

WIOA STATE PLAN FOR THE COMMONWEALTH OF
NORTHERN MARIANAS FY-2018

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OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
- Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (Programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment Program (Programs authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))*
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

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

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

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.* States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

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

Overview

The Commonwealth of the Northern Mariana Islands (CNMI) is entering into a period of an economic boom and at the same time, faces the pending threat of a potential economic collapse, all revolving around the need for a readily available, qualified, and well-trained workforce. Across the board approach of innovation and transformation of the CNMIs workforce development system is strongly supported by the leadership of the CNMI's Governor Ralph DLG. Torres and his administration, the CNMI Legislature, CNMI Businesses, and the various communities we serve. This outcome is executed through Governor Torres's appointed State Workforce Development Board, the new CNMI Secretary of Labor and the New Director of the CNMI Department of Labor Workforce Investment Agency which oversees the implementation of the programs and services required of the Workforce Innovation and Opportunities Act of 2014.

Although the Commonwealth of the Northern Mariana Islands (CNMI) has gone through drastic changes since it first wrote the original version of this State Plan, investment in Human capital continues to be the most essential and much needed component of economic development. Preparing the CNMIs workforce through continuous design and development of education and training workforce development programs and strategies continues to be key to the CNMIs economic prosperity as the entire community is focused on developing U.S. eligible workers and finding alternative worker sources from U.S. eligible areas to support the overwhelming demand needed to not only limit the dependency on foreign workers but to fill the huge shortage of supply of eligible U.S. workers in the islands. Recognizing that it does not have the sufficient workforce to populate its private and public sector pipelines, the focus on getting the CNMIs available workforce that are not employed and needing additional education and training including individuals with disabilities and those experiencing other barriers to employment has become much more needed and is seen as one key to the CNMIs ability and efforts to fill the demand and shortage. Another key initiative is to promote the shift from public to private sector employment which is seen to also play a critical role in the sustainability of the CNMIs private sector economy. Although these two short-term remedies may help, the demand still far exceeds the supply of workers available and needed to sustain and/or meet the CNMI's growing economy.

The integration of workforce development programs is focused at an earlier stage such as from elementary to high school and subsequently to the adult service delivery programs. The CNMI is poised to embracing the opportunities in developing its workforce development system into a system of education, skilled, and competitive workforce development and eco-system.

Development of promising career pathways is an integral workforce development strategy and initiative that will bring the CNMIs human capital development to the levels of competitiveness locally, regionally, and globally. In addition, job-driven training (e.g., work experience, OJT, internship, etc.) and customized training will help individuals to better meet the needs of employers and thus increase opportunities for job placement.

The use of labor market intelligence and analysis provides the guidance and strategic workforce development goals and initiatives that the CNMI is embarking on. These labor market analysis information with the economic analysis component provides the path to shape the CNMIs current and future workforce development programs and system design. The long term dependency on foreign labor has tremendously benefitted the CNMIs economic growth and employment opportunities while at the same time presents the greatest opportunity as well for the CNMI to re-design its programs and workforce system that will develop its local resident workforce with the necessary education and training tools that will fill the void of foreign workers.

The strong partnerships and collaborations between both public and private sector is essential to the success of the CNMIs efforts in transforming its workforce system. The delivery design is also focused on ensuring that not only the greater workforce population benefits but more so those that are in the target or at risk populations in the workforce landscape. The CNMI is built on the foundation of providing care to all its citizens by continuously investing in its human capital through the opportunities of funded education opportunities and/or training and employment programs for both duo customers in the CNMIs workforce system.

I. WIOA STATE PLAN TYPE

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

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

Combined State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below. No

COMBINED PLAN PARTNER PROGRAM(S)

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

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) No

Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.) No

Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4))) No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))) No

Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)) No

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.) No

Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law) No

Senior Community Service Employment Program (Programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.)) No

Employment and training activities carried out by the Department of Housing and Urban Development No

Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) No

Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532)) No

II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

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

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATION

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

III. EMPLOYERS' EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in 1 and 2 above, provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

A. Economic Analysis

The Commonwealth of the Northern Mariana Islands (CNMI) is entering into a period of an economic boom and at the same time, faces the pending threat of a potential economic collapse, all revolving around the need for a readily available, qualified, and well-trained workforce.

Data collected from the U.S. Department of Commerce Bureau of Economic Analysis revealed that the CNMI's Gross Domestic Product (GDP) grew by 28.6 percent in 2016 to \$1.24 Billion, in comparison to the previous year (2015), the CNMI's GDP grew by only 3.8 percent to \$933 Million, with further comparison, the real GDP for the United States increased by 1.5% in 2016 after increasing 2.9% in 2015. The exports of services, largely contributed to visitors spending on casino gambling. In addition, the report states that private fixed investments grew by 60% as a result of the Casino Resort in the village of Garapan (Saipan) and other hotel and related construction

throughout Saipan. These growths are a significant difference from the hard times the CNMI faced in the years between 2005 and 2009 as the CNMI Garment Industry essentially shut down and drove the GDP to negative standings.

The CNMI also sustained its economic momentum due to some of the following key economic developments in 2016 (and forward).

- Data from the Marianas Visitors Authority (MVA) revealed that over the past 5 years, the CNMI experienced continuous growth in tourism as the number of visitors grew by 30%, including a growth of 10% in 2016, primarily reflecting an increase in visitor arrivals from Korea and China (despite a reduction of visitors from Japan);
- On September 30, 2017, the Federal minimum wage in the CNMI increased to \$7.05/an hour (up from \$4.55 in 2009, with targeted increases upon an approved schedule) and is expected to continue towards the national federal minimum wage of \$7.25 within a year;
- Job growth from the casino industry (and the trickle effects of the Casino in the community) continues;
- Military plans for the island of Tinian to be used as a divert airfield (not including President Trump's plan to infuse \$50 Million dollars to construct these facilities);
- Indications of low or no inflation threats as the 4th quarter of 2016 posted a 2.1% inflation rate, down from a high of 13.4% in 2006.

a. Existing Demand

The CNMI's primary economic driver has been the Services Industry, more particularly in the Accommodations and Amusement Industry, further broken down into the following:

- Accommodations, Food, and Drinking Services
- o Tourism, Hospitality, Casino Gaming and Amusement
- Wholesale and Retail Trade
- o Distributive Services
- Education, Health, and Social Services
- o Government, Public, Private, Non-Government Entities
- Public Administration
- o Government (Federal and Local/Territorial)
- Construction
 - Others

Within the above industries, the CNMI 2016 Prevailing Wage and Workforce Assessment Study (PWWAS) released in September of 2017 reveals that there were 2,146 employers (1,124 were surveyed) and 32,061 employees (19,827 were reported in the survey) in the CNMI. The Standard

Occupational Classification (SOC) Major Titled 2 Digit Title reveals the following occupations and number of existing employees in such fields:

- Office and Administrative Support Occupations 2,935 employees
- Management Occupations 2,202 employees
- Food Preparation and Serving Related Occupations 1,915 employees
- Sales and Related Occupations 1,402 employees
- Construction and Extraction Occupations 1,329 employees
- Protective Service Occupations 1,109 employees
- Personal Care and Service Occupations 1,054 employees
- Education, Training, and Library Occupations 1,053 employees
- Installation, Maintenance, and Repair Occupations 1,046 employees
- Building and Grounds Cleaning and Maintenance Occupations 1,014 employees

b. Emerging Industry Sectors

The impact of the Casino Gaming and Amusement Industry has been significant in the CNMI as the Casino houses over 1,800 employees. A little under half of this is seen in the new SOC categories now published in the 2016 PWWAS (not including non-gaming positions). These include:

- Gaming Dealers 248 employees
- Gaming Supervisors 164 employees
- Gaming Managers 113 employees
- Gaming Change Persons and Booth Cashiers 105 employees
- Gaming Cage Workers 66 employees
- Amusement and Recreation Attendants 33 employees
- Gaming Surveillance Officers and Investigators 17 employees
- Gaming Service Workers, All Others 16 employees
- Costume Attendants 15 employees
- Coin, Vending, and Amusement Machine Repairers 09 employees

Total New Casino SOC Categories for CNMI 786 employees

The other emerging industry revolves around the Construction, Repair, and Maintenance industries. The growth and impact of the Casino Industry has led other investors to the CNMI in hopes of cashing in on the current and anticipated success of the casino once it is in full operation. The CNMI now has four ongoing Construction projects for new hotels, resorts, and other forms of lodging. Prior to 2018, the CNMI had an inventory of over 1,300 skilled construction workers (mostly foreign workers under the Commonwealth Worker (CW) program), due to the impact of U.S. Public Law 110-229, that inventory figure has dropped significantly, and the availability of U.S. workers in this industry is scarce. This reduction and the lack of overall available skilled U.S. workers in the CNMI have started to take its toll on the economic growth of the islands. One example of such potential stunt in growth is the need for one hotel chain to hire an additional 800 construction workers to meet its building needs. However, due to the limited number of qualified U.S. workers in this industry, the project may face delays or be canceled.

c. Employer's Employment Needs

A delicate balance and mix of workers in the CNMI is needed to sustain the economic development and business employment needs in the CNMI. The CNMI is the least populated State or Territory in the United States Family with the 2016 Department of Commerce Household, Income, and Expenditures Survey (HIES) listing its population as 53,890 people living in the inhabitable islands of Saipan, Tinian, Rota and Northern Islands that make up the CNMI. Of the 53,890 people, there are 33,219 U.S. citizens and 20,671 non-U.S. citizens. As mentioned earlier, within the demand industries of the CNMI, according to the CNMI 2016 Prevailing Wage and Workforce Assessment Study (PWWAS) released in September of 2017, the CNMI had 2,146 employers (1,124 were surveyed) and 32,061 employees (19,827 were reported in the survey). Newly permitted projects in the CNMI would grow the demand for employees by an additional 8,000 new workers, bringing the total demand to over 40,000 U.S. workers, spread throughout all industries. As one could see, the demand for qualified U.S. workers outweighs the population and availability of U.S. workers in the CNMI. This has been a long standing issue for the islands and was temporarily resolved by the authorization of the CNMI's Commonwealth Worker (CW) Program through U.S. Public Law 110-229.

The threat to the CNMI's growing economy relies heavily on the impending impact of U.S. Public Law 110-229 which is set to end the CNMI's Commonwealth Worker (CW) Program in December of 2019. To help fill the shortage of U.S. workers in the CNMI, the United States Citizenship and Immigration Services (USCIS) set a cap in Fiscal Years 2015-2017 at 12,999 positions for the CW Program to be used by foreign workers to obtain jobs in the CNMI. However, a huge surprise for many and a shock to the CNMI, USCIS set the following new caps: FY 2018: 9,998; FY 2019: 4,999; and FY 2020 (until December 21, 2019); 2,499. Although the CNMI has made strides to increase the number of qualified U.S. workers through increase education, training, and work experiences opportunities, the interest and/or lack of interest of U.S. workers to pursue most of the jobs filled by CW workers has been very limited. In addition to the lack of interest, the resources needed to carry out the education and training of U.S. eligible workers are still in the developmental stage in terms of curriculum, equipment, materials, supplies, and qualified instructors. The demand for workforce ready, skilled, experienced, credentialed and licensed employees are tantamount to the service industries mentioned above.

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

I. EMPLOYMENT AND UNEMPLOYMENT

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

II. LABOR MARKET TRENDS

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

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

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

IV. SKILL GAPS

Describe apparent 'skill gaps'.

B. Workforce Analysis

Title I Core Programs

Program Year 2015 (July 01, 2015 to June 30, 2016). This year was impacted by many storms and Typhoon Soudelor. The national emergency caused by Typhoon Soudelor led WIA to apply for and secure the Disaster Unemployment Assistance Grant and the National Dislocated Worker Grant. These funding sources helped residents transition through the hardships experienced. Programs offered in PY 2015 were limited to 99 youth, 36 adults were served through the Adult Program and 29 were served in the Dislocated Worker Program.

Program Year 2016 (July 01, 2016 to June 30, 2017). 221 Youth were served in the Youth programs, 61 adults were served through the Adult Program and 15 were served in the Dislocated Worker Program.

Program year 2017 (July 01, 2017 to February 2018 (June 30, 2018)). To date 72 Youth were served, 61 adults were served through the Adult Program and 6 were served in the Dislocated Worker Program. Of those figures 79 are currently participating in a Work-based Training in public, private, and non-profit sectors. In addition, a newly composed CNMI State Workforce Development Board was formally established and is now functioning, the WIA Division moved offices to be closer to the other divisions within the Department of Labor, which creates a One-Stop Labor area for the CNMI. More recently, the WIA-WIOA Director was hired to help lead the program and work with the Governor, SWDB, new Secretary of Labor to execute the Workforce Development Goals and Strategies of the CNMI.

OVR

The number of applicants for vocational rehabilitation services rose by seven individuals from 2014 to 2015 with 144 applicants, but then decreased by 11 from 2015 to 2016 with 133 applicants. Approximately 56% of individuals that applied for services were found eligible, indicating that almost half of the people that apply are not eligible. OVR wrote more than 80 individualized plans for employment (IPEs) each in 2015 and 2016 for a grand total of 165 employment plans. OVR has had 25 people in some level of postsecondary education since 2015. The number of cases closed as rehabilitated more than doubled from 2015 to 2016 to 48 successful closures, and the rehabilitation rate increased to above 63%. OVR served more cases in 2016 than in any other year of the study and the cost per case closed successfully increased to nearly \$1,900. The median earnings increased to almost \$20,000 annually for OVR consumers in 2016. The rate of female applicants exceeded males in 2015 and 2016, though the number of plans completed were less for

women than men. The rehabilitation rate for men exceeded the rate for women in 2016, but the average cost per case was greater for women in the same time period. The median earnings of females closed successfully were much greater than men in 2016. The number of individuals by age range remained steady during the period from 2014 to 2016. It is likely that the number of youth applicants will increase significantly in the coming years due to the implementation of pre-employment transition services.

An analysis of RSA-911 data from FFY 2015 was conducted in order to examine the types of jobs obtained by clients of CNMI OVR at case closure. The 2015 data was selected because it is the most recent year that this data was available from the RSA 911 data set. The RSA-911 data set includes a variable that contains the Standard Occupational Classification (SOC) code describing the individual's occupation when their service record was closed. While most SOC major group reported were affiliated with two or fewer cases, 27% of all cases (n=6) were affiliated with the SOC major group for "Office and administrative support occupations". The next most commonly occurring SOC major group, "Management occupations", was associated with three cases, or 13.6% of the cases that included an SOC code. The project team cautions against drawing any conclusions based on such a small sample size for each category, but the data gives the reader a snapshot of the types of jobs obtained or maintained by OVR consumers.

An analysis of the needs of individuals with the most significant disabilities, including their need for supported employment begins with an analysis of the primary disability types served by OVR, the significance of disability categories and the rate of SSA beneficiaries served by the organization. The significance of disability for OVR consumers has increased steadily in the three-year period of the study, from 2014 to 2016. More than 97% of the consumers served by OVR in 2016 had at least a significant disability. This information is consistent with the mandate in the Rehabilitation Act that VR programs serve individuals with the most significant disabilities as a priority of service delivery. The number of individuals with physical disabilities, though declining as a percentage of the overall population of applicants, is still the most common disability type served by OVR. Individuals with cognitive impairments are slowly increasing in number while those with mental health impairments have remained steady. The rehabilitation rate of individuals with intellectual disabilities or other cognitive impairments and those with mental health impairments is below the rate of other disability types served by OVR. The number of SSA beneficiaries served by OVR increased by five from 2015 to 2016 for a total of 23, after dropping by three from 2014 to 2015 for a total of 18. The eligibility determination rate of these applicants was at nearly 61%, which may mean that OVR staff should review the presumptive eligibility requirement for SSA recipients. The number of cases rehabilitated is low across years, but especially low in 2015 and 2016. The fear of benefit loss, which was a recurring theme in the study, may play a part in the return-to-work behavior of this population. The rehabilitation rate for supported employment cases was at 33% for 2015 and 2016, which is also below the average for all OVR clients.

