hired.

DVR ensures rehabilitation counselors predominately serving clients who are deaf are skilled in American Sign Language and knowledgeable of deaf culture. Evaluation of these skills is incorporated in the screening and hiring process for counselors working with this population. Similarly, orientation and mobility instructors and rehabilitation teachers must meet the same minimum qualifications of a rehabilitation counselor, along with specialized skills necessary to provide orientation and mobility services and vision rehabilitation.

Current Status of Qualified Personnel

DVR first established a CSPD policy to require all DVR rehabilitation counselors to meet minimum qualifications in 2000. At that time, DVR established a target 5 year period by which all existing rehabilitation counselors would meet the requirement. Since attaining that target, DVR has maintained the established minimum qualifications for newly hired staff in collaboration with the Department's Division of Human Resources. As DVR moves to CDLE, this partnership will continue with human resources staff there. DVR will ensure HR staff who assist with initial screening of applicants are knowledgeable of the education and experience requirements needed to assure qualified personnel.

Of the 95 individuals currently in filled rehabilitation counselor positions within DVR (there are currently 10 vacant rehabilitation counseling positions), 1 individual is currently categorized as a rehabilitation intern and is working on completing her master's degree.

Coordination with Institutions of Higher Education

The University of Northern Colorado (UNC), located in Greeley, offers a Master's degree in Rehabilitation Counseling. Graduates of the rehabilitation counseling program meet the minimum qualifications for a Rehabilitation Counselor I position. Faculty at UNC indicates that there are currently 22 individuals enrolled in their graduate level Rehabilitation Counseling program. Eight individuals graduated with Master's degrees in Rehabilitation Counseling in 2015. DVR regularly partners with UNC to offer internship opportunities for students and a number of graduates have been hired by DVR in recent years.

In addition, DVR has partnered with a number of Rehabilitation Counseling programs out of state that offer distance education, including Utah State University, University of Wisconsin - Stout and Hunter College when staff require additional training to meet minimum qualifications. When feasible, DVR also partners with universities from across the country to provide internship opportunities, particularly to students attending distance education programs or those considering relocating to Colorado. Additionally, there are a number of other institutions of higher education across the state that offer Master's level degrees in counseling and related areas. Individuals obtaining this level of degree, when combined with the appropriate acceptable work experience, meet the minimum qualifications as well.

DVR's plan for recruiting qualified personnel, including qualified individuals from minority backgrounds and individuals with disabilities, includes collaboration with all of the relevant educational programs mentioned above as well as several additional graduate schools with programs in vocational rehabilitation. DVR also recruits using various resources such as The Summit on Program Evaluation, Emerging Leaders, CSAVR, and other university websites to post staff openings.

Communication with Diverse Populations

DVR believes strongly in being able to provide quality services to everyone who applies for vocational rehabilitation services. Consequently, DVR strives to meet the communication needs of all participants. At the present time, approximately 27% of DVR's field offices have one or more staff members who speak Spanish. Offices in the areas with a high Hispanic population have at least one staff member who is also Hispanic. DVR also has staff members who speak a variety of other languages such as German, Swahili, Polish, Greek, Yoruba and Afrikaans. In addition, all offices have access to translation resources. DVR also is able to access the State of Colorado Division of Refugee Services to capitalize on the knowledge, expertise and resources available to provide the best possible rehabilitation services to common clients.

All communities with a significantly large population of individuals who are deaf are assigned at least one staff member who is proficient in American Sign Language (ASL). In the past when none of the applicants for the position of Rehabilitation Counselor for the Deaf possessed sign language skills, the individual who was hired was sent to an intensive sign language training program for vocational rehabilitation counselors.

There are approximately seven community-based organizations throughout Colorado that provide interpreting services as well as numerous private vendors. The Division of Vocational Rehabilitation provides personnel or obtains services to accommodate clients in need of appropriate modes of communication. Agency staff members who have an interest are encouraged to take sign language classes. Offices without staff members who can sign have local agreements with these organizations and individuals to provide interpreting services.

DVR also has the advantage of having several local colleges that provide interpreter preparation programs, such as Front Range Community College in Westminster, CO (which is in the northern part of Colorado), Pikes Peak Community College (which is in the southern part of Colorado), and The MARIE Center at the University of Northern Colorado. The combination of these programs is expected to sufficiently address future interpreter needs.

Every DVR office in the state has access to a telephone relay service available through Colorado's local telephone provider and those offices that serve a high number of individuals who are deaf are equipped with video relay equipment.

The capacity to provide materials in Braille is available through equipment located in some of the offices throughout the state. Additional needs are addressed through private transcribers. This has been meeting the current level of need. Many clients, at this time, prefer materials electronically and this is accommodated routinely. Materials are also routinely made available in large print. In addition, all of the orientation and mobility specialists and vision rehabilitation therapists are being trained on the various uses of the iPhone and the applications that enhance accessibility. Due to the geographical nature of Colorado, there are a number of individuals who live in communities that don't have public transportation. This impacts their ability to access and to participate in vocational rehabilitation services.

To address this issue, DVR is working on a remote training program. This allows a participant to be trained remotely by staff based out of the Denver office, primarily in the use of assistive technology. Ongoing efforts continue in the employer relations area, where DVR is working with employers to make worksites and computer systems accessible for potential and current employees who are blind/visually impaired.

Staff Development

Colorado DVR requires that all new counselors participate in comprehensive new counselor training to assure understanding by all counselors of DVR policies and procedures governing service delivery. Counselors receive an overview of the legislation and regulation impacting the

program, in addition to service delivery policies. Extensive mentoring and coaching is required of all counselors and are provided in collaboration between the new counselor's supervisor and a lead counselor in the work unit. Initial development of new counselors also includes review of all work to ensure thorough understanding and application of eligibility criteria, determination of severity of disability, completion of the comprehensive assessment, plan development and approval, provision of rehabilitation services, monitoring of employment, and appropriate closure decisions and practices.

During this period of training and mentoring, new counselors are evaluated on their skills and receive training to enhance their ability to effectively seek and synthesize disability, vocational, and labor market information to effectively and appropriately move clients through the vocational rehabilitation process from the point of referral to case closure. Counselors receive guidance and training to assist them to appropriately utilize assessments, determine service needs, including the application of available rehabilitation technology, and partner with other workforce development agencies. Counselors regularly participate in case consultations and clinical supervision with their supervisors and mentor counselors to develop and refine skills needed to make sound clinical decisions and provide excellent vocational counseling and guidance. While this initial period of training focuses on new counselors, supervisors regularly evaluate performance of all counselors and counselors may re-enter this period of enhanced training, coaching, and supervision as needed throughout their tenure.

Additionally, as part of DVR's performance management process, all staff consider areas of needed development in collaboration with their supervisors. DVR will begin using CDLE's performance management process in April 2016, which will require agreement to a formal professional growth and development plan, enhancing DVR's current practices. In particular, supervisors will be asked to give special consideration to training needs of their staff related to the Workforce Innovation and Opportunity Act, American's with Disabilities Act, the Individual's with Disabilities Education Act, the Assistive Technology Act and Social Security work incentive programs, including programs under the Ticket to Work and Work Incentives Improvement Act of 1999, facilitating informed choice, and providing services to culturally diverse populations.

DVR continues to incorporate the principles of informed choice into all aspects of training curricula, including policy and procedural training. Such training efforts focus on helping clients develop skills necessary to analyze their strengths, resources, capacities, concerns, priorities, abilities, and interests, as well as a thorough understanding of the benefits and challenges inherent in various options available to them, allowing informed decisions to be made related to the development of their rehabilitation programs. DVR believes that these efforts help counselors become better facilitators and help clients develop the skills needed to be more independent and self-directed, as they go through the rehabilitation process and enter the workforce.

The Organizational Planning and Development unit regularly gathers information from staff, clients, and stakeholders informally and formally to determine areas of training development. Information gathered during the Comprehensive Statewide Needs Assessment, stakeholder

meetings, quality assurance file reviews, customer satisfaction surveys, and periodic internal training needs assessments help to determine areas of focus and shape training developed or purchased to ensure necessary staff development is available. DVR regularly provides access to a broad range of professional develop opportunities for staff through relevant seminars, workshops, webinars, conferences, and distance education to enhance staff skills and knowledge. Training opportunities are regularly made available on topics including specific disabilities, ethics, case management, rehabilitation technology, assessment, job development and service delivery policies. Often this training incorporates the dissemination of knowledge gained through research in rehabilitation. DVR regularly reviews offerings and expands training to ensure staff needs are met. When training in rehabilitation technology is needed, DVR seeks to partner with the University of Colorado's Assistive Technology Partners (AT Partners), which is responsible for carrying out the Assistive Technology Act in Colorado. DVR will continue to explore ways to enhance and further promote this partnership to assure staff development needs in rehabilitation technology are fully met.

Additional training and development opportunities are available to support succession planning and leadership development. All current DVR managers are completing CDLE's Leadership Series to enhance their management skills and further prepare to lead the agency as DVR moves to a new Department. All staff have access to a variety of courses available through the Department of Personnel and Administration's Statewide Training and Development Center, which offers a Supervisory Certificate Program, consisting of a series of leadership and management courses. These courses can also be taken independently, allowing staff to focus on specific areas of growth supporting their leadership abilities. Annually, DVR supports participation of a small number of staff in University of Washington's Center for Continuing Education in Rehabilitation's Emerging Leaders in Rehabilitation Series.

DVR is currently fully staffed within executive and upper management positions, despite some significant turnover in recent years. DVR anticipates increased stability in these positions moving forward, but always seeks to ensure staff are provided opportunities to grow their skills and develop the professional expertise necessary to be qualified for leadership roles. DVR is currently recruiting for a small number of district supervisors. Supervisors are required to be qualified rehabilitation counselors with added years of experience and are often hired from among current rehabilitation counselors.

Coordination with Personnel Development under IDEA

As part of its implementation of transition services, including pre-employment transition services and Colorado's School-to-Work Alliance Program (SWAP), DVR has a formal cooperative agreement with the Colorado Department of Education (CDE). This agreement describes how each agency will provide cross-training and technical assistance to local DVR and education staff to enable them to work more effectively with students as they partner to ensure a seamless transition from school to post-school activities. DVR and CDE regularly partner to develop, sponsor and provide comprehensive training and build effective partnerships at the local level.

State Rehabilitation Council

DVR maintains a close working relationship with the State Rehabilitation Council (SRC) and feedback from that group regarding training issues is solicited and incorporated where appropriate.

Section (J) Results of the Comprehensive Statewide Assessment Of the Rehabilitation Needs of Individuals with Disabilities

Every three years, the Colorado Division of Vocational Rehabilitation (DVR) and the State Rehabilitation Council (SRC), jointly develop and conduct a comprehensive statewide assessment of the rehabilitation needs of individuals with disabilities in Colorado. The triennial Comprehensive State Needs Assessment (CSNA) was developed and conducted in the summer and fall of 2015.

Colorado's CSNA was developed and implemented using the InfoUse guide submitted to Rehabilitation Services Administration on November 30, 2009 and titled "Developing a Model Comprehensive Statewide Needs Assessment With Corresponding Training Materials for State VR agency Staff and SRC Members: The VR Needs Assessment Guide". A CSNA team comprised of DVR executive leadership members and members of the SRC's Planning, Performance and State Plan (PPSP) committee collaborated to:

- develop the work plan and timeline for the CSNA;
- implement the CSNA;
- analyze the results of the CSNA
- develop and present findings to the entire DVR leadership and the SRC for consideration; and
- lead the development of recommendations, goals and strategies to inform the state plan.

Colorado's CSNA was designed to address the following seven informational goals:

1. The rehabilitation needs of individuals with disabilities, including individuals with the most significant disabilities and their need for supported employment services;
2. The rehabilitation needs of individuals with disabilities who are minorities;
3. The rehabilitation needs of individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program;
4. The needs of individuals with disabilities served through other components of the workforce development system;
5. The need to establish, develop or improve community rehabilitation programs within the state;
6. The need to expand and improve rehabilitation services for youth and students; and
7. The need to expand outreach, training and technical assistance to employers.

Data sources used to address the CSNA informational goals included:

- Demographic data including United States Census data, Colorado Workforce Investment Act (WIA) program participant data and Colorado Vocational Rehabilitation program participant data
- Information from ten in-person statewide meetings jointly held by the DVR and the Colorado Department of Labor and Employment (CDLE) to discuss the transfer of DVR into CDLE and to engage, involve and seek the advice of DVR's stakeholders in developing recommendations and plans for a smooth and effective transfer of the vocational rehabilitation program to CDLE
- Key Informant interviews with multiple individuals
- Key Informant interviews with four statewide advisory groups; the Colorado Behavioral Health Council, the Colorado ASPIRE Advisory Group, the Colorado Transition Community of Practice and the Colorado Disability Support Benefits Support Program Board of Directors
- Results from the most recent quarterly DVR/SRC Client Satisfaction Surveys
- Results from the 2015 Colorado Developmental Disabilities Council five-year planning survey
- Results from the Statewide Independent Living Council's 2015 needs assessment
- The SRC and DVR current annual reports
- Feedback from more than 368 survey respondents. Surveys were sent to DVR staff, Colorado educators, families and youth, current and recent DVR customers. Surveys were also made available to the general public on the Colorado DVR website.
- Economic development publications including the Colorado Workforce Development Council's Talent Pipeline Report and the Colorado Economic Development Council/ Office of International Trade's Colorado Blueprint.

CSNA findings were analyzed and weighted to indicate greatest areas of statewide need. The greatest area of need was within the area of unserved and underserved populations. Specifically identified as underserved were:

- individuals with criminal histories;
- youth (from foster care, juvenile justice, mental health systems and deaf/blind youth);
- individuals with limited education;
- homeless individuals;
- refugees; and
- individuals with a history of substance abuse.

Enhanced, increased and improved services to DVR consumers was identified as an area of great need, specifically job development and placement services, counseling and guidance, situational and formal vocational assessment, job coaching, soft skills training and technology training and equipment.

Outreach, technical assistance and education to employers were identified as areas of considerable need. Most commonly identified were the need, through education, to change employer attitudes about disability and the need to educate employers about the value of

hiring individuals with disabilities. Also identified frequently was the need to educate employers about job accommodations and the need to reach out to employers in emerging industries and hot sectors.

The rehabilitation needs of individuals with disabilities living in rural areas garnered considerable rank. Improved access to DVR staff and services, improved transportation, greater numbers and array of vendors, and improved translation and interpretation services were areas of significant need.

The need for stronger collaboration between DVR and the workforce development system's programs and partners was identified through the CSNA, along with the need for increased disability awareness and knowledge, and greater accessibility within workforce centers and partner programs.

The CSNA results indicated the need for additional vendors and an increased array and range of services in order to meet the rehabilitation needs of all individuals with disabilities. Also expressed was the need for vendor disability awareness, cultural competence and communication skills, including foreign language translation and sign language.

Finally, in terms of transition and pre-employment transition services (PETS), the CSNA indicated the need for greater collaboration between DVR and education partners, including increased understanding of educators and parents about what DVR does and the use of the referral process to DVR. Additionally, the CSNA indicated the need for increased coordination between DVR and the schools to provide PETS.

Section (K) Annual Estimates of Individuals to be Served and Costs of Services

The Colorado Division of Vocational Rehabilitation (DVR) implemented an Order of Selection on March 1, 1993, in anticipation of projected economic and funding difficulties, to ensure DVR's ability to manage limited funds, and to guarantee continuity and fairness in the provision of rehabilitation services to persons eligible for vocational rehabilitation services. Since March 1, 1993 DVR has restricted services through activation of the order of selection, four times.

Most recently, on March 1, 2013, DVR implemented a wait list for all individuals whose disabilities were not most significant or significant. On April 22, 2013, based on continued increases in case service expenditures, DVR established wait lists for all three of DVR's priority categories.

During the next two years, DVR carefully monitored and managed staff resources, fiscal resources and the wait list, which consisted of 9,891 individuals during the period from March 1, 2013 through April 30, 2015. Through a series of eleven discrete releases of eligible individuals from the wait list and into active status, DVR was able to eliminate the wait list on April 30, 2015. Since that date, no wait list has been in place. Additionally, based on the number of individuals anticipated to be served in Federal Fiscal Year 2017 and based on the fiscal and staff resources projected to be available to serve these individuals, DVR does not anticipate a

deficit or the need to establish a wait list. DVR anticipates providing the full range of vocational rehabilitation services to all eligible individuals who will be served during FFY 2017

FFY 2017 Annual Estimates of Eligible Individuals and Cost

During Federal Fiscal Year (FFY) 2017, DVR estimates that the following outcomes will be accomplished. These estimates are based on data from all of FFY 2015, on FFY 2016 data through November 30, 2015, and on service projections:

Title I, Vocational Rehabilitation Funds – A total of 13,667 eligible clients will be served at a case services cost of $13,245,575.00.

Title VI, Part B Supported Employment Funds - A total of 1953 eligible clients will be served using DVR's entire allotment of Title VI-B funds, and at a total case service cost of $1,581,218.00.

FFY 2017 Annual Estimates of Eligible Individuals by Priority Category

The table below contains the estimate of individuals who will be eligible for services by priority category and the cost of services under each under each priority category during FFY 2017. These estimates are based on data from all of FFY 2015, on FFY 2016 data through November 30, 2015, and on service projections. The estimates do not include the contractual funds expended through DVR's School to Work Alliance Program (SWAP).

	Eligible Individuals	Cost of Services for Eligible Individuals
Individuals with most significant disabilities	11,090	$11,876,462.00
Individuals with significant disabilities	3905	$2,595,272.00
All other eligible individuals	625	$355,059.00
Totals	15,620	$14,826,793.00

Estimate of Individuals receiving Supported Employment Services

Typically, DVR uses 100% of its Title VI-B funds for direct authorization of supported employment services. Title I funds are also used for supported employment services provided under cooperative agreements as well as for individual supported employment programs. DVR's policy is to assure the provision of supported employment services to all who need them and DVR uses both Title VI-B funds and Title I funds for this purpose.

When Title VI-B funds are not available or have been exhausted, DVR uses Title I funds to assure that supported employment services are not interrupted. Thus, it is impossible for DVR to separate its programmatic supported employment plans and goals into separate components for each funding source. Rather, DVR develops programming strategies for its entire supported employment program, which includes the use of Title VI-B and Title I funds.

DVR provided supported employment services to 1772 clients during FFY 2015 and expended $1,434,212 for these services. This figure represents $400,451.00 Title VI-B funds and an additional $1,033,755 Title I funds that were expended to serve clients with supported employment needs.

FFY 2017 Total Projected Costs

The information listed below includes total projected vocational rehabilitation costs, including the dollar amount of funds provided under Part B of Titles I and VI of the Rehabilitation Act and administrative costs.

The FFY 2017 cost of vocational rehabilitation services is projected to be $14,826,793.00. The total projected combined funds available for FFY 2017 are currently unknown, but are projected to be greater than the FFY 2016 combined total award of $50,019,483.00. DVR anticipates the availability of funding that will allow all eligible individuals to be served without being placed on an Order of Selection wait list.

Section (L) State Goals and Priorities

The following goals were developed and approved through ongoing discussion between DVR leadership and the State Rehabilitation Council (SRC). The development of the state plan is a standing agenda item at SRC meetings. This is when DVR leadership and the SRC's Planning, Policy and State Plan Committee share the results of their state plan activities and solicit the involvement, discussion and approval of the entire SRC. These goals are based on the 2015-2017 triennial Comprehensive State Needs Assessment (CSNA) results, comment from public hearings and the joint planning and development activities of the SRC and DVR leadership.

GOAL #1 – DVR WILL INCREASE OUTREACH AND VOCATIONAL REHABILITATION SERVICES TO COMMUNITIES AND CULTURES THROUGHOUT COLORADO, WITH EMPHASIS ON UNDERSERVED POPULATIONS

Strategies:

1. Establish partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.
2. Explore the expansion of technology and social media to provide better access and information to Coloradans.

GOAL #2 – DVR WILL EXPAND TRANSITION SERVICES TO COLORADO'S YOUTH WITH DISABILITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES (PETS), TO COLORADO'S STUDENTS WITH DISABILITIES

Strategies:

1. Develop and update cooperative partnerships with Colorado school districts/BOCES, education providers and core workforce development programs to encompass PETS requirements.
2. Create a youth transition unit within DVR to expand and innovate excellent transition services throughout the state.
3. Explore the provision of transition services to groups of youth with disabilities who may have not yet applied or been determined eligible for vocational rehabilitation services and if feasible, develop policies and processes to provide these services.

GOAL #3 – DVR WILL INCREASE THE SKILLS OF DVR STAFF AND SERVICE PROVIDERS TO ASSURE A 21ST CENTURY UNDERSTANDING OF THE LABOR MARKET AND THE PROVISION OF QUALITY SERVICES THAT MEET THE NEEDS OF COLORADANS WITH DISABILITIES

Strategies:

1. Implement integrated professional development for DVR staff with WIOA partner programs to elevate internal expertise and equip them with the tools necessary to operate a comprehensive, holistic approach to talent development for business and industry. Put particular emphasis on leveraging the synergies resulting from the merger of DVR and CDLE.
2. Develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.
3. Implement the Colorado LEAN process to assure a customer-focused, continuous improvement culture of operational excellence.

GOALS #4 – BUILD AND STRENGTHEN STAKEHOLDER RELATIONSHIPS TO INCREASE EMPLOYMENT OPPORTUNITIES FOR INDIVIDUALS WITH DISABILITIES

Strategies:

1. Expand the involvement of DVR staff in regionally-focused sector partnerships to champion career pathways within business and industry for individuals with disabilities.
2. Align business outreach efforts with partner agencies to leverage the identification of employment opportunities and expand awareness of disability employment competency within the business sector.
3. Explore the provision of technical assistance to businesses that are seeking to employ individuals with disabilities and as feasible, develop policies and processes to provide these services.

Section (M) Order of Selection

DVR implemented an Order of Selection on March 1, 1993, in anticipation of projected economic and funding difficulties, to ensure DVR's ability to manage limited funds, and to guarantee continuity and fairness in the provision of rehabilitation services to persons eligible for vocational rehabilitation services. This action resulted from increased costs for

vocational rehabilitation services, increased demand for services and increased numbers of applicants with disabilities.

Since March 1, 1993, DVR has restricted services through activation of the order of selection, four times. Most recently, on March 1, 2013, DVR implemented a wait list for all individuals whose disabilities were not most significant or significant. Following implementation, based on continued increases in case service expenditures, DVR determined the need to establish wait lists for all priority categories. As a result, on April 22, 2013, DVR established wait lists for all three of DVR's priority categories.

During the next two years, DVR carefully monitored and managed staff resources, fiscal resources and the wait list, which consisted of 9,891 individuals during the period from March 1, 2013 through April 30, 2015. During the period from March 1, 2013 through April 30, 2015 all individuals who were determined eligible for services and placed on the wait list were provided accurate information and referral services using appropriate modes of communication, to assist them in preparing for, securing, retaining, advancing in or regaining employment. Individuals receiving information and referral services were referred to programs within the statewide workforce development system.

Through a series of eleven discrete releases of eligible individuals from the wait list and into active status, DVR was able to eliminate the wait list on April 30, 2015. Since that date, no wait list has been in place. Additionally, based on the number of individuals anticipated to be served in Federal Fiscal Year (FFY) 2017 and based on the fiscal and staff resources projected to be available to serve these individuals, DVR does not anticipate the need to establish a wait list under an active Order of Selection.

During FFY 2017, DVR and the State Rehabilitation Council (SRC) will explore the options and impact related to serving eligible individuals (whether or not the individuals are receiving vocational rehabilitation services under the order of selection) who require specific services or equipment to maintain employment. DVR will use exploratory findings to determine if DVR will elect to serve eligible individuals who require specific services or equipment to maintain employment outside of the order of selection wait list. Based on this decision and if necessary, DVR will develop policy that reflects the decision.

In accordance with the Rehabilitation Act of 1973 as amended by the 2014 Workforce Innovation Opportunity Act, Colorado DVR has designated that individuals with disabilities will receive vocational rehabilitation services in the following order of priority, and shall be classified in the highest priority category for which the individual is determined qualified:

First, eligible individuals with the most significant disabilities;

Second, eligible individuals with significant disabilities; and

Third, all other eligible individuals.

DVR, in accordance with federal requirements, has developed criteria that define the three priority categories to assure that individuals with the most significant disabilities are

selected for services before all other individuals with disabilities. The priority categories are described below:

Most Significant Disability:

An individual is classified as having a most significant disability when he/she has a severe physical or mental impairment that seriously limits three (3) or more functional capacity areas (mobility, motor skills, interpersonal skills, communication, work tolerance, work skills, self-care and self-direction) in terms of an employment outcome; and, whose successful vocational rehabilitation can be expected to require the provision of two (2) or more core vocational rehabilitation services for at least five (5) months.

Significant Disability:

An individual is classified as having a significant disability when he/she has a severe physical or mental impairment that seriously limits one (1) or two (2) functional capacity areas and who otherwise meets the same criteria for a most significant disability. In other words, the individual's successful vocational rehabilitation can be expected to require the provision of two (2) or more core vocational services for at least five (5) months. An individual who is determined to be eligible for SSI/SSDI on the basis of his or her own disability is presumed to have at least a significant disability.

Individual with a Disability:

An individual is classified as having a disability when he/she meets DVR eligibility criteria but his or her disability does not meet the criteria for most significant or significant disability.

Section (N) Goals and Plans for Distribution of Title VI, Part B Funds

The Division of Vocational Rehabilitation (DVR) will continue to expend available grant funds obtained under Title VI, Part B (Supported Employment Services), towards the administration of the supported employment program and the purchase of services in accordance with the WIOA proposed rules of April 16, 2015. No more than 5% of supported employment grant funds will be used for administrative activities, including but not limited to, data collection and analyses, training, and consultation costs. At least 95% of grant funds under Title VI, Part B will be used to purchase supported employment services under Individualized Plans for Employment (IPE) for individuals with the most significant disabilities who have been determined eligible for supported employment. The types of services to be purchased remain the same as those identified in Section Q of the Vocational Rehabilitation Services Portion of the Combined State plan. DVR will add 15% State fund match to the Title VI, Part B Funds and expend 50% or more of these funds on Youth with Disabilities that need supported employment services.

DVR's administrative priority is to assure the provision of supported employment services to all who need them. Historically, DVR's Title VI-B funding has been insufficient to meet this need. For example, during FFY 2015, DVR's supported employment services award was

$400,457 and DVR expended $1,434,212 for supported employment services. For FFY 2016 DVR's supported employment award is $464,210 and DVR expects to spend $1,505,922 for supported employment services. DVR anticipates that its Title VI-B award for FFY 2017 will not be sufficient to meet the needs of all individuals who need supported employment services and expects to expend a total of $1,581,218 for supported employment services. DVR's electronic case management system provides the utility to ensure that Title VI-B funding is the primary source of payment for supported employment services until that funding is exhausted, at which point funding continues to be provided through Title I. Title I funds are also used for supported employment services provided under cooperative agreements. During FFY 2015, DVR provided supported employment services to 1772 clients using both Title I and Title VI-B funds. DVR projects to provide supported employment services to 1861 individuals during FFY 2016 and to 1953 individuals during FFY 2017. As explained above, when necessary both Title VI-B and Title I funds will be used for the provision of services.

To successfully meet the supported employment needs of individuals with the most significant disabilities, DVR continues the collaborative efforts and working relationships between local DVR offices and mental health centers, and between local DVR offices and agencies serving clients with developmental disabilities. DVR counselors and vocational staff from the above agencies work together to identify individuals who would be appropriate referrals to DVR for supported employment services.

DVR continues to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services including supported employment services along with all Colorado youth. DVR has worked to infuse best practices within these areas, so that the needs of youth with the most significant disabilities are considered and met. Colorado DVR and Colorado Department of Education state-level staff work and travel as a team throughout the state to respond to requests and to provide training, technical assistance and facilitation to local community agencies, such as schools and adult organizations, as these entities work to provide collaborative transition services to youth with the most significant disabilities.

The Division's programmatic activities for supported employment services and programs funded under both Titles I and VI-B are intended to increase the number of persons receiving supported employment services and to improve employment outcomes for these individuals. The Division believes that the most effective and efficient strategy to accomplish this is by expanding and strengthening its collaborative linkages with relevant state agencies and/or private not-for-profit agencies for the provision of supported employment and extended support services. The activities to be conducted during FFYFY 16 and beyond reflect a continuation and refinement of activities performed over the last several years.

The Office of Behavioral Health applied for and, with DVR's support, has been accepted into the Johnson and Johnson-Dartmouth Community Mental Health Program. This program

includes $380,000 to fund an Individual Placement and Support (IPS) Trainer for four years. OBH is in the second year of this four year grant and the IPS Trainer is actively working with Employment Specialists and DVR Counselors to understand and effectively implement IPS in the Mental Health Centers that have adopted this practice.

Section (O) State Strategies

Strategies to Achieve Goals and Priorities

DVR Goal #1 Strategies:

- Establish partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.
- Explore the expansion of technology and social media to provide better access and information to Coloradans.

DVR Goal #2 Strategies:

- Develop and update cooperative partnerships with Colorado school districts/BOCES, education providers and core workforce development programs to encompass PETS requirements.
- Create a youth transition unit within DVR to expand and innovate excellent transition services throughout the state.
- Explore the provision of transition services to groups of youth with disabilities who may not have yet applied or been determined eligible for vocational rehabilitation services and if feasible, develop policies and processes to provide these services

DVR Goal #3 Strategies:

- Implement integrated professional development for DVR staff with WIOA partner programs to elevate internal expertise and equip them with the tools necessary to operate a comprehensive, holistic approach to talent development for business and industry. Put particular emphasis on leveraging the synergies resulting from the merger of DVR and CDLE.
- Develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.
- Implement the Colorado LEAN process to assure a customer-focused, continuous improvement culture of operational excellence.

DVR Goal #4 Strategies:

- Expand the involvement of DVR staff in regionally-focused sector partnerships to champion career pathways within business and industry for individuals with disabilities.

- Align business outreach efforts with partner agencies to leverage the identification of employment opportunities and expand awareness of disability employment competency within the business sector.
- Explore the provision of technical assistance to businesses that are seeking to employ individuals with disabilities and as feasible, develop policies and processes to provide these services.

Strategies Carried Over from Prior State Plan

- DVR will have thirty day contact with all clients to increase client engagement and enhance the client-counselor partnership.
- DVR will improve case file documentation reflecting personalized and meaningful contact with clients.
- DVR supervisors will meet regularly with counselors and staff to model excellent guidance and counseling skills as well as motivational interviewing so that counselors and staff can in turn use these skills with clients.
- DVR will generate, monitor and use information to make sound fiscal decisions to ensure the ability to provide effective individualized services to clients.
- DVR will continue collaborative efforts and working relationships between local DVR offices and mental health centers and between local DVR offices and agencies serving clients with intellectual disabilities.
- DVR will continue to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services, including supported employment.

Strategies to Outreach to Individuals Who are Unserved or Underserved, Including Individuals who are Minorities, and Individuals with Significant Disabilities

DVR believes strongly in being able to provide quality services to everyone who applies for vocational rehabilitation services. Based upon DVR's recent Comprehensive State Needs Assessment, DVR is aware that specific demographics of the disability population appear to be underserved by DVR. Specifically underserved appear to be:

- Rural populations of Colorado;
- Individuals with criminal histories;
- Youth within the foster care, juvenile justice and mental health systems;
- Individuals with limited education;
- Homeless individuals; and
- Refugees.

DVR intends to increase the number of applications for services from unserved and underserved populations, including minority populations. DVR has begun, and intends to increase, outreach to these populations to educate individuals with disabilities about DVR and support their access to vocational rehabilitation services, when these are needed. Strategies include:

- As identified under DVR Goal #1, establishing partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.
- DVR will develop working and, as appropriate, formal partnership agreements with state community partners to create referral processes and jointly deliver services to customers, including customers from unserved and underserved populations.
- As identified under Goal #1, exploring the expansion of technology and social media to provide better access and information to Coloradans.
- Outreaching and providing technical assistance to community partners to generate referrals and educate them about DVR and services DVR can provide.
- Making training on cultural competence available to DVR staff.
- Making resources on cultural competence available to DVR vendors.
- Expanding the provision of traditional transition services, and pre-employment transition services, to students and youth in all Colorado communities.
- Exploring opportunities from providing services to groups of individuals from unserved and underserved demographics of the disability population.
- Increasing collaboration with Colorado's two tribes, including the cross-training and the development of a formal interagency agreement between DVR and each tribe.

Strategies to Provide Assistive Technology and Assistive Technology Services

- DVR has two dedicated staff positions (Assistive Technology Coordinator and Assistive Technology Specialist) within our Statewide PAT (Personal Adjustment Training) Unit to provide assistive technology services to clients. The Assistive Technology Specialist works with individuals with blindness or low vision within DVR's center-based program; however, referrals are accepted from clients with other disabilities as well. The Assistive Technology Coordinator works primarily to provide assistance, support, and services on a statewide level to DVR clients and teachers in the PAT Unit.

- Outside of the center-based program, there are eight additional teachers who work with clients to provide assistive technology training. While the field teachers do not provide assistive technology on a full-time basis, they assess and provide training in this area as part of the individual's DVR program.

- In addition to DVR's internal staff, DVR has numerous statewide vendors that we are able to purchase assistive technology related services from including, but not limited to, assistive technology evaluations, ergonomic evaluations, assistive technology devices, etc.

- DVR plans to develop and formalize an agreement with Assistive Technology Partners (AT Partners). AT Partners provides services statewide under the Assistive Technology Act of 1998. The formal agreement will strengthen the working relationship between DVR and AT Partners, and will define how the partners will work together, including a process for referral and the coordination of activities.

Strategies to Establish, Develop or Improve Community Rehabilitation Programs

- DVR has an established vendor committee that works to effectively determine rates and standards for goods and services that vendors provide to address vendor related concerns and to improve the overall quality of vendors. DVR staff across the state continually work to recruit new qualified vendors to increase client choice of service providers. DVR's vendor committee, in collaboration with the Operations Support Unit, has implemented a code of ethics for vendors and is exploring the options of a vendor portal and electronic fund transfer payment for vendors. As mentioned, DVR intends to develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.

Strategies to Assist Other Components of the Statewide Workforce Development System in Assisting Individuals with Disabilities

DVR's recent CSNA indicated areas of need within the Colorado workforce development system related to the delivery of effective services to individuals with disabilities. Specifically, the CSNA indicated a need for greater collaboration between DVR and Colorado's workforce development partners. Additionally, CSNA results suggested a lack of accessibility within workforce centers and partner programs related to knowledge and awareness of disability, accessible communication, accessible programs and assistive technology. To address these issues DVR intends to implement the following strategies:

- DVR will participate in cross- training and sharing of curriculum among all core and combined plan partners. DVR will place particular emphasis on collaboration, education and cross-training related to the delivery of effective transition and pre-transition services to students, youth and young adults.
- DVR will identify core and partner program providers at the state and local levels, including contracted adult basic education providers, and will assign DVR liaisons to these programs.
- DVR will infuse disability awareness and etiquette into the cross-education of core and combined plan partners, including the sharing of best practices in serving individuals with disabilities.
- DVR will assure the participation of DVR disability subject matter experts on the committees of local workforce boards.
- DVR will, in keeping with the spirit and the letter of the law, encourage and pursue the development of all MOUs, cooperative agreements and interagency agreements required and encouraged within WIOA.
- DVR will commit to and ensure that DVR is represented and DVR staff are involved in state and local sector strategy efforts and activities.
- DVR will update our Disability Awareness Training Tool Kit and make these materials, including DVR staff subject matter expertise, available to core and combined plan partners to meet the needs of Colorado employers and promote a diverse workforce.

- DVR will provide pre-employment transition services to younger students, including work experiences, to assure that youth and young adults are better-prepared for the services they will receive through other core and partner programs.
- DVR will promote STEM awareness, activities and opportunities, particularly through pre-employment and transition services to youth.

Strategies to Improve Performance on Evaluation Standards and Indicators

DVR will address areas of deficiency from our recent FFY Standards and Indicators measures to improve the employment outcomes of individuals with disabilities in Colorado. Specifically, DVR will strive to increase the number of individuals who are employed and the wages of those individuals. Additionally, DVR commits to monitor and evaluate the implementation of the six WIOA-required performance measures, and will use findings from our long-standing Standards and Indicators in this endeavor.

Section (P) Evaluation and Reports of Progress

The Colorado Division of Vocational Rehabilitation (DVR), in collaboration with the State Rehabilitation Council (SRC) is confident that DVR achieved or made progress toward all of the identified goals and priorities and innovation and expansion activities established within the FFY 2015 state plan.

GOAL 1 – DVR WILL PROVIDE EXCELLENT GUIDANCE AND COUNSELING TO DVR CLIENTS

Strategy - DVR will have 30 day contact with all clients to increase client engagement and enhance the client-counselor partnership.

Progress: DVR collaborated with the SRC to formalize this strategy into a state regulatory requirement through placement into state rule and into DVR policy. The requirement for thirty day contact with clients is tracked and monitored within DVR's quality assurance data collection instrument. SRC-driven quarterly customer satisfaction surveys appear to indicate that for most clients, contact with DVR staff at least every thirty days has resulted in increased rapport, improved client-counselor partnership and communication and increased opportunities for counseling and guidance to occur. DVR will maintain this strategy.

Strategy - **DVR will improve case file documentation reflecting personalized and meaningful contact with clients.**

Progress: DVR formalized this strategy through the placement of specific questions on client engagement and meaningful contact within DVR's monthly case record supervisory review document. Additionally, DVR requires the inclusion of annual individual performance objectives related to personalized and meaningful client contact within the annual review plans of all DVR counselors and supervisors. Measures are based on feedback from customer satisfaction surveys, and review of case note documentation and activity to assure that meaningful contact with a vocational focus has taken place. Beginning in October 2014, all DVR counselors and supervisors participated in professional development related to meaningful, purposeful and

personalized contact between client and counselor supporting the development of a successful working alliance. At this time, all DVR counselors and support staff also received training addressing expected case file documentation of such contact. DVR continues to provide training to all new counselors emphasizing the importance of the working alliance and highlighting strategies to ensure ongoing focus on meaningful contact and the related documentation of such efforts.

Strategy - DVR supervisors will meet regularly with counselors and staff to model excellent guidance and counseling skills as well as motivational interviewing so that counselors and staff can in turn use these skills with clients.

Progress: DVR supervisors received ongoing coaching from Dr. Jared Schultz of Utah State University to support the development of their clinical supervision skills, first introduced in August 2014. Additionally, DVR's lead counselors received training in clinical supervision with Dr. Schultz in June 2015 to further expand DVR's ability to provide clinical supervision to all counselors. Supervisors participated in an advanced training during this same period. The clinical supervision training helped supervisors and lead counselors to think through case conceptualization strategies, as well as the identification and application of appropriate counseling theory, including Motivational Interviewing, to support client progress. They have continued to receive ongoing coaching from Dr. Schultz and are regularly implementing these skills with their counseling staff. In particular, many supervisors have begun reviewing theory during unit meetings and regularly practice case conceptualization strategies during case consultations to assist counselors to move forward with clients who present with challenges. All counselors also participated in training specifically to build skill in the use of Motivational Interviewing within their counseling practice in the summer and fall of 2015 and continue to practice these skills within their units. DVR continues to explore mechanisms for further supporting the development of these skills among all counselors.

Strategy - DVR will explore training options to improve consistent and excellent client service to all clients, focusing on methods for dealing with difficult situations and creating welcoming client focused environments in all DVR locations.

Progress: During DVR's October 2014 Academy for Excellence in Rehabilitation, staff received training in strategies for providing excellent customer service and dealing with difficult situations. Training sessions targeted both support staff and counselors. Support staff learned strategies for creating a positive impression and welcoming environment for all clients, including an introduction to basic sign language and strategies for communicating with deaf or hard of hearing clients. Counselors participated in sessions addressing key components of a successful intake, highlighting strategies for ensuring the intake creates a sense of welcome to DVR and supports the establishment of a positive working alliance. Support staff and counselors also received training on effective caseload and time management catered to their roles within the agency. These skills are critical to ensuring consistently positive experiences for all clients. DVR continues to provide training in these areas to new staff. As DVR merges with the Colorado Department of Labor and Employment effective July 1, 2016, customer service will

also be a focus as a core value of the Department and additional training will be provided to all DVR staff as part of the integration into Department.

GOAL 2 - DVR WILL BUILD PUBLIC TRUST BY DEMONSTRATING STEWARDSIP, SOUND OPERATIONAL PRACTICES AND POSITIVE INTERNAL DYNAMICS

Strategy - DVR will implement new procedures for external job placement vendors that will establish reasonable timelines for services and a greater focus on successful closures.

Progress: DVR's fee schedule was reworked to incorporate new procedures and fees for purchase of employment placement services that are structured around milestones to encourage more effective service delivery. As DVR moved to a new milestone fee structure for job placement services, all vendors were required to attend training prior to moving to the new fee schedule. The training addressed roles and responsibilities, explained the fee structure, and provided guidance to job search and placement providers related to agency expectations. As new job search and placement providers are registered, they also complete the training available online from DVR. The expectations of the job search and placement service provider, client, and counselor are clearly outlined and an agreement is put into place between this team for each client to ensure common understanding of how the client will best be supported in his or her job search. Progress is closely monitored and lack of progress is carefully considered by the team to determine appropriate resolution. All DVR counselors and supervisors also received training in this change to the fee structure for job search and placement services to ensure compliance and effective monitoring of related services.

Strategy - DVR will generate, monitor and use information to make sound fiscal decisions to ensure the ability to provide effective individualized services to clients.

Progress: The administrative staff hired by DVR within the last twelve months to be responsible for developing the program's budget, and monitoring expenditures and revenues, have extensive experience, expertise and training in state and federal budgeting processes and in proper accounting and fiscal procedures. Led by this expertise, DVR continues to regularly monitor data collected through the electronic case management system, through the state's fiscal and accounting system and through the agency's personnel data system, to make sound fiscal decisions and ensure the ability to provide effective individualized services to clients.

Strategy - DVR will utilize the Waitlist Management process to project and manage the removal of clients from the waitlist effectively and efficiently.

Progress: On March 1, 2013, DVR implemented a wait list for all individuals whose disabilities were not most significant or significant. DVR and the Colorado Department of Human Services developed and implemented a policy and strategy for managing the wait list. This included estimating time frame targets for serving wait listed participants within the priority categories, supervisory reviews to ensure staff followed wait list policies, and comprehensive methods for projecting DVR expenditures and estimating available funding needed to serve individuals on the wait list. DVR regularly generated and monitored fiscal and human resource information to assist the agency in determining how to effectively provide vocational rehabilitation services to

clients. Based on continued increases in case service expenditures, DVR determined the need to establish wait lists for all priority categories. As a result, on April 22, 2013, DVR established wait lists for all three of DVR's priority categories. During the next two years, DVR used the strategies and policies developed for managing the wait list to carefully monitor and manage staff resources, fiscal resources and the wait list, which consisted of 9,891 individuals during the period from March 1, 2013 through April 30, 2015. Through a series of eleven discrete releases of eligible individuals from the wait list and into active status, DVR was able to eliminate the wait list on April 30, 2015. Since that date, no wait list has been in place. Based on the number of individuals anticipated to be served in Federal Fiscal Year (FFY) 2016 and FFY 2017 and based on the fiscal and staff resources projected to be available to serve these individuals, DVR anticipates the ability to serve all eligible individuals and does not anticipate establishing a wait list.

Strategy - DVR will invest resources as available to improve the data collection and reporting capabilities of its electronic case management system and other mechanisms to enable management to make data driven decisions and better gauge program performance.

Progress: DVR invested significant resources into this area and worked with the electronic case management system vendor to determine the capabilities needed in the accessible web-based activity and reporting environment system to implement a system project plan that included methods to extract historical data. As a result, data is collected through the electronic case management system and used to make sound data driven decisions and to improve program performance. Specifically, DVR contracted with the case management system vendor to add the ability to collect data and report on case status history, and to add a database snapshot server. This allows DVR to report on point-in-time data. DVR hired a data analyst who is trained in MS SQL and is able to collect data directly from the case management database that is in addition to, and more complex than, what is readily available through the case management reporting programs and tools. DVR created a performance management report that is shared through supervisory channels with all direct service delivery staff. All direct service delivery staff now have performance management goals within their annual performance improvement plans, and data from the performance management report is used to measure, monitor and improve performance at the individual, office, regional and state levels. Along these lines, DVR instituted monthly performance management meetings to review data, discuss trends and drive performance improvement throughout the agency. Additionally, DVR developed and implements a "self-serve" dashboard reporting system that is used by DVR management and leadership to observe performance on key measures in real time, eliminating the lag-time previously experienced within the agency's data collection and reporting systems. Finally, DVR continues to work closely with our electronic case management system vendor as the vendor develops and modifies their program in order to collect WIOA-mandated post-secondary and employment outcome data. The roll out of this program is anticipated to occur in two phases during 2016.

GOAL 3 – DVR WILL ENGAGE IN EFFECTIVE PARTNERSHIPS, TEAMWORK AND COLLABORATION

Strategy - The DVR Business Outreach Program will increase business partnerships with Federal contractors for the purposes of employment.

Progress: DVR has 10 Business Outreach Specialist (BOS) positions throughout Colorado. The BOS positions create and sustain important employer relationships with DVR's small, medium, large, Federal and Federal contracting employers. BOS staff work with DVR's pool of "ready" job seekers and partner with private job developers and job development programs to increase opportunities for individuals with disabilities.

Section 503 of the Rehabilitation Act creates an ongoing opportunity for collaboration, and BOS staff are connecting with many Federal Contractors to provide information and develop employment opportunities for DVR clients. BOS staff received training on the 503 changes, met with the Office of Federal Contractor Compliance Programs, and responded to Federal contractor inquiries for information on compliance and Affirmative Action planning. BOS staff regularly conduct Disability Awareness Training for Federal Contractors and present information on how these Federal Contractors can best meet the requirements of the 503 changes within their companies.

Strategy - -DVR will outreach to other state agencies, state departments, other VR agencies, and other entities regarding best practices and ways to work more efficiently and effectively together.

Progress: In November, 2013 DVR learned the outcome of a performance audit that was conducted by the Colorado Office of the State Auditor. In response to the audit, and at the suggestion of the auditors, DVR staff reached out to state agencies and vocational rehabilitation programs in more than ten states to learn about best practices and how these agencies from across the United States worked together efficiently and effectively. Specifically, DVR gathered information pertaining to: implementation of a supervisory review process that assures staff are implementing the vocational rehabilitation program of services effectively and efficiently; creation of policy and procedures for documenting the comprehensive assessment; the effective use of comparable benefits; and the development of a highly accurate process for determining significance of disability. DVR used information gathered from entities outside of Colorado to develop policy, procedures and rules that both responded to audit findings and improved the delivery of services to clients. Additionally, Colorado's DVR leadership meets annually with the leadership from vocational rehabilitation agencies in Montana, Wyoming, Utah, South Dakota and North Dakota to share best practices, learn from one-another, network and discuss new research findings, legislation and cutting edge practices within the realm of vocational rehabilitation. The subject matter experts from these states have met and communicate regularly to share information that can be used to improve vocational rehabilitation policies and practices within all states. Transition, human resource development, supported employment, services to individuals who are blind, field services, quality assurance, fiscal management and program evaluation are examples of the groups of subject matter experts that come together regularly. Colorado's DVR director participates as an active member of the Council of State Administrators of Vocational Rehabilitation (CSAVR). CSAVR is composed of the chief administrators of the public rehabilitation agencies serving individuals with physical

and mental disabilities in the States, District of Columbia, and the territories. Through this Council, DVR's director stays abreast of legislation, research, business partnerships and other areas of importance to DVR's ability to work effectively and efficiently in the provision of services to clients. On the state level, VR works closely with other state agencies including the agencies involved in the development of Colorado's WIOA Combined State Plan to develop the cross-agency policies, procedures and working agreements that will result in effective realization of the vision of Colorado's workforce development system and excellent services to individuals with disabilities.

SUPPORTED EMPLOYMENT GOAL – DVR WILL MEET THE NEEDS OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITES WHO NEED SUPPORTED EMPLOYMENT AND WILL DO SO THROUGH COLLABORATION WITH PARTNER SYSTEMS.

Strategy – DVR will continue collaborative efforts and working relationships between local DVR office and mental health centers and between local DVR offices and agencies serving clients with intellectual disabilities.

Progress: DVR and the Office of Behavioral Health maintain a formal agreement that stipulates collaborative planning and coordination of services by local mental health centers and DVR offices. This agreement successfully drives local interactions that support enhanced service delivery and decrease duplicative service delivery. Local DVR staff and vocational staff from all twenty community center boards have developed collaborative referral and service delivery processes to identify individuals who are appropriate referrals for supported employment services through DVR. DVR will continue this strategy and will expand upon collaborative partnerships and agreements between DVR and local providers who serve clients with mental health concerns and intellectual disabilities.

Strategy – DVR will continue to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services, including supported employment.

Strategy – During FFY 2015, Colorado's team of DVR and Department of Education Transition Specialists continued their work to infuse transition best practices into local school districts through the provision of onsite training, technical assistance and facilitation regarding the provision of transition services to youth and students with disabilities, including those with the most significant disabilities. Additionally, in FFY 2015 Colorado developed a "Transition Community of Practice". DVR is a key player in this Community, along with state-level partners from the Office of Behavioral Health and the Division for Intellectual and Developmental Disabilities. A goal of this group is to assure that all youth, including youth with most significant disabilities, receive excellent transition services that lead to desired post-school outcomes. DVR will continue this strategy.

<u>Performance on FFY 2015 Standards and Indicators</u>

(Beginning Date: 10/01/2014 - End Date: 09/30/2015 → Run Date: 11/16/2015)

STANDARD 1	REQUIRED	RESULT
Indicator 1.1 - Change in Employment Outcomes	>= 0	**- 36** (FFY 2014: 1704) (FFY 2015: 1668)
Indicator 1.2 - Percentage of Post-IPE Closures that are Successful Employment Outcomes	55.8%	**58.95%**
Indicator 1.3 - Percentage of Successful Employment Outcomes that are in Competitive Employment	72.6%	**95.37%**
Indicator 1.4 - Percentage of Successful Competitive Employment Outcomes that are for Persons with Significant Disabilities	62.4%	**98.32%**
Indicator 1.5 - Average Hourly Wage for All Successful Competitive Employment Outcomes vs. the Average Hourly Wage for all Colorado Workers	52.0%	**48.00%**
Indicator 1.6 - For Successful Competitive Outcomes, the Percentage whose Primary Support is Own Income at Application vs. at Closure	53.0%	**56.41%**
STANDARD 2	**REQUIRED**	**RESULT**
Indicator 2.1 - Percentage of All Closures – Persons from Minority Backgrounds vs. Persons from Non-minority Backgrounds	80.0%	**93.20**

Use of Funds for FFY 2015 Innovation and Expansion Activities

Total expenditures of Title I funds for innovation and expansion activities for FFY 2015 were as follows:

The Division of Vocational Rehabilitation values and appreciates the collaborative efforts of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC).

Positive collaborative working relationships have resulted in valued input and contributions to help DVR develop goals and priorities as well as strategies to meet the needs of individuals with disabilities as identified in the comprehensive needs assessment. In addition, the SRC is actively involved on an ongoing basis any time that DVR revisits and updates its service delivery policies and procedures. DVR will continue to use Title I funds for innovation and expansion to provide staff support and to pay for the operating, travel, and per diem costs of members of the SRC and the SILC.

Support of the State Rehabilitation Council (SRC): For FFY 2015, the SRC had an operating budget of $18,000. The budget was developed to be used for SRC meetings, SRC travel, meeting expenses including expenses for committee meetings and the SRC retreat, printing and materials and contract expenses. During FFY 2015, the SRC expended $3,829.

Support of the State Independent Living Council (SILC): For FFY 2015, the SILC had an operating budget of $48,000. The budget was developed to be used for professional services, SILC travel, meeting accommodations, operating costs, conference calls, membership dues and fees, and the State Plan for Independent Living (SPIL) needs assessment. During FFY 2015, the SILC expended $42,254.

Section (Q) Quality, Scope and Extent of Supported Employment Services

The Workforce Opportunity and Innovation Act of 2014 reinforces and expands the roles of both vocational rehabilitation counselors and clients with regard to supported employment services. Effective delivery of supported employment services for individuals with the most significant disabilities requires professionals to become even more creative in looking beyond the traditional array of practices and services. Therefore, the skill and experience of vocational rehabilitation counselors is key to the development of successful supported employment programs. The Colorado Division of Vocational Rehabilitation's training efforts continue to focus on helping counselors and other involved professionals understand the importance of supported employment. Training assists staff to develop skills necessary to the provision of excellent supported employment services. Training addresses client evaluation, realistic goal setting, the development of precise plans of services, objective progress reporting, and meaningful recordkeeping. DVR's Supported Employment Coordinator leads this training and has provided training on supported employment to individual DVR offices as well as to provider agencies, Community Centered Board (CCB) staff and parent groups.

Direct utilization of Title I (Vocational Rehabilitation Services) and Title VI-B (Supported Employment Services) case service funds facilitate the counselor's ability to provide supported employment services for individuals with the most significant disabilities. The resources available through the Title VI-B program are used only to provide supplemental evaluations and supported employment services, as identified in the Individualized Plan for Employment (IPE), to assist eligible individuals with the most significant disabilities to obtain and secure community-integrated employment. Title VI-B funds are not used for services necessary to conduct the preliminary and comprehensive assessments, to determine eligibility and

vocational rehabilitation needs, or to provide job skill training unless it is provided at the worksite.

Supported employment services are provided to enable individuals with the most significant disabilities to obtain employment, to learn job skills, and to maximize their hour and wage employment opportunities in the competitive labor force. The Division of Vocational Rehabilitation will continue to provide a wide range of supported employment services to individuals with the most significant disabilities for whom competitive employment has not traditionally occurred or has been interrupted or intermittent and who need supported employment services and extended ongoing support services to attain and maintain integrated competitive employment.

Any other vocational rehabilitation service may be provided when necessary to prepare and support the individual in supported employment. Such services include, but are not limited to, physical and mental restoration services; vocational adjustment and other vocational and academic training; occupational licenses, tools and equipment; specialized services for the blind and/or deaf; and, support services, such as maintenance, transportation, services to family members, and personal assistance services.

DVR's required documentation for supported employment for an eligible individual with the most significant disability will include the individual's weekly work goal, job stabilization criteria, the supported employment services to be provided, the type and frequency of monitoring contacts which will be provided during the provision of supported employment services, and a description of extended services needed. With the passage of WIOA, extended services can now be provided by DVR for up to four years for youth with disabilities, and DVR's policy and documentation requirements will be revised accordingly.

Supported employment services provided under Title VI-B and Title are provided up to 24 months from when employment begins unless the team has determined that more time is necessary for the client to achieve job stabilization before the client transitions to extended services. In these cases, the Individualized Plan for Employment (IPE) can be amended to provide a longer period of services to fully attain the weekly work goal and/or stabilize employment.

During the provision of supported employment services, assessing job stabilization and transition to extended services is the final phase of the vocational rehabilitation counselor's involvement in the provision of supported employment services. Job stabilization, which occurs when the individual can and is reasonably expected to continue to perform all job duties acceptably, should be attained prior to transition to extended services. The timing and flexibility of the transition process is critical to ensure that the individual's placement is not jeopardized once the job coach fades from the job site. Training and technical assistance will continue to be provided to counselors and other service providers on how to identify the appropriate time to fade job coaching services and when extended support services, including natural supports, should begin. DVR and the Office of Behavioral Health have developed written guidelines for mental health centers, which provide supported employment services to eligible individuals

with serious mental illnesses, to clarify their role in the provision and funding of extended services.

The Division of Vocational Rehabilitation believes that the need for supported employment cannot be met by vocational rehabilitation agencies alone but requires the collaborative efforts of all providers of services to individuals with the most significant disabilities. In accordance with this belief, DVR continues to analyze and address the systems barriers in Colorado which have historically hindered local delivery of supported employment services. For example, when DVR has an active wait list, there is a process in place to allow applicants with developmental disabilities to access waiver services more swiftly. DVR has developed an "Affidavit of Application" letter to be used for individuals with a developmental disability who are currently working with a Community Centered Board (CCB) and have Medicaid Waiver Supported Employment Services available to them. The intent of this letter is to notify the CCB case manager that an application for the client has been taken, and that the client will be placed on DVR's Order of Selection wait list once his/her priority classification is determined. Completion of this form will allow the CCB to access Medicaid Waiver Supported Employment Services for the individual after the DVR intake is complete. In addition, DVR has trained staff about SSA work incentives and other options for extended support provision such as self-pay and Impairment Related Work Expense (IRWE) plans, so that clients who unable to receive funding under the Medicaid Waiver, may move forward toward pursuing their employment goals.

DVR, the Division for Intellectual and Developmental Disabilities (DIDD), and the Office of Behavioral Health (OBH) have created an environment, through collaborative policy development and innovative funding initiatives, which encourages local provider agencies to enhance existing supported employment services. These efforts continue through an intra-agency agreement between DVR and OBH to expand and develop methods to provide effective supported employment services to mutual clients. DVR is also working on developing a new interagency agreement with the DIDD to address each agency's responsibilities and assure the collaborative and streamlined provision of supported employment to mutual clients.

The Division of Vocational Rehabilitation's strong commitment to facilitate coordination and development of community-based supported employment services for individuals with the most significant disabilities is reflected in the prioritization of supported employment initiatives. As a result, increasing numbers of community rehabilitation programs throughout Colorado have developed supported employment services to supplement those provided by the Division of Vocational Rehabilitation. One such initiative involved the collection and study of data by a team of DVR staff, state agency partners, and community rehabilitation providers. As a result, changes were made to the DVR Fee Schedule. Payments made by DVR for supported employment services increased. The increased fee schedule rate supports an increase in the number of supported employment providers throughout the state.

DVR has a strong commitment to serve Colorado's youth population. DVR's supported employment Coordinator serves on the ASPIRE Oversight Committee, to support and educate

ASPIRE staff and partners in the coordination of supported employment services to youth. ASPIRE is working with DVR counselors in the Denver DVR office to pilot services to supported employment youth and students. Public school personnel often refer students with most significant disabilities to DVR prior to their completion of the school transition program. DVR's has counselors with supported employment expertise throughout Colorado. These counselors begin plan development and services so the youth can move to employment as they are completing their education. DVR is also coordinating services with the Mental Health Center of Denver in their newly formed Emerson St. Program for Teens and Young Adults. With the focus on youth within WIOA's proposed regulation, this strong foundation will serve DVR well as it begins a new program year, and focuses 50% of its Title VI B funds on youth with disabilities annually on an ongoing basis.

Vocational Rehabilitation Assurances

		The State Plan must provide assurances that:	Documentation and Comments
☑	1.	**Public Comment on Policies and Procedures:** The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	CDLE complies with all requirements for public participation by notifying stakeholders, including individuals with disabilities, of the public comment period and inviting their participation in the development of the Combined State Plan.
☑	2.	**Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement*:*** The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	DVR complies with all requirements pertaining to the submission and revisions of the VR Services Portion of the Combined State Plan and Supplement for the State Supported Employment Services Program.
☑	3.	**Administration of the VR services portion of the Unified or Combined State Plan*:*** The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (b) the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected):	DVR complies with all requirements of the administration of the VR Services portion of the Combined State Plan. (a) The Department of Labor and Employment (CDLE) is the designated State agency and the Division of Vocational

		(A) is an independent State commission (B) has established a State Rehabilitation Council (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance section 101(a)(3). (e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/No) (f) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act . Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (Yes/No) (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency is requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan. (h) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11), (24)(B), and 606(b) of the Rehabilitation Act. (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act . (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and	Rehabilitation (DVR) is the designated State unit to administer the VR services portion of the Combined State Plan. (b) DVR has established a State Rehabilitation Council. (e) No - DVR does not allow for the local administration of VR funds. (f) No – DVR does not allow for the shared funding and administration of joint programs. (g) No - DVR is not requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Combined State Plan.

		606(b)(8) of the Rehabilitation Act. (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities. (m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.	
☑	4.	**Administration of the Provision of VR Services*:*** The designated State agency, or designated State unit, as appropriate, assures that it will: (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act. (b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act . (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No) (d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act . (f) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. (g) provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. (h) comply with the requirements for the conduct of semiannual or annual review,	DVR complies will all requirements associated with the administration of VR Services. (c) Yes – DVR is able to provide the full range of services to all eligible individuals with disabilities who apply for services, as appropriate.

		as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act, as required by section 101(a)(14)of the Rehabilitation Act. (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs (j) with respect to students with disabilities, the State, (A) has developed and will implement, (i) strategies to address the needs identified in the assessments; and (ii) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and (B) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).	
☑	5.	**Administration of the VR services portion of the Unified or Combined State Plan*:*** The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.. (b) the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected): (A) is an independent State commission. (B) has established a State Rehabilitation Council (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. (d) the financial participation by the State, or if the State so elects, by the State	*This is a duplicate of number 3* DVR complies with all requirements of the administration of the VR Services portion of the Combined State Plan. (a) Effective July 1, 2016, the Colorado Department of Labor and Employment (CDLE) has been established as the designated State agency and the Division of Vocational Rehabilitation (DVR) is established as the designated State unit to administer the VR services portion of the Combined State Plan.

		and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance section 101(a)(3). (e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/No) (f) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act . Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (Yes/No) (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency is requesting or maintaining a waiver of statewideness for one or more services (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan. (h) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11), (24)(B), and 606(b) of the Rehabilitation Act. (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act . (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities. (m) the submission of reports as required by section 101(a)(10) of the	(b) DVR has established a State Rehabilitation Council. (e) No - DVR does not allow for the local administration of VR funds. (f) No – DVR does not allow for the shared funding and administration of joint programs. (g) No - DVR is not requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Combined State Plan.

		Rehabilitation Act.	
☑	6.	(a) **Financial Administration of the Supported Employment Program:** The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act. (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.	CDLE complies with the financial administration of the Supported Employment Program.
☑	7.	(a) **Provision of Supported Employment Services*:*** The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. (b) The designated State agency assures that: i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated	CDLE complies with requirements related to the provision of Supported Employment Services.

		with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.	

VII. Combined Plan Partners

Colorado Works

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(a) *Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).*

Colorado's TANF Program is known as Colorado Works and is designed to assist families in becoming stable and self-sufficient, reducing the need for the social safety net due to positive outcomes, particularly employment. Colorado values engaging low-income families in services and strategies that result in meaningful, self-supporting employment as the best strategy for promoting long-term well-being for those in poverty. In addition to the core function of the safety net, Colorado Works promotes job preparation, successful transition to and progression in work, and develops strategies and policies that ensure participants are engaged in an individualized and outcome-oriented plan that promotes well-being and economic security. The Colorado Works program is administered in Colorado by 64 county departments of human services throughout the state, with central supervision provided by the Colorado Department of Human Services.

(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)*

All applicants for Colorado Works are assessed no later than 30 days after the application date. The initial assessment focuses on identifying what services and assistance will support the family in achieving economic stability, and are particularly centered on obtaining meaningful employment. All assessments, both initial and ongoing, are individualized and include formal and informal evaluations to determine strengths and challenges to obtaining economic stability, such as recent work history and skills, education level, literacy and compounding circumstances, such as mental and physical disabilities or Limited English Proficiency (LEP).

Work eligible individuals are identified through logic in the Colorado Benefits Management System (CBMS), which is the state's eligibility and work program tracking system for Colorado Works/TANF participants, as well as other public assistance.

(c) *Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific*

analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.

All work eligible individuals engage in an individualized plan, and as such, participate in a state or county defined work activity. Exception is made for those with a domestic violence waiver or for single parents with a child under age six for whom childcare is unavailable. Single parents with a child under age one is not exempt, unless specified by county policy.

Failure to engage in the individualized plan components and activities without good cause will result in sanction, as described in the section of this plan on "sanctions and disqualifications." Colorado considers childcare unavailable if childcare is inaccessible, unaffordable, or unsuitable as defined in each county policy. All participants are notified in writing of the criteria for this exemption, how to apply for the exemption, and the effect of this exemption on time limits.