The reauthorization of the Rehabilitation Act under WIOA places a greater emphasis on the provision of transition services to youth and students with disabilities, especially their need for pre-employment transition services (Pre-ETS). The number of consumers coded as transition-age youth increased from 2015-2016, and is likely to continue to increase based on the number of applications in 2016 and the increased focus on youth services in WIOA. All of the youth found eligible for services in 2016 were coded as at least significantly disabled. The data indicates that of all the open transition age cases in 2016, almost 20% of them were in postsecondary education. There were not enough employment outcomes for this group to draw any conclusions based on the data.

a. Employment and Unemployment

Information obtained from the 2016 Department of Commerce Household, Income, and Expenditures Survey (HIES) revealed that 70% of the reported people living in the CNMI were in the labor force. Of that figure, 81.2% worked in the private sector and 16.6% worked in the CNMI Government. 30.9% worked in service occupations and 23.3% worked in the hotel and food industry. The updated (updated January 2018 and includes an adjustment for U.S. Green Card holders) HIES unemployment rate for U.S. eligible workers is 7.5% or 1,800 unemployed U.S. eligible citizen workers. This reinforces that even if the CNMI provides the 1,800 unemployed U.S. eligible citizen workers a job, the CNMI would still be short by over 6,000 workers to fill the current workforce demand and much more for anticipated workforce needs.

During program year 2016, which is from July 1, 2016 to June 30, 2017, OVR had a total of 266 eligible consumers. This number includes carry-over from previous program year. At time of application for VR services, 68 (25.6%) consumers indicated that they were employed and needed services to be able to maintain their employment. The other 198 (74.4%) consumers reported that they were not employed at time of application.

b. Labor Market Trends

Within the above industries, the CNMI 2016 Prevailing Wage and Workforce Assessment Study (PWWAS) released in September of 2017 reveals that there were 2,146 employers (1,124 were surveyed) and 32,061 employees (19,827 were reported in the survey) in the CNMI. The Standard Occupational Classification (SOC) Major Title 2 Digit Title reveals the following occupations and number of existing employees in such fields:

- Office and Administrative Support Occupations had 2,935 employees
- Management Occupations had 2,202 employees
- Food Preparation and Serving Related Occupations had 1,915 employees
- Sales and Related Occupations had 1,402 employees
- Construction and Extraction Occupations had 1,329 employees
- Protective Service Occupations had 1,109 employees
- Personal Care and Service Occupations had 1,054 employees
- Education, Training, and Library Occupations had 1,053 employees
- Installation, Maintenance, and Repair Occupations had 1,046 employees
- Building and Grounds Cleaning and Maintenance Occupations had 1,014 employees

In addition, the impact of the Casino Gaming and Amusement Industry has been significant in the CNMI as the Casino houses over 1,800 employees and is expected to grow to over 3,000 employees once the hotel/resort component of the casino opens. A little under half of this is seen in the new SOC categories now published in the 2016 PWWAS (not including non-gaming positions). These include:

- Gaming Dealers had 248 employees
- Gaming Supervisors had 164 employees
- Gaming Managers had 113 employees
- Gaming Change Persons and Booth Cashiers had 105 employees
- Gaming Cage Workers had 66 employees
- Amusement and Recreation Attendants had 33 employees

- Gaming Surveillance Officers and Investigators had 17 employees
- Gaming Service Workers, All Others had 16 employees
- Costume Attendants had 15 employees
- Coin, Vending, and Amusement Machine Repairers had 09 employees

Total New Casino SOC Categories for CNMI 786 employees

The other emerging industry revolves around the Construction, Repair, and Maintenance industries. The growth and impact of the Casino Industry has led other investors to the CNMI in hopes of cashing in on the current and anticipated success of the casino once it is in full operation. The CNMI now has four ongoing Construction projects for new hotels, resorts, and other forms of lodging. Prior to 2018, the CNMI had an inventory of over 1,300 skilled construction workers (mostly foreign workers under the Commonwealth Worker (CW) program), due to the impact of U.S. Public Law 110-229, that inventory figure has dropped significantly, and the availability of U.S. workers in this industry is scarce. This reduction and the lack of overall available skilled U.S. workers in the CNMI have started to take its toll on the economic growth of the islands. One example of such potential stunt in growth is the need for one hotel chain to hire an additional 800 construction workers to meet its building needs. However, due to the limited number of qualified U.S. workers in this industry, the project may face delays or be canceled.

Due to the CNMI's remote location and limited population base, other necessary industries are that of the Health Care and Medical Industry and Government entities. The CNMI often faces shortages for specialized workers in the Health Care and Medical Industry as in some expertise or specialties, the professionals usually prefer in locations with larger populations so that they would be able to service more individuals in need. The CNMI currently refers patients off island to the Philippines, Hawaii, or U.S. mainland institutions to receive specialized care. Furthermore, as the competition for Health Care and Medical workers are so fierce around the world that the CNMI is in constant search for Certified Nursing Assistants (CNA), Licensed Practical Nurses (LPN), Registered Nurses (RN), Radiology Technicians, and individuals skilled in Medical Billing and Coding.

Government and public sector jobs have been a primary choice for an individual to start or land a career in. The vast majority of these types of jobs include firefighting and emergency medical services, police, corrections, customs, and other law enforcement types of positions, as well as light service types of jobs.

c. Education and Skills Levels of the Workforce

According to data extracted from the HIES for Fiscal Year 2016, the education and skills level attainment of individuals living in the CNMI are as follows:

- 2,187 had an education of less than the 9th grade;
- 3,592 had an education between the 9th to 12th grade;
- 12,783 obtained a High School Diploma;
- 4,085 had some College courses;
- 2,348 earned an Associate of Arts in Academics;
- 1,064 earned an Associate of Arts in a Specific Occupation;
- 4,642 earned a Bachelor's Degree;
- 697 earned a Master's, PhD or Professional Degree

During program year 2016, which is from July 1, 2016 to June 30, 2017, OVR had a total of 266 eligible consumers. This number includes carry-over from previous program year. At time of application for VR services, consumers reported their educational levels as follows:

Educational Level - PY 2016

Category Number Percentage

- Elementary Education (Grades 1-8): 09 or 3.4%
- Secondary Education, No H.S. Diploma (G9-12): 34 or 12.8%
- Special Education Certificate or Completion/Attendance: 41 or 15.4%
- H.S. Graduate or Equivalency Certificate (GED, etc.): 153 or 57.5%
- Post-Secondary Academic, Associate Degree: 09 or 3.4%
- Vocational/Technical Certificate or License: 04 or 1.5%
- Bachelor's Degree: 13 or 4.9%
- Master's Degree: 03 or 1.1%

Total: 266 or 100%

As the economy continues to rebound, there is no surprise that the need for accountants, managers, sales reps, skilled trades and technical workers in the CNMI are in great demand. These close to 7,000 positions listed in the 2016 CNMI Prevailing Wage and Workforce Assessment Study and data collected by the CNMI Department of Commerce W2 Data are those of hard trades, technical trades, and service related industries and reveal the positions with the largest skills gaps outside of positions requiring at least a Bachelor's or other higher education degree. The following data sets reveals the number of Commonwealth Workers (CW) who are of non-U.S. origin; the number of U.S. eligible workers; and the number of workers coming from Micronesia's Freely Associated States (FAS) who are authorized to work in the U.S. These types of jobs need some form of credentialing or nationally recognized certification. Other positions listed in other sections above revolved around the obtainment of higher education degrees or industry/sector licensing.

- ***Culinary Arts: 1,076 or 68% are held by CW Positions and 504 or 32% are held by US/FAS workers;***
- ***Hotel & Restaurant Operations: 870 or 55% are held by CW Positions and 713 or 45% are held by and US/FAS workers;***
- ***Maintenance and Repair Workers: 463 or 65% are held by CW Positions and 254 or 35% are held by US/FAS workers;***
- ***Carpenters and Woodworkers: 437 or 95% are held by CW Positions and 22 or 5% are held by US/FAS workers;***
- ***Cement Masons & Concrete Finishers: 328 or 94% are held by CW Positions and 19 or 6% are held by US/FAS workers;***
- ***Automotive Technicians and Mechanics: 268 or 73% are held by CW Positions and 100 or 27% are held by US/FAS workers;***
- ***Electricians, Power Generation: 240 or 77% are held by CW Positions and 73 or 23% are held by US/FAS workers;***
- ***Welders, Cutters, Solders & Braziers: 112 or 95% are held by CW Positions and 6 or 5% are held by US/FAS workers;***

- *HVAC & Refrigeration: 103 or 84% are held by CW Positions and 19 or 16% are held by US/FAS workers;*
- *Plumbers, Pipefittings, Plumbing: 100 or 63% are held by CW Positions and 59 or 37% are held by US/FAS workers;*
- *Painters, Maintenance Painting: 80 or 88% are held by CW Positions and 11 or 12% are held by US/FAS workers;*
- *Security Guards & Protective Services: 449 or 44% are held by CW Positions and 569 or 56% are held by US/FAS workers;*

Which comes to 4,526 or 66% of the total Positions are occupied by CWs and 2,349 or 34% of the Positions are Occupied by US/FAS workers, with a grand total of 6,875 Positions within the hard trades and skilled positions.

CNMI OVR, through the San Diego State University Interwork Institute, recently conducted their Comprehensive Statewide Needs Assessment for FYs 2014-2017. Respondents were presented with a series of yes/no questions about potential barriers to achieving their employment goals and were asked to indicate whether each was a barrier to achieving their employment goals. The following summarizes the percentage of individuals who identified each barrier as an obstacle to achieving their employment goals:

Not having education or training - 47.9%; Not having job search skills - 35.6%; Not having job skills - 26.0%; and Language barriers - 23.3%

In addition, many individuals with disabilities, especially those with the most significant disabilities, need training in basic computer skills in order to be employable. Furthermore, work experience is a major need for students with disabilities in the CNMI. And, soft skills were frequently noted as a need for youth in CNMI.

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 Education and Skill Levels of the Workforce above, and the employment needs of employers, as identified in Employers' Employment Needs above. This must include an analysis of –

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

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

** Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy*

Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

A. The State's Workforce Development Activities

The CNMIs workforce system continues to transform itself into a more structured and successful workforce development system. The CNMI believes that workforce education and skills gaps are both critical informations to designing and re-designing education and training activities. Inclusive in these workforce development activities is the blended approaches of incorporating career pathways and workforce curriculum and transition services from elementary to junior to high school to either college, trades, technical or professional credentialing programs and into the workplace through subsidized employment and/or training programs. All CNMI core program partners are actively participating and networking its greater and common efforts of developing the CNMIs workforce skills and talents. The experiences of the State Workforce Development Board, the newly appointed Secretary of Labor, and the newly appointed Director of the Department of Labor (DOL) Workforce Investment Agency (WIA) which oversees the programs and services of WIOA is seen to be a game changer for the CNMI community as the individuals providing leadership in these positions have a great combination of private, government, and education service provider knowledge and expertise to make an impact to the workforce development system.

Some of the services provided are private sector mentoring programs, cooperation education job experiences, job fairs, life and workskills trainings such as developing interview skills, time management, work etiquette, computer literacy, classroom developmental instructions, and knowledge and work skills capacity building for students to work, further education, community involvement and family self-sufficiency. Credentialing and trainings administered through community based or non-profit organizations are also seen as viable for our community in support of workforce development activities. Subsidized employment and training workforce development activities are also recognized by the CNMI as key initiatives in the development of its workforce. Complementing classroom instruction with work experience is a known and successful combination for workforce development strategy and greatly encouraged as part of a succession planning strategy for the CNMI.

The CNMI's core workforce partner programs are now more complementary of each other and are more aware of each others functions and services as the new Director of the CNMI DOL WIA WIOA has experience in working with each partner program and has provided leadership in one or more program in related capacities. The core programs are willing to work closely together and increase collaborative opportunities to works towards improving access to, providing of, and delivery of workforce development activities. A primary example of such collaboration was done through the creation of the modified state plan as all three partners worked together to ensure that the plan was completed in a timely manner, had public input, and was created with the SWDB, all while sharing limited resources. Resource mapping and understanding key roles, vision, objectives of each core entity is also vital to the collaborative efforts of the team. Another example of cross participation is found in the membership of VR State Rehabilitation Council and the CNMI SWDB in which members of each core entity sits as either a member or officer of each respective council or board. This leads to improve understanding of the available programs as well as reveals opportunities for advancement.

A prime example in regards to providing services for those in need of rehabilitation services, the Office of Vocational Rehabilitation helps to prepare individuals with disabilities for

competitive integrated employment through an array of VR services including training or educational services consistent with and provided in the context of an approved individualized plan for employment (IPE). According to OVR's Comprehensive Statewide Needs Assessment for FYs 2014-2017, OVR has had 25 people in some level of postsecondary education since 2015, while 4 individuals participated in vocational training since 2015.

The table below contains OVR's case service expenditure data pertaining to education and training from 2014-2016 and as extracted from the needs assessment report:

Expenditure by Service Category

| Service Category | 2014 Amount Spent | 2015 Amount Spent | 2016 Amount Spent |
|--|-------------------|-------------------|-------------------|
| Junior or Community College | \$14,598.00 | \$6,604.00 | \$11,670.00 |
| Graduate College & University Training | \$6,268.00 | | |
| Occupational & Vocational Training | \$2,100.00 | \$3,824.00 | \$8,597.00 |
| On-the-Job Training | \$42,220.00 | \$15,154.00 | \$12,538.00 |
| On-the-Job - Time-limited | \$4,038.00 | | |
| On-the-Job - Supported Employment | \$12,400.00 | \$13,924.00 | |
| Job Readiness Training | \$20,318.00 | \$14,900.00 | \$18,286.00 |
| Miscellaneous Training | \$78.00 | \$3,354.00 | |
| Grand Total | \$79,314 | \$60,274 | \$71,283 |

Please note that OVR is mandated to maximize comparable services and benefits (e.g. FAFSA, CNMI Scholarship, SHEFA, and/or other financial assistance programs) before VR funds are expended.

For OVR's clientele who are categorized as most significantly disabled, the number who were in some level of postsecondary education in 2014, 2015, and 2016 was 7, 9, and 10, respectively. Only 1 in 2015 was recorded as having participated in vocational training.

As for our youth with disabilities, the number who were in some level of postsecondary education in 2014, 2015, and 2016 was 8, 11, and 11, respectively. None participated in vocational training during this 3-year period.

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) above.