(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)

All applicant or recipient information is confidential and available only for the purposes of the effective administration of the program and will be made available to federal or state agencies as appropriate. All employees are trained to maintain the confidentiality of information and are notified that failure to do so will result in dismissal. All parties acting on behalf of the county department must be employees or contractual agents. County departments of human/social services contracting for program administration or services are required to include confidentiality requirements in their contracts. County departments of human/social services administering the program are required to include procedures to ensure confidentiality in their policies.

(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)

Colorado has established goals and taken action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies, and established numerical goals for reducing the illegitimacy ratio. Colorado works with county departments of human/social services and educational and health agencies to reduce the out of wedlock birth rate, with a special emphasis on teenage pregnancies.

(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)

Local law enforcement personnel, representatives of counseling services in the counties, and the education system provide training regarding statutory rape education to males and females alike. Efforts are made to get law enforcement personnel and judicial personnel to impose stricter enforcement of the statutory rape laws.

(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)*

Delivery of cash benefits is made through electronic benefit transfers (EBT), either directly to a recipient's bank account or to an account maintained by the State on behalf of the recipient through an electronic benefits transfer (EBT) vendor. The EBT system is an online system accessed with plastic magnetic strip cards and personal identification numbers (PINs). Benefits are accessible through point of sale (POS) devices at participating retailers or at automated teller machines (ATMs). The EBT system is operable anywhere in the United States where the retailer or ATM displays the Quest logo. The Quest logo signifies that the retailer or ATM owner follows the national operating rules for EBT adopted by the National Automated Clearing House Association (NACHA).

(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)*

All completed ATM transactions cost $0.85 each. This transaction fee is assessed by Colorado's EBT card vendor. There is no additional surcharge for transactions completed at Chase ATMs. Transactions completed at all other ATMs often do have a surcharge. This amount varies by ATM owner/processor and can range from $1 to $8. There is no fee or surcharge for POS transactions; POS transactions are completely no cost and allow participants to withdraw cash during the transaction.

(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)*

Colorado does not impose different eligibility criteria or benefit levels on families moving into Colorado from other States

(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)*

Qualified legal non-citizens or those who are not federally exempt, who entered the United States on or after August 22, 1996, are ineligible for cash assistance for five (5) years from date of entry into the United States.

(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)

All programs and services under the Colorado Works/TANF program are implemented in a fair and equitable manner. This includes ensuring the correct use of any adverse actions towards applicants and participants of Colorado Works/TANF whose basic cash assistance benefits have been denied, reduced or discontinued. An applicant and/or participant may appeal such decisions through the appeals process established by CDHS.

(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.

Colorado intends to assist individuals to train for, seek and maintain employment to provide direct care in a long-term care facility and in other occupations related to elder care determined appropriate by the State of Colorado for which Colorado identifies an unmet need for service personnel.

(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)

Colorado continues its maintenance of effort based on FFY 1994 expenditures at the level of at least 80 percent unless federal work participation rates are met, in which case Colorado will reduce its MOE expenditures to 75 percent. In order to meet its annual MOE obligation, Colorado may count any qualifying expenditures that are allowed under federal statute and regulation. Qualifying MOE expenditures are any non-federal and otherwise unclaimed expenditure made on behalf of TANF-eligible families with household gross income up to $75,000 per year.

TANF CERTIFICATIONS

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:	DOCUMENTATION and COMMENTS

1.	Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	
2.	Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	
3.	Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)— (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and (B) have had at least 45 days to submit comments on the plan and the design of such services;	The Colorado Works Program operates in all counties in Colorado and is administered locally by county departments of human/social services, per state statute. Each county enters into a performance memorandum of understanding with CDHS and has written county policies describing its program. CDHS is responsible for ensuring that all counties comply with the terms of their county policies, as well as with all federal and state statutes and regulations. County departments of human/social services have flexibility in determining the most effective approach for accomplishing the four federal purposes of TANF within their local area and within the parameters established by the state and federal government, including the authority to contract all or part of the program operation to private and/or public providers. Counties develop their program policies to deliver the most appropriate services to eligible participants in their communities. All local program policies must meet federal and state statutory and regulatory requirements.

		All local governments and private sector organizations are provided 45 days to submit comments prior to the state submitting the plan.
4.	Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	
5.	Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	
6.	(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— (i) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; (ii) refer such individuals to counseling and supportive services; and (iii) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for	

	individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	

Senior Community Service Employment Program

(a) Economic Projections and Impact

(1) *Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d))(*May alternatively be discussed in the economic analysis section of strategic plan.)

As members of the Baby Boom generation continue to retire and leave the workforce there will be fewer people able to fill the current job openings in Colorado. This will create opportunities for older workers in the workforce. Specifically, businesses are recognizing the value of older workers and the cost savings that can be attributed to employing people with many years of work experience.

Colorado's diverse economic base and recent employment turnaround indicate positive prospects for a variety of industry sectors that require the expertise and experience that older workers can provide. Throughout the country, demand for education and healthcare services workers will continue to grow. Teachers and healthcare workers of all levels are needed to meet this demand. Specifically, Colorado's scenic attractions, numerous gaming facilities, and Denver's status as a destination location will increase employment in the tourism, hospitality, and transportation industries. Additionally, professional, scientific, and technical services employment will continue to increase in both the short and long term. Opportunities for computer software engineers, accountants and auditors, and executive and administrative support positions for these occupations are increasing as well. Highly skilled construction workers such as carpenters, electricians, plumbers, and construction managers are needed to meet the continuing demand for building activity, particularly as a result of recent wildfires and floods in the state.

(2) *Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))*

Community service assignments for SCSEP participants are carefully selected to train them for unsubsidized employment in areas where local employers have identified unmet needs. With regional economic trends as a broad roadmap, knowledge of the needs of community employer partners is critical to the proven success of our employer-based philosophy. By matching employer needs to the tested and validated skills of SCSEP participants, efforts focus on both employers and participants in areas that meet the needs of both.

Computer training, which is a key means for increasing the job preparedness of participants, will continue to be provided to participants at local project sites as part of community service assignments in Colorado's Host Agencies. Training takes place at Workforce Centers (WFCs), local community colleges, and through community agencies.

According to the Colorado Department of Labor and Employment, until Colorado's citizens are educated to a level that maximizes their potential, gaps will exist across every skill set

through the next several years. Reading comprehension ranks highest at most education levels as a skill facing critical shortages. In fact, there is a significant skill gap for many skills associated with communication across all education levels. Other skills that show up high on the list of those facing possible shortage for every education level include: critical thinking, troubleshooting, and judgment and decision making abilities. Skill gaps are identified using the Skills Based Employment Projections System, a tool provided by the Projections Managing Partners. Ongoing, each SCSEP participant must participate in services at the local Workforce Center in the county where the participant works to attend classes that enhance/upgrade their skills.

The WFCs use individualized assessments and tests to ensure participant training is customized to the participants' skills and abilities. Within the WFCs there are defined categories that have a career ladder and list of similar jobs, job levels, and next steps.

(3) *Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))*

CO Statewide Occupations with the Highest Projected Openings 2010-2020

SOC	Title	Training and Education Required
41-2031	Retail Salespersons	Short-term on-the-job training
35-3031	Waiters and Waitresses	Short-term on-the-job training
41-2011	Cashiers	Short-term on-the-job training
29-1111	Registered Nurses	Associate degree
35-3021	Combined Food Prep & Serving	Short-term on-the-job training
43-4051	Customer Service Representatives	Moderate-term on-the-job training
13-1199	Business Operations Specialists	Bachelor's degree
11-1021	General and Operations Managers	Bachelor's or higher degree, plus work experience
13-2011	Accountants and Auditors	Bachelor's degree
25-2021	Elementary School Teachers	Bachelor's degree

CO Vocational Training Occupations with the Highest Projected Number of Openings 2010-2020

SOC	Title
31-1012	Nursing Aides, Orderlies, and Attendants

29-2061 Licensed Practical and Licensed Vocational Nurses

49-3023 Automotive Service Technicians and Mechanics

41-3021 Insurance Sales Agents

39-9031 Fitness Trainers and Aerobics Instructors

25-2011 Preschool Teachers, Except Special Education

39-5012 Hairdressers, Hairstylists, and Cosmetologists

41-9022 Real Estate Sales Agents

25-4031 Library Technicians

49-9021 Heating, Air Conditioning, and Refrigeration Mechanics and Installers

CO Other Occupations with the Highest Projected Number of Openings 2010-2020

SOC Title

41-2031 Retail Salespersons

35-3031 Waiters and Waitresses

41-2011 Cashiers

35-3021 Combined Food Preparation and Serving Workers, Including Fast Food

43-4051 Customer Service Representatives

43-5081 Stock Clerks and Order Fillers

43-6014 Secretaries, Except Legal, Medical, and Executive

37-2011 Janitors and Cleaners, Except Maids and Housekeeping Cleaners

41-4012 Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products

43-6011 Executive Secretaries and Administrative Assistants

(b) Service Delivery and Coordination

(1) A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

(A) Planned actions to coordinate activities of SCSEP grantees with WIOA Title I programs, including plans for using the WIOA one-stop delivery system and

its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))

Colorado's SCSEP will take advantage of the unique resources available through the Colorado Department of Labor and Employment, and its statewide network of Workforce Centers, by utilizing WFC staff to assist in creating opportunities for participants of SCSEP. In addition to providing more opportunities to place participants, Colorado has a cadre of community recruiters who regularly send applicants to SCSEP host agency sites, leveraging the efforts of SCSEP project directors. This gives SCSEP project directors unique recruitment opportunities in their local communities. Project directors are called upon to speak to local business leaders as part of the larger public/private partnership. Project directors will assist the local WFC to implement the "Protocol for Older Workers." Colorado will continue to send SCSEP participants to staff the WFC locations and collaborate with other WFC partners such as Veteran Services, Wagner-Peyser, and Vocational Rehabilitation to maximize participant referrals.

To enhance services to SCSEP participants, Colorado has added the Career Edge System™ to the e-Colorado portal. The Career Edge System™ is an audio and written comprehensive career exploration program available online to career, adult education, and employment centers. This program is at a simplified reading level, includes a completed varied-voice audio component, and is available in English and Spanish. The voices are varied to maintain the interest of nonreaders. The program ties in all components a person needs to make an informed and intelligent career selection. In three steps, a person who has limited English proficiency (LEP) can find appropriate occupations, consider accessible education and training options, search for jobs by location, learn to read career-oriented information, and work systematically toward employment goals. This system benefits both the LEP customer and the SCSEP staff in accessing services.

The participants of SCSEP come to the program with highly developed soft skills, such as loyalty, strong work ethic, dependability, and honesty. However, many participants may need additional training on current technical and operational skills.

The SCSEP Administrator works closely with all SCSEP providers in the State to identify and coordinate training opportunities. The WFCs play a pivotal role in training the participants. In the rural areas there is a great cooperative effort with all of the agencies and often there is free training in the region through the libraries and non-profit sector.

(B) Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))

SCSEP participants have access to a wide array of programs and services. SCSEP programs are encouraged to establish strong linkages with the county department(s) of human services within their region. The program engages these departments as workforce partners to assist low-income individuals, including recipients of public

assistance. However, the degree and nature of the relationship will ultimately be determined by the local elected officials and department directors in each county. Regions are encouraged to use the Work Opportunity Tax Credit (WOTC) program as hiring incentives to encourage employers to hire disadvantaged job seekers. Additionally, SCSEP participants 60 and older have the opportunity to participate in the services available through their local Area Agency on Aging (AAA) such as administrative assistants, food service, and environmental services. Colorado's SCSEP participants are placed in community service agencies that include schools, health care, housing, workforce services, recreation, environmental quality, public works, and social services agencies. Likewise, essential and necessary community services are provided to the participants of SCSEP. The following is a list of services that are available to Colorado SCSEP participants:

1. Education/ESL/Tutoring/Libraries
2. Health Care/Hospitals
3. Recreation/Parks/Agriculture
4. Social Services/Welfare/Local Government
5. Economic Development/Counseling/Tax Service
6. Recreation/Senior Center Operations
7. Housing
8. Nutrition Programs
9. Transportation
10. Homemaker Services
11. Caregiver Services
12. Material Aide
13. Legal Assistance
14. Other Counseling Services

Many of the SCSEP participants placed in community programs provide services for the elderly. There is a significant need among agencies that provide various services to the elderly for trained workers. Increased placement and training expenditures per individual in these types of agencies would benefit senior service providers (e.g. adult day care, nutrition programs, and independent living centers), SCSEP participants, and SCSEP contractors. Ongoing training and the development of targeted services for older workers must continue in order to give SCSEP participants a competitive edge.

The SCSEP Administrator incorporates language in Requests for Proposals (RFP) to ensure services are provided to older adults in poverty. A sample of language commonly used in contracts is "in the delivery of services under this contract (provider) agrees to give preference and priority to older adults who meet the following criteria: are of a minority status or have a language barrier; are of low income; are homebound; live in a particularly remote area; and live alone or are frail due to health condition or disability." The State ensures that preference will be given to providing services that meet the target criteria

through these efforts. Participants of SCSEP that qualify for the services provided through the Older Americans Act will be directed to agencies that provide those services.

(C) *Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith-based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))*

Commitment to full access of services for persons with disabilities is mirrored at the State level. The Colorado Department of Labor and Employment (CDLE) and Colorado SCSEP have a long-standing interagency agreement with the Division of Vocational Rehabilitation (DVR) and work closely with DVR on projects such as planning, job development and placement, training, WOTC, and job fairs targeting persons with disabilities. CDLE is a member of the Interagency Consortium and Stakeholders Policy Forum created as a result of Project WIN (Workforce Incentive Network), a multi-year systems change project to identify and develop strategies to remove barriers to employment for persons with disabilities. Several WFCs are involved in Project WIN's "consumer navigator" project.

Colorado abides by, and follows, the Charitable Choice philosophy. The provision in the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) enacted in 1996, and its later revisions, allows the opportunity to contract and work directly with faith-based and community-based organizations. Additionally, it allows these organizations to work with workforce clients who are in need of services.

Over the past four years, Colorado has actively participated in the identification, recruitment, education, and training of faith-based and community-based organizations in order to build better partnerships with WFCs. Thus far, Colorado has been successful using Charitable Choice to partner with faith-based and community-based organizations in helping to serve Colorado's workforce clients.

Colorado State sub-grantees maximize WFCs' ability to serve SCSEP clients, as well as expand and enhance services by utilizing websites that provide comprehensive tools for FBOs/CBOs. The WFCs have assembled a list of service providers in Colorado in the form of an on-line catalogue. The catalogue has the capacity to search for 50 specific services by region and provider, and currently contains over 800 providers.

D) Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

A demand-driven SCSEP is made up of the public and private sector policies and programs that help people acquire the knowledge and skills needed to earn a living. This model includes policies and programs that help employers get and maintain a skilled workforce. Unlike separate programs operating in an uncoordinated and static manner, Colorado's SCSEP demand-driven workforce is flexible and able to adapt quickly to changing economic

conditions. The demand-driven model is characterized by ongoing communication and continual feedback among employers, workers, educators, and governmental agencies.

Labor Market Information's LMI Gateway is an online resource intended to meet informational needs of both the employer and employee community. The (http://www.colmigateway.com/) contains an extensive amount of readily accessible labor market data as well as provides job search capabilities for SCSEP participants. The following is a list of additional key components that support SCSEP:

1. Strategies and incentives that support sustained public and private sector investment in skills development.
2. Strategic linkages among employers, union, educators, governmental, non-governmental organizations, and individual citizens in the labor market to promote system responsiveness to economic needs, and results-based accountability.
3. Labor market information, job placement, employment retention and work support services that increase access to employment and meet the needs of workers and employers, the system's dual customers.
4. Target marketing to new businesses and high-growth industries using direct mail and follow-up telephone calls to introduce customers to available program and services; maintain active membership and participation in local business organizations such as local Chambers of Commerce, economic development groups, and human resource manager groups; conduct business forums at the local level to market local employment and training services and brief attendees on labor market information; and conduct job fairs and on-site recruitment to assist small business high-growth industries, and targeted populations.

The State supports business services efforts through marketing grants and discretionary grants focused on services benefiting employers and delivered through partnerships with the business community.

A major goal of SCSEP is to ensure opportunities for placement for the maximum number of eligible individuals. Therefore, each project sponsor uses every reasonable means to place SCSEP enrollees into unsubsidized employment. The goal established by the U.S. Department of Labor is to place 33 percent of all authorized positions into unsubsidized employment during the program year.

Some SCSEP projects have higher goals. Unsubsidized employment is officially defined as:

> "Employment in the public or private sector where the former SCSEP participant is not a participant in a federally funded employment and training program. Placements in programs operated by VISTA (now Americorps) shall not be counted as unsubsidized unless they are in non-volunteer positions."

Each project sponsor is encouraged to contact private and public employers directly in an effort to identify and develop suitable unsubsidized employment opportunities for enrollees.

Sponsors should also encourage host agencies to employ enrollees. All enrollees must understand their obligation to demonstrate initiative in seeking unsubsidized employment whenever possible. As part of the effort to find unsubsidized placement, enrollees should be strongly encouraged to register as a job seeker with the appropriate local Workforce Center, as well as public sector employers.

Every reasonable means are employed by the sponsor staff to assist enrollees with job search activities including the following strategies:

1. Seek assistance at One-Stop Centers;
2. Seek assistance from local, state and federal employment agencies;
3. Seek assistance from other local agencies;
4. Prevail upon host agencies to accept qualified enrollees into their regular work force;
5. Maintain a liaison with other SCSEP sponsors and state agencies to identify job openings or training opportunities;
6. Identify and seek the assistance of for-profit and non-profit organizations concerned with employment and services for seniors; and
7. Consistently remind enrollees of their responsibility to seek and accept unsubsidized employment.

Some techniques that SCSEP project staff have found useful for increasing unsubsidized employment are:

1. Using motivational techniques with enrollees;
2. Using public relations effectively;
3. Organizing and operating a job club;
4. Training and using a job developer;
5. Training enrollees in job search techniques;
6. Providing training to increase enrollee's skills.
7. Rotating enrollees;
8. Keeping job search records; and
9. Asking host agencies to hire enrollees and move enrollees to another site if they are not considered for job opening.

(E) Actions to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)

Prior to enrolling in SCSEP, potential SCSEP participants must enroll with a WFC in the county they reside. Participants will attend WFC classes that enhance/upgrade their skills. Each enrollee looks for a minimum of six jobs a month, and goes on job interviews when a job developer has a possible job opening for the participant's particular skill set. The participant must work with the job developer to set an interview. The classes and job search will continue until a job is secured.

(F) Efforts to work with local economic development offices in rural locations.
SCSEP projects have not had specific partnerships with local economic development offices. Moving forward, SCSEP staff will become more involved with local workforce boards, which will help facilitate connections with economic development offices.

2. *The State's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the State strategies section of strategic plan.)*

The State supports business services efforts through marketing grants and discretionary grants focused on services benefiting employers and delivered through partnerships with the business community.

State leadership makes efforts to create new ways of engaging business through collaborative public/private partnerships that utilize technology to resolve critical labor market shortages and deficiencies. State workforce and labor market professionals must work with business to identify the additional skill sets needed in the future and to identify the foundational skills needed to acquire those skills. Additionally, there is a critical need for industry, workforce, and economic development organizations to work together to strengthen the ability and responsiveness of higher education to develop training that meets real time needs of high growth/high demand industries. Finally, there is a need to continue the development of a comprehensive demand-driven system that will provide all Coloradans the opportunity to engage in productive work.

Training a project job developer can increase SCSEP project's unsubsidized placement rates. Some activities for job developers are:

1. Accessing local labor market information - Using Workforce Centers, regional community colleges, the chamber of commerce, labor unions, etc.;
2. Setting up job banks - Obtaining listings from Workforce Centers, Connecting Colorado (the state's on-line job bank), and local newspapers;
3. Participating in job clubs; Assisting job club leader in job search activities;
4. Developing systems to inform enrollees of job openings - Putting notices in with pay checks, call enrollees at host agencies, request enrollees to come into the project office for face-to-face discussions; and
5. Contacting local employers.

SCSEP staff make use of the Labor Market Information (LMI), which is an important feature of the One-Stop Career Center System. Through America's Labor Market Information System (ALMIS), job seekers will have access to a database containing information about over ten million employers throughout the country.

3. *The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))*

In Colorado there was no significant change in service to minorities in program year 2014. Colorado SCSEP will continue to initiate strategies that encourage minority populations to participate. The sub-grantees recruit minority individuals to the program through a variety of methods and resources. Posters, brochures, and flyers are placed in strategic locations throughout communities specifically to encourage people to consider SCSEP when seeking employment. The program materials and interpreting services are available in Spanish and English. The sub-grantees promote SCSEP where people congregate, such as Social Service agencies, government offices, libraries, senior centers, low-income housing projects, faith based organizations, service/cultural organizations, grocery stores, and medical facilities. Social Service agencies and medical clinics in the counties have referred people who are in need, specifically minority populations and people with disabilities. Advertisements are placed in the local newspapers to market the program, provide eligibility requirements, identify benefits, and promote the emphasis on recruiting minority populations and persons with disabilities.

The State SCSEP program partners with several workforce centers that serve minority populations. The Older Workers Specialist at the workforce center provides information and assistance to the enrollees of the workforce center, focusing on the programs that serve the elderly populations, minorities, and people with disabilities. The Otero County workforce center has been very successful in recruiting minority participants for SCSEP.

A barrier to recruiting minorities may be program partners' lack of understanding of cultural differences. An example of this is the Hispanic population and the strong family bonds or hierarchy. The female elder of the home may stay home to care for the grandchildren, while the children's parents go to work. There may be a need for more income; however, the senior may not be accustomed to working outside of the home when children need care.

In addition, occasionally there are barriers to communication when interpreters are not readily available or if there are dialects that the SCSEP managers are not familiar with. To address these barriers the sub-grantees must be familiar with the different cultures. The State hosts a quarterly meeting of the Older Workers Task Force. This task force is very diverse and is comprised of the State sub-grantees, national grantees, SCSEP participants, private industry representatives, Colorado Department of Labor and Employment staff, and representatives of people with disabilities. The group addresses specific challenges encountered during the program year. The task force, through educational forums addresses barriers to communication, if there are cultural misunderstandings or cultural differences; an educational forum addresses the uniqueness of the culture with specific strategies to communicate successfully.

The US Department of Labor identifies that participants who are most in need are those with multiple barriers to employment: people that are over age 65; limited English proficiency; homeless or at risk of being homeless; have a disability; reside in rural areas; are Veterans or eligible spouses of Veterans; have low employment prospects; have failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunity Act;

have the greatest economic need; are minority individuals; and have the greatest social need. The locations of the people that meet the above criteria are located throughout the state. However, many may be found to have just been released from prison; they may live in central metropolitan areas in shelters, on the street or in subsidized housing; and there are participants that are isolated in rural communities; and those that are in segregated areas of the city with minority populations.

4. *A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)*

ENROLLEE SUPPORTIVE SERVICES

According to the US Department of Labor a grantee or sub-grantee must provide supportive services designed to assist the enrollee in participating successfully in community service assignments and, where appropriate, to prepare and assist the enrollee in obtaining unsubsidized employment. To the extent feasible, the grantee or sub-grantee utilizes supportive services available from other titles of the Older Americans Act, particularly those administered by AAAs and other funding sources. Supportive services may include, but need not be limited to:

- Counseling or instruction designed to assist the enrollee to participate successfully in community service assignments or to obtain unsubsidized employment;
- Counseling designed to assist the enrollee personally in areas such as health, nutrition, social security benefits, Medicare benefits and retirement laws;
- Incidentals, including, but not limited to: work shoes, badges, uniforms, safety glasses and hand tools may be provided if necessary for successful participation in community service assignments and if not available from other sources; Periodic meetings on topics of general interest, including matters related to health, job seeking skills, safety and consumer affairs;
- Costs of enrollee transportation if transportation from other sources at no cost to the project is unavailable and such unavailability is documented. When authorized in the grant agreement, transportation may be provided for enrollees from home to work, to training or to supportive services [Sec. 502(b)(1)(L), 641.312(5)]; and
- Grant funds may not be expended to support the transportation costs of host agencies or programs funded by other than SCSEP of the Older Americans Act, except where provided by federal law [641.312].

The SCSEP partners include: The Denver Indian Center; Senior Support Services (SSS) of Denver; The Empowerment Program-Denver Metropolitan Re-Entry Collaboration (for offenders); Denver Office of Economic Development (Denver Workforce Center); Colorado Workforce Development Council; Colorado Senior Corp; Arapahoe Community College; Red Rocks Community College; Trinidad Chamber of Commerce; and Trinidad State Junior College (TSJC).

These partners will provide Colorado the opportunity to maximize educational and employment opportunities for the SCSEP participants most in need.

At the time of enrollment and prior to placement in a host agency, the enrollee will have a thorough assessment, which will include an interview and the completion of a skills review. Upon completion of the assessment the case manager will identify the enrollees, skills, interests, talents, work history, physical capabilities, need for supportive services, aptitudes, occupational preferences and the potential of successfully completing the SCSEP assignment. The enrollee and the case manager will develop an Individual Employment Plan (IEP), which will be used to upgrade the enrollee's employability skills and assure the proper community service assignment.

The grantee or subgrantee must seek a community service employment assignment that permits the most effective use of each enrollee's skills, interests and aptitudes. After periodic review of the IEP, the grantee should make another assignment if feasible, should there be a determination that a different community service assignment will (a) provide greater opportunity for use of an enrollee's skills and aptitudes; (b) provide work experience that will enhance the potential for unsubsidized employment; or (c) otherwise serve the best interests of an enrollee [641.309, GP].

The SCSEP Administrator requires the sub-grantee to provide or arrange for training specific to an enrollee's community service assignment. Training may be provided through lectures, seminars, classroom instruction, individual instruction or other arrangements including, but not limited to, arrangements with employment and training programs. The grantee or the sub-grantee is encouraged to obtain such services through locally available resources, including employment and training programs, as defined in 641.103 and through host agencies, at no cost or reduced cost to the project [Sec. 502(b)(1)(1)].

Training consists of up to 500 hours per grant year that is consistent with the participant's IEP. Such training may cover all aspects of training (e.g. skill training and job search). Participants will not be enrolled solely for the purpose of receiving job search and job referral services. Waivers for additional hours of training will be considered on an exception basis.

In addition to training in preparation for community service assignments, a grantee or sub-grantee is encouraged to arrange for, or directly provide, training opportunities which will permit the enrollee to acquire or improve skills such as literacy training needed for unsubsidized employment. The case manager will assure that the enrollee has continued support through on-site visits, re-assessments, collaborative discussions between the host agency, enrollee, and case manager and facilitated training programs.

To the extent feasible, skills training is provided by the grantee or sub grantee to the enrollee that is realistic and consistent with the enrollee's IEP. A grantee or sub-grantee places major emphasis on the training available through on-the-job experience at SCSEP work sites, thereby retaining the community service focus of the SCSEP. An enrollee engaging in skills-related

training may be reimbursed for the documented travel costs and room and board necessary to engage in such training. [Sec. 502(b)(1)(I)]

A grantee or sub-grantee will seek to obtain all training for enrollees, whenever possible, at reduced or no cost to SCSEP from such sources as the WIOA and the Carl D. Perkins Vocational and Applied Technology Education Act. Where training is not available from other sources, SCSEP funds may be used for training.

Nothing in this section shall be interpreted to prevent or limit an enrollee from engaging in self-development training available from sources other than SCSEP of the Act during hours other than hours of community service assignment.

5. *The State's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))*

The following collaborations are the state's long term strategies to improve SCSEP's goals and objectives.

Local Workforce Centers

1. Increase the number of people served with multiple barriers;
    a. Utilize Colorado work readiness training programs such Key Train, Work Keys and computer literacy courses;
2. Increase the number of Workforce Center host agencies;
    a. Participants will utilize workforce counselors, such as DVR, Veterans, and Older Workers counselors;
    b. Greater opportunities to receive outside funding due to the number of clients served.

Community Colleges

1. Increase the number of SCSEP students enrolled;
    a. Increase partnerships with colleges developing programs designed to meet participants' needs.

Community Service Organizations and State Programs

1. Additional educational services;
2. Paid employment training;
3. On the job experience leading to unsubsidized jobs;
4. Increase opportunities for partnerships for grant related funding;
5. Increase access to community and faith based resources; and
6. Increase capacity to clients and participants for needed supportive services; and
7. Participants will receive chemical dependency counseling, food assistance, transportation funding, clothing, housing assistance and healthcare.

Business/Community

1. Increase educated labor pool of SCSEP participants;
2. Increase pool of community service workers;
3. Opportunity to complete green energy projects, creating a green community; and
4. Expansion of economic opportunities through doubling the number of On The Job Experience participants.

6. The State's strategy for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

1. The SCSEP Contractor will be encouraged to provide participants with training after placement in community service job training assignments. Training may include skills training, job seeking skills, training in preparation for obtaining unsubsidized employment, and consumer information. The number of hours of training is not limited; however, 500 hours should be used as a guideline.
   a. Required training has the primary purpose of providing or improving skills required for participation in the subsidized position assignment. Required training will be reasonable and consistent with the participant's assignment and the participant will be paid the established wage rate for the hours of training.
   b. Voluntary training will have the primary purpose of enhancing the participants' potential for obtaining un-subsidized employment while participating in the subsidized position assignment. The participation of 1300 hours is considered a guideline and is no longer a set limit.

2. The Contractor will be encouraged to obtain training through local resources at no cost to the project, whenever possible. Workforce Centers should be considered as a training resource for eligible participants. The Title V "other participant costs" funds may be used when training from other sources is not available.

As soon as possible after the completion of a participant's orientation and pre-job training (if any) the Contractor will be required to assess skills and experience and place the participant into subsidized, part-time work. This job assignment will be a part of the employment plan.

1. Participants are employed with a host agency involved in community services such as social, health, welfare, education, legal and/or other counseling, community betterment or beautification services, services of Area Agencies on Aging, or other services that are essential and necessary to the community.

2. The Contractor is required to assess participant skills, experience, physical ability to perform the job tasks, and occupational interests through individual

counseling sessions. If indicated, a physical examination/assessment by a physician may be required to assess physical ability. This will factor into determination of a start date. Work requirements and job specifications for openings will be elicited from host agencies, and these openings then matched with participants' skills and interests.

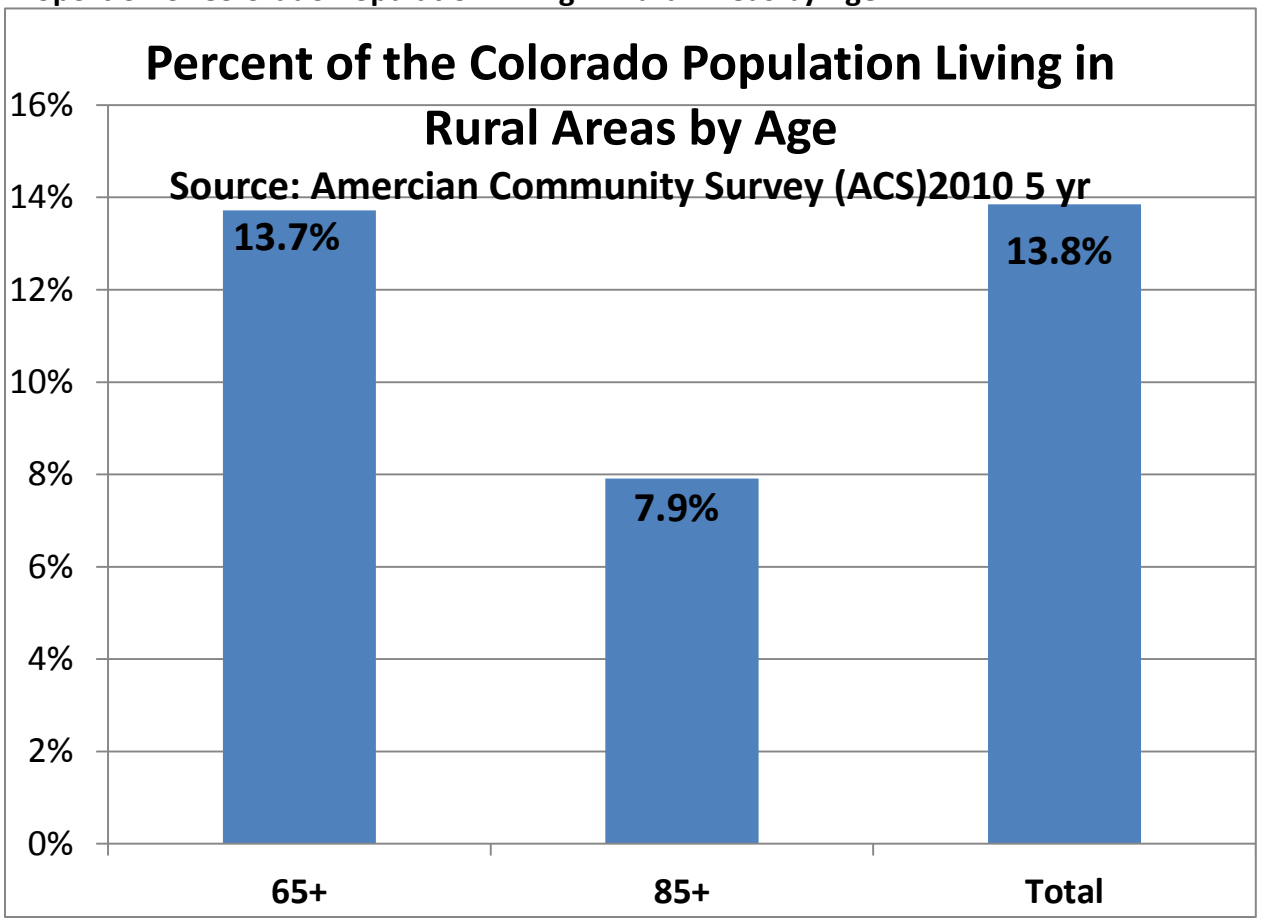
3. Participants may be assigned to project administration where assignments are congruent with skills and interests and where services provided are in addition to those that would normally be provided, thus ensuring the creation of employment opportunities to people over 55 years of age.