B. The Strengths and Weaknesses of Workforce Development Activities

Strengths:

- ***Strong understanding of, respect for, collaboration and partnership amongst the core programs and services amongst each partner;***
- ***Leveraging of both local and federal resources to achieve common goals, objectives or strategies;***
- ***Increased desire to achieve an educated and skilled CNMI workforce;***
- ***Improved availability and access to education and training providers to fill more of the identified gaps and skill shortages;***
- ***Increased or renewed interests in private business sectors in U.S. eligible workers;***

Weaknesses:

- ***Lack of sufficient workforce funding to fund the immediate need of all private and public sector entities due to implementation of federal law and the shortage of workers;***
- ***The lack of a greater pool of service providers or community rehabilitation programs (Not all sectors are being served at the moment)***
- ***Long term dependency on government sponsored programs such as food stamp and other social welfare programs which shrinks the job pool availability of workers;***
- ***Dependence upon sectors that are more susceptible for economic downturn limits the ability of the CNMI to sustain economic growth at the level that is comparable with the rest of the region/world.***
- ***Limited land resources leads to constrains on alternative industries, available locations and/or expansion.***
- ***The education and skill levels of much of the labor force are not high enough or competitive enough yet to compete in the technological global economy.***
- ***CNMI still experiences infrastructure problems including power outages, water shortages, high transportation costs, etc.***
- ***The small and limited population tied with the remote location (hundreds of miles of water separating CNMI from nearest island or land mass) leads to the lack of sufficient CNMI residents or U.S. Eligibles to fill jobs***
- ***Unavailability of a reliable public transportation system (limited airlines - down to one U.S. carrier, virtually no sea lines, and lack of public ground transportation) that limits the ability of individuals targeted by WIOA to avail of low cost transportation through a reliable system.***
- ***Education and Training opportunities are usually run on Saipan and based on minimum enrollment due to costs. Rota and Tinian are the populations most to suffer from this as services are limited to On-the-Job training or Work Experiences.***
- ***Specialized equipment, materials, supplies for trades or technical courses are also hard to come by due to the higher expenses involved in such specialties. These apply to most hands on and medical/health type of trainings as well.***
- ***Lack of qualified instructors to teach specialized courses, trades, or technical components. For example, the CNMI has a hard time finding a plumbing instructor, This is also a shortage on other islands as well, as most of these types of instructors migrate to bigger cities where pay is much higher.***
- ***Other specifics can be found below.***

CNMI OVR lists the following strengths and weaknesses of their workforce development activities:

Strengths:

- *Northern Marianas College (NMC) offers a variety of Associate, Bachelor's and Master's degree programs.*
- *NMC has an active Disability Support Services staff that engage students with disabilities to utilize support services to the maximum extent possible to ensure college success.*
- *NMC's Community Development Institute (CDI) and University Center for Excellence in Developmental Disabilities (UCEDD) are active partners in helping to identify the community's needs and provide training opportunities to meet those needs. CDI is unique in that it does not follow a traditional semester calendar, and most courses may be tailored to meet customer needs and expectations. UCEDD's four core functions as identified by the Administration on Intellectual and Developmental Disabilities (AIDD) are carried out through culturally responsive approaches and culturally competent practices.*
- *OVR provides supports and other intensive services needed by consumers to enable them to participate in education and training activities such as transportation, personal assistance, and job coaching.*
- *OVR identifies and utilizes to the maximum extent possible comparable services and benefits in an effort to maximize program dollars to serve a larger client population.*
- *The Northern Marianas Trades Institute is able to connect with some employers for internships and apprenticeships that can result in permanent employment if the training goes well.*
- *The CNMI Scholarship Office accommodates student's request of a reduction in course load, cumulative GPA requirement and repeated courses.*

Weaknesses:

- *Educational and vocational training providers require a minimum number of students before a course could be offered.*
- *Limited training providers in the CNMI especially in the neighboring islands of Tinian and Rota.*
- *Training providers need training on how to effectively work with clients with different types of disabilities.*
- *The paperwork and reporting requirements asked of employers that either hire or provide work experience opportunities for OVR clients was described as burdensome and time consuming.*

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

With the newly appointed/hired administrators within the CNMI Department of Labor and DOL WIA WIOA, along with the respective teams they oversee, the CNMI has the commitment and capacity necessary to carry out the WIOA Title I workforce development activities. The CNMI will also restructure and invest in its team to help improve the reporting of both program and financial matters as well as delivery of programs and services. Additionally, the increased

involvement of a private sector led State Workforce Development Board membership in carrying out the necessary workforce development activities provides the leadership and professional guidance to the State workforce entities in the delivery of effective workforce development strategies for an educated, skilled, and competitive CNMI workforce system and human capital successful employment outcomes.

The NMC ABE program has proven leadership and team to execute its given mandates. Although resources have been reduced, the team continues to provide quality service which leads to improved outcomes.

CNMI OVR, given their current resources, has adequate capacity to provide for their workforce development activities (e.g. educational and training activities) through the maximization of available comparable services and benefits allowed as well as the utilization of cost-sharing strategies with WIOA Core Program Partners as appropriate.

In addition, the strong collaboration and partnership between state workforce programs are firmly established with the understanding, focus, and commitment in the transformation and development of the CNMIs workforce development activities. Leveraging, sharing of critical information of participants served for the delivery of essential and holistic workforce development services is well established and open while also ensuring that the confidentiality of the population served are protected.

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.

The CNMI State Workforce Development Board has adopted the following:

Vision: “To promote a workforce development system that meets the needs of businesses, job seekers and workers to support a strong and vibrant economy in the CNMI.”

Mission: “Empowering, integrating, implementing, and innovating the workforce needs of the CNMI.”

2. GOALS

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

- A. Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers of employment* and other populations.***
- B. Goals for meeting the skilled workforce needs of employers.*

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

***** Veterans, unemployed workers, and youth and any other populations identified by the State.***

The CNMI SWDB sees every individual and entity as a unique entity that should be provided with the best programs and services that they are qualified and available for. In linewith the new vision and mission, the following Goals and general outcome statements were voted upon by the SWDB as the new direction needed to better serve, prepare, educate, and upskill youth and individuals (priority and/or with barriers to employment, etc.) so that they would meet the skilled workforce needs of employers.

Goals

Goal 1: Support pathways that lead to livable wage employment and upward mobility of participants.

- ***Increase support of workforce learning, education, and training so that participants can access, develop, attain and/or demonstrate marketable skills at early stages in their lives to ensure economic security, etc.***

Goal 2: Promote and support participants' efforts to obtain workforce credentials, skill development and training, and/or career or college readiness. Increase the number of participants who pursue and complete technical/trades programs and/or post-secondary education and specific skills necessary to compete in the CNMI's critical economic sectors.

- ***Work closely with education, training, and sponsor providers to align and maximize the investments made.***

Goal 3: Align, coordinate, and integrate the workforce development system to provide a quality and consistent experience to for all participants.

- ***Map out and economize limited resources so that participants are receiving the right services, their potential and unique needs are identified and addressed.***

Goal 4: Create a data driven workforce environment supported by market forecasts, surveys, evaluations, analysis, and assessment results, etc.

- *Improve the availability of and access to workforce and economic data*

Goal 5: Inventory and align the workforce skills needs of private sector employers and businesses with the education, service, and training provider offerings, so that participants are able to access the marketable skills to be matched to the private sector employers and businesses.

- *Conduct Inventory and Assessments*

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.)

CNMI WIOA Title 1 Core Program Performance Goals for PY16 and PY 17 are as follows:

WIOA Adult

Employment 2nd Quarter after Exit: PY16: 30%; PY17: 33%

Employment 4th Quarter after Exit: PY16: 30%; PY17: 33%

Median Earnings in the 2nd Quarter after Exit: PY16: \$2700; PY17: \$2900

Credential Attainment Rate: PY16: 63%; PY17: 66%

WIOA Dislocated Worker PY16 PY17

Employment 2nd Quarter after Exit: PY16: 30%; PY17: 33%

Employment 4th Quarter after Exit: PY16: 30%; PY17: 33%

Median Earnings in the 2nd Quarter after Exit: PY16: \$2700; PY17: \$2900

Credential Attainment Rate: PY16: 63%; PY17: 66%

WIOA Youth PY16 PY17

Education or Training Activities or Employment

In the 2nd Quarter after Exit: PY16: 35%; PY17: 38%

Education or Training Activities or Employment

In the 4th Quarter after Exit: PY16: 35%; PY17: 38%

Credential Attainment Rate: PY16: 72%; PY17: 75%

4. ASSESSMENT

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

**4. Assessment on the CNMIs overall effectiveness of its Workforce Development System
Plan, Do, Check, Adjust, and Act (PDCAA)**

The SWDB and DOL WIA WIOA Team are familiar with what is called in simple terms the Plan, Do, Check, Adjust, and Act (PDCAA) functions of the Continuous Quality Improvement Cycle. Through this modified State Plan, the following will occur:

Plan: *The Modified State Plan will be the source of the planning process and guides the SWDB and DOL WIA WIOA Team in the direction, goals and strategies of the SWDB.*

Do: *The DOL WIA WIOA Team is responsible for the implementation of the operational plan which will help execute the specific functions needed towards meeting the SWDB's Goals and Vision.*

Check: *Data collection via client satisfaction surveys, performance evaluations and/or a combination of both will be gathered and used to measure how well the programs and services offered are meeting the prescribed performance goals identified. The information generated from these tools will help the administration to better understand its position and make continuous quality improvement decisions to help the CNMI meet its workforce vision and goals.*

Adjust: *The information generated from these tools will help the administration to better understand its position and make continuous quality improvement decisions to help the CNMI meet its workforce vision and goals. As we review the outcomes and performance ratings, we will make needed adjustments to either strategies or implementation techniques in order to meet our performance goals.*

Act: *The appropriate actions as needed will be made to ensure that the Core Programs and Services meet performance measures. The CNMI is held to certain agreed upon performance standards. The outcome of its workforce development delivery system evaluations are considered paramount in the planning of the CNMIs current and future education, employment, and economic prosperity. Proper development of the tools and human resources needed to adequately track and analyze data is also critical to the assessment of programs and services. The CNMI core partners will develop a work group to go through performance and data. This group will meet regularly to ensure that the data collected is assessed and will be compared against the baseline set to measure the effectiveness of the CNMI's workforce delivery system and will then report to the SWDB as needed.*

The agreed upon performance standards will be the primary areas for review, followed by satisfaction of services received from the Core Programs, Client satisfaction of performance performed by participants, Participant satisfaction of work place, work experience, education and/or training environment and learning opportunities. Other factors may be created to better meet the vision and goals.

C. STATE STRATEGY

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis

provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

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

The CNMI has chosen to focus on the following Seven Strategies that are evidence based and have been shown to work, helping ensure effective delivery of services, and increasing the likelihood that those who receive services obtain gainful employment:

Career Pathway Strategy (Career Ladders or Career Lattices):

The CNMI Core Programs are working closely with Education and Training providers to promote and recommend clients to participate in Career Pathway types of programs. This strategy is linked to the new SWDB goal and will be designed to identify a series of positions, work experiences or educational benchmarks or credentials that offer occupational advancement opportunities for clients to facilitate incremental and progressive skill attainment over time, in clearly segmented blocks, which are flexible, and can be module based, staggered learning, or other form of articulated system. Curriculum design to integrate from K-12 and introduce workforce careers into elementary to middle school to high school and beyond will also be identified. A model program for the hotel and tourism industry is called the My W.A.V.E. program also know as the Marianas Youth Welcome All Visitors Enthusiastically Program, which could be linked to the American Hotel and Lodging Educational Institute's S.T.A.R.T. program offered in high schools and trades schools which would could eventually lead to an undergraduate certificate in Business Administration with an Emphasis in Tourism and Hospitality Management. All segments focusing on certain industry positions as time progresses and skills/knowledge/experiences are gained.

Industry Participation Strategy:

Work with employers to develop industry based programs to help address the industry's particular skills shortages. Some examples include:

- **AHLEI Certification for Hotel and Restaurant Operations;**
- **A HANMI recognized curriculum for Culinary Arts;**
- **CISCO Networking Certifications for the Telecommunications Industry**
- **Accounting Credentials**
- **NCCER Certification for Construction Trades/Technology**
- **Identify Resource Gaps inclusive of monetary, institutional, labor, skills, etc.**

Learn and Earn Strategy

- **Designed to facilitate skills attainment while also providing compensated work experiences.**
- **Examples are:**

- *o Pre-Apprenticeships leading towards an Apprenticeship Opportunity*
- *Registered Apprenticeship Opportunities are being held in Collaboration with the Guam Department of Labor and will be integrated into the CNMI's overall Workforce System*
- *o Incumbent Worker Training*
- *o On-the-Job Training*
- *o Work Experience Programs*
- *o Paid Internships*

Building Data Capacity Systems

- *Data will guide the design and evaluation of programs*
- *Diagnostic Data*
- *Performance Data*
- *Studies*
- *Measurement of Skill Attainment*
- *Inventory*

Integrating, Mapping, and Aligning Services

- *Integrating service delivery and mapping resources better align services and goals to achieve common outcomes across the CNMI's workforce, education, and employers*

SWDB and CNMI core partners as well as other key service providers will collaborate in designing effective policies to ensure that those in most need in the community are provided opportunities to participate in educational and training programs supporting their entry or transition in the workforce. Additional strategies to address the needs of the population will include:

ACCESSIBILITY

Workforce core partners will work to identify and reduce barriers to employment for all residents. Policies and procedures will be developed and implemented to ensure employment access for all CNMI residents.

KEY STAKEHOLDERS

Core partners and employers will collaborate to develop programs and initiative to increase opportunities for CNMI residents to gain the skills, credentials, and experience needed to get a job and to sustain employment, reduce the skills gap between the employers and the workforce. Recognizing and identifying the CNMI employers' education, training, and workforce needs will be set as priorities.

CAREER PATHWAYS

Core partners will strengthen the career pathways process by improving the delivery and transitional navigation into the workforce. Career pathways will provide the CNMI workforce with the skills, education, work-based training opportunities, resources, support, and accommodations needed to gain employment.

INTEGRATED EDUCATION AND TRAINING

CNMI Core Partners must ensure all CNMI residents to programs that address literacy skills. Free or affordable options will be offered to obtain education, skills, and training opportunities that will include soft and hard career skills and basic literacy and numeracy skills (including financial). These options will assist in securing and sustaining employment.

CUSTOMIZED TRAINING AND EMPLOYMENT

Ensuring competitive integrated employment opportunities by matching employers with skilled and talented workers including individuals and youth with disabilities.