(C) *Location and Population Served, including Equitable Distribution*

(1) *A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))*

The 2010 Census found that approximately 85% of Colorado's population lives in urban areas and 15% in rural areas. The chart below shows the proportion of Colorado's population living in rural areas by age.

Proportion of Colorado Population Living in Rural Areas by Age



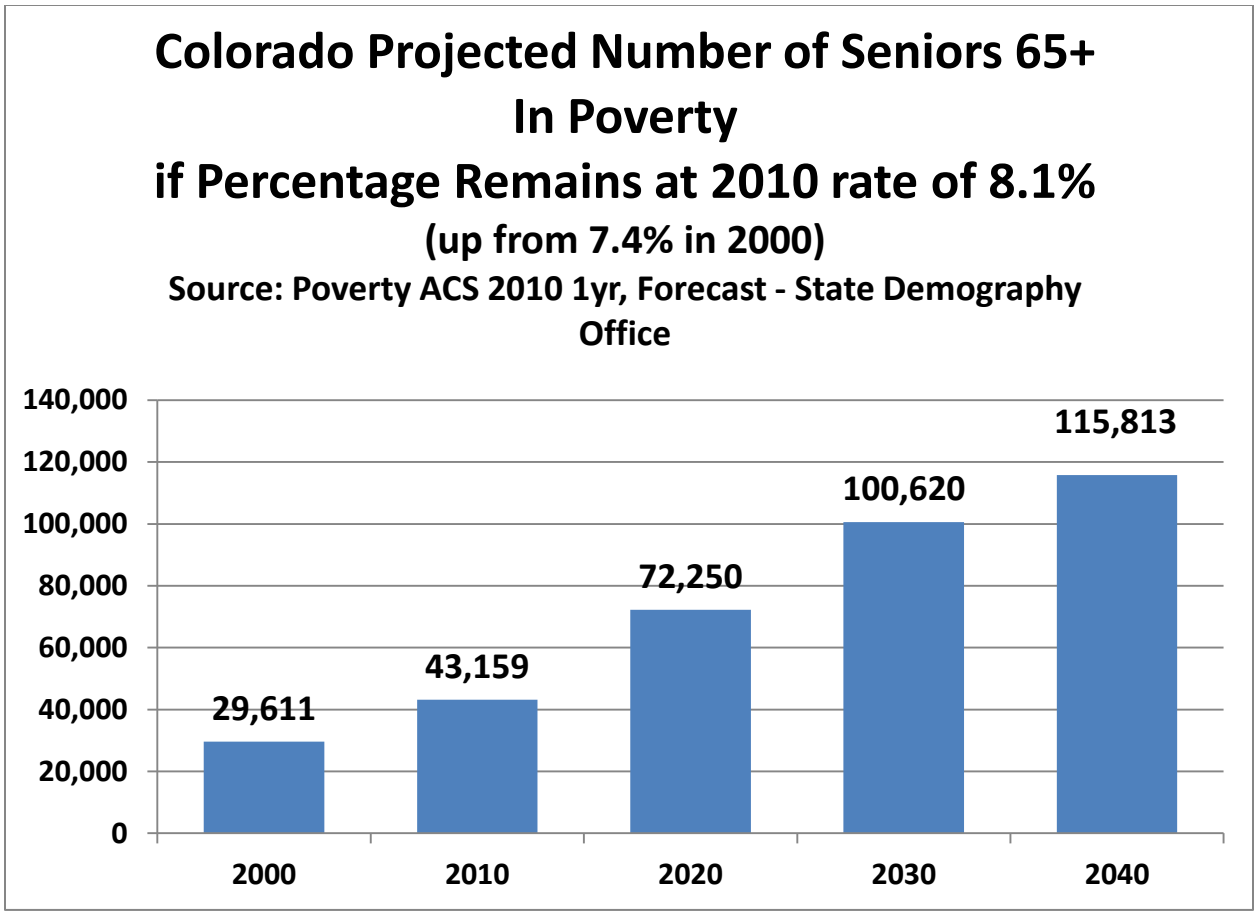
The 2000 Census altered its previous definition of "urban" to include "urban areas" and "urban clusters," which changed the classification for many communities in Colorado.

Specific Population Groups

Priority will be given to special populations in accordance with the Older Americans Act and USDOL rules and regulations. Priority will be given (based on Section 508 of the 2006 OAA Amendments) to individuals who:

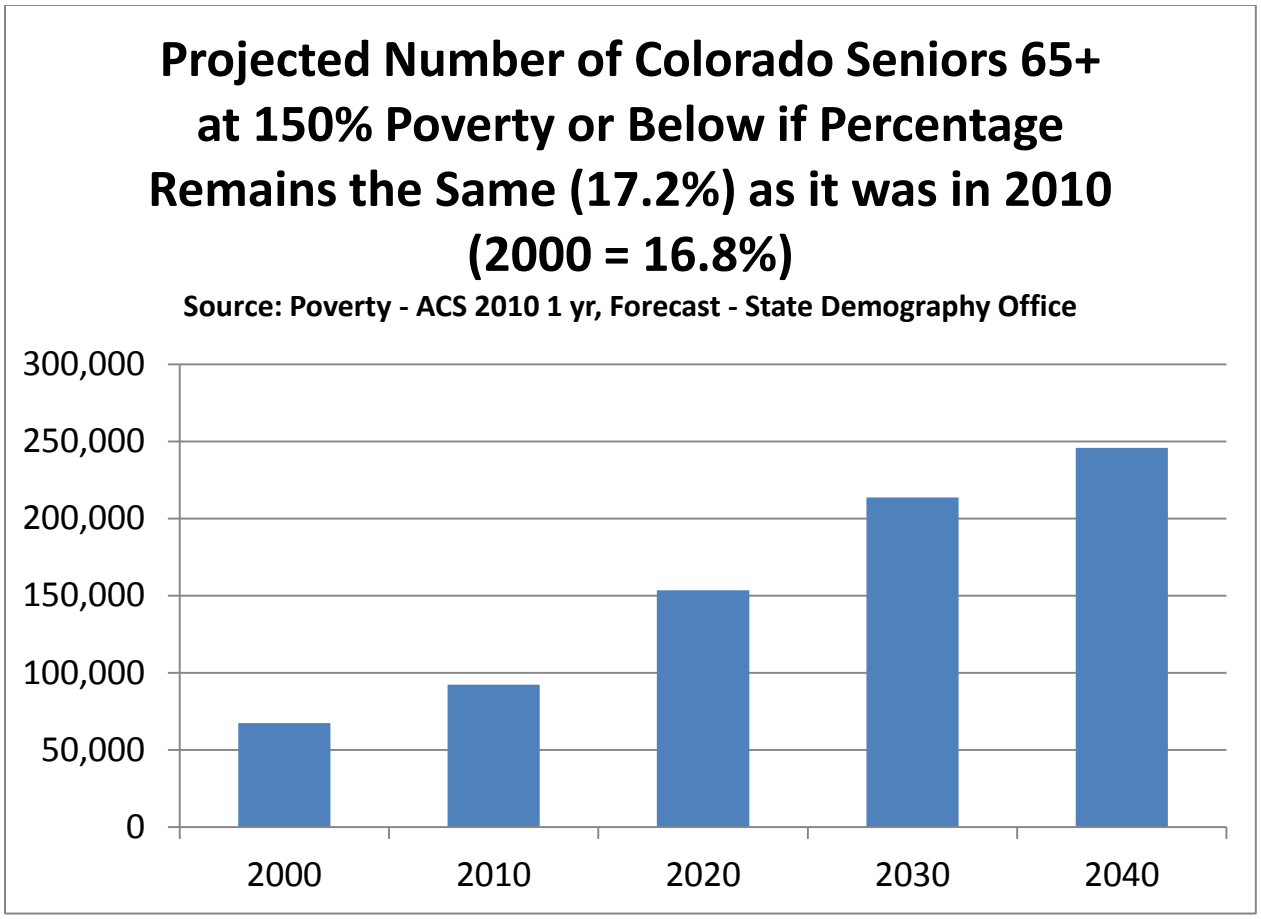
1. are age 65 years or older;
2. have a disability;
3. have limited English proficiency or low literacy skills;
4. reside in rural areas;
5. are veterans or the spouse of a veteran;
6. have low employment prospects;
7. have failed to find employment after utilizing services provided under Title I of WIOA;
8. are homeless or at risk of being homeless;
9. have the greatest economic need;
10. are minority individuals; and
11. have the greatest social need.

According to the Colorado State Demographer, the *number* of older adults below the federal poverty level will greatly increase. The human and fiscal impacts are vast. As older adults age, their economic resources dwindle. The 2010 Census found approximately 43,000 persons 65 years and older in Colorado below the federally designated poverty level. If the same percentage (8.1%) of older adults 65 years and older are below the federal poverty level in 2020, Colorado will have more than 72,000 older adults below the federal poverty level. In 2030 more than 100,000 older adults 65 years and older may be below the federal poverty level and in 2040 close to 116,000 may be below the federal poverty level.



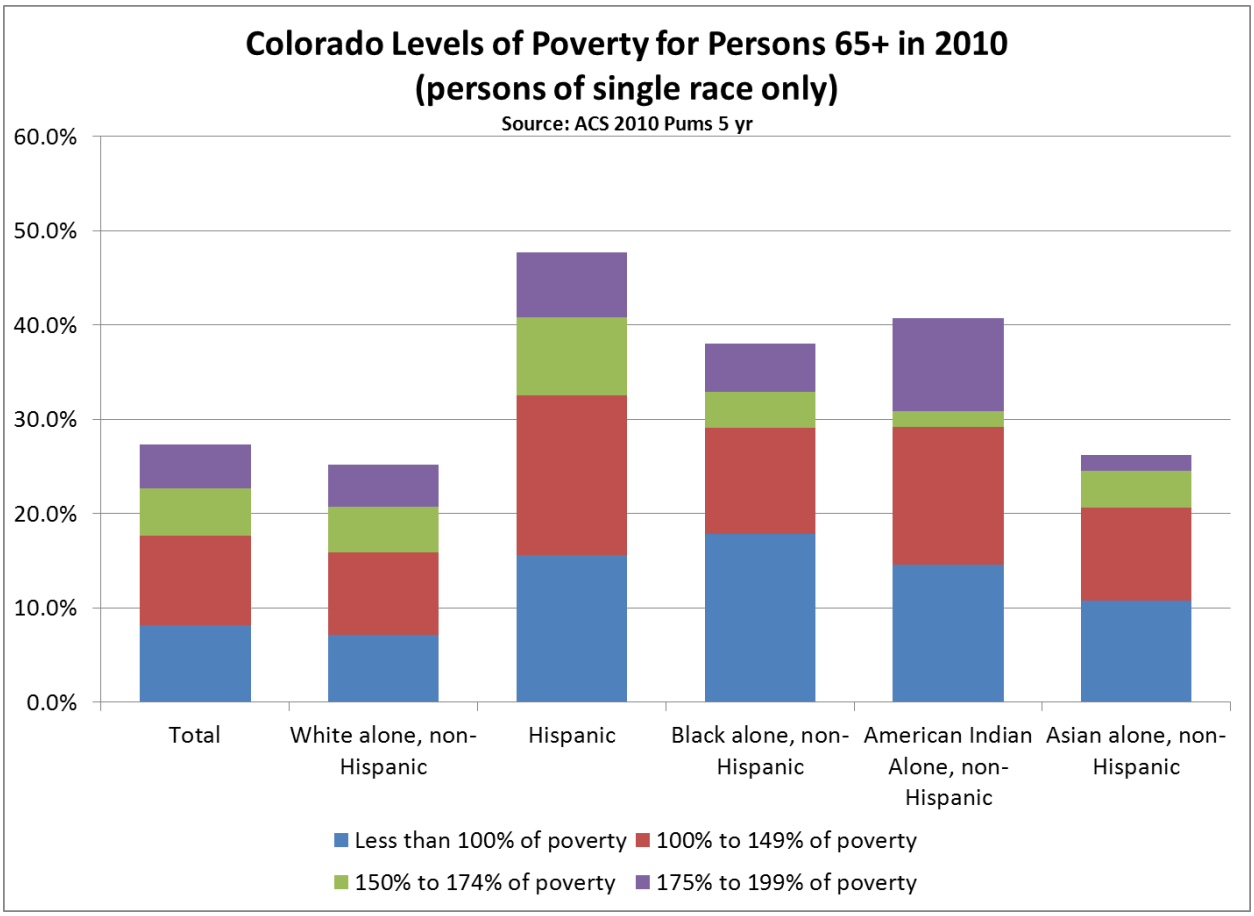
As the graph on this page indicates, the 2000 Census found approximately 71,000 older adults 65 years and older in Colorado below 150% of the federally designated poverty level. In 2010, Colorado has approximately 92,000 older adults below 150% of federal poverty level. In 2020 about 150,000 older adults 65 years and older may be below[15] 150% of the federal poverty level. In 2030 to 2040 there will be over 200,000 people 65 and older that may be below federal poverty level.

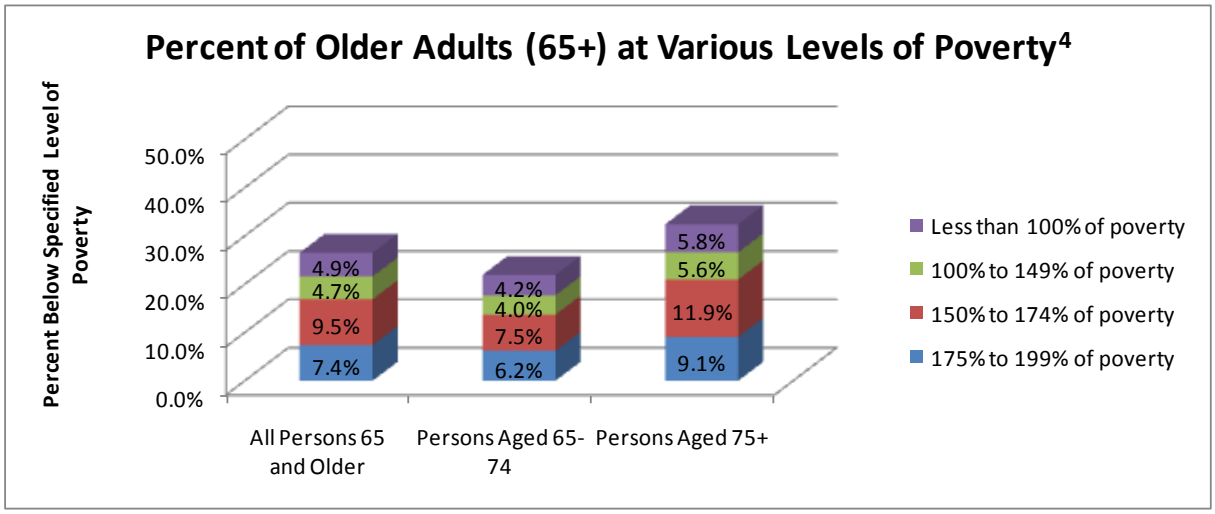
[15] U.S. Bureau of the Census, 2000 Census, Summary File 3.



[1] U.S. Bureau of the Census, 2000 Census, Summary File 3.

Poverty is substantially more prevalent among Hispanic, Black, and American Indian older adults than for all older adults in Colorado. Poverty is only slightly more prevalent among Asian older adults than all older adults combined. Low-income minority older adults are at a higher risk of being unable to obtain housing and healthcare due to affordability, accessibility, and availability within their communities.





Colorado will experience remarkable demographic changes through the year 2017. The portion of the total population over the age of 55 will increase to 25 percent from 20.6 percent in 2007. Conversely, the portion of the population in their "prime working years"

(generally considered to be between 25 and 54 years of age) will shrink to 40.3 percent from 43.6 percent today. Should the population grow at the same pace it did between 2000 and 2005, Hispanics will account for 25.2 percent of the population while non-Hispanic Whites will comprise about 67 percent of the population. Females will remain almost exactly half of the total population. Colorado SCSEP will continue to use various outreach methods to broaden local awareness in its service areas and encourage unemployed low-income people age 55 and over to apply for SCSEP.

(2) List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

The distribution chart below shows the number of slots allocated to the State of Colorado. AARP and SER National are the two national grantees. SER National is the State sub-recipient and has 90 slots allocated for the State operations.

SCSEP Equitable Distribution Report				
County	**State**	**AARP**	**SER**	**Totals**
Adams County, CO	10	21		**31**
Alamosa County, CO	3			**3**
Arapahoe County, CO	6	40		**46**
Archuleta County, CO			1	**1**
Baca County, CO	1			**1**
Bent County, CO	1			**1**
Boulder County, CO	18			**18**
Broomfield County, CO	3			**3**
Chaffee County, CO			3	**3**
Cheyenne County, CO				**0**
Clear Creek County, CO	1			**1**

Conejos County, CO	1		2	**3**
Costilla County, CO	1		0	**1**
Crowley County, CO	1			**1**
Custer County, CO	1			**1**
Delta County, CO			7	**7**
Denver County, CO	22	60		**82**
Dolores County, CO			0	**0**
Douglas County, CO	7			**7**
Eagle County, CO			3	**3**
Elbert County, CO	1			**1**
El Paso County, CO		42		**42**
Fremont County, CO	0		8	**8**
Garfield County, CO			3	**3**
Gilpin County, CO				**0**
Grand County, CO			1	**1**
Gunnison County, CO			1	**1**
SCSEP Equitable Distribution Report				
County	**State**	**AARP**	**SER**	**Totals**
Hinsdale County, CO				**0**
Huerfano County, CO	3		0	**3**
Jackson County, CO			0	**0**
Jefferson County, CO	0		35	**35**
Kiowa County, CO				**0**
Kit Carson County, CO			1	**1**
Lake County, CO			0	**0**

La Plata County, CO			4	**4**
Larimer County, CO			22	**22**
Las Animas County, CO	3			**3**
Lincoln County, CO			1	**1**
Logan County, CO			3	**3**
Mesa County, CO			17	**17**
Mineral County, CO			0	**0**
Moffat County, CO			2	**2**
Montezuma County, CO			4	**4**
Montrose County, CO			6	**6**
Morgan County, CO			4	**4**
Otero County, CO	4		0	**4**
Ouray County, CO			1	**1**
Park County, CO			2	**2**
Phillips County, CO			1	**1**
Pitkin County, CO			1	**1**
Prowers County, CO	3			**3**
Pueblo County, CO			24	**24**
Rio Blanco County, CO			0	**0**
Rio Grande County, CO			3	**3**
Routt County, CO			2	**2**
Saguache County, CO			2	**2**
San Juan County, CO			0	**0**
San Miguel County, CO			0	**0**
Sedgwick County, CO			0	**0**

Summit County, CO	1			**1**
Teller County, CO			2	**2**
Washington County, CO			1	**1**
Weld County, CO			21	**21**
Ute Mt. Ute Tribe			0	**0**
Yuma County, CO			1	**1**
TOTALS:	90	163	189	**442**

(3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

The State is sent an Equitable Distribution report by US DOL allocating participant slot placement within the counties the State is required to serve. Colorado's over enrollment will be reduced through attrition, participants that meet SCSEP time limitations as well as those that have found unsubsidized employment, or have left the program for various reasons. Colorado will make an effort not to enroll new participants in counties that currently are over enrolled.

Counties that are under enrolled will continue to be examined for new opportunities with host agencies and participants. The demographics of each county will be examined, looking for the cities in the underserved counties that have a high low-income older adult population. Outreach and education will be targeted to those specific communities and the residents of those communities.

The rural counties are challenged through geographic distance as well as the lack of employment opportunities and host agency training sites. The site managers in the rural areas will continue to serve on the local chamber of commerce committees as well as speak at service organizations. The site managers will be a visible presence in the community educating business owners, nonprofits/government agencies and potential participants of the benefits of SCSEP.

(4) The State's long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

i. Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365. (See above)

ii. Equitably serves rural and urban areas.

iii. *Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)*

A. Recruitment and Selection of Participants

The Contractor will ensure the following:

1. The recruitment of sufficient numbers of eligible individuals to maintain the established number of authorized;
2. To provide job training assignments for eligible participants with the greatest economic need, greatest social need, poor employment history or prospects, and over the age fifty-five.

B. Enrollment Priorities Include:

1. Veterans and qualified spouses at least aged sixty;
2. Other eligible individuals at least sixty years old;
3. Veterans and qualified spouses aged fifty-five to fifty-nine; and
4. Other eligible individual aged fifty-five.

Other Special Considerations are:

1. Incomes below the poverty level;
2. Poor employment prospects;
3. Greatest social or economic need;
4. Minorities;
5. Limited English Speaking; and
6. Native Americans.

C. SCSEP ELIGIBILITY SHALL BE DETERMINED USING THE FOLLOWING CRITERIA

(A) Age - not less than 55 years of age; no upper age-limit may be applied
(B) Income - family income may not exceed 125% of the Federal Poverty Level
(C) Residence - at the time of initial enrollment, participants must reside in the state in which the project is authorized (homeless people may qualify).

(5) The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

Chart to be developed.

(6) The relative distribution of eligible individuals who:

1. *Reside in urban and rural areas within the State*

2. *Have the greatest economic need*
3. *Are minorities*
4. *Are limited English proficient.*
5. *Have the greatest social need. (20 CFR 641.325(b))*

The tables below illustrate the relative distributions of eligibgle individuals.

PARTICIPANT CHARACTERISTICS							
		Q No.	**Q %**	**YTD No.**	**YTD %**	**L4Q No.**	**L4Q %**
Gender	**1.** Male	38	40	56	40	56	40
	2. Female	58	60	83	60	83	60
Age at Enrollment	**3.** 55-59	24	25	44	32	44	32
	4. 60-64	34	35	41	29	41	29
	5. 65-69	21	22	28	20	28	20
	6. 70-74	10	10	16	12	16	12
	7. 75 & over	7	7	10	7	10	7
Ethnicity	**8.** Hispanic, Latino or Spanish origin	40	42	59	42	59	42

PARTICIPANT CHARACTERISTICS							
		Q No.	Q %	YTD No.	YTD %	L4Q No.	L4Q %
Race	**9.** American Indian or Alaska Native	1	1	1	1	1	1
	10. Asian	0	0	1	1	1	1
	11. *Black or African American*	13	14	22	16	22	16
	12. Native Hawaiian or Pacific Islander	0	0	0	0	0	0
	13. White	79	82	112	81	112	81
Education	**14.** 8th grade & under	3	3	3	2	3	2
	15. 9th grade – 11th grade	9	9	14	10	14	10
	16. High School diploma or equivalent	44	46	61	44	61	44
	17. 1 – 3 years college	23	24	34	24	34	24
	18. Post-secondary certificate	0	0	0	0	0	0
	19. Associate's degree	2	2	2	1	2	1
	20. Bachelor's degree or equivalent	8	8	14	10	14	10
	21. Some graduate school	4	4	4	3	4	3
	22. Master's degree	3	3	7	5	7	5
	23. Doctoral degree	0	0	0	0	0	0

PARTICIPANT CHARACTERISTICS							
		Q No.	Q %	YTD No.	YTD %	L4Q No.	L4Q %
Additional Measures	**24.** Family income at or below the poverty level	82	85	118	85	118	85
	25. Individuals with disabilities	3	3	4	3	4	3
	26. Individuals with limited English proficiency	0	0	1	1	1	1
	27. Individuals with low literacy skills	5	5	5	4	5	4
	28. Individuals residing in rural areas	42	44	53	38	53	38
	29. Individuals with low employment prospects	95	99	136	98	136	98
	30. Individuals who failed to find employment after using WIA Title I	42	44	53	38	53	38
	31. Individuals age 75 and over at date of report	10	10	16	12	16	12
	32. Individuals who are homeless or at risk of homelessness	28	29	46	33	46	33
	33. Displaced homemakers	2	2	3	2	3	2
	34. Veterans (or spouses)	19	20	26	19	26	19
	35. Individuals receiving public assistance	52	54	77	55	77	55
	36. Individuals with severe disability	2	2	5	4	5	4

	37. Individuals who are frail	0	0	0	0	0	0
	38. Individuals old enough for but not receiving SS Title II	1	1	3	2	3	2
	39. Individuals with severely limited employment prospects in areas of persistent unemployment	11	11	54	39	54	39

(7) A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

Transition Planning Activities

Two months prior to reaching the durational limit, the participants will meet with SCSEP counselors to discuss transition options. The participant is given the following options:

1. Apply to WIOA for services through the local workforce centers;
2. Apply for a grant through the local community college to further education in an occupational field that has employment opportunities;
3. If the participant is a Veteran, work with the Veteran service officer for assistance in finding employment or assistance in enrolling in the local community college;
4. Participants with disabilities will be referred to a vocational rehabilitation counselor to receive employment training and job search assistance, and
5. Participants will be encouraged to apply to local county human services office for assistance through programs such as Old Age Pension, Supplemental Nutrition Assistance Program, Aid to the Needy Disabled, and Medicaid.

Participants transitioning out of the program will participate in an intensive job search training program developed in coordination with the local workforce center that will address the following skills:

1. Resume writing;
2. Networking;
3. Employment research through the workforce centers and on-line; and
4. Interviewing Skills.

Participants will work directly with their SCSEP case manager to find a position through On The Job Experience (OJE). The participant and the case manager will work together making cold calls

to prospective employers and promote OJE through SCSEP. The participants will be given training on the computer and may be assigned to a mentor through Senior Corp or Retired Senior Volunteer Program (RSVP) to assist them with job search activities.

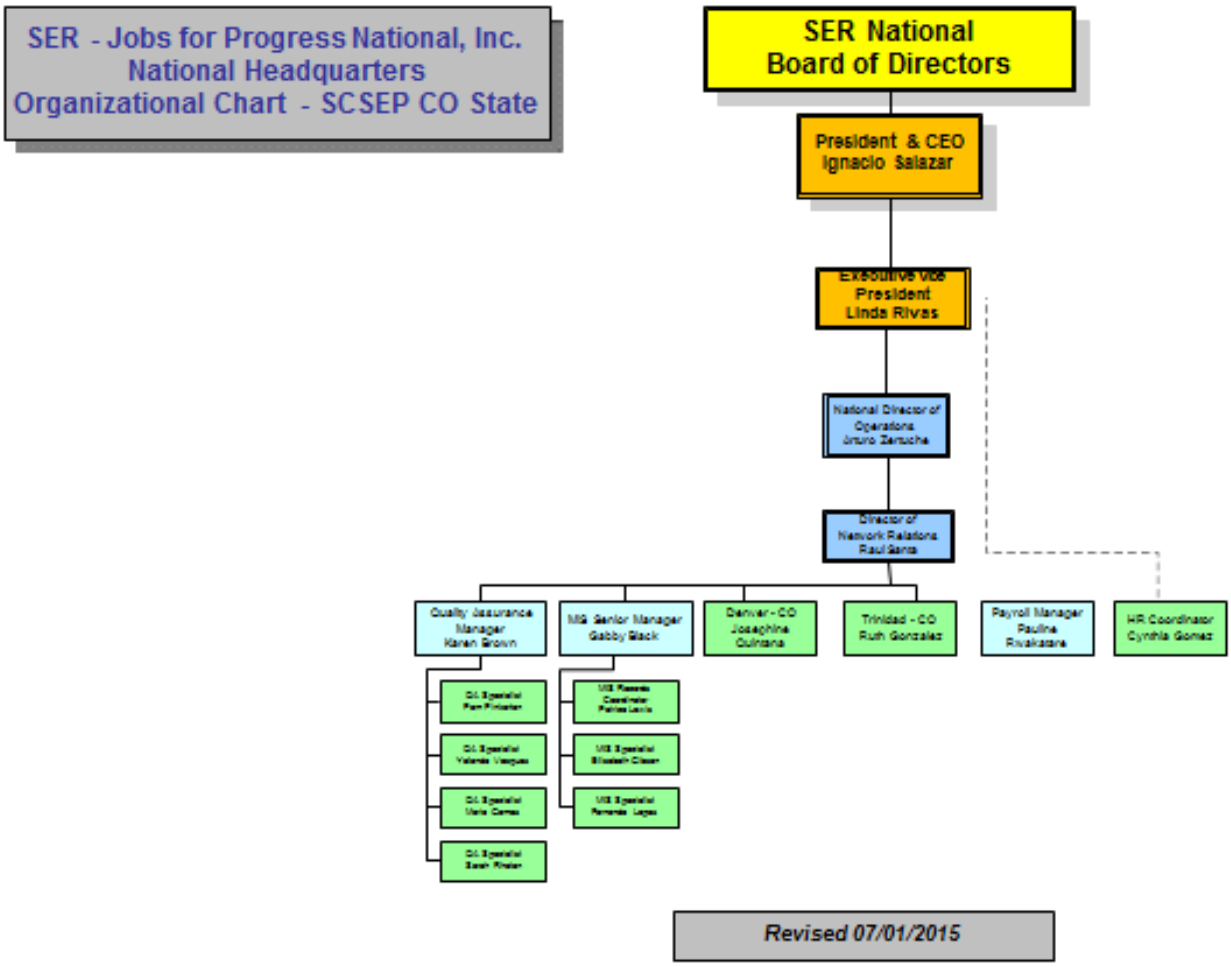
D. SCSEP Operations

(1) Administrative: describe the organizational structure of the project and how subprojects will be managed, including:

(A) identification of the key staff, including the primary responsibilities and the amount of time assigned to the SCSEP grant;

Key staff - The staff administering the grant includes the Manager of the State Unit on Aging (SUA) and the Administrator of the Senior Community Service Employment Program (SCSEP). The Administrator of SCSEP is responsible for writing grants; writing and implementing contractual agreements; facilitating advisory meetings; representing the State on workforce boards; monitoring; auditing; advising the sub-grantees; approving invoices; marketing and developing partnerships; writing the annual and four year State Plans; and hosting an annual SCSEP celebration. The Administrator is allocated 20 hours a week to administer SCSEP. The Manager of the SUA assists the Administrator with contractual issues that may arise and with other tasks.

(B) Include an organization chart depicting any subgrantees or local affiliates implementing the grant. Include a table with authorized positions for each subgrantee or affiliate, if applicable (need to make a chart)



(C) Describe training to local staff

(D) *describe how projects will be monitored for program and financial compliance, including audit plans; and*

Training for local project managers occurs on a bi-weekly basis or as needed. The training is provided via webinars and when necessary or appropriate the State Administrator will provide on-site training to staff. Case managers receive training on a variety of processes, procedures and programs within SCSEP. The following are examples of training programs: documentation; office procedures; eligibility; data entry; On the Job Experience; benefits of direct deposit; worker's compensation; assessments; and supplemental services.

Performance is monitored on a quarterly basis to determine if interventions are necessary. US DOL considers a program that meets 80% of the goal and above is acceptable. If a program falls below the 80% the State develops an action plan to improve performance.