As mentioned earlier, the in-demand industry sectors and occupations and career pathways are identified in the the CNMI 2016 Prevailing Wage and Workforce Assessment Study (PWWAS) released in September of 2017 reveals that there were 2,146 employers (1,124 were surveyed) and 32,061 employees (19,827 were reported in the survey) in the CNMI. The Standard Occupational Classification (SOC) Major Titled 2 Digit Title reveals the following occupations and number of existing employees in such fields:

- *Office and Administrative Support Occupations 2,935 employees*
- *Management Occupations 2,202 employees*
- *Food Preparation and Serving Related Occupations 1,915 employees*
- *Sales and Related Occupations 1,402 employees*
- *Construction and Extraction Occupations 1,329 employees*
- *Protective Service Occupations 1,109 employees*
- *Personal Care and Service Occupations 1,054 employees*
- *Education, Training, and Library Occupations 1,053 employees*
- *Installation, Maintenance, and Repair Occupations 1,046 employees*
- *Building and Grounds Cleaning and Maintenance Occupations 1,014 employees*

In addition, the impact of the Casino Gaming and Amusement Industry has been significant in the CNMI as the Casino houses over 1,800 employees and is expected to grow to over 3,000 employees once the hotel/resort component of the casino opens. A little under half of this is seen in the new SOC categories now published in the 2016 PWWAS (not including non-gaming positions). These include:

- *Gaming Dealers 248 employees*
- *Gaming Supervisors 164 employees*
- *Gaming Managers 113 employees*
- *Gaming Change Persons and Booth Cashiers 105 employees*
- *Gaming Cage Workers 66 employees*
- *Amusement and Recreation Attendants 33 employees*
- *Gaming Surveillance Officers and Investigators 17 employees*
- *Gaming Service Workers, All Others 16 employees*
- *Costume Attendants 15 employees*
- *Coin, Vending, and Amusement Machine Repairers 09 employees*

Total New Casino SOC Categories for CNMI 786 employees

The other emerging industry revolves around the Construction, Repair, and Maintenance industries. The growth and impact of the Casino Industry has led other investors to the CNMI in hopes of cashing in on the current and anticipated success of the casino once it is in full operation. The CNMI now has four ongoing Construction projects for new hotels, resorts, and other forms of lodging. Prior to 2018, the CNMI had an inventory of over 1,300 skilled construction workers (mostly foreign workers under the Commonwealth Worker (CW) program), due to the impact of U.S. Public Law 110-229, that inventory figure has dropped significantly, and the availability of U.S. workers in this industry is scarce. This reduction and the lack of overall available skilled U.S. workers in the CNMI have started to take its toll on the economic growth of the islands. One example of such potential stunt in growth is the need for one hotel chain to hire an additional 800 construction workers to meet its building needs. However, due to the limited number of qualified U.S. workers in this industry, the project may face delays or be canceled.

Due to the CNMI's remote location and limited population base, other necessary industries are that of the Health Care and Medical Industry and Government entities. The CNMI often faces shortages for specialized workers in the Health Care and Medical Industry as in some expertise or specialties, the professionals usually prefer in locations with larger populations so that they would be able to service more individuals in need. The CNMI currently refers patients off island to the Philippines, Hawaii, or U.S. mainland institutions to receive specialized care. Furthermore, as the competition for Health Care and Medical workers are so fierce around the world that the CNMI is in constant search for Certified Nursing Assistants (CNA), Licensed Practical Nurses (LPN), Registered Nurses (RN), Radiology Technicians, and individuals skilled in Medical Billing and Coding.

Government and public sector jobs have been a primary choice for an individual to start or land a career in. The vast majority of these types of jobs include firefighting and emergency medical services, police, corrections, customs, and other law enforcement types of positions, as well as light service types of jobs.

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

Through a Consortium Agreement between the Guam Department of Labor, The Palau WIOA Office, The America Samoa Department of Human Resources (DHR) and the CNMI Department of Labor, the CNMI Core partners are laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an off-shoot of the hireguam case management system.

The responsibilities of each partner are to:

47. Coordinate services among partners in the one-stop system to assure seamless delivery of services

48. Placement of personnel within their designated one-stop delivery system area

49. Use of the single case management system identified to address the following:

- Common registration through out the partner area WIOA Core Programs*
- implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs*
- Implement data integration strategies that support the ability for front-line staff and counselors better assist clients*

4. Assure performance standards, measures and objectives applicable to each partner such as

- Improved service delivery and employment outcomes*
- More effective connections to all available services through integrated case management*
- Increased accessibility to services through automation and self-service*

5. To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

Other strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2):

Training for key stakeholders are ongoing and conducted by appropriate core partners who will identify and define career pathways that are available in the CNMI. This training will also provide opportunities to expand and/or redefine pathways that may need to be restructured to meet employers' ever-changing needs and expectations.

The Title IV Vocational Rehabilitation Program remains committed to strategically aligning itself with the core programs consistent with the WIOA mandates. CNMI OVR welcomes and supports the formalization of an MOA to bind the core programs in alignment efforts that embrace and promote a shared mentality approach pertaining to cases, costs (as in the case of a One-Stop or American Job Center), and data. Program

alignment via cross-agency collaboration with emphasis on results-driven practices will contribute to an integrated service delivery at the State level that meets the needs of our target population(s). The creation of a physical or virtual American Job Center for the CNMI will help to achieve this strategic alignment of the core programs. CNMI OVR recognizes the need and importance of co-locating core and non-core programs that will better meet the needs of customers within its workforce delivery system.

III. OPERATIONAL PLANNING ELEMENTS

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

A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include—

1. STATE BOARD FUNCTIONS

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

The CNMI SWDB is governed by its operational by-laws reflective of Section 101 (d) and other applicable sections of the Workforce Innovation and Opportunity Act of 2014, Public Law 113-128. The CNMI SWDB is organized with primary members from the leading economic sectors of the CNMI as well as other required members as stipulated by WIOA. CNMI SWDB are appointed for 2 years by the Governor to carry out the responsibilities under WIOA. The Board is governed by Officers (Chair, Vice-Chair, etc.), an Executive Committee and Standing Committees. Each member of the SWDB has been appointed to serve in standing and/or adhoc committees and will report to the whole body their committee reports and any action items for board consideration, as applicable. This operational by-laws also guides the SWDB meetings, any special meetings, and is in compliance with the required public notices of a meeting, meeting agenda, location, time, date, etc. A quorum must always be established in order for the CNMI SWDB to conduct its business and for any action to be voted upon. A Conflict of Interest clause has also been adopted to ensure that board members are in compliance.

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 Section II(c). above. This must include a description of—

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

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

Title 1 Adult, Dislocated Worker, and Youth Programs

The CNMIs Title 1 Programs are an important part of the CNMIs workforce development system. Title 1 programs are specifically designed and intended to target the at-risk and most in need populations. In order to successfully implement the strategies that will transform the CNMIs workforce development system, the following activities will be implemented to achieve the desired outcomes of the strategies.

- ***Conduct frequent outreach efforts of the Title 1 programs that promotes an increased participation of the intended target population***
- ***Coordinate closely with other CNMI core programs the activities so that duplication of activities are either consolidated or minimized and desired outcomes is accomplished***
- ***Increase awareness of the new required expenditure on OSY WIOA funding***
- ***Increase awareness of the programs and services offered by Title 1 funding programs to employers***
- ***Consistently monitor labor market events such as business closure, lay offs, downsizing for the immediate implementation of Rapid Response and layoff aversions***
- ***Consistently improve communications between the core and non-core programs for the effective delivery and implementation of the CNMIs workforce transformation initiatives***
- ***Consistently share data information with core program partners for the effective and holistic service delivery approach for individuals seeking program services***
- ***Leverage program financial resources by avoiding duplication of services and costs and maximizing services through co-enrollment approached across core and non-core program partners***

In addition, funding will also be dedicated towards achieving the following strategies:

Career Pathway Strategy (Career Ladders or Career Lattices):

The CNMI Core Programs are working closely with Education and Training providers to promote and recommend clients to participate in Career Pathway types of programs. This strategy is linked to the new SWDB goal and will be designed to identify a series of positions, work experiences or educational benchmarks or credentials that offer occupational advancement opportunities for clients to facilitate incremental and progressive skill attainment over time, in clearly segmented blocks, which are flexible, and can be module based, staggered learning, or other form of articulated system. Curriculum design to integrate from K-12 and introduce workforce careers into elementary to middle school to high school and beyond will also be identified. A model program for the hotel and tourism industry is called the My W.A.V.E. program also know as the Marianas Youth Welcome All Visitors Enthusiastically Program, which could be linked to the American Hotel and Lodging Educational Institute's S.T.A.R.T. program offered in high schools and trades schools which would could eventually lead to an undergraduate certificate in Business Administration with an Emphasis in Tourism and Hospitality Management. All segments focusing on certain industry positions as time progresses and skills/knowledge/experiences are gained.

Industry Participation Strategy:

Work with employers to develop industry based programs to help address the industry's particular skills shortages. Some examples include:

- ***AHLEI Certification for Hotel and Restaurant Operations;***
- ***A HANMI recognized curriculum for Culinary Arts;***
- ***CISCO Networking Certifications for the Telecommunications Industry***
- ***Accounting Credentials***
- ***NCCER Certification for Construction Trades/Technology***
- ***Identify Resource Gaps inclusive of monetary, institutional, labor, skills, etc.***

Learn and Earn Strategy

- ***Designed to facilitate skills attainment while also providing compensated work experiences.***
- ***Examples are:***
- ***o Pre-Apprenticeships leading towards an Apprenticeship Opportunity***
- ***Registered Apprenticeship Opportunities are being held in Collaboration with the Guam Department of Labor and will be integrated into the CNMI's overall Workforce System***
- ***o Incumbent Worker Training***
- ***o On-the-Job Training***
- ***o Work Experience Programs***
- ***o Paid Internships***

Building Data Capacity Systems

- ***Data will guide the design and evaluation of programs***
- ***Diagnostic Data***
- ***Performance Data***
- ***Studies***
- ***Measurement of Skill Attainment***
- ***Inventory***

Integrating, Mapping, and Aligning Services

- ***Integrating service delivery and mapping resources better align services and goals to achieve common outcomes across the CNMI's workforce, education, and employers***

SWDB and CNMI core partners as well as other key service providers will collaborate in designing effective policies to ensure that those in most need in the community are provided opportunities to participate in educational and training programs supporting their entry or transition in the workforce. Additional strategies to address the needs of the population will include:

ACCESSIBILITY

Workforce core partners will work to identify and reduce barriers to employment for all residents. Policies and procedures will be developed and implemented to ensure employment access for all CNMI residents.

KEY STAKEHOLDERS

Core partners and employers will collaborate to develop programs and initiative to increase opportunities for CNMI residents to gain the skills, credentials, and experience needed to get a job and to sustain employment, reduce the skills gap between the employers and the workforce. Recognizing and identifying the CNMI employers' education, training, and workforce needs will be set as priorities.

CAREER PATHWAYS

Core partners will strengthen the career pathways process by improving the delivery and transitional navigation into the workforce. Career pathways will provide the CNMI workforce with the skills, education, work-based training opportunities, resources, support, and accommodations needed to gain employment.

INTEGRATED EDUCATION AND TRAINING

CNMI Core Partners must ensure all CNMI residents to programs that address literacy skills. Free or affordable options will be offered to obtain education, skills, and training opportunities that will include soft and hard career skills and basic literacy and numeracy skills (including financial). These options will assist in securing and sustaining employment.

CUSTOMIZED TRAINING AND EMPLOYMENT

Ensuring competitive integrated employment opportunities by matching employers with skilled and talented workers including individuals and youth with disabilities.

Title II, Adult Education

The CNMI's Adult Education and Family Literacy program plays a critical role in the workforce development system by providing access to educational services to adult learners. The program increases opportunities in the educational and workforce development of adults as parents, workers, and citizens. As a core member of WIOA, Adult Education is excited to be collaborating in so many levels to bring the workforce development system to adult learners. Adult Education makes an impact by assisting adults attain a high school equivalency diploma and transitioning them into postsecondary education and training through career pathways.

Adult Education programs will continue to provide critical services and activities that will support adult learners by improving access to educational, training, and work opportunities. This can be achieved by helping adults be literate and obtain knowledge and skills for employment. Adult Education will also support the educational and skill development of parents and family members to participate in the educational development of their children and improve the economic opportunities for them. The program will support non-English speaking adult learners in learning and improving their English and math proficiency and understanding the rights and responsibilities of U.S. citizenship. In addition, the program will assist in the re-entry of incarcerated

individuals into the CNMI community by providing educational, training, and work opportunities.

- **ACCESSIBILITY:** *Adult Education will support efforts in increasing enrollment and retention by offering year-round flexible schedules and student support services in learning-conducive environment. The program will use technology to improve delivery methods of teaching and learning of adults. The development of and improvement in distance education will provide adult learners access to educational, training, and work resources that would not be otherwise available to them. Recognizing that many jobs require computer and digital literacy, the CNMI's Adult Education program will encourage and support the integration of these digital literacy skills into all adult education and literacy activities. Professional development opportunities will be provided to train instructors to address and assess digital literacy skills into instruction in all content areas.*
- **KEY STAKEHOLDER PARTNERSHIPS:** *Adult Education will educate students, parents, work seekers, teachers, student support staff, and administrators about in-demand careers and prepare them for these careers.*
- **CAREER PATHWAYS:** *Through the use of career pathways, Adult Education will aid in the transition and access of adult learners into postsecondary education, training, and work opportunities. The program will support the linkage of employers with the core programs and prioritize work-place learning and career opportunities.*
- **INTEGRATED EDUCATION AND TRAINING:** *Opportunities and participation of an integrated system of education and training will allow for the preparation of adult learners into the workforce. CNMI residents will be able to obtain the knowledge and skills necessary to secure in-demand careers.*

Title IV, Vocational Rehabilitation

The Office of Vocational Rehabilitation will work closely with the WIOA Core Program Partners and the State Workforce Development Board to help develop and promote an all-inclusive workforce for the CNMI. Collaboration and coordination with partners will be emphasized. Increasing employer engagement will be key as we recognize the importance of also serving employers in the dual customer approach to provide them with the services and supports they will need to be able to promote a diverse workforce to include individuals with disabilities as well as those experiencing other barriers to employment. Best practice strategies or evidence-based approaches for assisting our clientele to achieve competitive integrated employment will be utilized to the maximum extent possible. Regular communication especially regarding cost-sharing of workforce development activities and development of infrastructure that will promote improved access to programs and services as well as evaluations of program performance will be expected. Sharing of data among the WIOA Core Programs will be critical to maintaining most effective partnerships for greater outcomes for all involved.

Methods or strategies that will demonstrate alignment across the WIOA Core Programs may include:

- *A memorandum of understanding or agreement that will promote program alignment, clearly define program roles and responsibilities, solidify partnerships, etc.*
- *Tracking and reporting system for consumers that have been referred to, or are co-enrolled in the core programs.*
- *Use of OJTs as a strategy to provide employment opportunities for individuals with disabilities in CNMI.*
- *Agreement to set aside a number of work-based learning opportunities for students with disabilities annually.*
- *Agreement to target a number of co-enrolled individuals with disabilities to share funding for training and employment services.*
- *Regular and frequent cross-training for core program staff on program flow and processes.*
- *Pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs.*
- *Training to the core program partners on how to recognize, accommodate and effectively work with individuals with hidden disabilities.*

CNMIs Response: The CNMI is continuously working on aligning not just its core program partners but all workforce system partners. In this effort the CNMI plans to implement the following strategies to reach alignment of core and non-core program workforce partners.

- 1. Work on the achievement of the creation of a physical AJC location***
- 2. Execute MOU/MOA between core and non-core workforce partner programs on the delivery of services***
- 3. Eliminate duplication of services but rather leverage services that can best be delivered by the core or non-core workforce partner program***
- 4. Implement a referral system process that meets the needs of participants without duplication of efforts and services***
- 5. Implement a robust workforce data system that captures all common core and non-core workforce partner program information where all can have access to with information/data protection policies***
- 6. Implement a program/service delivery training program where all core and non-core workforce partners can learn from each other's services and programs which will help improve and achieve success in the alignment of programs and services to those being served by the CNMIs workforce development system***
- 7. Align outreach of programs and services in a unified way so that those being provided the outreach sessions will receive the information from all partners during and at the same outreach activities***
- 8. Promote a more cohesive approach for the implementation of working towards co-designing or developing education and training programs that better supports alignment of services and program to those served by the CNMIs workforce system such***

as aligning college transition courses by engaging the local college institution and the Public School System's K-12 in the process of curriculum design and development that meets both institutions academic requirements.

9. Implement a strategic approach where the unified services to common customers are approached and delivered in an agreed standard procedure that will achieve the desired outcome of the services and programs the customer is seeking

10. Implement the strategy of customer centric approach without disregarding program specific delivery and requirement with the focus of leveraging program services and funding

The above can be achieved through the Consortium Agreement between the Guam Department of Labor, The Palau WIOA Office, The American Samoa Department of Human Resources (DHR) and the CNMI Department of Labor, the CNMI Core partners are laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an off-shoot of the hireguam case management system.

The responsibilities of each partner are to:

97. Coordinate services among partners in the one-stop system to assure seamless delivery of services

98. Placement of personnel within their designated one-stop delivery system area

99. Use of the single case management system identified to address the following:

- o Common registration through out the partner area WIOA Core Programs*
- o implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs*
- o Implement data integration strategies that support the ability for front-line staff and counselors better assist clients*

4. Assure performance standards, measures and objectives applicable to each partner such as

- o Improved service delivery and employment outcomes*
- o More effective connections to all available services through integrated case management*
- o Increased accessibility to services through automation and self-service*

5. To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for

dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

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

The CNMI is transforming its workforce development system across all core and non-core programs. The Governor of the CNMI expects all workforce related programs across the CNMI whether core or non-core program to collaborate, cooperate, leverage resources for the effective and outcome oriented results of the workforce development programs. No longer is it acceptable to continue operational strategies independent of the CNMIs workforce development and transformation initiatives. The appointed SWDB will also play a key role the implementation of the required board functions that will assist the CNMI Governor in achieving his vision of the CNMIs workforce transformation and systemic changes.

Department heads are Governor appointees therefore the expectation to follow the initiatives of the CNMI Governor for a better workforce development and service delivery to include the Governor's call on businesses to "hire local, hire our community" is fundamental in the process of the CNMIs workforce transformation efforts and initiatives. The appointed SWDB primarily from the private sector will play just as important a critical role in achieving success in the transformation of the CNMIs workforce system. The SWDB's recommendations to the Governor in setting the standards of excellence in building the CNMIs human capital in education and training by improving programs and services is key to the CNMIs overall workforce and economic success.

The implementation of the Consortium Agreement between the Guam Department of Labor, The Palau WIOA Office, The American Samoa Department of Human Resources (DHR) and the CNMI Department of Labor, the CNMI Core partners are laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an off-shoot of the hireguam case management system.

The responsibilities of each partner are to:

106. *Coordinate services among partners in the one-stop system to assure seamless delivery of services*
107. *Placement of personnel within their designated one-stop delivery system area*
108. *Use of the single case management system identified to address the following:*
 - *Common registration through out the partner area WIOA Core Programs*
 - *implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs*
 - *Implement data integration strategies that support the ability for front-line staff and counselors better assist clients*

4. Assure performance standards, measures and objectives applicable to each partner such as

- *Improved service delivery and employment outcomes*
- *More effective connections to all available services through integrated case management*
- *Increased accessibility to services through automation and self-service*

5. To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Eduatoin and Family Literacy, and Vocational Rehabilitation.

In addition, the CNMIs workforce development system is in collaboration and partnership with other CNMI workforce related programs such as the Older Worker Program or SCSEP administered under the Office of the Secretary Department of Community and Cultural Affairs whom also administers the Nutrition Assistance Program (NAP). Registrants/Participants of the WIOA Program are always referred to other CNMI workforce partner programs for expanded services that the individual is in need of. The CNMIs Public School System (PSS) administers the Career Technical Programs at the high school level on all 3 islands. PSS, the Northern Marianas College, Latte Academy, and the Northern Marianas Trades Institute are all working to provide the necessary education and training within their ability to help address some of the CNMIs workforce needs. High School students for example are being brought to the training grounds of the Northern Marianas Trades Institute (NMTI) for classroom and

hands on training, SCSEP participants are provided training in collaboration with the local college and WIOA funded programs and services, high school students are continuously being provided college access programs and outreach activities, while nutrition assistance program clients are also assisted for employment services through the CNMI Department of Labor's Employment Services Division, provided subsidized employment and training services through the CNMI Department of Labor WIA Division either for youth, adult, or dislocated worker program services.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

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

The Consortium Agreement between the Guam Department of Labor, The Palau WIOA Office, The American Samoa Department of Human Resources (DHR) and the CNMI Department of Labor, will be adopted and localized to meet the CNMI Core partners needs. The CNMI is laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremariannas, an off-shoot of the hireguam case management system. The system also allows for self-service, in which an individual can request services and other assistance without the assistance of a case manager or a workforce rep. These functions are also monitored by the case management system.

The responsibilities of each partner are to:

- 115. Coordinate services among partners in the one-stop system to assure seamless delivery of services*
- 116. Placement of personnel within their designated one-stop delivery system area*
- 117. Use of the single case management system identified to address the following:*
 - o Common registration through out the partner area WIOA Core Programs*
 - o implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs*
 - o Implement data integration strategies that support the ability for front-line staff and counselors better assist clients*

4. Assure performance standards, measures and objectives applicable to each partner such as

- o Improved service delivery and employment outcomes*

- *More effective connections to all available services through integrated case management*
- *Increased accessibility to services through automation and self-service*

5. To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

Additionally, the core program partners and other non-core programs are just as involved in the process of providing a professional, committed, comprehensive, and customer centric service focus. Coordination of activities and resources to provide a comprehensive, high quality, customer centered services, including supportive services to individuals including those population identified in section II (a) (10 (B)) will be implemented through

- 124. *Development of MOU/MOA between the core programs*
- 125. *Improve and develop the menu of shared services without duplication*
- 126. *Improve communications between core and non-core workforce related programs and services*
- 127. *Improve core program knowledge across all workforce development core programs and that of non-core programs*
- 128. *Improve referrals to workforce programs and workforce service specific programs*
- 129. *Improve collaboration and leveraging of resources and services*
- 130. *Develop and promote an environment of a holistic CNMI workforce development programs and services*
- 131. *Promote awareness and capacity building to all core and non-core programs that leads to a better understanding and support towards a customer-centered services delivery*

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs

needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

The foundation and infrastructure of the Virtual Online System/Virtual One-Stop System created by Geographical Solutions also has an employer section that would allow for employer self-service, in which an employer can request services and other assistance without the assistance of a case manager or a workforce rep. These functions are also monitored by the case management system. In person orientation to the Online System and to employer services are also available and can be conducted by the case management or administrative teams.

In addition, the CNMIs economy is primarily the hospitality industry with large association memberships such as HANMI and the Chamber of Commerce membership association. The CNMI understands along with a private sector driven SWDB that providing the highest level of quality and efficient services to employers can only bring successful and tangible outcome oriented results. The development and investment in the CNMIs human capital feeds into the private sector economy where employers provide the employment and training opportunities.

Engaging in improved employer relations across core and non-core programs is not an option to be considered but rather the "must do" approach in order to achieve and succeed with the execution of the CNMIs workforce development initiatives and transformation efforts. The CNMIs economy depends on the successes of the private/employer sectors hence the need to ensure that all programs core or non-core are responsive to, actively participates in collaboration, partnerships, and leveraging of programs and services benefitting the CNMIs economy of employers.

The achievement of this approach can be accomplished through

- 132. Coordination and partnership of all core programs in the service delivery approach to employers*
- 133. Development of a comprehensive and unified programs and services information material specifically targeted for employers*
- 134. Promotion and development of a strong business relationship with employers that can assess their current and future workforce development and needs*
- 135. Encouraging the active engagement of employers through the CNMI State Workforce Development Board private sector membership*
- 136. Improvement on information sharing to employers on workforce partnership benefits*
- 137. Production of the workforce talent that is responsive to employer's workforce needs whether short or long term*
- 138. Engagement of the Higher Education Institution(s) and training providers in acquiring labor market intelligence for the design and development of employer's current and future workforce needs*

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development

system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

A formal registration process for educational institutions will also be implemented as a part of the Virtual Online System/Virtual One-Stop System created by Geographical Solutions. This can also be done via self-service or in-person. An orientation to the requirements and expectations will also be conducted. The SWDB has adopted policies reflecting these updates.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for educational institutions, career and technical schools, job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

The CNMI's lone accredited Higher Education Institution (Northern Marianas College) is a member of the CNMI State Workforce Development Board. The institution work closely with the CNMI Department of Labor in aligning their educational and training programs that is responsive to both the required academic requirements but also responsive to the needs of the CNMIs demand driven industries and occupations. NMC's certificated and Degree Programs include an Associate or Bachelor's Degree in Business (with Emphasis in Accounting, Management, etc.), an AA degree in Nursing; A degree in Liberal Arts; a Bachelor's Degree in Education with various emphasis, and other degree programs that are needed to fill certain workforce needs. For certifications and degrees not offered locally, NMC is actively engaged with other off-island accredited institutions under an articulation agreement with the local college through on-line post secondary education, on-site, or hybrid models that provide credentials access.

In addition, the CNMI's Public School System (PSS) and the Northern Marianas Trades (Technical) Institute (NMTI), recently executed a Memorandum of Agreement for NMTI to offer its hard Trades courses to students in PSS High Schools. These include NCCER Certified Courses, AHLEI courses, Automotive Trades, Culinary Arts, and other workforce development components.

These entities will be required to register with the DOL WIA program in order to be provided continued services.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners

in the workforce development system to create a job-driven education and training system.

A formal registration process for other educational institutions and training providers will also be implemented as a part of the Virtual Online System/Virtual One-Stop System created by Geographical Solutions. This can also be done via self-service or in-person. An orientation to the requirements and expectations will also be conducted. The SWDB has adopted policies reflecting these updates.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for the other education and training providers, job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

Examples of these are the Latte Training Academy and the Northern Marianas Trades (Technical) Institute. These institutions work closely with the CNMI Department of Labor in aligning their educational and training programs that are responsive to both the required workforce requirements responsive to the needs of the CNMIs demand driven industries and occupations. Both Latte Academy and NMTI offer the American Hotel and Lodging Educational Institute's S.T.A.R.T curriculum designed to help individuals enter into the Hotel and Restaurant industry. In addition, both partner with the CNMI's Public School System (PSS) however, the Northern Marianas Trades (Technical) Institute (NMTI), recently executed a Memorandum of Agreement for NMTI to offer its hard Trades courses to students in PSS High Schools. These include NCCER Certified Courses, AHLEI courses, Automotive Trades, Culinary Arts, and other workforce development components; and Latte offers a program in Entrepreneurship and Computer/Systems Networking, etc.

Existing entities will be required to register in order to continue receiving services from DOL WIA.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

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

CNMI Governor Ralph DLG. Torres and his administration as well as the CNMI Legislature all have worked hard to ensure that qualified CNMI residents to avail of financial aid opportunities from the CNMI Scholarship Program. In addition, each island municipality sets aside funding for its qualified residents to avail of municipal scholarship (upon availability of funds). On Saipan, there is the Saipan Higher

Education Financial Assistance (SHEFA) program is specific to Saipan residents, whereas Tinian and Rota also have their own respective municipal local scholarship fundings. Access to federal financial aid may be available for those who qualify. The WIOA Core Programs maximizes local and federal funding to leverage the limited resource in efforts for clients to receive as much assistance as possible. However, in order to access WIOA funding, clients are asked to maximize local financial aid and scholarship funding before they access WIOA funding. Core and non-core programs with workforce related funding activities are all part of the greater effort in enhancing and improving for an increased and upward mobility and access to available CNMI workforce development programs within the CNMI providers of education and training programs.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

Access to Post-Secondary Credentials has steadily been increasing in the CNMI. Local funding has been given to Education and Training providers to build the needed curriculum and improve upon programs and services needed to better match educational and training offerings to industry demands. Scholarship programs and services are now more diverse and now include funding for trade/technical training type of curriculum and courses (previously restricted to academia). Young and old adults to include non-traditional students are all exposed to the numerous available resources for education and training upward mobility. Laws allowing for high school and part-time students to access scholarship funds are also now available. Career Days, College Access Opportunities, Site Visits and other related workforce types of programs further enhancing and increasing the awareness of postsecondary education and credentialed programs and services are now more available. As mentioned in other sections, PSS and NMC work closely with the CNMI Department of Labor in aligning their educational and training programs that is responsive to both the required academic requirements but also responsive to the needs of the CNMIs demand driven industries and occupations. NMC's certificated and Degree Programs include an Associate or Bachelor's Degree in Business (with Emphasis in Accounting, Management, etc.), an AA degree in Nursing; A degree in Liberal Arts; a Bachelor's Degree in Education with various emphasis, and other degree programs that are needed to fill certain workforce needs. For certifications and degrees not offered locally, NMC is actively engaged with other off-island accredited institutions under an articulation agreement with the local college through on-line post secondary education, on-site, or hybrid models that provide credentials access. In addition, the CNMI's Public School System (PSS) and the Northern Marianas Trades (Technical) Institute (NMTI), recently executed a Memorandum of Agreement for NMTI to offer its hard Trades courses to students in PSS High Schools. These include NCCER Certified Courses, AHLEI courses, Automotive Trades, Culinary Arts, and other workforce development components.

Other examples of these are the Latte Training Academy and the Northern Marianas Trades (Technical) Institute. These institutions work closely with the CNMI Department

of Labor in aligning their educational and training programs that are responsive to both the required workforce requirements responsive to the needs of the CNMIs demand driven industries and occupations. Both Latte Academy and NMTI offer the American Hotel and Lodging Educational Institute's S.T.A.R.T curriculum designed to help individuals enter into the Hotel and Restaurant industry. In addition, both partner with the CNMI's Public School System (PSS) however, the Northern Marianas Trades (Technical) Institute (NMTI), recently executed a Memorandum of Agreement for NMTI to offer its hard Trades courses to students in PSS High Schools. These include NCCER Certified Courses, AHLEI courses, Automotive Trades, Culinary Arts, and other workforce development components; and Latte offers a program in Entrepreneurship and Computer/Systems Networking, etc.

The Title IV Vocational Rehabilitation Program strongly supports postsecondary outcomes for the individuals we serve. Professional staff providing direct services engage clients in discussions about the importance of postsecondary education or training to attain credentials consistent with the local job market to better compete in the 21st century workforce. VR counselors stress the value of a career over simply a job for long-term employment that promises competitive wages and opportunities for advancement. VR is very capable of assisting consumers in their pursuit of postsecondary education or training goals and pays for the services in whole or in part after an analysis of comparable benefits and programs such as the FAFSA, CNMI Scholarship, Saipan Higher Education Financial Assistance, etc. There are also opportunities for VR to collaborate and leverage resources with the WIOA Core Programs such as the Title I Program, for instance, to support a mutual consumer's participation in training certification programs offered by private providers. Whatever the case may be, VR counselors are trained to factor into the equation the unique needs of the consumer and customize a plan that takes into consideration the individual's primary employment factors and informed choice through a well-structured counseling approach. CNMI OVR will continue to ensure that funds are allocated to activities that lead to recognized postsecondary credentials.

Title II's Adult Education will be involved in improving access to postsecondary credentials. It will use and invest state leadership funds to improve its academic bridge program for students transitioning from adult education to postsecondary education through career pathways. All adult education students will be encouraged to explore pathways for a smoother transition into postsecondary education. Adult Education will work with the single state board to clearly define career pathways to assist adult education students to industry recognized credentials, certificates, licenses or certificates that are portable and stackable.