In Program Year 2014, Colorado did not meet the goals of entered employment and average earnings. The State SCSEP Administrator is working with the sub-grantee to develop opportunities for participants to become employed in unsubsidized employment. The State Administrator meets on a regular basis with employers to discuss their employment needs as well as the benefits of hiring older workers. The State Administrator promotes hiring of participants at job fairs as well as meeting individually with employers. Employers are encouraged to contract with the Colorado Department of Human Services for the On the Job Experience program and to utilize the Work Opportunity Tax Credit for people with barriers to employment. Participants are encouraged to attend job fairs and are required to submit a job search form with their time sheets every two weeks documenting the jobs they have applied for.

In Program Year 2015 a monitoring guide was created for Colorado's SCSEP. On-site and desk monitoring of the State program will occur annually. The scope of the review includes: a host agency review; participant review and a file review. There are interviews with staff and participants and the State reviews the activities and timelines associated with participant services.

US DOL requires the State to submit a 9130 fiscal report on a quarterly basis. The State requires the sub-grantee to provide a monthly reimbursement request. The State reviews the monthly reimbursement request to determine if the program expenses correspond with SCSEP goals and assurances. The accounting team and program staff meet monthly to monitor the status of the grant throughout the fiscal year.

(E) Describe how the State will manage its providers and how it will transfer participants if new providers are selected to serve in the State.

The State Administrator manages the Sub-grantee through on site reviews and monthly conference calls; management reports; performance goals; and fiscal monitoring. Sub-

grantee(s) receive training through Webinars, conference calls, and information sharing. Sub-grantee(s) are encouraged to attend national workshops and local educational forums.

The transition from one provider to another will be handled through a systematic approach. The participants will be notified of the change of provider at a participant meeting. The participants will be encouraged to ask questions if they have any regarding the move. The participants will be assured that the State will make the transition as smooth as possible. The current provider and the new provider will be at the meeting to discuss any changes that may occur due to the transition. The new provider will orient the participants to their specific program, rules and regulations.

The new providers will meet with the State and the former providers to discuss what needs to be transferred such as participant files, host agency files, and any equipment. The State staff will have a list of all files and equipment that need to be transferred. A checklist of the files and equipment to be transferred will be developed and both the previous provider and State staff will sign off on the transfer.

The participant files will be transferred in secure boxes. Upon transferring to the new provider, State staff and the new provider will sign off on the receipt of the files and equipment. The participant files will then be placed in a secure locked file. The State Administrator will transfer the participants on-line via the data collection system to the new provider once the transfer of hard copy files has occurred.

(2) *Recruitment: describe how grantee will recruit and select of participants will be achieved. The eligibility of participants is described under 20 CFR 641.500 and 641.525.*

The recruitment and selection process of SCSEP participants will assure that the maximum number of eligible individuals will have an opportunity to participate in the program. To maximize the number of eligible participants recruited for the program, each enrollment vacancy should be listed at all the corresponding One-Stop Centers and CareerLinks.

Each SCSEP office will maintain a list of eligible applicants who have been selected and identified as qualified SCSEP participants. This `SCSEP Waiting List' allows the SCSEP offices fill vacancies in a timely and prompt manner.

Priorities and Special Consideration

U.S. Department of Labor (DOL) delineates in Public Law 109-365 Sec. 518. (b), the priorities that must be used in selecting eligible individuals consistent with the requirements of the Older Americans Act (OAA) Section 516(2) and the Jobs for Veterans Act, Public Law 107-288. A quick view of the priorities:

- 65 years of age or older;
- disabled;
- limited English proficiency or low literacy skills;
- rural area;

- veteran;
- low employment prospects;
- failed to find employment through WIOA; or
- homeless or at risk of being homeless.

SCSEP priorities are as follows:

1) Eligible veterans with at least one statutory priority
2) Eligible veteran with no statutory priority
3) Non-eligible veteran with statutory priorities
4) All others

Within all enrollment priorities, those persons with poor employment prospects will be given preference. "Poor employment prospects" are those eligible individuals who are unable to obtain employment without the assistance of SCSEP or other employment and training programs. Persons with poor employment prospects include, but are not limited to, those without a substantial employment history, basic skills, and English-language proficiency; those who are displaced homemakers, school dropouts, and also those with disabilities including disabled veterans, or homeless. Enrollment priorities established apply to all vacant community service positions, but will not be interpreted to require the termination of any eligible participant.

The main goal in recruitment is to develop awareness of the SCSEP program and attract potential SCSEP participants, especially those most in need. A variety of recruitment strategies should be implemented to achieve the desired results. The following "How To" strategies are designed to accomplish the participant recruitment goal:

- Develop a local web-site for SCSEP information that includes an initial applicant form for program enrollment. Develop relationships with community organizations, community colleges, universities, and technical schools to help in developing this web-site;
- Reach out to food banks, financial assistance centers, faith-based centers, offices of the aged, and government social services offices; and let clients know what SCSEP has to offer individuals with multiple barriers to employment and/or individuals with poor or no employment history;
- Seek out opportunities to participate in job fairs, health fairs, senior center events, and activities at local colleges and universities, to communicate with seniors who visit these activities;
- Utilize a variety of media channels to advertise the program: set-up radio and TV interviews; develop relationships with newspaper editors and submit stories on programs, events, and articles that address mature workers' issues and successes; attend events that teach how to work with the local media and conduct research on the appropriate way to interact with this targeted population;
- Plan visits with site directors of mature citizen housing complexes and low income housing to offer program options that can be utilized at their monthly meetings, such as speaking on employment issues, volunteering, and other topics of interest to seniors. Distribute and post informational flyers in senior citizen and low-income housing

complexes;

- "Word of mouth" from SCSEP participants can be your greatest recruitment asset;
- Utilize promotional events, such as "National Employ Older Workers Week" and "Older Workers Expo." Plan ahead for these events; recruit other service agencies to participate with SCSEP, or coordinate with representatives conducting job fairs, health fairs and other community activities during this time;
- Gain awareness by participating with local economic development boards and chambers of commerce to develop community awareness of SCSEP and to develop business and employment contacts;
- Coordinate outreach activities with other local partners, including placing flyers in food bank distribution packets, attending senior health fairs, participate in local job fairs, visit senior nutrition sites and work to partner with local school districts.
- Network with organizations who serve and advocate for those who are classified as most in-need or minority, and /or those who are in special populations;
- Visit locations where priority populations may congregate, such as Laundromats, senior centers, nutrition centers, health clinics, and other health care providers;
- Local partners who may assist with recruitment activities and/or may refer applicants for SCSEP services include the following:

  AAAs, U.S. Department of Veterans Affairs, Social Security Administration Offices, vocational rehabilitation agencies, Goodwill, United Way agencies, food banks, HUD housing entities, food stamp offices, faith-based organizations, medical centers, libraries, community colleges and other schools, transportation authorities, ex-offender programs, homeless coalitions, county and city agencies, elected officials, ministers, homeless and domestic violence shelters; and

- Grantees will target recruitment activities to underserved areas of the county, areas of high concentration of minorities, those most-in-need and/or individuals in priority populations.

(3) *Income Eligibility: describe how participant income will be recertified each year, including where eligibility records will be maintained.*

Certification and recertification of income eligibility occurs annually. A participant is determined income eligible if he/she meets the criteria described below. All participant paper records are stored in a locked file cabinet. Only SCSEP staff will have access to the locked filing cabinets. Participant records that are on-line are transmitted via encryption.

Determining Number in Family for SCSEP Income Computation

The definition of family conforms to the Workforce Innovation and Opportunity Act (WIOA) definition of family, unless the applicant is claimed as a dependent on the Federal Income Tax Return of another family member. In the latter case, the U.S. Census Bureau's Current Population Survey (CPS) definition of family will apply. **Note:** An applicant with a disability may be considered a family of one – documentation is required.

WIOA Definition of a Family:

The definition of family is as follows:

- Spouses (including same-sex spouses) and dependent children, or
- Parent or guardian and dependent children, or
- Spouses.
- **The IRS defines a person as a dependent child, if they pass the four tests:**
- **Age** — must be under the age of 19 at the end of the tax year, or under the age of 24 if a full-time student for at least five months of the year, or be permanently and totally disabled at any time during the year.
- **Relationship** — the taxpayer's child or stepchild (whether by blood or adoption), foster child, sibling or stepsibling, or a descendant of one of these.
- **Residence** — has the same principal residence as the taxpayer for more than half the tax year. Exceptions apply, in certain cases, for children of divorced or separated parents, kidnapped children, temporary absences, and for children who were born or died during the year.
- **Support** — did not provide more than one-half of his/her own support for the year.

CPS Definition of a Family and Sub-family:

If the individual is claimed as a dependent on the Federal Tax Return of a family member with whom he/she reside, the CPS definition of family applies, which is:

A family is a group of two or more people related by birth, marriage, or adoption and residing together, including related subfamily members, are considered as members of one family.

Definition of Sub-family is:

A married couple with or without children or a single parent with one or more of their unmarried children under 18 years old living in the household of another. (A sub-family does not maintain their own household, but lives in the residence of someone else.)

Related Sub-family is:

- A married couple with or without children, or
- One parent with one or more unmarried children under 18 years old living in a household and related to (but not including) the person or couple who maintains the household. Example: Applicant is living with children or other relatives; guests, partners, roommates or resident employees are NOT included in the sub-family.

Exception to WIA or CPS Definition of family:

Note: An applicant/participant with a disability may be treated as a family of one, even if the applicant/participant is married and lives with other family members, which means only the applicant's or participant's includable income would be calculated. The WIA and/or CPS definition of family would not be applicable. Should the applicant/participant be over income

due to being treated as a family of one, use the standard WIA/CPS definition, whichever is applicable, to determine if that definition would be in the best interest for the individual. Official documentation of the disability, such as a physician's statement or social security records, is required for proof of disability. The official documents must employ the SCSEP definition of disability as explained in the SCSEP Data Collection Handbook.

The "traditional" common law marriage is one which is entered into without formalities. This type of marriage is usually defined as the intent to be married combined with living together and holding one's self out to the world as married. There is no such thing as common law divorce. Once parties are married, regardless of the manner in which their marriage is contracted, they can only be divorced by court order. If the SCSEP participant fits the definition of spouse based on the State Law for Common Law Marriage; then the participant will be considered as part of Family definition as explained above.

There are four requirements for a valid common law marriage. Just living together isn't enough to validate a common law marriage:

1. They must live together.

2. They must present themselves to others as a married couple. Some ways of doing this are by using the same last name, referring to one another as spouses, and filing a joint tax return.

3. Although not defined, they have to be together for a significant period of time.

4. They must intend to be married.

Colorado: A common-law marriage may be established by proving cohabitation and a reputation of being married.

If the *Statement* of *Family Size* form is not witnessed, then an acceptable document is required to verify the number of household members; including but not limited to:

- Rental Agreement or lease;
- Public housing authority records;
- Written statement from a third-party who has knowledge of the participant's number in home and reflects the living situation at time of application.

To establish a **family of one** due to disability, official government or other official records are acceptable but not limited to:

- Receipt of Social Security Disability Insurance (SSDI);
- Other Social Security Administration records;
- School records; sheltered workshop certification;
- Social service records or referrals;
- Alternatively, certification from a medical professional or medical records that establish specific facts that meet the regulatory definition as explained in the SCSEP Data Collection Handbook are acceptable, including but not limited to:

    - Physician's statement or certification from a medical professional;
    - Form #37, Physician Statement of Disability form
    - Letter from Drug or Alcohol rehabilitation agency;
    - Medical records; psychologist's diagnosis; rehabilitation evaluation;
    - Disability records; vocational rehabilitation letter; or
    - Veteran's medical records;
- Workers' compensation record; and
- Verification from an aging, information and referral assistance (I&A or I&R)/case management program; Aging and Disability Resource Center (ADRC); Independent Living Center (ILC);

Income -- Financial

To compute income, staff must begin by determining who the includable SCSEP family members are as defined above.

The annual family income is computed by adding up the amounts of the includable income received by each one of the includable family members reported. Documented proof of each includable family member's income received during the preceding 12-month period, or 6-month period (annualized), ending on the date of SCSEP application or re-certification date (as per TEGL 12-06) must be provided and kept in the participant's file.

The individual's total family income may not exceed 125 percent of the poverty guidelines as established annually by the U.S. Department of Health and Human Services. The poverty guidelines levels are released in a TEGL during the first quarter of each fiscal year.

Acceptable documents from each income source must be provided that establish the amount of income received in the 6-month or 12-month look-back period for each includable household member, including but not limited to:

- Social security benefit statement with monthly gross amount;
- Alimony agreement;
- Award letter from Veteran's Administration;
- Compensation award letter;
- Court Award letter;
- Employer statement;
- Farm or business financial records;
- Pay stubs or wage printout/earnings statement from employer;
- (Attention to the date the statement is generated is important);
- Pension statement;
- Bank statement showing interest; and/or
- Quarterly Estimated Tax for Self-Employed Persons (Schedule C).

In addition to providing documentation of income received, the participant must also sign an attestation to document that no other family income exists.

Zero Income or Very Low-Income

Applicants/participants with zero income claimed or very low low-income must provide an explanation of how they are supporting themselves. We must probe to explain how the family is managing and to ensure that all income or assistance is being reported. Typical questions to ask the participant:

- How much is rent/mortgage?
- How is rent and/or utilities paid?
- Do you live alone?
- How do you manage for food, clothing, medicine,

Documentation must also be provided to prove how the individual supported him/herself, in addition to a signed statement from the applicant/participant, or a third-party that explains how he/she supported him/herself; such as:

- Shelter/temporary housing letter;
- Public assistance records;
- Housing Authority verification;
- Bank Statement;
- Written statement from individual(s) or agency(ies) providing temporary assistance; and/or
- Assistance Statement form.

Self-Employed Farmers and other self-employed individuals may not have official records until they file their income tax return. A self-attestation may be used, based on the individual's own figures, until the official tax documents are available. The individual is required to provide a copy of their prior year's tax return, and explain any substantial changes in expected income from the prior year.

Odd Jobs Income

For those individuals who have income from odd jobs and/or do not report their self-employment income on the federal income tax, they must submit documentation of income received. If no records are available, the individual must turn in a self-attestation of income received; may use Form #48, Self-Employment form. The individual must turn in any supporting documentation available.

(4) Orientation: describe the orientation procedures for:

(A) Participants

A full and complete orientation must be provided to each participant at the time of enrollment and prior to the first day of training at a host agency. This orientation is an opportunity to provide the individual with the program's policies and procedures and obtain a commitment

from the participant to enhance his/her involvement in training and acquiring gainful employment. Participants may be paid for orientation only if the orientation is conducted after the assignment to a community service. Individuals who are assigned to a host agency are paid minimum wage for time spent in the orientation.

The orientation process is a good time to emphasize the importance of the unsubsidized employment element of the program. SCSEP requires the participants to sign statements that they understand and will comply with the requirement to seek employment outside the program.

The participants' orientation should be designed to provide information about the goals and policies of SCSEP. The following items must be covered:

A. Goals of the SCSEP;
B. Enrollment process;
C. Available supportive services;
D. Policies and procedures, including, but not limited to:
    1. This is not a job, it is paid training;
    2. The importance of the Assessment, IEP, and CSA forms;
    3. Rotation policy;
    4. Availability of training (host agencies);
    5. Hours of training;
    6. Training payment (wages start after assignment to a host agency);
    7. Schedule and method of training payment;
    8. Procedures for reporting assignment-related accidents/injuries;
    9. SCSEP Safety Program
    10. Reasons for Exit (including IEP Related, For Cause, Administrative, etc.);
    11. The participant's obligation to immediately report any changes in income or family size;
    12. Drug-free work place policy;
    13. Non-allowable political activities;
    14. The participant's obligation to job search, including applying for jobs at host agency;
    15. Durational Limits policy; and
    16. Fringe benefits (paid Physical Exam and Worker's Compensation only).
E. Community service assignment description (Participant Training duties); and
F. Procedures for complaint resolution.

Receipt of a copy of the policies is required by documenting it on the Participant Orientation form, which is signed by the participant and filed in his/her file. The participant receives a copy of the Participant Orientation form, the SCSEP Enrollment Criteria and the SCSEP Handbook**.**

Explain and complete the required forms, such as:
a) Authorization to Release Information (#21);
b) Direct Deposit form (#26 or #27);
c) W-4;
d) I-9;
e) Commitment Agreement (in the SCSEP Handbook);
f) Consent for Release of Information (in the SCSEP Handbook);
g) Privacy Act Statement (in the SCSEP Handbook);
h) Authorization to Adjust Training Hours (in the SCSEP Handbook);
i) Unemployment Ineligibility (in the SCSEP Handbook); and
j) Physical Examination Offer/Waiver (included as part of Orientation).

(B) Host Agencies

Orientation of the host agency is vital for a successful partnership. Each host agency supervisor must be aware of the goals, responsibilities and expectations that come with being a host agency supervisor. It is a partnership, and the partners must clearly communicate with each other on a regular basis. It is highly recommended that at each orientation the participant's host agency supervisor be present. The SCSEP Handbook should be given to the supervisor. It is highly recommended to go over the handbook together chapter by chapter and highlight the areas of most concern to the sub-grantee. Orientation should occur at least once a year, but is recommended twice a year, to ensure compliance with the program.

(5) Duration Limits: describe any policy for maximum duration of enrollment or maximum time in community service and provide a copy of the current Duration Limit policy.

27 Months Average Project Durational Limit: Refers to SCSEP maintaining an average or overall project duration of 27 months or fewer (see OAA Title V Sec. 502(b)(1)(c)). This is the average length of time of all the participants SCSEP serves, and is not an indication of each individual field office nor is it limited to only individuals. This average project duration of 27 months applies to SCSEP as a whole. Grantees may request a waiver that allows up to a 36 month average participation rate.

48 Months Individual Durational Limit (IDL): Refers to each SCSEP participant. It is the total months of SCSEP services the participant received in his/her lifetime. According to the OAA Title V Sec. 518 (a)(3) SCSEP participants are only eligible to receive services for a total of 48 months in their lifetime. The clock for this measurement started ticking on July 1, 2007. This limit applies to any and all enrollments in SCSEP, whether or not consecutive, with grantee or sub-grantee on or after July 1, 2007.

Grantees may request a waiver from DOL to allow a limited number of hard-to-serve individuals to participate beyond the 48 months. SCSEP has a DOL approved individual durational limit policy which allows a one-time 12-month waiver extension of anyone with

a waiver of durational limit factors. Colorado's policy has a DOL approved 48 month durational limit policy with no waivers permitted.

Policy:

Participants exiting SCSEP due to the durational limit are notified in writing, of their up-coming durational limit date.

2. All host agencies with participants that will be reaching their 48th month will be notified at least six (6) months prior to the 48th month ending.

3. SCSEP managers must continue to work closely with local agencies that can provide support or other services to the SCSEP participants. The host agency plays an integral role in the participant development and can be a partner in providing intensive services or referrals to local agencies or organizations.

4. SCSEP staff must implement a recruitment plan to replace participants who will be exiting due to their individual durational limits.

5. Staff must also have a placement plan to exit participants into jobs where appropriate.

6. Participants who have reached their individual durational limit cannot be re-enrolled into the program (with any grantee).

(6) Assessments: describe the procedures for assessing job aptitudes, job readiness, and job preferences of participants and their potential to transition into unsubsidized employment. Also describe how the assessment will be used to develop the participant's Individual Employment Plan (IEP).

The assessment is a process intended to discover the individual's employment strengths; experiences; needs; and gather comprehensive information for evaluating the best route for providing the skills needed for employment. The purpose of the assessment is to collect this information which helps in designing an Individual Employment Plan (IEP) with action steps the applicant can learn and apply in order to reach his/her unsubsidized employment goal. It is imperative to complete a thorough assessment of the applicant, as it will provide a solid basis/foundation to obtain the applicant's goal of unsubsidized employment.

The assessment form serves as an interviewing guide, that outlines issues and topics to be addressed; plus it documents the fact that an assessment was conducted with the applicant. The assessment form is to be filled out, in its entirety by the SCSEP staff only and not by the applicant. The staff may initiate the assessment process by pre-screening the applicant via the telephone, prior to a face-to-face interview.

If the applicant's responses are unclear, ask additional questions to clarify the answers. Remember understanding where the applicant is coming from is critical to making the best possible decisions regarding his/her training.

Following the assessment the participant and staff member will develop an individual employment plan (IEP) based on the information collected from the assessment. The participant and the staff member will sign off on both the assessment and the IEP. The signatures indicate that both parties are in agreement with the content of the assessment and the IEP. A copy of the completed form is provided to the participant and a copy is placed in the participant's file.

(7) *Community Service Assignments: describe how the participant will be assigned to community service including:*
- *the types of community service activity that will be emphasized and how they were chosen; methods used to match participants with community service training;*
- *the extent to which participants will be placed in the administration of the project itself;*
- *the types of host agencies used and the procedures and criteria for selecting the assignments;*
- *the average number of hours in a participant's training week;*
- *the fringe benefits offered (if any); and*
- *procedures for ensuring adequate supervision.*

The COMMUNITY SERVICE ASSIGNMENTS

It is important to understand the participant's primary experience in SCSEP takes place at the host agency training site. Part of the goal of SCSEP is to *"promote useful part-time opportunities in community service activities"* (Federal Register §641.120). Each SCSEP office should establish partnerships with non-profit organizations and public agencies (identified here as host agencies) that are able to provide meaningful training opportunities for our SCSEP participants.

A qualifying SCSEP host agency is a public agency or a private non-profit organization" exempt from taxation under the provisions of section 501(c)(3) of the Internal Revenue Code of 1986, which provides a training site and supervision for one (1) or more participants (See also OAA sec. 502(b)(1)(C).) A host agency may be a religious organization as long as the training assignments do not involve the construction, operation, or maintenance of any facility used, or to be used, as a place for religious instruction or worship." (20 CFR Part 641.140). The public or non-profit organization may not be affiliated with any political party. The qualifying non-profit agency must provide evidence of their non-profit organizational status, prior to serving as a host agency.

ASSIGNMENTS AND RE-ASSIGNMENTS

The SCSEP staff seek and develop community service training sites which will serve as host agencies and will provide training to the participant based on the participant's Assessment and the Individual Employment Plan's (IEP) goals and timelines. In order that the supervisor may assist the participant in achieving the goals and meet the timelines, the host agency

should share the goals, objectives, and timelines of the participant. Due to the fact that the IEP may contain personal information (i.e. barriers, comments, etc.); it is advisable that the IEP, itself, remain only with the participant and SCSEP staff. If the participant approves; a copy of the IEP may be given to the participant's supervisor.

Community services training assignments include, but are not limited to:

- Social, health, welfare and educational services (including literacy tutoring);
- Legal assistance, and other counseling services, including tax counseling, assistance, and financial counseling;
- Library, recreational, and other similar services;
- Conservation, maintenance, or restoration of natural resources;
- Community betterment or beautification;
- Anti-pollution and environmental quality efforts;
- Weatherization activities; and
- Economic development (OAA sec. 516(1)).

A community service assignment will:

(a) Provide greater opportunity to train the participant, enriching his/her life by learning or improving his/her skills and aptitudes;
(b) Provide training experience which will enhance the potential for unsubsidized employment; and/or
(c) Serve the best interests of the participant.

Safety training is mandatory for each participant prior to starting in any community service assignment. Therefore, all SCSEP participants must receive a Safety Training Orientation from the SCSEP office. The SCSEP office must also ensure each participant will receive an individual host agency safety training on the duties they will be assigned to perform at the host site. This is to ensure the participant is consciously aware of his/her responsibilities, the basic information in the safety training, and the importance of receiving an individual safety training provided by the host agency.

COMMUNITY SERVICE ASSIGNMENTS

Each participant must be placed in a community service assignment, at a host agency, which contributes to the general welfare of the community and provides services related to publicly-owned and operated facilities and programs, or projects sponsored by organizations other than political parties, exempt from taxation under the provisions of section 501(c)(3) of the Internal Revenue Code of 1986. Pursuant to the Assessment and subsequent IEP, the participant's training assignment will serve the community and enhance the individual's opportunities toward unsubsidized employment. SCSEP offices may provide participants with opportunities to assist in the administration of the local SCSEP; thus be a SCSEP host agency.

Non-Permissible Community Service Assignments

Training that involves construction, operation or maintenance of any facility used, or to be used, as a place for sectarian religious instruction or worship, or that primarily benefits private, profit-making organizations, is not a permissible community service assignment.

Hours of Community Service Assignments

All SCSEP participants may train up to 35 hours per week based on the availability of training funds and on SCSEP Performance Measures. Any changes to the participants' training schedules are documented in the participant's file either by updating the schedule on the most recent CSA form, or by documenting the schedule change (including training hours and days) in the case notes.

a) The participant's training is scheduled during the host agency's standard business operating hours;
b) The participant is scheduled a *minimum* of three (3) hours per training day or a *maximum* of eight (8) hours per training day; and
c) The participant's training schedule does not exceed five (5) consecutive training days.

Assigning the Community Service Position

Training assignments should be based primarily on the participant's training and employment goals as expressed and documented during the Assessment and IEP process. For an individual to be considered "assigned to a community service position," the assignment must be documented on the Community Service Assignment form and in the participant file. Participants must be assigned, in good faith, to a host agency with the expectation that he/she will start the community service assignment there.

The following procedures should be used when placing a participant in an assignment:

1. The program staff determines appropriate host agency assignment and training activities for the participant based on the Assessment and IEP. The unsubsidized employment goals, skills (including transferable skills), and aptitudes of each participant should govern the assignment, conditioned by the program staff's knowledge of skills required by the host agency.

2. The program staff will meet with the host agency supervisor and the participant to determine the specific training activities, training schedule, and pre-assignment training, if necessary. The written Participant Training Duties are developed in conjunction with the host agency representative.

   The Training Duties are documented on the Community Service Assignment (CSA) Form and copies are provided to the following individuals and files:

   a. The participant;
   b. The participant's file;
   c. The participant's host agency supervisor; and

d. The host agency's file

3. The SCSEP program staff will ensure that each host agency supervisor receives an orientation, (along with the most current SCSEP Handbook), in order to fully understand SCSEP's goals, including the unsubsidized placement goal, and the right to re-assign (rotate) the participant as needed. The orientation should be documented and signed by both parties for validation.

The State requires that a thorough orientation of SCSEP is provided to all host agencies, and that a re-orientation is conducted each year for existing host agencies. Host agencies should be well-informed on SCSEP's goals, policies and procedures, including the proper completion of the participant timesheet.

The responsibilities of a host agency are to:

- Provide orientation, supervision, instruction, and on-the-job training enabling each participant to achieve the IEP goals and timelines;
- Make a commitment to give consideration (consistent with other hiring requirements) to hiring each participant, if funds become available for a position with duties which are the same as, or similar to, those being performed by the participant. Note: If the host agency hires someone other than the qualified participant, the SCSEP staff will consider removing the participant and terminating the agreement with said host agency;
- Support the goals of SCSEP to contribute to the general welfare of the community;
- Attend the SCSEP meetings, facilitated and conducted by the local SCSEP office staff; and
- Not fire, terminate, dismiss, and/or let-go of the SCSEP participant. However, the host agency may request removal of the participant from their site by submitting a written request (documenting the reason) to the SCSEP staff.

Participant Training Environment

Each participant should be assigned to a training site in or near their community. SCSEP staff must ensure participants train during normal host agency business hours. The participant community service assignment is required to be under a supervised training environment. SCSEP program staff must visit the agency site prior to placing a participant at the site to assure all safety conditions are met, and should document the visit in the host agency file. Participants are not permitted to train under any conditions which are unsanitary, hazardous, or dangerous to the participant’s health or safety. Periodic visits by the SCSEP program staff should be made subsequent to participant assignments, to ensure that a clean and safe environment is maintained. Host agency visits must be documented using the Host Agency Training Site Visit form and placed in the host agency file.

SCSEP program staff are responsible for ensuring host agencies provide orientation, instruction, and supervision for participants regarding their training responsibilities and

safety. It is recommended that the SCSEP program staff be present at the host agency's orientation to the participant, in order to ensure compliance with SCSEP training plans and safety requirements, and to build a positive working relationship with the host agency site supervisor.

Participant Volunteering

The Fair Labor Standards Act (FLSA) prohibits individuals, under certain circumstances, from volunteering for extra hours of service with a public agency if they are employed at the same agency. Section Three of the FLSA does not permit an individual to perform volunteer service for a public agency when such service involves the similar, or identical, service that the individual is employed to perform for the same public agency. For this reason, the participant should be told to volunteer at an organization other than the host agency where he or she is assigned if the participant has extra time and energy [A detailed explanation of the volunteer service prohibition is included in Older Worker Bulletin 87-15].

Host Agency "Paying" the Participant

The host agency may not pay participants for "training" extra hours at their community service assignment. This includes the act of an employee of the host agency staff "giving" money to the participant out of his/her personal funds. Host agencies should be encouraged to hire the participants and not supplement their SCSEP stipends. If this is happening and the host agency will not hire the participant, it is recommended to rotate the participant and reconsider the organization as an active host agency.

Limitations on Training Sites

Participants cannot participate in a community service assignment where the training involves:

- The construction, operation, or maintenance of any facility used or to be used as a place of sectarian religious instruction or worship;
- Training which primarily benefits private, profit-making organizations;
- Training which benefits directly or indirectly any private or personal undertaking of any executive or member of the staff of the sub-grantee or of any host agency;
- Training at the participant's place of residence (i.e. home, shelter, dorm, etc);
- Training at the participant's place of worship/study/club, etc.; and/or
- Participants may not have keys to open and close the host agency's facilities, without prior written approval.

Cashiers

Participants may train to be cashiers. However, if bonding is required, it will be the responsibility of the host agency to provide this insurance requirement for the participant. The participant should receive the training necessary to ensure that he or she is able to attain the skills and the experience necessary to acquire a job as a cashier.

Drivers
Participants are not allowed to be drivers of any vehicle while on a community assignment, unless approved by the SCSEP Coordinator. The participant may drive a vehicle belonging to the host agency, if:

1. It is approved by the SCSEP Coordinator in writing and maintained in the participant's file;
2. The host agency provides a copy of their current insurance policy for this activity to the local SCSEP staff, and a copy is placed in the host agency's file; and
3. The participant provides a copy of his/her valid driver's license to the local SCSEP staff.

The participant may drive his/her own vehicle if:

1. It is requested by the host agency supervisor in writing and maintained in the participant's file,
2. It is approved in writing by the SCSEP Coordinator and maintained in the participant's file, and
3. A copy of the participant's valid driver license and a copy of his/her current insurance/auto liability policy are on file with the SCSEP Case Manager. If the participant continues to perform this duty, then all documents on file must be kept current.

Note: The host agency is responsible for payment of mileage to the participant when using his/her own vehicle.

Forest Service Host Sites
Participants assigned to the Forest Service host sites are not allowed to drive federal vehicles (only federal employees are allowed to drive federal vehicles). In regards to forest fires, the participant cannot assist with the activity of putting out the fires; this is in direct violation of the Host Agency Agreement and affects workers compensation insurance. If the SCSEP program staff determines this is occurring, immediate removal of the participant from the host agency is required and the host agency will not be able to participate as a training site in the future.

The Host Agency Agreement

Each host agency must annually sign the Host Agency Agreement, which is an agreement between the host agency and the local SCSEP office, prior to placing a participant at that host site. No participant may be at the host site unless a current agreement is in place. The Host Agency Agreement that is signed on or after April 1st is valid for the next program year. This agreement will be for the length of one (1) program year, or the appropriate portion thereof. The renewal of the Host Agency Agreement is signed for each new program year, if continuation of the partnership benefits both parties. Should the SCSEP program staff and/or the host agency wish to amend the Host Agency Agreement, then the request must be submitted to the SCSEP office in writing for approval.

Each SCSEP office will maintain records of all current Host Agency Agreements in a manner which makes it possible to determine that the assignment of each participant is covered by an appropriate agreement. Non-profit organizations participating as a host agency must provide a recent/current copy of their IRS 501(c)(3) designation letter to the local SCSEP office for their files. The SCSEP offices must have a *current* copy of the 501(c)(3) IRS letter and a signed Host Agency Agreement on file. This means no participant may be placed at a non-profit agency until SCSEP staff obtains IRS documentation of 501(c)(3) status. If the 501(c)(3) documentation is over ten (10) years old, SCSEP office must obtain IRS documentation that the 501(c)(3) status is still active. A printed copy of the results of a search on the official IRS Web site for exempt organizations- http://apps.irs.gov/app/pub78 - is also acceptable. Additionally, see page 11-16 "Possible Types of Host Agencies" for alternate means to obtain proof of 501(c)(3) status.

The Host Agency Supervisor

The role of the supervisor of the host agency is to provide:

- A training place and task orientation;
- On-the-job training;
- Skill and personal development assistance based on the participant's IEP;
- Encouragement and assistance in job search;
- Evaluation of participant progress;
- Supervision of the participant's training activities and;
- Partner with the SCSEP staff in upgrading the tasks or assignments, if necessary.

The host agency supervisor is a partner with the local SCSEP Case Manager in monitoring the participant's IEP progress. Comments from the host agency supervisor should be included in the participant's file to demonstrate progress or lack thereof.

The Community Service Assignment (CSA) Form

This form must be filled out for each community service assignment of a participant. An applicant does not become a participant until the applicant is assigned to community service and this form is filled out and signed by all parties. This form is used to collect data which will later be entered into the Data Collection system. It also contains the schedule and training duties of the participant along with all the required signatures indicating approval of information.

(8) Training: describe the training that will be provided during community service assignments and any other types of training provided, including linkages with local one-stop centers, and Registered Apprenticeship.

Participants may require additional skills that are not available in a host agency setting. As a result of the expanded definition of training from DOL, SCSEP is able to offer other training opportunities in addition to the community service assignment. When it is determined that a participant cannot meet the goal of unsubsidized training at the host agency, the need for

additional training must be documented in the participant's Individual Employment Plan (IEP). SCSEP may provide Optional Trainings which are trainings outside of CSA that enhances basic skills or prepares participant for a particular job or occupation and OJEs which are specialized trainings with an employer who agrees to hire participant at end of contract.

Optional Trainings are designed to enhance or refresh the participant's basic skills or provide participants more detailed, and up-to-date trainings. The training is to enhance the confidence of the participant by making them more proficient in a skill. The training components should target those skills that are in demand in the workplace. Optional Trainings opportunities may be conducted via classroom programs, workshops, Community College curriculum, seminars, meetings, Professional Development courses, lectures, Host Agency classes/programs, and/or On-line courses.

Some examples of training programs include:

- Basic Computer Instruction; dress for success;
- CPR; Safety Issues in the Environment;
- Financial Literacy;
- Job Search on the Internet;
- Interview Skills;
- Keyboarding;
- Resume Writing;
- One-Stop core training services;
- Computer Literacy, including Microsoft Office and Desktop Publishing;
- Customer Service Certification;
- Sales Techniques;
- Website Development;
- Workplace Conduct; and
- Time Management.

Other Training Resources

SCSEP staff is encouraged to utilize and direct participants to other resources to further develop or to supplement skills learned through the CSA training. Some of these available resources are: ***American Job Center*** (***jobcenter.org***) provides a single access point to federal programs and critical local resources. This website can be used to help find jobs, identify training programs, and provide resources to gain skills.

The free website ***USALearns.org*** may be used for those participants needing to learn English. This website teaches basic and intermediate ESL through videos and activities.

GCFLearnFree.org (or gcfaprendelibre.org for Spanish) provides on-line tutorials to learn essential skills needed to live and work in the 21st century such as basic and intermediate computer; social media-- blogging, using the Cloud; Microsoft office; basic education – Math, Reading, English; job search; and workplace skills.

CareerOneStop.org and ***Onetonline.org*** both identify in-demand occupations and offer user-friendly tools to build résumés and/or search for short term job certifications; such as National Retail certifications, Certified Administrative Professionals, Microsoft Office Specialists, and Certified Protection Officers.

SKOOLnet.org (Society for Knowledge, Opportunity, and Occupational Learning) is a state-of-the-art, membership-based community offering an ever-expanding catalog of free resources available to participants. SKOOLnet's featured resources, which include a built-in job board, live-streamed video webinars and events, and career enhancement tools, support everything from English Language Acquisition (ELA), to basic business etiquette, to finding a well-matched online education program.

SCSEP Computer Labs -- the offices containing these labs are available during office hours to accommodate the participants' schedules. The computers in these labs are equipped with the following software: Learn to Speak English, Learn to Speak Spanish, Professor Teaches, Resume Maker, The GED Academy, Typing Instructor, and Microsoft Windows and Office 2010 Suite (Access, Excel, Outlook, PowerPoint, Publisher, and Word). Additionally, participant staff may be trained to assist participants in the labs with learning basic computer functions, setting up an email account, résumé preparation, job search activities, and online applications. These labs may be utilized for On-line training courses.

SCSEP staff is encouraged to assign participants to the computer labs to supplement their CSA trainings. SCSEP wages may be paid if the trainings are included on the participants' training plans. Reminder: the computer lab must be in addition to the community service assignment and never a stand-alone activity. The websites can be accessed at any time the participants has available.

WAYS TO LOCATE TRAININGS:

- Fliers/Postings in community;
- Explore Host Agencies' courses/trainings offerings;
- Participants may hear of opportunities & notify staff;
- Examine Community College course listings;
- Research local community – a PST may be assigned this task;
- Spend time networking in community; and
- Build relationships with Workforce Investment Boards, adult education organizations, community colleges, etc...

(9) <u>Supportive Services: describe the supportive services that will be offered to help participants obtain and retain an unsubsidized job, including transportation assistance (if applicable).</u>

The State's policy for Supportive Services follows the outline in DOL's SCSEP Final Rule §641.545 What supportive services may grantees and sub-recipients provide to participants? (a) Grantees and sub-recipients are required to assess all participants' need for supportive services and to

make every effort to assist participants in obtaining needed supportive services. Grantees and sub-recipients may provide directly or arrange for supportive services that are necessary to enable an individual to successfully participate in a SCSEP project, including but not limited to payment of reasonable costs of transportation; health and medical services; special job related or personal counseling; incidentals such as work shoes, badges, uniforms, eyeglasses, and tools; dependent care; housing, including temporary shelter; needs-related payments; and follow-up services.

Supportive services can be provided for up to twelve (12) months following unsubsidized placement if necessary to retain employment. Permissible supportive services during follow-ups for unsubsidized employment exits include, but not limited to, help with transportation, uniforms or other work-related expenses, eyeglasses, and medical care.

SCSEP project offices are required to solicit free or develop partnerships within the community to access free or low cost supportive services. In the event, free services cannot be obtained; project staff must follow the policy listed below to request supportive services. All availability of supportive services will be based on the SCSEP funding for the specified area.

In order for participants to share in SCSEP activities, the SCSEP office will make available reasonable supportive services. To ensure all participants have access to supportive services, the office may limit the amount and frequency of supportive services based on the availability of SCSEP funding per region.

All project offices are required to thoroughly assess applicants and re-assess all participants for barriers that may impede his/her participation in SCSEP. Project staff must refer participants to local community resources such as the 2-1-1 helpline and/or websites www.benefits.gov and/or www.benefitscheckup.org to assist in no-cost or low-cost community resources. If necessary, the project office may provide directly or arrange for supportive services. A current list of available no-cost or low-cost community resources/services, such as medical and dental clinics, clothing and food banks, and public transportation agencies, must be maintained at every project office. Additionally, all staff must search for no-cost community resources prior to submitting a supportive services request; this search must encompass the above mentioned federal/state/city/county agencies, current host agencies, and any other resources available. A Case Note documentation of community resources search is required.

The following is a partial list of supportive services:

- **Clothing** *(limited to once a program year)*
  CSA required items — such as uniforms, work boots/shoes, badges, safety goggles, and tools.

  Coats — not to exceed $125.00.

  Clothes — training related; not to exceed ***$200.00***

- **Dental Care**

Requests are *limited to a one-time occurrence* throughout program duration; not to exceed ***$3500.00.***

Dentures, Partials, and Bridges

No implants or braces allowed.

- **Health/Medical**
  Requests are *limited to once a program year* include: eye exams, eyeglasses (no designer frames, only basic-progressive/bifocal, scratch resistant lens), hearing exams, physical exam (not to exceed ***$200***) and all other medical/health related services.

  Hearing aids -- *limited to one-time occurrence* throughout program duration; not to exceed ***$2500.00.***

- **Shelter/ Utilities** *(limited to once a program year)*
  Requires the completion of the *Monthly Budget Worksheet*

  Provide documentation of eviction, late/balance payments and/or disconnection notices.

  Housing assistance/rent /utilities — No payment for deposits and fees such as reconnection fees.

- **Transportation**
  Gas cards –*limited to new/re-enrollments and participants returning from a lengthy LOA*.

  Bus Passes and Mileage Reimbursements* ******based on the *USGSA's POV Mileage Reimbursement Rates – on-going.*

- Car Repair— *limited to once a program year* — not to exceed ***$500.00.*** **Trainings**
- Trainings other than community service such as short term certifications, GED, ESL classes, workshops, computer classes, etc….may be paid through supportive services.

All supportive services requests must be based on the participant's need and if approved, will be paid at a reasonable amount.

(10)Termination: describe procedures for terminating a participant, including IEP terminations. Please provide a copy of the current termination procedures.

There are two types of exits, voluntary (participant initiated) and involuntary (staff initiated). Each participant that exits the program is to receive an Exit Letter*;* all involuntary Exit Letters must contain the right to appeal. All involuntary IEP-related 'For Cause' exits, the participant should receive a corrective notice.

Participants may not be exited on the basis of age, race, color, creed, sex, (including gender harassment or medical conditions), religion, marital status, national origin, or any other consideration made unlawful by applicable federal, state or local laws.

Note: Host agencies may request for the participant to be removed from their agency; however, a host agency may not exit, terminate, or dismiss the participant from the program. The SER SCSEP Coordinator has sole authority to exit a participant from the program.

Two Warnings/Notices for IEP-related For-Cause Exits

Prior to requesting an exit of a participant, the participant must receive a minimum of two (2) warnings/notices indicating the reason(s) he/she may be exited, and an allotted time to correct his/her behavior/conduct or failure to comply with the IEP requirements. These warnings/notices must be documented. SCSEP staff should schedule a face-to-face meeting with the participant, immediately to personally address the situation at hand. It is highly recommended to have another staff member present when conducting the face-to-face meeting with the participant. A participant must be given an opportunity to correct his/her behavior or conduct, or if the cause is failure to comply with the IEP requirements. At any point, if a participant makes a positive effort/change, or the participant's action or lack of action is justified, the corrective action will be discontinued. However, the results or outcomes of the corrective action must be documented in the case notes in the participant's file for future reference. Improving/correcting/resolving the reason for the corrective action does not void the warning/notice.

Care should be taken to assure the cause for the behavior and/or problems are clearly identified; if dealing with a person with disabilities, all proper accommodations must have been provided to assist the participant in completing his/her tasks. Failure to perform assigned duties due to a lack of accommodation of a person with disabilities may result in a dispute due to the disability covered by the Americans with Disabilities Act. Therefore it may be inappropriate to exit such a person without first making an effort to accommodate the disability.

No - Two Warning/Notice Required for Non-IEP Related for-Cause Exits

When a participant's violation of SCSEP policy is of a serious nature, immediate action to remove the participant from the host agency and/or SCSEP may be required. In this case, the participant will be placed immediately on Administrative LOA.
The following are some examples of "a serious nature:"

- Commit or intent to cause serious bodily harm, to self, or the SCSEP staff and partners, or the host agency's staff, cliental, or others;
- Commit, or intent to cause imminent threat of health, safety, and/or property, to self, or the SCSEP staff and partners, or the host agency's staff, cliental, or others;
- Falsification of timesheets and/or program records,
- Abusing the Leave of Absence (LOA) policies (no call no show);
- Surfing the Internet for inappropriate sites, such as pornographic sites;
- Severe abuse of alcohol on any SCSEP property, including the host agency;
- Illegal drug usage on any SCSEP property, including the host agency;
- Illegal possession of any weapons on any SCSEP property, including the host agency;
- Using any object/instrument as a weapon at any SCSEP property, including the host

agency; and/or
- Theft (in any form) from any SCSEP property, including the host agency.

When the SCSEP office receives approval of the exit, the SCSEP office will mail an Exit Letter giving the participant 30-days advanced notice of the exit date and stating that the reason the participant is being exited from the program is For Cause. All involuntary 30-day Exit Letters must have:

A. The 'Right to Appeal' information with the contact information clearly stated,
B. A copy of SCSEP's Grievance Procedures, and
C. A referral to the One-Stop system for job-search assistance or other services.

Individual Employment Plan (IEP) Related for Cause Exits
This exit policy ensures conformity to the participant's IEP. SER SCSEP staff must ensure the procedures are applied in a fair and consistent manner with all participants.

If the participant fails, without good cause, to cooperate fully with SCSEP staff to accomplish the IEP goals, such as lack of cooperation with staff, refusing to complete a reasonable number of job offers, refusing referrals to unsubsidized employment, etc., the participant may be subject to disciplinary action (Corrective Action Warning/Notice) up to and including exit.

A Corrective Action Warning/Notice is required for the infractions. Below are some examples of infractions that require disciplinary action
Note: This list is not an all-inclusive list:
- Refuses to comply with the listed number of job search on the IEP;
- Refuses three job offers and/or referrals to job openings;
- Sabotages a job interview, for example, attends the interview poorly dressed, is late, tells the interviewer that he/she is not interested or qualified, and/or does not show up for the interview;
- Refuses to or not participating fully in training opportunities;
- Refuses to transfer to a new community service training assignment (rotation);
- Refuses to register at the One-Stop/Job Service Center;
- Refuses to take advantage of WIA opportunities;
- Refuses to accept follow-through in obtaining supportive services that will enhance ability to participate in a community service assignment;
- Refuses to cooperate with other IEP-related referrals;
- Refuses to cooperate with the Assessment or IEP process, e.g., refusing to complete the Assessment, IEP, and other training development plan; and/or
- Ignores the field staffs unapproved request for a Leave of Absence.

When the participant's actions are not consistent with the IEP, staff must explore the cause in each case. A meeting with the participant should be held to discuss the cause and corrective action. A Corrective Action Warning/Notice must be provided to the participant in

each of these cases, including instances where a referral is provided but not fulfilled. The notice will include appropriate response timeframes. The IEP may be updated to be consistent with a new situation which was not considered in the original IEP. Documenting and tracking the events that led to the IEP termination is imperative. Careful case notes must be kept in the participant's file, and when applicable, in the host agency's file. Upon managerial approval an Exit Letter must be provided to the participant giving 30-day notice of the date of exit.

(11)Complaints & Grievances: describe the procedures for addressing and resolving participant complaints and grievances related to program termination. Please provide a copy of the current complaint/grievance policies.

Complaint Resolution Procedures/Grievance Policy

STEP 1: Address the complaint/grievance with the SCSEP Site Coordinator, the host agency supervisor may be included, within five (5) working days of the incident. Most workplace issues can be resolved in an informal manner.

STEP 2: If the complaint/grievance has not been satisfactorily resolved, write to the Sub-grantee Human Resources Department within 30 days of the incident/event with a detailed explanation of the complaint/grievance.

The Human Resources Department will acknowledge complaint/grievance and contact the individual via U.S. Mail to resolve the complaint/grievance within ten (10) working days of receipt of the explanation.

STEP 3: If the reply from the Human Resources Department is not satisfactory, an appeal may be made within five (5) working days from the postmarked date of the decision letter to the State of Colorado SCSEP Administrator. Appeals should be mailed to:

ATTN: Administrator
Senior Community Service Employment Program
Colorado Department of Human Services (CDHS)
1575 Sherman St., 10th Floor
Denver, CO 80203

This written appeal should contain the following:

- A detailed explanation of the complaint/grievance,
- A copy of the previous acknowledgements, and
- A request for a re-examination of the facts.

STEP 4: The State of Colorado SCSEP Administrator will have ten (10) working days from the date of receipt of the letter to reply. The findings of the State of Colorado SCSEP Administrator are binding on all parties, if the allegation does not involve a violation of the law.

STEP 5: If the reply from the State of Colorado SCSEP Administrator is not satisfactory, and the allegation is in regard to a violation of the law, an appeal may be made to the U.S. Department of Labor. A written appeal must be filed within sixty-days of the event which prompted the original grievance/complaint. The address is:

Division of Older Worker Programs
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

In the local SCSEP office is a signed copy of the Participant Orientation form, which acknowledges that these procedures have been explained to the SCSEP participant.

(12)Maximizing enrollment: describe procedures for fully enrolling all available slots, including over enrolling participants, and how over-enrollments will be balanced with equitable distribution requirements.

EQUITABLE DISTRIBUTION

Equitable Distribution (ED) is defined as "the process of distributing SCSEP positions so that all eligible persons have reasonably equal geographic access to the program." The ED report is prepared by state agency officials at the beginning of each fiscal year, and provides a snapshot of the actual distribution of all the authorized positions within the state, by grantee, and the optimum number of participant positions based on the latest U.S. Census data. It provides a basis for improving the distributions of SCSEP positions within the state.
It is imperative that SCSEP offices work cooperatively to achieve equitable distribution of SCSEP positions. SCSEP offices are expected to increase the number of positions in under-served areas and decrease the number in over-served areas. Counts must be based on participants' places of residence, not on host agency sites. A cooperative approach is essential to ensuring that the distribution of program resources is fair and equitable.

Colorado's over enrollment will be reduced through attrition, participants that meet SCSEP time limitations as well as those that have found unsubsidized employment, or have left the program for various reasons. Colorado will make an effort not to enroll new participants in counties that currently are over enrolled.

Counties that are under enrolled will continue to be examined for new opportunities with host agencies and participants. The demographics of each county will be examined, looking for the cities in the underserved counties that have a high low income older adult population. Outreach and education will be targeted to those specific communities and the residents of those communities.

The rural counties are challenged through geographic distance as well as the lack of employment opportunities and host agency training sites. The site managers in the rural areas will continue to serve on the local chamber of commerce committees as well as speak at

service organizations. They will be a visible presence in the community educating business owners, nonprofits/government agencies and potential participants of the benefits of SCSEP.

(13)Performance: include a proposed level for each performance measure for each of the program years covered by the plan. While the plan is under review, the State will negotiate with the Employment and Training Administration to set the appropriate levels for the next year. The State may also negotiate performance levels in a subsequent modification. At a minimum, States must identify the performance indicators required under the SCSEP Final Rule published on September 1, 2010, and, for each indicator, the State must develop an objective and quantifiable performance goal for the next year. The performance measures include:

(A) entered employment,
(B) employment retention,
(C) average earnings,
(D) service level,
(E) service to most-in-need, and
(F) *community service*

ASSESSMENT RESPORTS FOR PROGRAM YEAR 2016, 2017,2018,2019,2020					
DESCRIPTION	**GOAL**	**GOAL**	**GOAL**	**GOAL**	**GOAL**
Entered Employment	40%	41%	42%	43%	44%
Retention	70%	71%	72%	73%	74%
Average Earnings	$6,500	$6,600	$6,700	$6,800	$6,900
Most In Need	2.5%	2.6%	2.7%	2.8%	2.9%
Community Services	75%	80%	83%	85%	87%
Service Level	150%	155%	155%	157%	160%

(14) Administrative Costs: describe any request for an increase in administrative costs consistent with section 502(c)(3) of the Older Americans Act. - (NA)

SCSEP ASSURANCES

The State Plan must include assurances that:	
1.	Where SCSEP is included in the Combined Workforce Plan, the State established a written policy and procedure to obtain advice and recommendations on the State Plan from representatives of the State and area agencies on aging; State and local boards under WIOA; public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Social service organizations providing services to older individuals; Grantees under Title III of OAA, Affected Communities, Unemployed older individuals, Community-based organizations serving older individuals; business organizations; and labor organizations.

Veterans

JOBS FOR VETERANS STATE GRANTS

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. *As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes*:

(a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

The JVSG 5 Year State Plan states:

Colorado will assign JVSG supported staff to AJCs located within the State Workforce Agencies (SWA) in order to most effectively advance and assure both Priority of Service with regard to all employment and training services, as well as, the prompt referral to appropriately needed supportive services for veteran customers. That is not to say that it is JVSG staff's responsibility to provide Priority of Service, but to provide technical assistance for AJC staff as needed. Of thesupported staff, the majority will be placed in the local areas that have the greatest Veteran population. . DVOP specialists assigned to their regional AJCs will be allowed to visit the offices of our outreach partners located outside of the AJCs after an approved schedule has been arranged and approved by their Regional Director. The JVSG supported staff may be assigned to locations outside of the AJC such as, but not limited to, the Department of Veteran Affairs (DVA) Vocational Rehabilitation & Employment in Denver and, the Soldier and Family Assistance Office on Fort Carson, and college campuses

Two LVER positions will be assigned to the CDLE Headquarters; State Veterans Program Coordinator (SVPC) and Assistant State Veterans Program Coordinator (ASVPC). With a veteran friendly state as large as Colorado, supporting 6 very active military bases, with 60 American Job Centers and satellite offices and a JVSG program that employees over 30 support staff members, Colorado believes that adding an assistant position will allow the SVPC to move beyond the day to day desk duties and become more involved with developing, implementing and monitoring a department Statewide Veterans Employment Program. In partnership with our county operated AJCs and other Veteran focused partners, The SVPC will develop this program with the purpose to improve

upon Priority of Service procedures by addressing the strategies in which we deliver employment services.

Within the AJCs, DVOP specialists will be collocated and aligned within the WIA divisions. The reasoning behind this decision is to promote; (i) program co-enrollments, (ii) similarities in WIA and JVSG case management practices and (iii) promote the appearance of a seamless application process to Veterans who apply for training in one or both programs (iii) and most importantly to ensure the demonstration of Priority of Service and Refocusing.

In an effort to continue to meet the employment and training needs of veterans, CDLE recognizes that changes in delivery strategies when targeting Veterans need to respond to the forecasted increase in veterans transitioning out of the military and into the civilian labor force. Outreach to locate veterans with SBEs is a required duty of the DVOP specialist as outlined in VPL 03-14. As such, DVOP specialists conducting outreach will begin assisting eligible veterans first within their assigned AJC and then at the outreach locations they visit or are assigned to. At the outreach locations, Veterans identified as not meeting one of the SBE categories will be provided a point of contact for assistance at the nearest AJC by other AJC staff. The DVOP specialists will conduct outreach activities within various organizations that provide services to Veterans allowing us to identify from within the Veteran population they serve, those who are eligible for DVOP services. The sole purpose of these outreach activities are to identify eligible SBE veterans and other eligible persons who, without the receipt of intensive services, would not be able to obtain employment on their own. State MIS Database and partner organizations that have been identified and approved as effective outreach sources include, but are not limited to:

- Connecting Colorado (State MIS Database)
- AJC Partners (particularly WIA and Wagner Peyser)
- Military Installations…excluding the Transition Assistance Program (TAP)
- Colleges, Universities and Technical Schools
- Homeless Veterans Reintegration Programs (HVRP) and Homeless Shelters
- Vocational Rehabilitation and Employment Programs (VR&E)
- Department of Veteran Affairs Medical Centers and Vet Centers
- Veteran Service Offices (VSO)

(b) The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

The JVSG 5 Year State Plan states:

Under this grant Colorado will staff 29 fulltime permanent DVOP specialists and 9 LVER in FY 2016. This staffing arrangement allows intensive services and business

engagement to be available in the areas of the state where the largest concentrations of veterans are seeking employment.

The primary duties of DVOPs are to provide intensive service to veterans with significant barriers to employment and any other veteran category identified by the Assistant Secretary. Case management continues to be an appropriate service delivery strategy or framework in which intensive services will be delivered.

The intensive services and the purpose for which they are used by the DVOP specialists are:

- Comprehensive Assessment (CA): Comprehensive and specialized assessments of the skill levels and services which may include diagnostic testing and use of other assessment tools and in depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
- Counseling (CS): A client centered service that may involve personal, financial, life management, case management, career guidance and counseling. This service also includes referrals to other assistance, as well as, arranging for additional support services not previously acquired.
- Individual Employment Plan (IE): A formal written document outlining a course of action that will lead to the individual entering employment; to include short and/or long term goals to remove barriers to getting and keeping employment.
- Pre-Vocational Services (PV): Short-term pre-vocational services such as GED, ESL, remediation and workplace literacy.

The primary duties of LVERs are:

- Conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups;
- “Facilitating” employment, training, and placement services furnished to veterans in a State under the applicable State employment service delivery systems. Facilitate is defined as capacity building within all programs.
- Working with other service providers in order to promote veterans as highly skilled and experienced members of the workforce;
- Advocating for veterans employment and training opportunities with businesses, industry, and community-based organizations is also a primary duty;
- Conducting outreach that includes, but is not limited to, planning and participating in job fairs, promoting employment and training opportunities for veterans with business organizations, unions, and apprenticeship programs;
- Promoting credentialing and training opportunities for veterans with training providers and licensing agencies;
- Establishing and maintaining regular contact with employers to include federal contractors ;

- Active involvement with the AJC employer or business services/relations team;
- Coordinating the Regional Manager's Report on Services to Veterans using the format found in VPL 07-05. Reasonable attempts are made to include best practices and success stories, special projects, and other LVER and DVOP activities.

(c) *The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or one-stop delivery system partner network;*

The JVSG 5 Year State Plan states:

As a mandatory partner under WIOA, DVOP specialists and LVERs will be fully integrated with the WIA, Wagner-Peyser, and Business Service Representatives. The JVSG staff is under the direct supervision of the state; however, local workforce directors ensure the functions of grant staff are integrated into the One-Stop environment. The State Veterans Program Coordinator provides general oversight and monitoring of Colorado's Veterans Employment and Training Programs and alerts state administrators to any program issues.

The purpose of the integration is to deliver the appropriate services as seamless as possible. Integration also allows other than the JVSG staff to deliver services to veterans on a priority basis. The integration of the JVSG staff support the co-enrollment of eligible veterans into funded programs in order to leverage available training funds to provide skills development for the veterans who meet the program criteria with the purpose of preparing the veteran for in-demand careers. During and after training the one stop delivery system partner network, LVER and DVOP will work together to find and place the veteran in viable employment.

The DVOP specialists will be placed within close proximity of the WIA case managers in order to promote cross training in the way of case management and program processes and alignment with other service providers of intensive services. The LVERs are placed in close proximity of the Business Service Division in order to promote cohort job driven efforts in the outreach to employers, the planning of employment events and the sharing of labor market information. LVERs are the subject matter experts who will ensure that training is facilitated in regards to Priority of Service, preparing veterans for a civilian career and program policies. LVERs will also make themselves available to assist those who may have a question in regards to connecting to other veteran resources located outside of the State's employment service delivery system or one-stop delivery system partner network.

(d) *The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;*

The JVSG 5 Year State Plan states:

The program provides an employee award and recognition system authorized by Colorado Veterans Employment and Training Program in accordance with 38 U.S.C.

Chapter 41 and 42, as amended, and by direction of Veterans Program Letter (VPL) 08-03. The program is designed to recognize an employee's contribution to the objectives of VPL 08-03 through excellence in performance and service to veterans. With the announcement of the Incentive Award Program, CDLE expects an increase in performance and activity outcomes. The selection criteria for award recipients will be based on a notable increase in performance or activity outcomes using both objective and subjective data such as attitude, motivation, program improvement, positive feedback, and other competency indicators of outstanding performance and outreach in the areas of entered employment rates, Priority of Service in referrals and/or triaging processes, or best practices, to name a few, that directly impact the services offered to veterans who have barriers to employment.

Eligible recipients of State Employee Performance Incentive Awards are as follows: Disabled Veterans' Outreach Program Specialists (DVOPs), Local Veterans Employment Representatives (LVERs) staff, and any other employee who provides services to veterans through employment service delivery programs. Ineligible recipients include agencies and federal staff. Although agencies are not eligible recipients, individuals within an office or work unit are not restricted from being awarded where performance warrants recognition under the State's incentive awards program.

The Colorado Department of Labor and Employment administers the funds for the Distinguished Accomplishment Awards Program and the Spot Awards. A team consisting of members from Colorado Veterans Employment and Training Programs, CDLE and American Job Center System representatives will meet on a quarterly basis to select Spot Award and Distinguished Accomplishment awardees

(e) *The populations of veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);*

The JVSG 5 Year State Plan states:

The primary role of the DVOP specialists is to provide intensive services to Veterans who, after being properly triaged and assessed by either Wagner Peyser or WIA staff, are identified as "eligible veterans and eligible persons." In order to best serve eligible Veterans effectively and efficiently and to better target their services, the DVOP specialists will deliver these services utilizing a case management approach and will limit their services to eligible veterans and eligible persons who meet the definition of an individual with a Significant Barrier to Employment (SBE), specifically defined in VPL 03-14, 04-14. Veterans categorized as having a SBE are:

- Disabled and Special Disabled Veterans who are entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans' Affairs; or

who were discharged or released from active duty because of a service-connected disability;

- Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a));
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who at any point in the previous 12 months has been unemployed for 27 or more weeks;
- An offender, as defined by WIA Section 101(27), who has been released from incarceration
- Lacking a high school diploma or equivalent certificate; or
- Low-income (as defined by WIA at Sec. 101(25)(B))
- Veterans between the ages of 18-24 years old;
- *Transitioning Service Members who participated in TAP and are in need of intensive services;
- *Wounded warriors assigned to a wounded warrior transition unit or the care-giver of a wounded warrior.

*Per VPL 01-14, services to these additional populations is contingent upon an authorized extension past FY14 (December 31, 2014).

(f) *How the State implements and monitors the administration of priority of service to covered persons;*

The JVSG 5 Year State Plan states:

Priority of Service: Since the enactment of the Jobs for Veterans Act in 2002, Priority of Service has been established in the State of Colorado under policy guidance issued by the Colorado Department of Labor and Employment. Priority of Service, as required by 38 U.S.C § 4215 and 20 C.F.R. 1001 and 1010, is provided to ensure veterans and covered persons receive consideration for all opportunities, for which they qualify, funded in whole or part by the United States Department of Labor. After receipt of state policy, local AJC's are required to develop internal veterans' Priority of Service policies and procedures and implementing them after review and approval by the State Veterans Program Coordinator. Each year they are required to submit their local policy to the State Coordinator for review, particularly when changes have been made. The Priority of Service regulations require that local AJC's implement policies and procedures that:

- Identify veterans and eligible spouses at point of entry (physical locations, web sites, and other virtual service delivery resources);
- Advise veterans and eligible spouse of their entitlement to Priority of Service;
- Make veterans and eligible spouses aware of the full array of employment, training and placement services available; and
- Identify applicable eligibility requirements for programs and services.
- Veterans and covered person are identified and made aware of their entitlement for Priority of Service at the point of entry into Colorado's workforce system.

Services are made available and provided to eligible veterans transitioning service members, chapter 31 veterans, Native American veterans, and other groups targeted for special consideration like SBE veterans on a priority basis.

If "entry" is made via Colorado Department of Labor and Employment website under "Veteran Services", Veterans are made aware of their entitlement to Priority of Service. This information advises the veteran or covered person of their entitlement to Priority of Service, and provides a web link that advises the covered persons of the full array of employment, training, and placement services available under Priority of Service. If a veteran or covered person is making "entry" via our Connecting Colorado statewide database they are made aware of their entitlement to Priority of Service through information on the registration page as well as at the end of the registration process. Additionally, veterans or covered persons who enter our workforce system via a local workforce center office are made aware of their entitlement to Priority of Service by signage posted in the local office. The signage advises veterans of their entitlement for Priority of Service and directs them to speak with workforce center staff regarding their eligibility for Priority of Service and the eligibility requirements for a particular program or service.

Priority of Service in Programs: AJCs that operate programs which deliver services to the public as a whole without targeting specific groups, veterans and eligible spouses will receive Priority of Service over all other program participants. The primary universal access services are the "core" services delivered through the AJC staff under the Wagner-Peyser and WIA programs. Veterans and eligible spouses receive the first level of priority in universal access programs.

1. Some programs are required by law to provide a priority for a particular group of individuals or require the program to spend a certain portion of program funds on a particular group of persons. For programs with this type of statutory priority, AJC program operators will determine the status of each individual veteran or eligible spouse and apply Priority of Service as described below:
    - Veterans and eligible spouses who meet the mandatory priorities and program eligibility must receive the highest level of priority for the program or service;
    - Non-covered persons who meet the program's mandatory priorities and program eligibility then receive the second level of priority for the program or service;
    - Veterans and eligible spouses who do not meet the program-specific mandatory priority or spending requirement or limitation then receive the third level of priority for the program or service;
    - Non-covered persons outside the program-specific mandatory priority or spending requirement or limitation then receive the fourth level of priority for the program or service.