There are other ways to improve access leading to postsecondary credentials. The island's lone postsecondary institution can partner up with the Public School System's CTE to collaborate on or improve pre-apprenticeship programs that meet industry demands. Funds will be prioritized for training that gives individuals the basic tools they need to succeed in their business of choice. By prioritizing and establishing a minimum of requirements for funds spent on these types of trainings, the single state board will be providing accountability that the workforce is supporting services that meet both job seekers and businesses benefits. These minimum requirements will be

reviewed annually to see if adjustments should be made to ensure they are meeting industry demands.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES.

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

Members of the SWDB are also members of other state committees or organizations that work closely with the economic development strategies of the CNMI. These include members of the Saipan Chamber of Commerce, the Small Business Development Center, the Society for Human Resource Management, the Strategic Economic Development Council, and the Northern Marianas Business Alliance Corporation to name a few. Workforce development and transformation is and continues to be the number one Economic Issue that the CNMI faces. This continues due to the small and limited population, lack of available skilled U.S. workers, and shortage of U.S. workers to meet the existing, growing, and expected emerging industry needs.

B. STATE OPERATING SYSTEMS AND POLICIES

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

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

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

An initiative of the CNMI's State Workforce Development Board is to co-locate the CNMI's WIOA Core Programs through a Comprehensive One-Stop Center. In the interim, the Core Programs are moving towards a Virtual OneStop Service Delivery through the Reemployment System Integration DW Grant or RSI. DOL-WIA will be migrating in the Spring of 2018, NMC-ABE in August 2018, and OVR in early 2019. Through a Consortium Agreement between the Guam Department of Labor, The Palau WIOA Office, The American Samoa Department of Human Resources (DHR) and the CNMI Department of Labor, the CNMI Core partners are laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an offshoot of the hireguam case management system.

The responsibilities of each partner are to:

- 139. Coordinate services among partners in the one-stop system to assure seamless delivery of services*

140. *Placement of personnel within their designated one-stop delivery system area*

141. *Use of the single case management system identified to address the following:*

- *Common registration through out the partner area WIOA Core Programs*
- *implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs*
- *Implement data integration strategies that support the ability for front-line staff and counselors better assist clients*

4. *Assure performance standards, measures and objectives applicable to each partner such as*

- *Improved service delivery and employment outcomes*
- *More effective connections to all available services through integrated case management*
- *Increased accessibility to services through automation and self-service*

5. *To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.*

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Eduatoin and Family Literacy, and Vocational Rehabilitation.

Other strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2):

Training for key stakeholders are ongoing and conducted by appropriate core partners who will identify and define career pathways that are available in the CNMI. This training will also provide opportunites to expand and/or redefine pathways that may need to be restructured to meet employers' ever-changing needs and expectations.

The Title IV Vocational Rehabilitation Program remains committed to strategically aligning itself with the core programs consistent with the WIOA mandates. CNMI OVR welcomes and supports the formalization of an MOA to bind the core programs in alignment efforts that embrace and promote a shared mentality approach pertaining to cases, costs (as in the case of a One-Stop or American Job Center), and data. Program alignment via cross-agency collaboration with emphasis on results-driven practices will contribute to an integrated service delivery at the State level that meets the needs

of our target population(s). The creation of a physical or virtual American Job Center for the CNMI will help to achieve this strategic alignment of the core programs. CNMI OVR recognizes the need and importance of co-locating core and non-core programs that will better meet the needs of customers within its workforce delivery system. The CNMI Department of Commerce Statistics Division by local statute and mandates is responsible for the collection of data related to all sectors of the CNMIs economic environment. For the workforce system, longitudinal data systems have yet to be developed and currently workforce data is housed and collected individually by the core programs. The CNMI however has plans to coordinate such labor market information system where unique common data information is available and accessible to all core program partners. The CNMI does have a state job bank where all job postings are available to the public <http://www.marianaslabor.net/sec.asp?secID=1>.

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

The CNMI Title 1 program is transitioning its data collection system and reporting processes from the Pacific Workforce Case Management System to the Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an off-shoot of the hireguam case management system. This should help resolve past errors and bring the programs up to date with data collection and reporting.

Reporting Capabilities:

Virtual OneStop provides fully-integrated report design, distribution, and management functionality in compliance with state and federal requirements. The system also includes new reporting functionality to meet the Participant Individual Record Layout (PIRL) requirements established by the U.S. Department of Labor Employment and Training Administration (DOLETA).

System-Generated Reports -

Virtual OneStop tracks, predicts, and accounts for agency performance, including job placement rates, fiscal management, service delivery, employment retention, skill gains, credentials earned, ad hoc reporting, and more. All system-generated program and performance reports comply with guidelines established by WIOA and the PIRL.

Federal Reports -

Virtual OneStop generates federal reports for all WIOA partner programs managed within the system. Should one of the partners maintain their legacy system, Virtual OneStop has the capability to serve as a conduit for all partner programs. The system can import data from third party systems and combine that data with internal program data to create unified data warehouse for analysis and reporting purposes.

Other details found in the Consortium are the responsibilities of each partner:

148. *Coordinate services among partners in the one-stop system to assure seamless delivery of services*

149. *Placement of personnel within their designated one-stop delivery system area*

150. *Use of the single case management system identified to address the following:*

- *Common registration through out the partner area WIOA Core Programs*
- *implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs*
- *Implement data integration strategies that support the ability for front-line staff and counselors better assist clients*

4. Assure performance standards, measures and objectives applicable to each partner such as

- *Improved service delivery and employment outcomes*
- *More effective connections to all available services through integrated case management*
- *Increased accessibility to services through automation and self-service*

5. To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

The system also integrates all common data sets and allows for reporting on all Core Programs among many other options.

Other strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2):

Training for key stakeholders are ongoing and conducted by appropriate core partners who will identify and define career pathways that are available in the CNMI. This training will also provide opportunities to expand and/or redefine pathways that may need to be restructured to meet employers' ever-changing needs and expectations.

The Title IV Vocational Rehabilitation Program remains committed to strategically aligning itself with the core programs consistent with the WIOA mandates. CNMI OVR welcomes and supports the formalization of an MOA to bind the core programs in alignment efforts that embrace and promote a shared mentality approach pertaining to cases, costs (as in the case of a One-Stop or American Job Center), and data. Program

alignment via cross-agency collaboration with emphasis on results-driven practices will contribute to an integrated service delivery at the State level that meets the needs of our target population(s). The creation of a physical or virtual American Job Center for the CNMI will help to achieve this strategic alignment of the core programs. CNMI OVR recognizes the need and importance of co-locating core and non-core programs that will better meet the needs of customers within its workforce delivery system.

Adult Education uses the CASAS TOPs Enterprise (TE) management system to collect data to input into the National Reporting System (NRS) for its annual reports. As a core partner, we are working with Title 1 programs to combine efforts to come up with a data system that can be utilized by all.

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

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

The CNMI SWDB has adopted policies on registration processes, eligibility requirements, assessment processes, enrollment and co-enrollment for the Core WIOA programs. These are found in the CNMI WIOA Operational Manual which matches policies to TEGL's and other federal and local requirements. In addition, the Virtual Online System will have a mechanism for each respective section to be compliant otherwise error messages will occur if the case manager or respective bodies do not follow policy or procedures.

The Operational Manual describes such as "individuals who meet the respective program eligibility requirements may participate in WIOA Title I adult and youth programs concurrently. Such individuals must be eligible under the youth or adult eligibility criteria applicable to the services received. Program operators may determine, for these individuals, the best mix of services under the youth and adult programs." School status at time of enrollment may determine which program options are appropriate for this population because young adults who are in school are only eligible for the Title I youth program if they are 21 or younger at the time of enrollment.

Some 18 to 24 year olds may also be ready for adult services due to life experiences such as having gained occupational skills through education or training, prior work experiences, adult schedules, family responsibilities, and the participant's needs. Others need specific youth services covered in the 14 WIOA youth program elements based on characteristics such as maturity, drug and alcohol abuse, homelessness, foster care status, family abuse/neglect, literacy challenges, pregnancy, and lack of employability skills. Assessments of their skills, career-readiness, literacy, and supportive service needs should be taken into consideration when determining the appropriate program(s) for young adults.

As discussed in 20 CFR § 681.430, if a young adult's needs can best be met by co-enrollment in the WIOA Title I youth and adult programs, "program operators will identify and track the funding streams which pay the costs of services provided to

individuals who are participating in youth and adult programs concurrently, and ensure no duplication of services.”

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

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

ADULT EDUCATION AND LITERACY ACT PROGRAM

Adult Education and Literacy Organizational Chart

Office of the Governor: RALPH DELEON GUERRERO TORRES

- 157. Northern Marianas College (NMC) Board of Regents***
- 158. NMC President: Dr. Carmen Fernandez***
- 159. NMC Vice President Office of Learning and Student Success: Cynthia Deleon Guerrero***
- 160. Adult Education State Director: LORRAINE C. MAUI***
- 161. Adult Education Instructors and Staff***

This chart is designed to reflect the Governor of the CNMI as the authorized State Official who has the authority to sign the State Plan or Extension for Adult Education and Literacy.

Title 1 Programs

Office of the Governor: RALPH DELEON GUERRERO TORRES

CNMI State Workforce Development Board - Chair Josephine DLG. Mesta

- o CNMI Department of Labor Office of the Secretary - Vicky Benavente***
- o CNMI Department of Labor Workforce Investment Agency Division Director - David Attao***
- o CNMI Department of Labor Workforce Investment Agency Federal Programs Coordinator - Frances A. Torres***
- o CNMI Department of Labor Workforce Investment Agency Job Placement Officer - Donyale C. Deleon Guerrero***
- o CNMI Department of Labor Workforce Investment Agency Job Placement Assistant - Olinka T. Cabrera***
- o CNMI Department of Labor Workforce Investment Agency Stats & Admin - Sarah A. Sablan***
- o CNMI Department of Labor Workforce Investment Agency Accountant - Vacant***

Title IV Vocational Rehabilitation Program Organizational Chart:

The Office of Vocational Rehabilitation currently has 13 personnel that provide VR services to an estimated 300 individuals/consumers per year. OVR administrative support and services are provided by:

- **One (1) Director who is a product of federal CSPD Master’s in Rehabilitation Counseling Program with CRC Credential and graduate of the National Rehabilitation Leadership Institute,**
- **One (1) Fiscal Officer with over 30 years of dedicated service to CNMI OVR,**
- **One (1) Administrative and Operations Manager who is a graduate of the National Rehabilitation Leadership Institute,**
- **One (1) Administrative Assistant,**
- **One (1) Data Analyst, and**
- **One (1) Administrative/AT Clerk.**

Direct services are provided by:

- **Two (2) General VR Counselors (one of which will complete her Master’s Degree in Rehabilitation Counseling from San Diego State University in PY 2018),**
- **One (1) VR Transition Counselor,**
- **Two (2) VR Counselor Aides,**
- **One (1) Employment Specialist, and**
- **One (1) ILOB Caseworker Assistant.**

The following describes the CNMI's Organizational Chart as a whole:

| |
|--|
| Commonwealth of the Northern Mariana Islands (CNMI) |
| 2018 Organizational Chart |
| Governor / Lt. Governor |
| Ralph DLG. Torres and Victor B. Hocog |
| State Workforce Development Board (SWDB) |
| Officers |
| Chair: Josephine DLG. Mesta (Private Sector); |
| Vice-Chair: Annie G. Hayes (Private Sector); |
| Secretary/Treasurer: Polly DLG. Masga (Private Sector); |
| Members |

Commonwealth of the
Northern Mariana Islands
(CNMI)

Private Sector:

Velma Palacios; Wayne Sanchez; Bertha Leon Guerrero;

Legislative:

Senator Sixto Igisomar; Representative Frank Aguon

Government:

Vicky Benavente; Esther Muna; Nicole Babauta; Carmen Fernandez

Core Partners:

Lorraine Maui (AEFLA); and Arlene Yamagata (OVR)

CORE PROGRAMS

| | | |
|--|--|--|
| Department of Labor | Office of Vocational Rehabilitation | Northern Marianas College Adult Education |
| State Workforce Development Board | State Rehabilitation Council | NMC Board of Regents |
| Vicky Benavente | <i>Arlene Yamagata</i> | Carmen Fernandez |
| Secretary of Labor | <i>State Director</i> | President |
| <i>David Attao</i> | Fiscal Officer | Cynthia Deleon Guerrero |
| <i>Director of WIOA</i> | Vice President of Learning & Student Success | |
| Frances A. Torres | Admin & Operations Manager | <i>Lorraine C. Maui</i> |
| Federal Programs Coordinator IV | Administrative Assistant | STATE DIRECTOR |
| Vacant - Accountant I | | |
| Donyale Deleon Guerrero | Data Analyst | Adult Education Instructors |
| Job Placement Officer | Administrative/AT Clerk | |
| Olinka T. Cabrera | 2 General VR Counselors | Adult Education Staff |
| Job Placement Assistant | 1 VR Transition Counselor | |
| Sarah Sablan | 2 VR Counselor Aides | |

B. STATE BOARD

Provide a description of the State Board, including—

As mentioned earlier, the CNMI SWDB is governed by its operational by-laws reflective of Section 101 (d) and other applicable sections of the Workforce Innovation and Opportunity Act of 2014, Public Law 113-128. The CNMI SWDB is organized with primary members from the leading economic sectors of the CNMI as well as other required members as stipulated by WIOA. CNMI SWDB are appointed for 2 years by the Governor to carry out the responsibilities under WIOA. The Board is governed by Officers (Chair, Vice-Chair, etc.), an Executive Committee and Standing Committees. Each member of the SWDB has been appointed to serve in standing and/or adhoc committees and will report to the whole body their committee reports and any action items for board consideration, as applicable. This operational by-laws also guides the SWDB meetings, any special meetings, and is in compliance with the required public notices of a meeting, meeting agenda, location, time, date, etc. A quorum must always be established in order for the CNMI SWDB to conduct its business and for any action to be voted upon. A Conflict of Interest clause has also been adopted to ensure that board members are in compliance.