2. Some qualified job training programs may include a focus on a particular group or make efforts to provide a certain level of service to a particular group without the authorizing law specifically mandating that the target group be served before other eligible individuals. For this type of discretionary focus, Priority of Service will be applied as described below:
   - Veterans and eligible spouses who meet program eligibility and target population;
   - Non-covered persons who meet program eligibility and target population;
   - Veterans who meet program eligibility but not target population;
   - Non-covered persons who meet program eligibility but not target population.

3. State policy requires that all AJC's establish policy on recruitment, intake and enrollment of Veterans within programs offered, to ensure that veterans are notified, reviewed, and enrolled before non-veterans. In incidences where it has been noted that the veterans who have applied for but not completed the registration and/or enrollment requirements within a program, AJC staff is required to outreach to the veterans encouraging them to complete the process. Their outreach efforts must be documented before the application and/or enrollment is closed. Documentation must show that various means were used to outreach to the veterans.

Priority of Service in Employment Opportunities: When job orders are entered into the state's automated database, Connecting Colorado, whether manually or virtually, they are placed in a 24 hour "vet hold" status. This allows only Veterans who have all required skills and who meet all required qualifications to be identified and contacted as suitable candidates before being released for review by non-veterans. The veterans are contacted about this job opportunity using our Integrated Voice Response (IVR) system which automatically e-mails all qualified veterans first and relays the information about the job opportunity and how to apply for the position. After each IVR email, a note is automatically entered into the applicant's record with information about the job posting. This noted information allows the JVSG supported staff and AJC staff to assist the Veterans if and when the Veterans call in regards to the job posting(s).

1. When the automated email generated by the IVR fails to reach the targeted Veteran due to a bad email address, a non-delivered notice is posted within the system. In the demonstration of providing Priority of Service, state policy requires that an attempt to contact the Veteran by phone and post card is required. These additional attempts to contact the veteran are the responsibility of the AJC staff – not JVSG staff.

2. When a job order is placed in Connecting Colorado system, a list of qualified veterans can be generated and viewed by the posting Employer, JVSG and/or, AJC staff. This generated list places all Veterans, beginning with Special disabled, disabled and then all other veterans, ahead of qualified non-veterans in

accordance with 20 CFR Part 1001. When the automated applicant list is generated and AJC staff notices that the generated list contains little to no qualified veterans, they will conduct a manual search as a demonstration of Priority of Service. This manual applicant search acts as a safe guard to ensure that qualified veterans, even if there is one, is given priority within job search services.

(g) *How the State provides or intends to provide and measure, through both the DVOP and one-stop delivery system partner staff: (1) job and job training individualized career services, (2) employment placement services, and (3) job-driven training and subsequent placement service program for eligible veterans and eligible persons;*

The JVSG 5 Year State Plan states: The demonstration of Priority of Service is the responsibility of AJC staff. It is also the responsibility of the state and county leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance and monitoring accomplished by the Local Veteran Employment Representative, CDLE Monitors, State Veterans Program Coordinator and Assistant Coordinator, CDLE Regional Directors, and Veteran Program Managers. Methods and means used to verify whether or not Priority of Service is being provided will be the following but are not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

(h) *The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and,*

The JVSG 5 Year State Plan states:

The steps below indicate how the state will expeditiously fill vacancies or keep grant-funded positions filled despite State budget problems, hiring freezes, and or potential furloughs. The announcement of DVOP or LVER openings is published online at the State Classified job website. When the announcement is published, all qualified applicants may apply. Email lists developed by DVOPs and LVERs are used to broadcast the announcements to veterans.

1. When a LVER vacancy is announced, the minimum requirements for the position are taken from Title 38 U.S.C., Chapter 4103, as amended, and are used to identify qualified veterans. Preference is given to disabled veterans. The veteran's status must be substantiated with a DD214 and letter from the Department of Veterans' Affairs to qualify for the position. These requirements

apply to all applicants whether internal or external. If no qualified veteran can be found, then a non-veteran can be temporarily placed in the vacant position to continue services to veterans. According to Federal law a non-veteran cannot work more than six months in a LVER position after which time the LVER vacancy will be re-announced to recruit qualified veterans.

2. When a DVOP vacancy is announced, the minimum requirements for the position are taken from Title 38 U.S.C., Chapter 4103, as amended, and are used to identify qualified veterans. Preference is given to disabled veterans. The veteran's status must be substantiated by a DD214 and letter from the Department of Veterans' Affairs regarding the existence of a service connected disability. These requirements are for all applicants from internal or external sources. If no qualified disabled veteran can be found, then a veteran without a disability can fill the position. If neither a qualified disabled veteran nor qualified veteran can be found, a non-veteran can be temporarily placed in the vacant position to continue services to veterans. According to Federal law a non-veteran cannot work more than six months in a DVOP position after which time the DVOP vacancy will be re-announced to recruit qualified veterans

Trade Adjustment Assistance

The Trade Adjustment Assistance (TAA) program is a Federal program that offers a variety of benefits and services to workers whose employment has been adversely impacted by foreign trade. Through a number of benefits and services, the TAA program provides trade-affected workers with opportunities to obtain the support, resources, skills, and credentials they need to return to the workforce in a good job. These include employment and case management services, training, job search allowances, relocation allowances, reemployment and alternative TAA wage subsidies for older workers, and income support in the form of Trade Readjustment Allowances (TRA).

(a) The TAA program is a required partner in the one-stop delivery system, established under section 121 of the Workforce Innovation and Opportunity Act (WIOA). Therefore, given that the TAA program is part of the broader workforce system and a key goal for the TAA program is to ensure that trade-affected workers are able to successfully return to work, *ETA strongly encourages States to integrate their TAA program activities in concert with other workforce system core and partner programs that may also address the needs of trade-affected workers*. WIOA Sec. 103(3)(A)(B). Consistent with the Governor-Secretary Agreement, the States agree to use funds obligated under the TAA Annual Cooperative Financial Agreement (CFA), to carry out the TAA program, including: 1) ensuring integration of the TAA program into its one-stop delivery system; 2) using the centers in this system or network as the main point of participant intake and delivery of TAA program benefits and services; and 3) ensuring the terms of the Memoranda of Understanding (MOU) with the Local Workforce Investment Boards, as established under WIOA section 121(c) will apply to the assistance provided by other one-stop partners to TAA participants. (Trade Act Sec. 239 (a) as amended by WIOA section 512 (hh))

Describe the State's process for operating the TAA program that ensures coordination and integration with WIOA core and partner programs. Provide examples, if available, of how the co-location of Wagner-Peyser in one-stop centers and the addition of Temporary Assistance for Needy Families (TANF), have improved access to these services for trade-affected workers.

Colorado will, on an annual basis, execute TAA Cooperative Financial Agreements and UI Funding Agreements for each fiscal year during the four-year State planning cycle.

Colorado has integrated TAA into the core programs in Colorado's workforce development system (one-stop centers) and continues to explore options to enhance this integration and partnership. Colorado has been granted demonstration state status, which goes beyond co-location to allow Wagner-Peyser services to be provided by local county as well as state merit staff. As a result, the local areas in Colorado are operated by staff who provide both Wagner-Peyser and WIOA services within the one-stop centers. This has allowed for the leveraging of services and resources within Colorado's local control areas for improved service delivery to TAA participants. TAA participants routinely participate in the core services of one-stops that include: job clubs, resume and interview workshops, career exploration services, labor market information

services, job fairs, hiring events, and basic computer classes. Colorado has and continues to emphasize wrap around services to TAA participants from intake to the obtainment of employment. In addition, co-enrollment in WIOA is encouraged to maximize the services and benefits to trade impacted workers that include the provision of supportive services. Colorado continuously seeks ways to integrate and align policies and procedures among all one-stop programs.

The integration within one-stop services allows for the early identification of potential trade impacted layoffs and impacted employees. Local areas are encouraged and trained to file TAA petitions on behalf of trade impacted workers. Through Colorado's Business Services units and Rapid Response program, outreach and education regarding the TAA program continues to be a focus. TAA is integrated into the Rapid Response services that are provided to employers experiencing a reduction in force. In instances where the layoffs are a suspected result of trade impacted competition, TAA services are discussed and offered. Colorado will continue to make enhancements to the provision of Rapid Response layoff services in coordination with TAA to ensure that impacted companies are reached and afforded the information and services from the TAA program.

The addition of core partners within the workforce development system provides additional opportunities to align the TAA program with services from the Division of Vocational Rehabilitation, Adult Education and TANF. These agencies represent populations that are inclusive of TAA impacted workers, and Colorado will work to align resources for the benefit of our shared customers. The TAA Unit will work with local workforce development boards to ensure that MOU's with these core partners and any additional partners identified in the local areas will be inclusive of services provided to TAA participants.

The TAA Unit holds an annual training conference to provide up-to-date information on program rules and regulations and best practices. Colorado extends the opportunity to participate in the annual conference to our regional services monitoring team, local area WIOA case managers, Rapid Response staff and Business Services staff to enhance program integration. As more partnerships are formalized within the one-stop system, this conference will be expanded to include additional partner participation.

(b) *States must develop and manage resources (including electronic case management systems) to integrate data, including co-enrollment data, provided through different agencies administering benefits and services to trade-affected workers in order to ensure consistent program administration and fiscal integrity, as well as reliable fiscal and performance reporting. (WIOA section 103(b)(3))*

Describe how the State will use TAA funding for infrastructure, other shared costs, and the promotion of the development of integrated intake, case management and reporting systems.

Colorado already has an integrated electronic case management/data management system known as Connecting Colorado/Joblink. All Title I and Title III basic career

services are provided through and tracked in Connecting Colorado and are inclusive of TAA program services. Colorado has worked to align TAA and WIOA case management activities and services through policy and procedures while respecting the needs of each program area. All activities at the local level are recorded in Connecting Colorado, which is a part of the Joblink program that houses all TRA/RTAA and TAA payments. TAA file documentation is scanned and uploaded into this system, which improves our data validation/data integrity. Our integrated system allows for seamless federal reporting of Title I, Title III, TAA, and Veterans programs.

Local areas in Colorado will complete the process of determining one-stop partner infrastructure and shared costs during the PY15 program year with the objective of having MOUs in place by the statutory deadline of July 1, 2016. For TAA these discussions will build upon the partnerships already established and supported with WIOA Dislocated Worker 25% funds provided for TAA case management purposes.

(c) *Except for States covered by the regulatory exemption 20 CFR 618.890 (c) or to perform non-inherently governmental functions, States must engage only State government personnel to perform TAA-funded functions undertaken to carry out the TAA program, and must apply to such personnel the standards for a merit system of personnel administration applicable to personnel covered under 5 CFR part 900, subpart F. (20 CFR 618.890)*

Describe how TAA program-funded benefits and services are approved by merit-staffed employees in accordance with 20 CFR 618.890.

In accordance with Colorado's Wagner-Peyser demonstration state status, all TAA services are delivered by merit-staff employees, both state and county. In Colorado's structure all intake and case management services are provided in the local areas by merit staff. All final approvals for TAA benefits and services are provided by state merit staff at the state level. All payments for TAA and RTAA are issued by state merit staff at the state level, as well.

Trade Adjustment Assistance (TAA) Program Assurances

The State Plan must include assurances that:	
1.	On an annual basis, the CSA will execute TAA Cooperative Financial Agreements and UI Funding Agreements for each fiscal year during the four-year State planning cycle. Colorado's CSA currently executes the TAA Cooperative Financial Agreements and UI Funding Agreements and we assure that this will continue for each fiscal year during the four-year State planning cycle.

Attachment One:
Economic and Workforce Data Analysis

Presented by:

THOMAS P. MILLER & ASSOCIATES

Strategic Planning Elements

Economic and Workforce Analysis

The State of Colorado is constantly searching for ways to aid its workforce in adapting to the constant changes within the economy. To accomplish this goal, the State must have a nuanced understanding of the economic and educational forces taking place statewide. Through this approach, the State recognizes the increased need for workers to have access to training that will prepare them for the demands of the economy. This Document serves as a high level overview of both the economic and workforce trends in Colorado, and is intended to be used to facilitate the development of the strategic elements within the Colorado WIOA State Plan. By providing stakeholders with an accurate view of both the economic and workforce landscape within the state it will assist in guiding the strategic vision and planning based on relevant data. *Note: Supplementary information can be found throughout the document as well as in the appendices.*

Economic Analysis

The economic analysis will provide an overview of both the in demand and emerging industries and occupations within Colorado. To meet the current and emerging economical needs, the State will need to have a basic understanding of all factors that affects the current and emerging economy. State level labor market information as well as data from Economic Modeling Specialists Inc. (EMSI) was used to create the economic overview.

Table 1: Colorado at a Glance	
Population (as of 2014)[16]	5,355,866
Veteran Population[17]	399,458
Veteran Unemployment Rate	5.9%
Poverty Rate[18]	12%
Unemployment Rate[19]	4.2%
Average Annual Wage[20]	$55,692

As of 2014 the total population of the State of Colorado has increased by 6.5% from 2010 to an estimated 5,355,866. Of that estimate, 2,806,992 are a part of the working population. Even with a 4.2% unemployment rate and $55,692 average annual wage, the state is faced with a 12% poverty rate that affects a wide population. This includes its veteran population which stands at nearly 400,000 experiencing almost 6% unemployment.

Existing Demand Industry Sectors

Table two reports the employment numbers for Colorado's current industry structure. Across the state, the Government employs 467,000 individuals, accounting for 17% of total employment. Government jobs are not only plentiful, but also offers high wages with an average yearly earnings of $61,261. As listed in Appendix Table A1, Elementary and secondary school teachers, local government (excluding education and hospitals) and colleges and

[16] US Census Bureau
[17] Colorado Department of Employment and Labor
[18] US Census Bureau
[19] Bureau of Labor Statistics
[20] Colorado Department of Employment and Labor

universities are the three largest government subsectors employing 128,079; 106,386; 65,354 individuals respectively.

As a sector, Health Care and Social Assistance is the second largest industry in Colorado, employing 293,024 individuals across the state and with average yearly earnings of $54,814. This accounts for 10% of total employment statewide. General medical and surgical hospitals, offices of Physicians and Services for the elderly and disables as the largest Health care and social assistance sectors employs 49,145; 36,185 and 24,985 individuals respectively. The remaining list can be found in Appendix Table A2.

Retail Trade is the third largest industry sector in Colorado, employing 267,095 individuals, and accounts for 9% of statewide employment. The average yearly earnings for Retail Trade is $33,807. As listed in Appendix Table A3, the retail trade subsectors with the highest employment numbers are supermarkets, new car dealers and convenient stores which employs 39,633; 17,374; 12,362 individuals respectively.

Table 2: Top Employment by Industry

NAICS	Description	2015 Jobs	Current Total Earnings
90	Government	467,800	$61,261
62	Health Care and Social Assistance	293,024	$54,814
44	Retail Trade	267,095	$33,807
72	Accommodation and Food Services	266,838	$22,167
54	Professional, Scientific, and Technical Services	227,729	$91,731
23	Construction	196,118	$55,952
56	Administrative and Support and Waste Management and Remediation Services	174,171	$38,835
31	Manufacturing	144,617	$78,423
81	Other Services (except Public Administration)	127,116	$31,721
52	Finance and Insurance	113,152	$94,208
42	Wholesale Trade	104,389	$86,696
48	Transportation and Warehousing	76,068	$60,514
51	Information	71,162	$110,367
71	Arts, Entertainment, and Recreation	61,392	$34,281
53	Real Estate and Rental and Leasing	58,468	$52,907
61	Educational Services	52,685	$38,025
21	Mining, Quarrying, and Oil and Gas Extraction	36,464	$135,041
55	Management of Companies and Enterprises	36,001	$155,619
11	Crop and Animal Production	27,179	$30,723

22	Utilities	8,303	$123,959
99	Unclassified Industry	3,870	$61,111
	Total	2,813,641	$58,878

Existing In Demand Occupations

The top ten occupations in Table 3 accounts for 66% or 1,868,379 jobs in Colorado. Office and Administrative Support Occupations employ 14% of total state population while Sales and Related Occupations and Food Preparation and Selling Related Occupations account for 11% and 9% of the state's employment respectively. The full listing of existing In Demand occupations can be found in Appendix B.

Table 3: Employment by Occupation

SOC	Description	2015 Jobs	2014 Avg. Hourly Earnings
43-0000	Office and Administrative Support Occupations	404,319	$17.69
41-0000	Sales and Related Occupations	301,268	$20.01
35-0000	Food Preparation and Serving Related Occupations	246,634	$10.86
13-0000	Business and Financial Operations Occupations	177,839	$34.85
47-0000	Construction and Extraction Occupations	166,191	$19.88
25-0000	Education, Training, and Library Occupations	153,574	$23.48
53-0000	Transportation and Material Moving Occupations	146,114	$18.06
29-0000	Healthcare Practitioners and Technical Occupations	136,515	$37.38
11-0000	Management Occupations	135,926	$49.14
37-0000	Building and Grounds Cleaning and Maintenance Occupations	111,948	$11.97
51-0000	Production Occupations	107,307	$17.63
49-0000	Installation, Maintenance, and Repair Occupations	105,581	$22.08
39-0000	Personal Care and Service Occupations	104,314	$11.73
15-0000	Computer and Mathematical Occupations	101,476	$41.75
31-0000	Healthcare Support Occupations	71,779	$15.03
17-0000	Architecture and Engineering Occupations	60,648	$41.50
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	57,105	$21.62
33-0000	Protective Service Occupations	56,492	$21.97
55-0000	Military occupations	53,971	$15.88
21-0000	Community and Social Service Occupations	42,011	$22.55

19-0000	Life, Physical, and Social Science Occupations	31,306	$33.96
23-0000	Legal Occupations	25,732	$45.08
45-0000	Farming, Fishing, and Forestry Occupations	15,593	$13.58
99-0000	Unclassified Occupation	0	$0.00
	Total	2,813,641	

Emerging Demand Industry Sectors

To assess the emerging demand industry sectors, a 10-year projection (2015-2015) was utilized. Similar to the year 2015, the top ten industries remain the same, however, several of those industries have a significant increase in projected statewide job availability. The largest increases takes place in the following sectors:

- Health Care and Social Assistance
- Professional, scientific and technical services
- Administrative and support and waste management and remediation services
- Educational Services and
- Accommodation and food services

Although not in the top five, Educational Services, Mining, Quarrying & Oil and Gas Extraction, and Management of Companies and Enterprises are expected to grow by 25%, 55% and 49% respectively. The list of all emerging demand industry sectors can be found in Appendix C.

Table 4: Emerging Industries from 2015-2025

NAICS	Description	2015 Jobs	2025 Jobs	2015 - 2025 Change	2015 - 2025 % Change
90	Government	467,800	518,512	50,712	11%
62	Health Care and Social Assistance	293,024	376,406	83,382	28%
72	Accommodation and Food Services	266,838	315,323	48,485	18%
44	Retail Trade	267,095	299,328	32,233	12%
54	Professional, Scientific, and Technical Services	227,729	293,788	66,059	29%
23	Construction	196,118	228,061	31,943	16%
56	Administrative and Support and Waste Management and Remediation Services	174,171	222,140	47,969	28%
31	Manufacturing	144,617	153,792	9,175	6%
81	Other Services (except Public Administration)	127,116	139,638	12,522	10%

52	Finance and Insurance	113,152	132,351	19,199	17%
42	Wholesale Trade	104,389	116,873	12,484	12%
48	Transportation and Warehousing	76,068	87,279	11,211	15%
71	Arts, Entertainment, and Recreation	61,392	70,440	9,048	15%
61	Educational Services	52,685	67,707	15,022	29%
51	Information	71,162	66,148	(5,014)	(7%)
53	Real Estate and Rental and Leasing	58,468	63,680	5,212	9%
21	Mining, Quarrying, and Oil and Gas Extraction	36,464	56,379	19,915	55%
55	Management of Companies and Enterprises	36,001	53,755	17,754	49%
11	Crop and Animal Production	27,179	26,889	(290)	(1%)
22	Utilities	8,303	7,750	(553)	(7%)
	Total	2,813,641	3,302,245	488,604	17%

Emerging Demand Occupations

Using a ten year projection to assess emerging demand occupations reveals that similar to the year 2015 the top ten occupations remains the same for the year 2025. Outside of the top ten, significant job increases takes place within the following occupations:

- Healthcare Support Occupations
- Healthcare Practitioners and Technical Occupations
- Computer And Mathematical Occupations

A full listing of all emerging occupations can be found in Appendix D.

Table 5: Emerging Occupations 2015-2025

SOC	Description	2015 Jobs	2025 Jobs	2015 - 2025 Change	2015 - 2025 % Change
43-0000	Office and Administrative Support Occupations	404,319	472,160	67,841	17%
41-0000	Sales and Related Occupations	301,268	338,245	36,977	12%
35-0000	Food Preparation and Serving Related Occupations	246,634	294,925	48,291	20%
13-0000	Business and Financial Operations Occupations	177,839	210,064	32,225	18%
47-0000	Construction and Extraction Occupations	166,191	197,667	31,476	19%

25-0000	Education, Training, and Library Occupations	153,574	184,791	31,217	20%
53-0000	Transportation and Material Moving Occupations	146,114	172,514	26,400	18%
29-0000	Healthcare Practitioners and Technical Occupations	136,515	169,741	33,226	24%
11-0000	Management Occupations	135,926	158,133	22,207	16%
37-0000	Building and Grounds Cleaning and Maintenance Occupations	111,948	131,512	19,564	17%
39-0000	Personal Care and Service Occupations	104,314	123,950	19,636	19%
15-0000	Computer and Mathematical Occupations	101,476	122,682	21,206	21%
51-0000	Production Occupations	107,307	121,839	14,532	14%
49-0000	Installation, Maintenance, and Repair Occupations	105,581	121,619	16,038	15%
31-0000	Healthcare Support Occupations	71,779	91,950	20,171	28%
17-0000	Architecture and Engineering Occupations	60,648	71,584	10,936	18%
33-0000	Protective Service Occupations	56,492	65,168	8,676	15%
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	57,105	64,882	7,777	14%
55-0000	Military occupations	53,971	53,911	(60)	(0%)
21-0000	Community and Social Service Occupations	42,011	50,099	8,088	19%
19-0000	Life, Physical, and Social Science Occupations	31,306	37,134	5,828	19%
23-0000	Legal Occupations	25,732	30,668	4,936	19%
45-0000	Farming, Fishing, and Forestry Occupations	15,593	17,009	1,416	9%
	Total	2,813,641	3,302,245	488,604	17%

Workforce Analysis

To gain a better understanding of the workforce trends in the State of Colorado, state level data was compiled to have a holistic view of the workforce. The Job Skills Report and the Talent Pipeline Report were created to guide Colorado towards its workforce goals and to initiate the following:

- Provide an overview of Colorado's populace in terms of migration, education, and demographic patterns that impact the potential workforce pool;
- Discuss the state's top jobs, analyzing the opportunities and challenges they present;
- Analyze skill sets required for occupations in Colorado's Key Industries;
- Present a progress report on current career pathway efforts; and
- Share recommendations to advance Colorado's talent pipeline, career pathways, and data-related practices/opportunities.

These two documents in addition to labor market data from the Colorado Department of Labor and Employment were used to create the workforce analysis.

Employment and Unemployment

As of September 2015 Colorado had one of the lowest unemployment rates in the country at 4.2 percent[21], however, this rate varied substantially depending on individual educational attainment. One area of concern is the youth unemployment rate. It still remains higher than pre-recession unemployment rates. Unemployment in 2014 in Colorado hovered at 4.4 percent for people with some college or an associate's degree and at 3.1 percent for an adult with a bachelor's degree or higher—lower than the unemployment rate for high school graduates (4.7 percent) and for those with less than a high school education (8.9 percent). Average earnings continue to be higher for those with higher levels of education.[22]

Table 6: Unemployment Rate by Level of Education

Educational Attainment	**Unemployment Rate**	Median Earnings
Less than high school graduate	8.9%	$21,624
High School graduate	4.7%	$30,011
Some college or associate's degree	4.4%	$33,594
Bachelor's degree	3.1%	$46,891
Graduate or professional degree		$61,730

Source: U.S. Census Bureau, 2013 American Community Survey, 1-year estimates; Current Population Survey, 2014

Table 7: Colorado Unemployment By Region

Area Name	Unemployment Rate
Pueblo MSA, Colorado	5.6%
Grand Junction MSA, Colorado	5.4%
Colorado Springs MSA,	4.5%

[21] Colorado Job Skills Report
[22] Colorado Job Skills Report

Colorado	
Greeley MSA, Colorado	3.8%
Denver - Aurora MSA, Colorado	3.6%
Boulder-Longmont MSA, Colorado	3.2%
Fort Collins-Loveland MSA, Colorado	3.2%

Within the estimated 4.2% unemployment rate, there were fluctuations by region within Colorado. Some areas have a higher unemployment rate than others. Detailed regional data in Table 67shows how the unemployment rate fluctuates by area. The highest unemployment rate is in the Pueblo MSA region while the lowest unemployment rate is in the Boulder-Longmount MSA and Fort Collins-Loveland MSA each with a regional unemployment rate of 3.2%

Table 8: Populations with Barriers to Employment	
Group	Number
Low-Income Individuals (18-64)	369,522
American Indiana/Alaska Natives/Native Hawaiians	40,925
Individuals with Disabilities	293,202
Older Individuals(over 65)	679,572
Older Individuals, low-income	630,786
Youth in Foster Care	5,553
Farmworkers	40,788
Long-term unemployed	22,700
Single Parent Households	309,558
Single Mother Households	210,499
Single Father Households	99,059
TANF	91,439

Vulnerable Populations, unemployment rate and workforce participation rate

Veterans	
Unemployment rate	4.8%
Workforce Participation Rate	76.4%
Disabled	
Unemployment rate	13.2%
Workforce Participation Rate	48.6%
Low-Income	

Unemployment rate	18.8%
Workforce Participation Rate	54.5%

Workforce Participation Rate

The total civilian labor force (seasonally adjusted) for Colorado in August, 2015 was 2,806,992 of which 2,688,745 were employed and 118,247 were unemployed. The unemployment rate was 4.2% percent.[23]

Labor Market Trends[24]

Comprehensive state level data show that several industries and occupations are on the incline while others will continue to decline over the next 10 years.[25]

Health care and social assistance will add an additional 83,382 jobs to the economy. The subsectors that will experience the most growth are:

- General Medical and Surgical Hospitals (9,701 additional jobs)
- Offices of Physicians (6,315 additional jobs)
- Services for the Elderly and Persons with Disabilities (10,283 additional jobs)
- Home Health Care Services (8,641 additional jobs)

Professional, scientific and technical services will add an additional 66,059 jobs. The engineering services subsector will add an additional 8,731 jobs over the next ten years while the subsectors of Computer Systems Design Services, Custom Computer Programming Services, Offices of Lawyers and Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology) will add 11,196; 8,571; 2,731 and 2,302 jobs respectively.

Although these industries are not listed as a top employment sector within Colorado, their projected growth between 2015 and 2025 is worth noting. Mining, Quarrying, and Oil and Gas Extraction industry will grow over 55% by 2025 and the Management of Companies and Enterprises industry will increase by 49%.

Industries that are on the decline include crop and animal production, utilities and information. Each of these industries combined are projected to lose approximately 6,000 jobs over the next ten years.

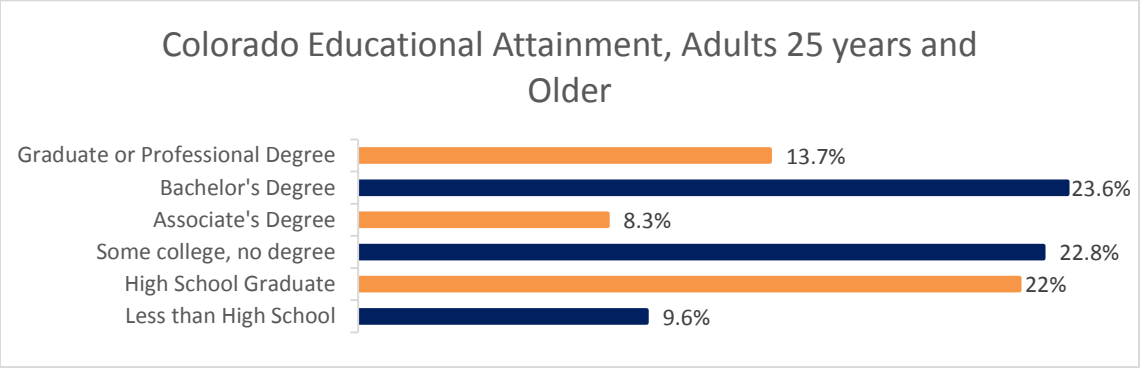
Education and Skill Levels of the Workforce

By the year 2020, it is estimated that 64 percent of all jobs, nationally, will require post-secondary education.[26] In Colorado, however, 74 percent of all jobs statewide will require some level of post-secondary education or training by the year 2020, well exceeding the national average.[27] State level data show that Colorado is anticipating that a majority of the

[23] Colorado Department of Labor and Employment
[24] The data in this section came from Economic Modeling Specialist International, unless otherwise stated.
[25] Full list of emerging industries and occupations can be found in Appendices C and D
[26] Colorado Skills Report
[27] IBID

postsecondary educational requirements will place more emphasis on baccalaureate and associates degrees.[28]

Relative to the rest of the nation, Colorado has a highly educated adult population. It is estimated that 68 percent of adults have some college experience or a post-secondary credential, while 46 percent have an associate's degree or higher.



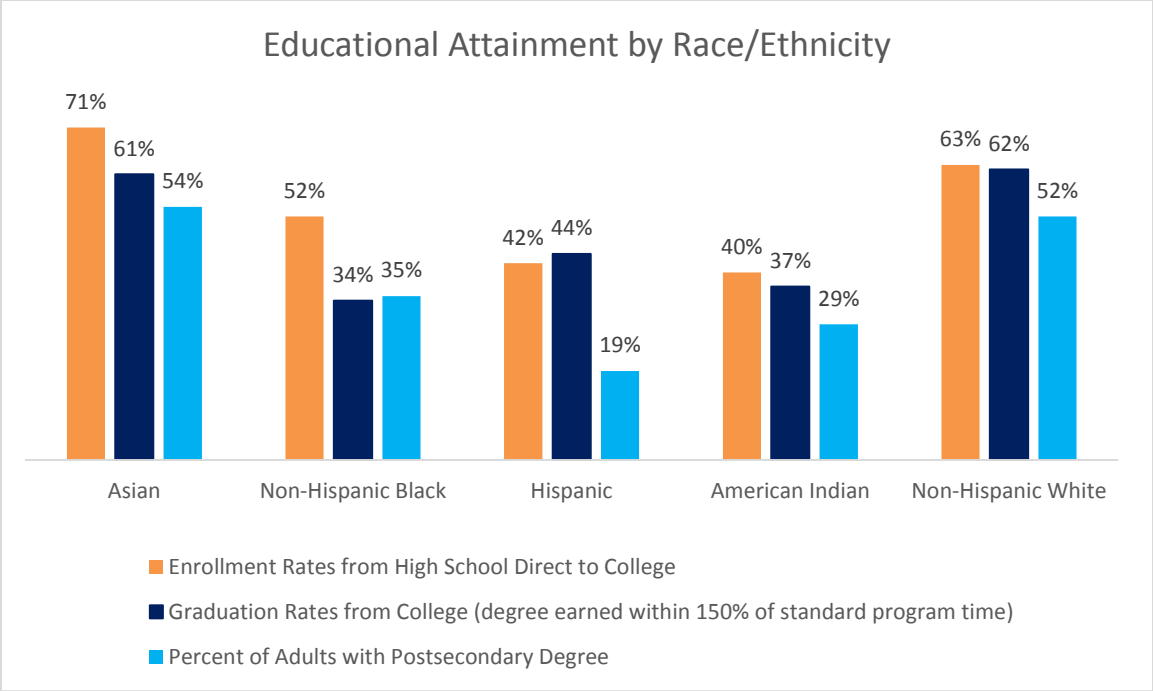
Source: U.S. Census Bureau; 2011-2013 American Community Survey, 3-year estimates

More jobs are expected to require higher levels of education in the coming years. To meet emerging employer demand, Colorado will need to increase postsecondary credential production by 2% per year or about 1,000 additional degrees/credentials annually[29]. A goal set by the Colorado Department of Higher Education identifies a target of 66 percent post-secondary certificate or degree attainment level for Coloradans ages 25 to 34 by 2025.[30]

It is important to note that there are significant disparities in educational attainment by race and ethnicity. Identifying these gaps is important in addressing overall workforce preparedness due to its impact on the development of the state economy. In Colorado, 19 percent of Hispanic adults have a college degree, whereas 52 percent of non-Hispanic white adults have a degree (U.S. Census Bureau, 2013). By 2040, the non-white share of the working adult population (ages 25 to 64) is projected to be 43 percent. Due to these statistics, Colorado foresees needing additional support for those in underserved populations due to the impact of educational attainment on the long term sustainability of the workforce.[31]

[28] IBID
[29] IBID
[30] IBID
[31] Colorado Talent Pipeline Study

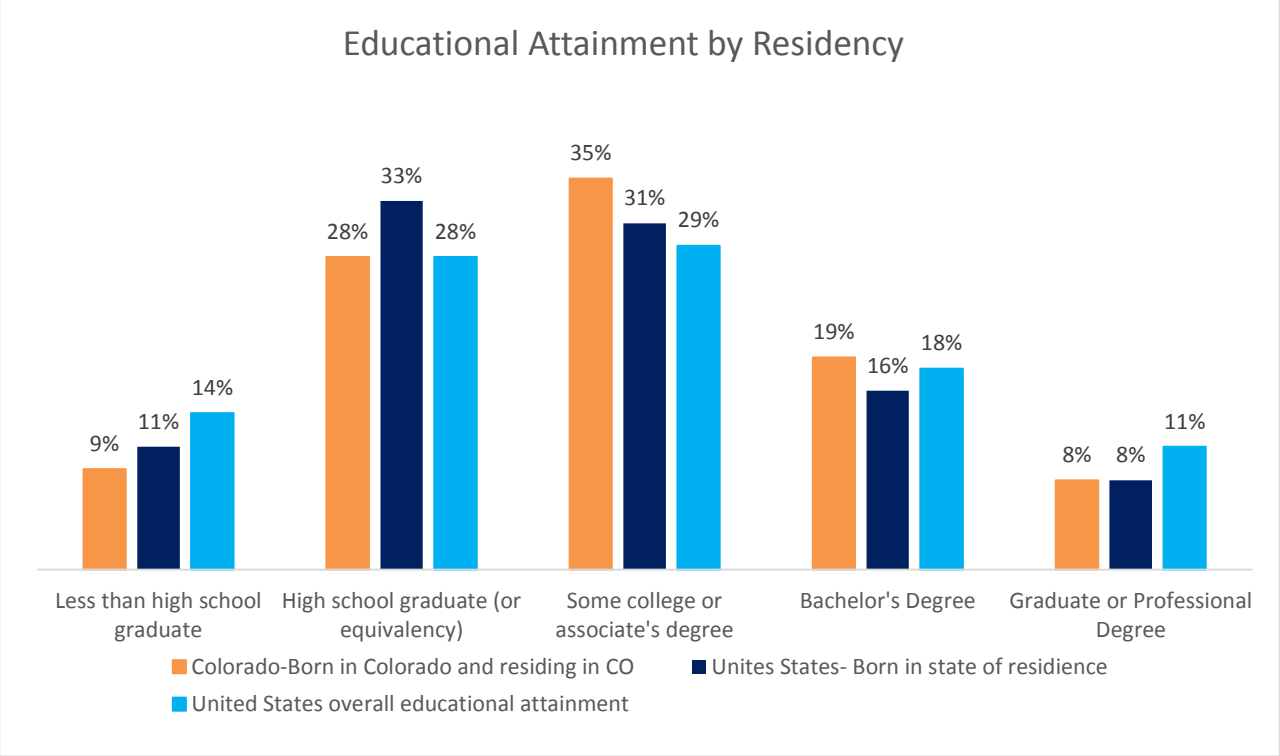
Because the young Hispanic population continues to grow within the state, it is essential that state resources are used to assist this population in finding success within their chosen educational and career pathways.



Source: Colorado Department of Higher Education; U.S. Census Bureau

Skills Gaps

Colorado is concerned about the "leaks" in the pipeline because studies have shown that those with lower levels of education typically have higher unemployment rates, less stable and lucrative job prospects, less opportunities for mobility, lower levels of health, and lower earning



potential.[32] It is noted that a significant portion of the Colorado adult population with a postsecondary education can be attributed to the significant influx of people from other states who have been drawn to Colorado's positive economic prospects, moderate cost of living, and attractive lifestyle.[33] Now, Colorado is seeking to understand the degree to which individuals born outside of the state account for Colorado's highly educated population.[34] In recent years, Colorado has experienced "brain drain", a term used to describe the emigration of intelligent, well-educated citizens for better job prospects, causing their place of origin to lose skilled workers. While Colorado continues to attract highly-educated workers from other states, many native Coloradans with high levels of education leave the state in pursuit of opportunities elsewhere However, when you compare this data to national statistics, Colorado's retention rates are higher than the nation-at-large.[35]

Additionally, there are discrepancies in supply and demand at individual occupation levels, however there appears to be a shortage of completions for computer-related occupations, various skilled trades and science technicians in particular[36]. Data also shows that Colorado is not producing enough graduates trained to enter financial occupations, computer-related occupations or healthcare occupations.[37] STEM occupations are most likely to have supply-demand gaps. Eighty-six percent of bachelor's level finance occupations and 87 percent of graduate level healthcare occupations are defined as STEM. All bachelor's level computer-related and air transportation occupations are defined as STEM.[38]

Occupation groups that may not maintain current graduate-level educational attainment levels of workers include financial and IT workers. Many of these occupation areas— such as finance, engineering, architecture and skilled healthcare practitioners—are occupation clusters that tend to be more skewed to older age workers.[39]

The potential deficits in completions for the graduate/professional level group of healthcare practitioners is complicated by the fact that many of these jobs requires upwards of ten years of schooling, and the healthcare industry will continue to evolve in staffing structures as practices and technology change.[40]

Appendix A-Industry Analysis

Table A-1: Current Government Industry Sector

Industry	2015 Jobs	Current Earnings
Elementary and Secondary Schools (Local Government)	128,079	$49,496
Local Government, Excluding Education and Hospitals	106,386	$61,756

[32] Colorado Talent Pipeline Study
[33] IBID
[34] IBID
[35] IBID
[36] Colorado Job Skills Report
[37] IBID
[38] IBID
[39] IBID
[40] IBID

Colleges, Universities, and Professional Schools (State Government)	65,354	$49,511
Federal Government, Military	53,971	$51,779
Federal Government, Civilian, Excluding Postal Service	42,634	$109,890
State Government, Excluding Education and Hospitals	31,129	$73,126
Hospitals (State Government)	15,757	$73,398
US Postal Service	10,334	$70,121
Hospitals (Local Government)	10,083	$73,967
Unclassified Industry	3,870	$61,111
Colleges, Universities, and Professional Schools (Local Government)	2,803	$26,052
Elementary and Secondary Schools (State Government)	1,122	$45,257
All Other Schools and Educational Support Services (Local Government)	129	$40,939
All Other Schools and Educational Support Services (State Government)	18	$38,070

Table A-2: Current Health and Social Assistance Industry Sector

Industry	2015 Jobs	Current Earnings
General Medical and Surgical Hospitals	49,145	$68,582
Offices of Physicians (except Mental Health Specialists)	36,185	$106,033
Services for the Elderly and Persons with Disabilities	24,985	$21,393
Nursing Care Facilities (Skilled Nursing Facilities)	21,059	$39,725
Child Day Care Services	20,493	$21,955
Offices of Dentists	18,990	$60,428
Home Health Care Services	18,499	$36,533
Offices of All Other Miscellaneous Health Practitioners	9,971	$34,093
Specialty (except Psychiatric and Substance Abuse) Hospitals	8,520	$71,247
Continuing Care Retirement Communities	7,476	$34,926
Other Individual and Family Services	7,452	$41,024
Assisted Living Facilities for the Elderly	7,401	$28,774
HMO Medical Centers	6,361	$93,171
Offices of Physical, Occupational and Speech Therapists, and Audiologists	6,152	$47,919
Outpatient Mental Health and Substance Abuse Centers	5,172	$55,204
Vocational Rehabilitation Services	3,817	$36,297
Medical Laboratories	3,578	$63,210
Residential Mental Health and Substance Abuse Facilities	3,574	$39,979
Offices of Chiropractors	3,157	$37,833

Child and Youth Services	3,124	$37,715
Freestanding Ambulatory Surgical and Emergency Centers	2,841	$77,691
Offices of Optometrists	2,780	$55,311
All Other Outpatient Care Centers	2,580	$62,286
Ambulance Services	2,528	$41,992
Offices of Mental Health Practitioners (except Physicians)	2,215	$42,843
Residential Intellectual and Developmental Disability Facilities	1,859	$31,703
Blood and Organ Banks	1,655	$58,369
All Other Miscellaneous Ambulatory Health Care Services	1,525	$91,834
Diagnostic Imaging Centers	1,481	$70,728
Kidney Dialysis Centers	1,324	$65,843
Other Residential Care Facilities	1,316	$37,782
Other Community Housing Services	1,281	$48,135
Psychiatric and Substance Abuse Hospitals	1,182	$53,770
Temporary Shelters	966	$34,819
Offices of Physicians, Mental Health Specialists	863	$69,504
Community Food Services	546	$40,771
Offices of Podiatrists	403	$54,515
Family Planning Centers	344	$43,754
Emergency and Other Relief Services	226	$62,671

Table A-3: Current Retail Trade Industry Sector

Industry	2015 Jobs	Current Earnings
Supermarkets and Other Grocery (except Convenience) Stores	39,633	$33,978
New Car Dealers	17,374	$66,290
Gasoline Stations with Convenience Stores	12,362	$22,101
Home Centers	12,078	$30,864
Electronics Stores	7,592	$42,827
Beer, Wine, and Liquor Stores	6,716	$27,549
Pharmacies and Drug Stores	6,084	$50,187
Automotive Parts and Accessories Stores	5,890	$32,410
Family Clothing Stores	5,533	$21,969
Furniture Stores	4,321	$48,010
Other Building Material Dealers	4,307	$57,686

Women's Clothing Stores	4,193	$18,865
Tire Dealers	4,125	$44,125
Hardware Stores	3,507	$28,692
All Other Home Furnishings Stores	3,270	$23,805
Used Car Dealers	2,953	$54,658
Shoe Stores	2,706	$22,288
Nursery, Garden Center, and Farm Supply Stores	2,473	$29,606
Other Clothing Stores	2,357	$22,606
Cosmetics, Beauty Supplies, and Perfume Stores	2,311	$22,862
Jewelry Stores	2,054	$45,899
All Other Specialty Food Stores	1,931	$16,513
Food (Health) Supplement Stores	1,814	$29,357
Motorcycle, ATV, and All Other Motor Vehicle Dealers	1,765	$50,046
Optical Goods Stores	1,596	$35,262
Convenience Stores	1,594	$18,635
Floor Covering Stores	1,582	$52,990
Children's and Infants' Clothing Stores	1,239	$15,509
Household Appliance Stores	1,170	$42,787
Clothing Accessories Stores	921	$22,489
Recreational Vehicle Dealers	895	$62,731
Paint and Wallpaper Stores	815	$44,278
Men's Clothing Stores	785	$33,220
Other Gasoline Stations	769	$33,976
Meat Markets	750	$26,372
All Other Health and Personal Care Stores	732	$55,864
Baked Goods Stores	401	$39,878
Confectionery and Nut Stores	392	$21,064
Luggage and Leather Goods Stores	261	$27,803
Window Treatment Stores	237	$55,523
Outdoor Power Equipment Stores	171	$43,893
Boat Dealers	163	$40,301
Fruit and Vegetable Markets	115	$27,379
Fish and Seafood Markets	42	$24,765

Table A-4: Current Accommodation and Food Services Industry

Industry	2015 Jobs	Current Earnings
Full-Service Restaurants	108,355	$22,851
Limited-Service Restaurants	75,598	$16,737
Hotels (except Casino Hotels) and Motels	41,342	$30,650
Snack and Nonalcoholic Beverage Bars	12,010	$17,033
Drinking Places (Alcoholic Beverages)	8,696	$19,605
Food Service Contractors	8,169	$24,916
Caterers	3,569	$19,655
Casino Hotels	2,925	$41,965
Cafeterias, Grill Buffets, and Buffets	2,249	$17,927
Recreational and Vacation Camps (except Campgrounds)	1,779	$30,212
RV (Recreational Vehicle) Parks and Campgrounds	638	$18,067
Mobile Food Services	619	$15,149
Bed-and-Breakfast Inns	346	$20,171
All Other Traveler Accommodation	305	$23,896
Rooming and Boarding Houses	240	$24,716

Table A-5: Current Professional Scientific Technical Services Industry Sector

Industry	2015 Jobs	Current Earnings
Engineering Services	34,621	$111,966
Computer Systems Design Services	28,941	$114,301
Custom Computer Programming Services	22,764	$113,877
Offices of Lawyers	19,768	$96,038
Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology)	10,972	$129,035
Administrative Management and General Management Consulting Services	9,625	$88,010
Other Accounting Services	9,577	$59,192
Offices of Certified Public Accountants	9,075	$88,090
Veterinary Services	7,611	$40,040
Marketing Consulting Services	6,758	$62,901
All Other Professional, Scientific, and Technical Services	6,646	$71,147
Other Scientific and Technical Consulting Services	4,725	$86,392
Architectural Services	4,167	$75,780
Advertising Agencies	4,155	$88,003

Environmental Consulting Services	3,942	$75,989
Graphic Design Services	3,156	$40,268
Tax Preparation Services	2,786	$28,219
Title Abstract and Settlement Offices	2,666	$59,323
Interior Design Services	2,477	$42,153
Other Management Consulting Services	2,428	$95,169
Other Computer Related Services	2,292	$102,263
Outdoor Advertising	2,284	$32,576
Payroll Services	2,202	$82,192
Marketing Research and Public Opinion Polling	1,935	$55,995
Research and Development in Biotechnology	1,916	$120,999
Process, Physical Distribution, and Logistics Consulting Services	1,897	$128,460
Geophysical Surveying and Mapping Services	1,876	$125,694
Testing Laboratories	1,871	$64,598
Surveying and Mapping (except Geophysical) Services	1,803	$74,464
Human Resources Consulting Services	1,457	$99,472
Other Services Related to Advertising	1,253	$31,952
Public Relations Agencies	1,244	$64,098
Photography Studios, Portrait	1,204	$24,284
Translation and Interpretation Services	1,094	$38,706
Landscape Architectural Services	1,023	$55,361
Computer Facilities Management Services	851	$62,141
Research and Development in the Social Sciences and Humanities	646	$86,606
Building Inspection Services	601	$48,325
Advertising Material Distribution Services	580	$25,943
Media Representatives	557	$91,455
Drafting Services	461	$59,533
Direct Mail Advertising	442	$61,946
Other Specialized Design Services	428	$53,028
All Other Legal Services	358	$59,085
Industrial Design Services	269	$75,081
Commercial Photography	249	$24,152
Media Buying Agencies	74	$108,004

Appendix B- Current Occupational Analysis

Table B-1-Current Office and Administrative Support Occupations

Occupation	2015 Jobs	2014 Average Hourly Wages
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	68,920	$17.24
Customer Service Representatives	46,614	$16.10
Office Clerks, General	40,720	$17.31
Bookkeeping, Accounting, and Auditing Clerks	33,108	$18.20
Stock Clerks and Order Fillers	32,292	$13.45
Receptionists and Information Clerks	22,473	$14.43
First-Line Supervisors of Office and Administrative Support Workers	21,677	$27.08
Executive Secretaries and Executive Administrative Assistants	12,619	$24.94
Shipping, Receiving, and Traffic Clerks	9,944	$15.63
Medical Secretaries	8,616	$16.79
Information and Record Clerks, All Other	7,984	$19.33
Tellers	7,757	$13.17
Billing and Posting Clerks	6,704	$18.90
Hotel, Motel, and Resort Desk Clerks	5,909	$11.06
Court, Municipal, and License Clerks	4,685	$18.97
Bill and Account Collectors	4,557	$17.02
Postal Service Mail Carriers	4,522	$24.98
Interviewers, Except Eligibility and Loan	4,239	$15.11
Office and Administrative Support Workers, All Other	4,152	$17.25
Loan Interviewers and Clerks	3,676	$20.81
Dispatchers, Except Police, Fire, and Ambulance	3,199	$19.82
Data Entry Keyers	3,178	$17.06
Production, Planning, and Expediting Clerks	3,127	$23.29
Legal Secretaries	2,914	$22.35
Eligibility Interviewers, Government Programs	2,882	$20.29
Reservation and Transportation Ticket Agents and Travel Clerks	2,855	$14.71
Order Clerks	2,673	$16.43
Human Resources Assistants, Except Payroll and Timekeeping	2,650	$19.31
File Clerks	2,648	$14.85
Payroll and Timekeeping Clerks	2,591	$21.13
Postal Service Mail Sorters, Processors, and Processing Machine Operators	2,376	$23.60

Library Assistants, Clerical	1,994	$12.11
Police, Fire, and Ambulance Dispatchers	1,935	$22.04
Insurance Claims and Policy Processing Clerks	1,855	$20.88
Switchboard Operators, Including Answering Service	1,820	$13.17
Couriers and Messengers	1,401	$13.67
Financial Clerks, All Other	1,378	$19.58
Mail Clerks and Mail Machine Operators, Except Postal Service	1,369	$14.62
Postal Service Clerks	1,114	$24.22
Procurement Clerks	1,093	$21.87
Brokerage Clerks	1,009	$23.56
Office Machine Operators, Except Computer	988	$15.00
Word Processors and Typists	959	$18.37
New Accounts Clerks	879	$17.52
Cargo and Freight Agents	668	$21.87
Computer Operators	645	$24.22
Weighers, Measurers, Checkers, and Samplers, Recordkeeping	626	$16.79
Meter Readers, Utilities	549	$22.26
Credit Authorizers, Checkers, and Clerks	488	$21.84
Desktop Publishers	419	$17.85
Statistical Assistants	227	$22.85
Gaming Cage Workers	222	$14.93
Telephone Operators	167	$18.28
Proofreaders and Copy Markers	134	$18.80
Correspondence Clerks	84	$19.68
Communications Equipment Operators, All Other	34	$20.61

Table B-2- Current Sales and Related Occupations

Occupation	2015 Jobs	2014 Average Hourly Wage
Retail Salespersons	83,012	$13.26
Cashiers	55,404	$10.66
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	30,429	$33.36
Sales Representatives, Services, All Other	23,034	$30.33
First-Line Supervisors of Retail Sales Workers	22,121	$19.58
Insurance Sales Agents	14,230	$25.83

Counter and Rental Clerks	12,111	$13.83
Real Estate Sales Agents	10,151	$24.08
Securities, Commodities, and Financial Services Sales Agents	9,671	$33.72
Telemarketers	7,869	$13.34
Sales Representatives, Wholesale and Manufacturing, Technical and Scientific Products	6,543	$44.49
First-Line Supervisors of Non-Retail Sales Workers	6,479	$31.73
Parts Salespersons	3,899	$15.83
Sales and Related Workers, All Other	3,799	$18.84
Advertising Sales Agents	3,254	$32.67
Real Estate Brokers	2,601	$33.34
Sales Engineers	1,993	$53.15
Door-to-Door Sales Workers, News and Street Vendors, and Related Workers	1,869	$7.62
Travel Agents	1,513	$18.61
Demonstrators and Product Promoters	1,012	$15.56
Models	147	$15.73
Gaming Change Persons and Booth Cashiers	126	$14.69

Table B-3- Current Food Preparation and Serving Related Occupations

Occupation	2015 Jobs	2014 Average Hourly Wage
Combined Food Preparation and Serving Workers, Including Fast Food	70,024	$9.56
Waiters and Waitresses	53,074	$10.11
Cooks, Restaurant	26,488	$11.70
First-Line Supervisors of Food Preparation and Serving Workers	16,131	$16.60
Food Preparation Workers	13,633	$10.96
Bartenders	11,354	$11.57
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	9,652	$10.15
Dishwashers	8,141	$9.74
Dining Room and Cafeteria Attendants and Bartender Helpers	7,523	$9.49
Food Servers, Nonrestaurant	7,421	$10.81
Cooks, Institution and Cafeteria	6,662	$13.50
Cooks, Fast Food	6,137	$9.71
Counter Attendants, Cafeteria, Food Concession, and Coffee Shop	4,613	$10.09
Chefs and Head Cooks	2,146	$22.05
Cooks, Short Order	2,137	$11.65

Food Preparation and Serving Related Workers, All Other	1,149	$10.41
Cooks, All Other	299	$13.58
Cooks, Private Household	49	$20.30

Table B-4- Current Business and Financial Operations Occupations

Occupations	2015 Jobs	2014 Average Hourly Wage
Business Operations Specialists, All Other	42,065	$36.57
Accountants and Auditors	36,520	$34.70
Market Research Analysts and Marketing Specialists	12,843	$36.98
Management Analysts	11,891	$38.49
Human Resources Specialists	9,829	$31.52
Purchasing Agents, Except Wholesale, Retail, and Farm Products	6,175	$32.47
Cost Estimators	5,943	$29.99
Loan Officers	5,207	$37.04
Training and Development Specialists	5,026	$30.90
Personal Financial Advisors	5,004	$41.66
Compliance Officers	4,728	$33.53
Claims Adjusters, Examiners, and Investigators	4,344	$31.96
Financial Analysts	3,877	$47.58
Financial Specialists, All Other	3,412	$32.36
Logisticians	2,970	$37.86
Meeting, Convention, and Event Planners	2,484	$21.62
Appraisers and Assessors of Real Estate	2,441	$27.13
Tax Preparers	2,328	$22.33
Wholesale and Retail Buyers, Except Farm Products	1,816	$25.01
Fundraisers	1,669	$28.00
Credit Analysts	1,329	$34.72
Insurance Underwriters	1,127	$34.28
Compensation, Benefits, and Job Analysis Specialists	1,061	$33.34
Budget Analysts	999	$35.93
Tax Examiners and Collectors, and Revenue Agents	808	$30.18
Labor Relations Specialists	600	$30.97
Financial Examiners	539	$39.18
Credit Counselors	286	$28.53
Agents and Business Managers of Artists, Performers, and Athletes	278	$22.79
Buyers and Purchasing Agents, Farm Products	116	$29.31

Insurance Appraisers, Auto Damage	108	$33.85
Farm Labor Contractors	17	$22.01

Table B-5- Current Construction and Extraction Occupations

Occupations	2015 Jobs	2014 Average Hourly Wage
Construction Laborers	28,665	$14.70
Carpenters	22,860	$18.10
Electricians	16,829	$22.56
First-Line Supervisors of Construction Trades and Extraction Workers	15,894	$29.52
Plumbers, Pipefitters, and Steamfitters	10,240	$22.03
Operating Engineers and Other Construction Equipment Operators	9,450	$20.90
Painters, Construction and Maintenance	7,925	$15.37
Cement Masons and Concrete Finishers	5,224	$17.56
Service Unit Operators, Oil, Gas, and Mining	4,336	$23.46
Roustabouts, Oil and Gas	3,708	$19.10
Roofers	3,526	$17.44
Sheet Metal Workers	3,525	$20.48
Drywall and Ceiling Tile Installers	3,152	$18.67
Highway Maintenance Workers	3,082	$19.78
Construction and Building Inspectors	2,135	$29.96
Brickmasons and Blockmasons	1,845	$19.84
Paving, Surfacing, and Tamping Equipment Operators	1,700	$19.36
Pipelayers	1,287	$17.34
Insulation Workers, Floor, Ceiling, and Wall	1,286	$16.79
Glaziers	1,260	$20.23
Tile and Marble Setters	1,094	$18.24
Structural Iron and Steel Workers	1,066	$20.56
Construction and Related Workers, All Other	1,025	$19.41
Hazardous Materials Removal Workers	935	$17.87
Insulation Workers, Mechanical	888	$19.01
Tapers	872	$19.64
Rotary Drill Operators, Oil and Gas	823	$25.89
Carpet Installers	796	$16.22
Derrick Operators, Oil and Gas	775	$22.79
Helpers--Extraction Workers	761	$19.33

Earth Drillers, Except Oil and Gas	719	$21.14
Helpers--Electricians	694	$17.10
Septic Tank Servicers and Sewer Pipe Cleaners	672	$19.13
Plasterers and Stucco Masons	643	$17.05
Helpers--Pipelayers, Plumbers, Pipefitters, and Steamfitters	615	$13.94
Continuous Mining Machine Operators	515	$28.10
Helpers--Carpenters	484	$12.74
Reinforcing Iron and Rebar Workers	482	$16.93
Fence Erectors	468	$15.27
Floor Layers, Except Carpet, Wood, and Hard Tiles	420	$15.73
Helpers--Brickmasons, Blockmasons, Stonemasons, and Tile and Marble Setters	411	$16.16
Stonemasons	379	$16.54
Helpers--Painters, Paperhangers, Plasterers, and Stucco Masons	250	$11.21
Elevator Installers and Repairers	248	$32.35
Floor Sanders and Finishers	225	$17.00
Rail-Track Laying and Maintenance Equipment Operators	219	$23.27
Helpers--Roofers	209	$12.79
Explosives Workers, Ordnance Handling Experts, and Blasters	195	$26.70
Boilermakers	186	$32.00
Helpers, Construction Trades, All Other	156	$13.95
Mining Machine Operators, All Other	154	$26.48
Extraction Workers, All Other	139	$23.00
Mine Cutting and Channeling Machine Operators	133	$20.55
Solar Photovoltaic Installers	132	$18.47
Roof Bolters, Mining	122	$29.34
Paperhangers	121	$15.02
Terrazzo Workers and Finishers	81	$17.98
Rock Splitters, Quarry	55	$17.66
Pile-Driver Operators	52	$22.79
Segmental Pavers	48	$17.27

Appendix C- Emerging Industry Sectors Analysis

Table C-1- Educational Services Industry Sector

Industry	2015-2025 Change	2015-2025 % Change
Colleges, Universities, and Professional Schools	5,997	35%
Elementary and Secondary Schools	3,420	26%
Sports and Recreation Instruction	1,546	36%
All Other Miscellaneous Schools and Instruction	1,058	38%
Fine Arts Schools	916	33%
Professional and Management Development Training	737	35%
Educational Support Services	600	22%
Exam Preparation and Tutoring	495	26%
Junior Colleges	328	37%
Cosmetology and Barber Schools	199	50%
Language Schools	128	21%
Automobile Driving Schools	85	16%
Business and Secretarial Schools	28	9%

Table C-2- Mining, Quarrying and Oil and Gas Extraction Sector

Industry	2015-2025 Change	2015-2025 % Change
Crude Petroleum and Natural Gas Extraction	7,373	61%
Support Activities for Oil and Gas Operations	10,549	66%
Drilling Oil and Gas Wells	1,023	37%
Support Activities for Coal Mining	327	106%
All Other Metal Ore Mining	307	29%
Gold Ore Mining	195	26%
Bituminous Coal Underground Mining	181	13%
Support Activities for Metal Mining	104	43%
Dimension Stone Mining and Quarrying	71	25%
Industrial Sand Mining	25	125%
All Other Nonmetallic Mineral Mining	21	14%
Other Crushed and Broken Stone Mining and Quarrying	7	7%
Support Activities for Nonmetallic Minerals (except Fuels) Mining	6	23%
Crushed and Broken Granite Mining and Quarrying	4	6%
Clay and Ceramic and Refractory Minerals Mining	1	3%

Table C-3- Management of Companies and Enterprises Sector

Industry	2015-2025 Change	2015-2025 % Change
Corporate, Subsidiary, and Regional Managing Offices	17,293	51%
Offices of Other Holding Companies	356	21%
Offices of Bank Holding Companies	105	32%

Appendix D - Emerging Occupations Analysis

Table D-1- Healthcare Support Occupations

Occupation	2015-2025 Change	2015-2025 % Change
Home Health Aides	6,139	33%
Nursing Assistants	5,015	25%
Medical Assistants	2,796	27%
Dental Assistants	1,557	23%
Massage Therapists	1,244	23%
Phlebotomists	581	30%
Medical Transcriptionists	496	33%
Physical Therapist Assistants	475	43%
Healthcare Support Workers, All Other	375	19%
Physical Therapist Aides	269	68%
Veterinary Assistants and Laboratory Animal Caretakers	267	27%
Occupational Therapy Assistants	247	39%
Medical Equipment Preparers	224	26%
Orderlies	208	35%
Psychiatric Aides	172	41%
Pharmacy Aides	57	41%
Occupational Therapy Aides	50	91%

Table D-2-Healthcare Practitioners and Technical Occupations

Occupation	2015-2025 Change	2015-2025 % Change
Registered Nurses	10,849	23%
Licensed Practical and Licensed Vocational Nurses	2,238	35%
Physical Therapists	1,399	29%
Dental Hygienists	1,284	28%
Pharmacy Technicians	1,101	24%
Pharmacists	933	19%
Veterinary Technologists and Technicians	911	31%

Physicians and Surgeons, All Other	837	25%
Medical and Clinical Laboratory Technicians	759	39%
Radiologic Technologists	748	24%
Speech-Language Pathologists	732	23%
Occupational Therapists	730	25%
Nurse Practitioners	705	31%
Medical Records and Health Information Technicians	690	27%
Emergency Medical Technicians and Paramedics	682	18%
Health Technologists and Technicians, All Other	658	26%
Physician Assistants	627	27%
Respiratory Therapists	562	31%
Medical and Clinical Laboratory Technologists	543	21%
Surgical Technologists	516	32%
Dentists, General	418	15%
Diagnostic Medical Sonographers	380	43%
Dietitians and Nutritionists	371	32%
Health Diagnosing and Treating Practitioners, All Other	363	29%
Opticians, Dispensing	356	24%
Veterinarians	308	16%
Family and General Practitioners	300	10%
Occupational Health and Safety Specialists	298	21%
Cardiovascular Technologists and Technicians	232	37%
Podiatrists	194	65%
Psychiatric Technicians	186	19%
Optometrists	170	16%
Healthcare Practitioners and Technical Workers, All Other	169	31%
Surgeons	164	13%
Ophthalmic Medical Technicians	152	20%
Nurse Anesthetists	141	81%
Magnetic Resonance Imaging Technologists	137	26%
Athletic Trainers	104	26%
Internists, General	103	14%
Audiologists	103	29%
Dietetic Technicians	103	27%
Psychiatrists	88	19%

Radiation Therapists	82	26%
Therapists, All Other	81	17%
Occupational Health and Safety Technicians	80	33%
Anesthesiologists	70	25%
Nuclear Medicine Technologists	69	23%
Exercise Physiologists	67	20%
Pediatricians, General	60	14%
Orthotists and Prosthetists	58	55%
Chiropractors	55	5%
Recreational Therapists	55	28%
Obstetricians and Gynecologists	44	11%
Nurse Midwives	41	32%
Respiratory Therapy Technicians	28	42%
Hearing Aid Specialists	24	43%
Orthodontists	21	19%
Genetic Counselors	20	42%
Oral and Maxillofacial Surgeons	18	16%
Dentists, All Other Specialists	10	11%

Table D-3- Computer and Mathematical Occupations

Occupation	2015-2025 Change	2015-2025 % Change
Software Developers, Applications	4,509	20%
Computer User Support Specialists	3,696	25%
Computer Systems Analysts	3,392	32%
Software Developers, Systems Software	2,092	18%
Network and Computer Systems Administrators	1,661	16%
Computer Programmers	1,080	23%
Web Developers	825	22%
Information Security Analysts	678	44%
Computer Occupations, All Other	666	8%
Computer Network Architects	650	15%
Computer Network Support Specialists	547	13%
Database Administrators	524	21%
Operations Research Analysts	442	43%
Statisticians	179	36%
Actuaries	165	30%

Computer and Information Research Scientists	71	36%
Mathematicians	16	33%
Mathematical Science Occupations, All Other	9	21%
Mathematical Technicians	6	60%