I. MEMBERSHIP ROSTER

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

CNMI SWDB Roster

- 180. Chair: Ms. Josephine DLG. Mesta, Director of Human Resources Hyatt Regency Saipan, Founding member of the CNMI Society of Human Resource Management (SHRM), Private Hospitality Sector*
- 181. Vice Chair: Ms. Annie G. Hayes, General Manager of Herman's Bakery Inc., Private Food/Baking Sector*
- 182. Secretary/Treasurer: Mrs. Polly Masga, General Manager of Marianas Medical Center, Private Medical and Health Sector*
- 183. Member, Wayne Sanchez, Assistant Human Resources Director of Bridge Investment Corporation, Private Construction Sector*
- 184. Member, Bertha Leon Guerrero, Vice President of Human Resources, Imperial Pacific International Casino, Private Gaming Industry*
- 185. Member, Velma Palacios, Engineer of IT&E, President of the Saipan Chamber of Commerce, Private Telecommunications*
- 186. Member, Nicole Babauta, Director Small Business Development Center, Private Small Business*

- 187. *Member, Esther Muna, CEO CHCC, Public Medical and Health Care*
- 188. *Member, Carment Fernandez, President of Northern Marianas College, Public, Higher Education*
- 189. *Core Partner Rep. Arlene Yamagata, CNMI OVR Director*
- 190. *Core Partner Rep. Lorraine C. Maui, CNMI State ABE Director*
- 191. *Representative Francisco Aguon, Legislator*
- 192. *Senator Sixto Igisomar, Legislator*
- 193. *Vicky Benavente, Secretary of Labor and Governor's Representative*

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 CNMI SWDB will perform the following activities to effectively carry out the WIOA functions:

- 194. *Assess the current CNMI workforce development system education and training programs*
- 195. *Review existing state workforce policies and procedures and make the necessary changes for implementation and compliance under WIOA*
- 196. *Analyze CNMI labor market information to effectively implement strategies and initiatives for the transformation of the CNMIs workforce development system across the board that will address the needs of the target populations*
- 197. *Assess and review the current training programs and make changes or recommendations in order to align with the CNMIs demand driven sectors and occupations*
- 198. *Assess the current workforce service delivery design and make recommendations to the Governor for efficiency and alignment of programs and services*
- 199. *Review functions and services of core and non-core workforce partner programs for seamless and better leveraging of resources*
- 200. *Assess the needs of each municipality of the CNMI and make recommendations to the Governor and respective municipal Mayor on the transformation of a holistic CNMI workforce delivery system*
- 201. *Review and/or assess the delivery of programs and services that serve persons with disabilities for a better delivery of program services and program design*
- 202. *Assess the workforce infrastructure and make recommendations to the Governor for the creation of a CNMI universal One Stop*
- 203. *Assess training and developmental programs to ensure that they are current/consistent with the needs of the CNMIs employer sector and economic growth and development*
- 204. *Review financial matters and make recommendations*

ADULT EDUCATION:

The WIOA performance accountability measures in Section 116 will be used to assess effectiveness of Adult Education programs and for the improvement of service deliveries. Performance reports will be published for adult programs on fiscal management, program implementation, and data management. The state adult education office will target programs for technical assistance if they fail to meet state performance benchmarks. If they fail to meet benchmarks for two consecutive years, consequences could lead to the reduction or elimination of funding.

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

A. ASSESSMENT OF CORE PROGRAMS

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

The CNMI will use the Plan, Do, Check, Adjust, and Act (PDCAA) Cycle to assess the success of the Core Programs and Partners. Program data from each of the core programs will also be reviewed and analyzed to ensure proper adjustment of baseline performance indicators. The indicators used by the core partners noted herein will be used as the foundation for the establishment of an annual and quarterly review process. A base level customer satisfaction survey format that is a WIOA statute requirement will be used to determine achievements of performance standards. At a minimum the SWDB will include the six common performance measures describe in section 116(b) for each of the core programs under Titles I, III, and IV. The SWDB is also exploring possibilities for the integration of performance reporting and alignment of system data collection and sharing. The cross-systems alignment is contingent upon the core partner's negotiation and cooperative agreement. Monitoring will also be conducted on a regular basis by the respective core programs to ensure progress towards meeting or exceeding the states negotiated performance levels.

Adult Education and Family Literacy:

The WIOA performance accountability measures in Section 116 will be used to assess effectiveness of Adult Education programs and for the improvement of service deliveries. Performance reports will be published for adult programs on fiscal management, program implementation, and data management. The State Adult education Office will target programs for technical assistance if they fail to meet state performance benchmarks. If they fail to meet benchmarks for two consecutive years, consequences could lead to the reduction or elimination of funding.

The CNMI SWDB will develop an assessment tool such as the customer satisfaction survey and review the performance measures of each core programs negotiated benchmarks.

Title IV, Vocational Rehabilitation Program:

In addition to the WIOA performance accountability measures as outlined in Section 116, CNMI OVR will also consider the following information to measure its effectiveness and improve service delivery: Evaluation of achievements/challenges of VR-specific goals and objectives; Consumer and employer satisfaction surveys; Quarterly reporting and reviews of program data; Information collected from the OVR leadership, SRC, and SILC through the Executive and QA/QI Committees; RSA monitoring of the VR program; Internal quality assurance case reviews; OVR's triennial Comprehensive Statewide Needs Assessment, etc. When technical assistance is necessary to help achieve program success including meeting WIOA performance benchmarks, CNMI OVR will reach out to organizations such as the Workforce Innovation Technical Assistance Center (WINTAC), Council of State Administrators of Vocational Rehabilitation (CSAVR), Rehabilitation Services Administration (RSA), etc. CNMI OVR will collaborate with the State Workforce Development Board to carry-out assessment activities of the WIOA Core Programs.

B. ASSESSMENT OF ONE-STOP PROGRAM PARTNER PROGRAMS

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

The Consortium Agreement between the Guam Department of Labor, The Palau WIOA Office, The America Samoa Department of Human Resources (DHR) and the CNMI Department of Labor, will be adopted and localized to meet the CNMI Core partners needs. The CNMI is laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System."

Item 4 of the agreement will help assure performance standards, measures and objectives applicable to each partner such as

- o Improved service delivery and employment outcomes*
- o More effective connections to all available services through integrated case management*
- o Increased accessibility to services through automation and self-service*

5. To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case

management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

Additionally, the core program partners and other non-core programs are just as involved in the process of providing a professional, committed, comprehensive, and customer centric service focus. Coordination of activities and resources to provide a comprehensive, high quality, customer centered services, including supportive services to individuals including those population identified in section II (a) (10 (B)) will be implemented through

- 208. Development of MOU/MOA between the core programs*
- 209. Improve and develop the menu of shared services without duplication*
- 210. Improve communications between core and non-core workforce related programs and services*
- 211. Improve core program knowledge across all workforce development core programs and that of non-core programs*
- 212. Improve referrals to workforce programs and workforce service specific programs*
- 213. Improve collaboration and leveraging of resources and services*
- 214. Develop and promote an environment of a holistic CNMI workforce development programs and services*
- 215. Promote awareness and capacity building to all core and non-core programs that leads to a better understanding and support towards a customer-centered services delivery*

Core program partners have maintained a continuous dialogue on specific workforce programs and activities that are provided by their respective agencies/programs that will be made available through a comprehensive One-Stop. An ad-hoc committee through the State Workforce Development Board that consists of the core programs and various partnering agencies will be looking into establishing a framework for cost sharing on joint case services as well as infrastructure costs.

The committee is also tasked with the development of policies and procedures for the One-Stop consistent with WIOA requirements. Criteria and standards will be established to ensure that the Center provides exceptional customer service, effective and innovative services, and highly qualified staff as well as ensure the Center's physical and programmatic access for individuals with barriers to employment, including customers with disabilities.

The assessment criteria will contain, at a minimum, the following:

- an assessment of customer focus and center design*
- assessment of the method used to ensure skills attainment*
- monitoring checklist*
- facility checklist*
- self-evaluation toolkit*

- *staff review tool*
- *delivery method for technical assistance*
- *assessment of professional development*
- *methodology for the utilization of performance data to ensure continuous quality improvement and*
- *assessment of employer engagement*

C. PREVIOUS ASSESSMENT RESULTS

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

Title I Core Programs

Program Year 2015 (July 01, 2015 to June 30, 2016). This year was impacted by many storms and Typhoon Soudelor. The national emergency caused by Typhoon Soudelor led WIA to apply for and secure the Disaster Unemployment Assistance Grant and the National Dislocated Worker Grant. These funding sources helped residents transition through the hardships experienced. Programs offered in PY2015 were limited to 99 youth, 36 adults were served through the Adult Program and 29 were served in the Dislocated Worker Program.

Program Year 2016 (July 01, 2016 to June 30, 2017). 221 Youth were served in the Youth programs, 61 adults were served through the Adult Program and 15 were served in the Dislocated Worker Program.

Program year 2017 (July 01, 2017 to February 2018 (June 30, 2018)). To date 72 Youth were served, 61 adults were served through the Adult Program and 6 were served in the Dislocated Worker Program. Of those figures 79 are currently participating in a Work-based Training in public, private, and non-profit sectors. In addition, a newly composed CNMI State Workforce Development Board was formally established and is now functioning, the WIA Division moved offices to be closer to the other divisions within the Department of Labor, which creates a One-Stop Labor area for the CNMI. More recently, the WIA-WIOA Director was hired to help lead the program and work with the Governor, SWDB, new Secretary of Labor to execute the Workforce Development Goals and Strategies of the CNMI.

Adult Education and Family Literacy

Adult Education and Family Literacy programs characterizes a sequence of basic skill attainment as defined by the National Reporting System (NRS) educational functioning levels. Program assessments include annual enrollment figures and state state performance benchmarks.

In 2015-2016, Adult Basic Education (ABE) instruction had 96 enrollees; Adult Secondary Education (ASE) was the second largest group with 58 participants; and English as a Second Language (ESL) had the lowest with 22 participants.

Of those reported, 135 were Pacific Islanders and Asians-41. There were 76 males and 100 female participants.

The largest age group served by the programs ranged between the ages of 26 and 54 with 63 participants. The next largest group, were below 20 years of age with 62 participants, followed by those between the ages of 21 and 25 with 50 participants. Only 1 participant was 55 years and above in age.

The total number of degrees & certificates awarded in AY 2015-2016 was 29.

In 2016-2017, Adult Basic Education (ABE) instruction had 135 enrollees; Adult Secondary Education (ASE) was the second largest group with 78 participants; and there were no English as a Second Language (ESL) participants.

Of those reported, 182 were Pacific Islanders, Asians-30 and Other was reported with 1. There were 121 males and 92 female participants.

The largest age group served by the programs ranged between the ages of 26 and 54 with 84 participants. The next largest group, were below 20 years of age with 76 participants, followed by those between the ages of 21 and 25 with 50 participants. Only 3 participant were 55 years and above in age.

The total number of degrees & certificates awarded in AY 2016-2017 was 44.

NEW CORE FOLLOW-UP OUTCOME MEASURES FOR 2016-2017:

- *Employment 2nd Quarter After Exit*
- *Employment 4th Quarter After Exit*
- *Median Earnings 2nd Quarter After Exit*
- *Attained a Secondary School Diploma/Equivalent and Enrolled in Post-Secondary Education or Training within one year after exit*
- *Attained a Secondary School Diploma/Equivalent and Employed within one year after exit*
- *Attained a Post-Secondary Credential while enrolled or within one year of exit*

Title IV, Vocational Rehabilitation Program:

The time period covered by OVR's Comprehensive Statewide Needs Assessment is the 3-year period from October 1, 2013 to September 30, 2016. Federal RSA data and OVR data is based on the Federal Fiscal Year. The time frame was determined by the requirement found in the Rehabilitation Act of 1973 as amended in WIOA that VR programs perform a CSNA every 3 years at a minimum. The data on agency performance comes from the case management system used by OVR and is compared to the available RSA 911 data submitted by OVR where available.

The following recurring themes across all data collection methods emerged in the area of Overall Agency Performance:

- *OVR has improved community outreach and established important partnerships that contribute to increasing opportunities for individuals with disabilities in CNMI.*
- *OVR is processing casework and moving consumers through the VR process well within the established time frames, but responsiveness to consumers remains an area in need of improvement.*
- *Many individuals with disabilities in CNMI continue to perceive OVR as a medical services provider as opposed to a vocational rehabilitation program, so community education remains an important activity for the organization.*

Observations based upon the data:

The number of applicants for services rose by seven individuals from 2014 to 2015 to a total of 144, but then decreased by 11 from 2015 to 2016 to a total of 133. Approximately 56% of individuals that applied for services were found eligible, indicating that almost half of the people that apply are not eligible. The average length of time for eligibility to be determined was below 50 days in 2015 and 2016, which is well below the 60 days required by law. The significance of disability of those individuals found eligible has been steadily increasing towards the most significantly disabled from 2014-2016. Less than 3 percent of the total cases found eligible fell in the disabled category. The others were either significant or most significantly disabled.

OVR wrote more than 80 individualized plans for employment (IPEs). In 2015 and 2016, yet they closed almost 20% of cases after eligibility was determined and prior to the IPE being completed. The average time to develop the IPE was 46 days from the date of eligibility determination in 2016, which is half of the maximum time frame of 90 days allowable by the Rehabilitation Act as amended. This indicates that of the 2 time frames identified in the law (eligibility determination and IPE development), OVR is well below the maximum time allowed.

Two of the new common performance measures in WIOA are related to the number of consumers in either secondary or postsecondary education. OVR has had 25 people in some level of postsecondary education since 2015. It will be important for OVR to monitor the progress of these individuals and report on any skills gains as they progress in training from year to year.

The number of cases more than doubled from 2015 to 2016 to a total of 48, and the rehabilitation rate increased to above 63%. OVR served more cases in 2016 than in any other year between 2014-2016, and the cost per case closed successfully increased to nearly \$1,900. The median earnings increased to almost \$20,000 annually for OVR consumers in 2016.

The rate of female applicants exceeded males in 2015 and 2016, though the number of plans completed were less for women than men. The rehabilitation rate for men exceeded the rate for women in 2016, but the average cost per case was greater for women in the same time period. The median earnings of females closed successfully were much greater than men in 2016.

The number of individuals by age range remained steady during the period from 2014-2016. It is likely that the number of youth applicants will increase significantly in the coming years due to the implementation of pre-employment transition services.

An analysis of RSA-911 data from FFY 2015 was conducted in order to examine the types of jobs obtained by clients of CNMI OVR at case closure. The 2015 data was selected because it is the most recent year that this data was available from the RSA 911 data set. The RSA 911 data set includes a variable that contains the Standard Occupational Classification (SOC) code describing the individual's occupation when their service record was closed. 27% of all cases (n=6) were affiliated with the SOC major group for "Office and administrative support occupations". The next commonly occurring SOC major group, "Management occupations", was associated with 3 cases, or 13.6% of the cases that included an SOC code.

The diagnosis and treatment of impairments and rehabilitation training account for more than 60% of all expenditures for OVR in 2015 and 2016. On the other hand, the total training costs for all types of training accounts for less than 20% of the total expenditures. The data suggests that the perception of OVR as a medical services treatment provider is supported by their expenditures.

D. EVALUATION

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

Evaluation of activities will be conducted to measure and gauge how each activity contributes towards the expected performance standards as well as how the activities meet the goals set out by the SWDB. Research and/or pilot-projects will be conducted on a case-by-case basis in order to test how effective and/or efficient identified activities are or to test new strategies derived from best practices that the SWDB would like to see implemented in the CNMI. A rubric for both evaluations and/or research project will be developed to help the SWDB and CNMI DOL WIA gauge each respective area.

Other considerations include the:

- 225. Utilization of the expertise at the CNMI Department of Commerce Statistics Division in designing an evaluation survey instrument with the acceptable survey methodologies and data collection standards: and/or*
- 226. Review and/or observe existing training programs through independent research contractors providing neutral analysis*

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

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

A. FOR TITLE I PROGRAMS

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

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

The CNMI is a single workforce development area consisting of 3 populated islands, Saipan, Tinian and Rota. Core programs distribution of funds are applied as a whole across the CNMI for the delivery of workforce development goals, strategies, education and training programs.

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

The CNMI is a single workforce development area consisting of 3 populated islands, Saipan, Tinian and Rota. Core programs distribution of funds are applied as a whole across the CNMI for the delivery of workforce development goals, strategies, education and training programs.

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

The CNMI is a single workforce development area consisting of 3 populated islands, Saipan, Tinian and Rota. Core programs distribution of funds are applied as a whole across the CNMI for the delivery of workforce development goals, strategies, education and training programs.

B. FOR TITLE II:

I. MULTI-YEAR GRANTS OR CONTRACTS

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

The CNMI Adult Education State Office will run competitions for its funds under WIOA Title II using the revised 12 considerations and the 5 new application requirements. These applications will include alignments with local workforce plans and participation in the one-stop system. The funds will be awarded to eligible providers that will provide some or all of the approved activities within the CNMI region.

Eligible program providers may include some or all of the following:

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

1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and

2. Is for the purpose of educational and career advancement.

The CNMI follows its state procurement and contract rules. All training services will be vetted in accordance to the CNMI Procurement Rules and Regulations and in accordance to the requirements under WIOA on the competitive process and requirements on service providers vetting processes.

The Adult Education Office will continue to run a two year competition and distribute no more than 82.5% of the grant funds to award grants and contracts under section 231 to eligible providers within the State to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the State.

Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. (c) each eligible agency receiving funds under this title shall ensure that— (1) all eligible providers have direct and equitable access to apply and compete for grants or contracts under this section; and (2) the same grant or contract announcement process and application process is used for all eligible providers in the State.

(d) SPECIAL RULE.—The Adult Education Office shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are not individuals described in subparagraphs (A) and (B) of section 203(4), except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

(e) In awarding grants or contracts under this section, the Adult Education Office shall consider the 13 considerations listed in Sec. 231 (e).

II. ENSURE DIRECT AND EQUITABLE ACCESS

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 CNMI follows state procurement rules. Required contract language clauses are also governed by state procurement rules and contract formats are reviewed through the CNMI Attorney General's Office and the CNMI Procurement Office.

The CNMI Adult Education State Office follows a stringent procurement rules adopted by the Northern Marianas College. Contract languages are governed by state procurment rules as well as other thresholds as required by the College.

C. TITLE IV VOCATIONAL REHABILITATION

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.

There is only one CNMI Office of Vocational Rehabilitation and thus the distribution of funds is through the one agency.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

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

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

The Consortium Agreement between the Guam Department of Labor, The Palau WIOA Office, The America Samoa Department of Human Resources (DHR) and the CNMI Department of Labor, will be adopted and localized to meet the CNMI Core partners needs. The CNMI is laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an off-shoot of the hireguam case management system.

The responsibilities of each partner are to:

- 235. Coordinate services among partners in the one-stop system to assure seamless delivery of services*
- 236. Placement of personnel within their designated one-stop delivery system area*
- 237. Use of the single case management system identified to address the following:*
 - o Common registration through out the partner area WIOA Core Programs*
 - o implementation of a robust on-line service delivery hub that integrates information and on-line services across core programs*
 - o Implement data integration strategies that support the ability for front-line staff and counselors better assist clients*

4. Assure performance standards, measures and objectives applicable to each partner such as

- **Improved service delivery and employment outcomes**
- **More effective connections to all available services through integrated case management**
- **Increased accessibility to services through automation and self-service**

5. To conform to Uniform and Administrative Requirements, Cost Principles, and Audit requirements for federal awards effective December 26, 2014 - 2 CFR 200 and DOL's Exceptions at 2 CFR 2900.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

Additionally, the core program partners and other non-core programs are just as involved in the process of providing a professional, committed, comprehensive, and customer centric service focus. Coordination of activities and resources to provide a comprehensive, high quality, customer centered services, including supportive services to individuals including those population identified in section II (a) (10 (B)) will be implemented through

- 244. Development of MOU/MOA between the core programs**
- 245. Improve and develop the menu of shared services without duplication**
- 246. Improve communications between core and non-core workforce related programs and services**
- 247. Improve core program knowledge across all workforce development core programs and that of non-core programs**
- 248. Improve referrals to workforce programs and workforce service specific programs**
- 249. Improve collaboration and leveraging of resources and services**
- 250. Develop and promote an environment of a holistic CNMI workforce development programs and services**
- 251. Promote awareness and capacity building to all core and non-core programs that leads to a better understanding and support towards a customer-centered services delivery**

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.

As mentioned earlier, the CNMI is laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an off-shoot of the hireguam case management system. The system also allows for self-service, in which an individual can request services and other assistance without the assistance of a case manager or a workforce rep. These functions are also monitored by the case management system.

The above are designed to improve connectivity and service delivery among core partners that would provide solutions for job seekers, employers, service providers, and state and local staff. This is intended to conform with the requirements of WIOA and any future requirements. Improvements is designed to allow better access for dislocated workers, long-term unemployed individuals, and other job seekers with significant barriers to employment, the immediate job labor market information, job openings, eligible training providers and training programs, job development tools, links to career paths, career counselors, apprenticeship programs, and supportive services that are available. This will also allow for common registration and case management systems across Employment Services, WIOA Title I programs, Adult Education and Family Literacy, and Vocational Rehabilitation.

Additionally, the core program partners and other non-core programs are just as involved in the process of providing a professional, committed, comprehensive, and customer centric service focus. Coordination of activities and resources to provide a comprehensive, high quality, customer centered services, including supportive services to individuals including those population identified in section II (a) (10 (B)) will be implemented through

- 252. Development of MOU/MOA between the core programs**
- 253. Improve and develop the menu of shared services without duplication**
- 254. Improve communications between core and non-core workforce related programs and services**
- 255. Improve core program knowledge across all workforce development core programs and that of non-core programs**
- 256. Improve referrals to workforce programs and workforce service specific programs**
- 257. Improve collaboration and leveraging of resources and services**
- 258. Develop and promote an environment of a holistic CNMI workforce development programs and services**
- 259. Promote awareness and capacity building to all core and non-core programs that leads to a better understanding and support towards a customer-centered services delivery**

III. EXPLAIN HOW THE STATE BOARD WILL ASSIST THE GOVERNOR IN ALIGNING TECHNOLOGY AND DATA SYSTEMS ACROSS REQUIRED ONE-STOP PARTNER

PROGRAMS (INCLUDING DESIGN AND IMPLEMENTATION OF COMMON INTAKE, DATA COLLECTION, ETC.) AND HOW SUCH ALIGNMENT WILL IMPROVE SERVICE DELIVERY TO INDIVIDUALS, INCLUDING UNEMPLOYED INDIVIDUALS.

As mentioned earlier, the CNMI is laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." The CNMI's version of the system will be called hiremarianas, an off-shoot of the hireguam case management system. The system also allows for self-service, in which an individual can request services and other assistance without the assistance of a case manager or a workforce rep. These functions are also monitored by the case management system.

Implementation for Title 1 Core Programs are scheduled for the Spring of 2018, Title 2 Programs towards the end of Summer 2018, and Title IV Programs the end of Fall 2018.

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

As mentioned earlier, the CNMI is laying the foundation and infrastructure to have a Virtual Online System/Virtual One-Stop System created by Geographical Solutions that would implement a single employment and career system identified as the "Micronesia One-Stop System." This system is able to produce the reports needed by the Core Programs as well as the Federal Reports needed.

Planning Note: *States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.*

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

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

The core programs are required to conduct Post-Program Success assessments and such data are then compared to their negotiated Performance Measures.

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

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

The CNMI does not have unemployment insurance wage record data.

D. PRIVACY SAFEGUARDS

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

The CNMI will comply with all applicable requirements of all federal laws, executive orders, regulations and policies governing WIOA Title I -B programs. The CNMI workforce development system provides the assurances of protection of individuals identifications and information. The collection of individual information for use and/or purposes of core program requirements are all given the protections under the Privacy Act and shall be maintained under the highest standards of privacy and protection. State and federal privacy laws were enacted to safeguard an individual's privacy from the misuse of federal and state records and provide individuals access to their records. Providers must maintain participant and applicant files in a manner to safeguard confidentiality.

The Adult Education and Family Literacy program complies with the Family Educational Rights and Privacy Act. All have received training and are certified. Student files and other collection of information are protected and maintained under the highest standards of privacy.

CNMI OVR has policies in place protecting the privacy of client information.

7. PRIORITY OF SERVICE FOR VETERANS

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

The SWDB has adopted the following:

All WIOA-funded programs are required to implement the Veteran's priority provisions of the Jobs for Veterans Act. Veterans and covered spouses, who are determined eligible for WIOA services, are entitled to priority of service under WIOA Title I Adult, Dislocated Worker, and Youth-funded programs. The term "veteran's priority of service" means that a covered person shall be given priority over non-veterans, except for the priority of service established by law for the WIOA Adult program. The Veteran's priority will apply in the event there are limited funds and the applicant fits the eligibility requirements for the WIOA funded programs and one is a Veteran or Covered Spouse, and one is not. The Jobs for Veterans Act requires that Veterans and Covered Spouses must first meet any of the WIOA program's existing WIOA program eligibility requirements in order to obtain priority of service under the Veterans priority.

Staff shall provide information to “covered persons” on services available under the DOL job training programs and shall ensure that individuals are informed of their right to priority as Veterans or Covered Spouses for employment and training services. This information from staff must be provided to “covered persons” either verbally or in writing at each point in the program:

- 1) At the point of entry; and**
- 2) At orientation; and**
- 3) At eligibility determination; and**
- 4) At assessment; and**
- 5) During program activities.**

A covered person under the Jobs for Veterans Act is one of the following:

1. Veterans. A Veteran who is an individual who served at least one day in the active military, naval, or air service, and who was discharged or released from such service under conditions other than dishonorable; or

2. The Spouse of a Veteran. The Spouse of:

- o Any Veteran who died of a service-connected disability;**
- o A member serving on active military duty who is listed as missing in action, captured in the line of duty by a hostile force, or forcibly detained or interned in the line of duty by a foreign government or power; or**
- o Any Veteran with a total service-connected disability rating or one who died while being evaluated for it.**

Veterans and covered spouses take precedence over a non-covered person in obtaining all employment and training services. Depending on the type of service, this may mean veterans and eligible spouses receive services earlier in time, or instead of non-covered persons.

DOL-WIA Division staff will collect and enter the required veteran and covered spouse’s data elements into the HireMarianas Online Virtual Site when enrolling veterans and covered spouses into WIOA programs. The Online Virtual Site provides a descriptive marker identifying Veterans and alerts case managers to such distinction.

Proof of veteran and covered spouse status must be documented and kept in the applicant’s file. The CNMI workforce development system provides Priority of Service to Veterans and certain spouses. Upon the entrance and/or registration of a veteran the CNMI workforce development system will and has been prioritizing and accelerating services to veterans and certain spouses beyond other target populations. The CNMIs small island community of workforce services and programs provides the ability to quickly refer veterans and certain spouses for additional services required. The CNMI is not a recipient of the JVSG program however it does work closely on a regional level with the region’s JVSG recipient for extension of services to the CNMIs veterans needed priority of service.

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

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

The CNMI's Policy Manual includes the Nondiscrimination and Equal Opportunity Provisions pursuant to 29 CFR Part 38:

Accessibility

Each program or activity, when viewed in its entirety, must be operated in a manner that makes it readily accessible to qualified individuals with a disability. A qualified individual with a disability is an individual who, with or without a reasonable accommodation for his or her disability, meets eligibility requirements.

This does not require a recipient to make each of its existing facilities or every part of a facility accessible to and usable by qualified individuals with disabilities. However, if a program is available in only one location, that facility must be made accessible or the program must be made available at an alternative accessible facility.

An entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance. If an entity finds, after consulting with the individual with a disability, that there is no method of complying other than making a significant alteration in its existing facilities, the entity may refer the qualified individual with a disability to other providers of that service that are accessible.

Program accessibility requires the provision of auxiliary aids or services, such as: qualified interpreters on-site or through video remote interpreting service; exchange of written notes; voice, text and video-based telecommunications products and systems; videotext displays; telephone handset amplifiers, assistive listening systems or other effective aids for individuals with hearing impairments.

Audio recordings, Brailled materials and displays; large print materials; accessible electronic and information technology or other effective aids must be provided for individuals with visual impairments. In addition, acquisition or modification of equipment or devices, including assistive technology devices or software must be provided as appropriate.

Accordingly, the CNMI DOL-WIA Division has incorporated the statements below in all program materials:

"DOL-WIA Division is an equal opportunity employer and provider of employment and training services. Auxiliary aids and services are available upon request for individuals with disabilities." CNMI DOL WIA is also an active partner of the CNMI Disability

Provider Network and has access to Auxiliary Aids and Services from partners which are made available upon request.

The Virtual Online/One-Stop System is designed to be accessible as well.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

The SWDB Operations Manual on Language Barriers states

Language services, interpretation or translation, must be made available free of charge for limited English proficiency (LEP) individuals. When a significant number or proportion of the eligible population needs information in a language other than English to be effectively informed about the program or to be able to participate, the following four factors must be considered in determining the language services to provide:

1) The number or proportion of LEP persons served or encountered in the eligible service population;

2) The frequency with which LEP individuals come in contact with the program;

3) The nature and importance of the program, activity or service provided; and,

4) The resources available and costs. It may be determined, as a result of the analysis, that different language assistance measures are sufficient for the different programs or activities provided. Regardless of the number or proportion of individuals, reasonable efforts must be made to meet the particular language needs of LEP individuals.

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

The CNMIs 3 core programs collaborated in the development of the CNMIs Unified State Plan. The writing of this state plan was made possible through support of the SWDB and respective Core Partner Boards and through

- 263. Coordination between the 3 core programs was successful through consistent communications as the state plan writing was in progress*
- 264. Utilization of program specific knowledge and content assisted in the writing and organization of this Unified State Plan*
- 265. WIOA State Plan federal guidance sharing between the 3 core programs also provided the necessary guidance in planning and coordination in the development and writing of this Unified State Plan*
- 266. WIOA implementation sessions at the state level involved all the core programs and prescribed the roles of each core program in the coordination and planning of the Unified State Plan*
- 267. Public hearings, comments, and input were solicited together through collaborative meetings and scheduling*
- 268. Cross representation on applicable boards.*

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

- 1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts; Yes*
- 2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes; Yes*
- 3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; Yes*
- 4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; Yes*
- 5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; Yes*
- 6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes*
- 7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes*
- 8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes*

9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes

10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes

11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and Yes

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

A. ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

The CNMI consists of 3 inhabited island municipalities composed mainly of Saipan, Tinian and Rota. Although the three main islands are separated by water and miles apart from each other, the CNMI operates as one single region or workforce development area. Saipan is the capitol of the Commonwealth of the Northern Mariana Islands. The central government is located on the island of Saipan and the most populated. The CNMI workforce development area is focused on all 3 islands providing most of the same education and training opportunities. Each island has an elected Mayor however the CNMI is governed by a single Governor.

The economic activity of each island is unique, however, Saipan being the most populated and most developed provides most of the funding needed to operate the other islands and even more recently revenue gained from the gaming industry provides additional funding to the three islands. This new industry has created an environment of competitive employment opportunities for all 3 island residents and increased opportunities for workforce development programs that responds to the needs of the new industry and sub-sectors created by the industry.

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.

The CNMI SWDB recognizes itself as a single state workforce development board and incorporates local area requirements into the operational manual in order to be in compliance with WIOA. Rota and Tinian route all their documents to Saipan for analysis, assessment, review, modification and/or approval. All fiscal and performance criterias

are subject to the same requirements throughout the CNMI and follow the CNMI and Federal rules and regulations. Documents are then routed to the appropriate channels for checks and balances and follow the stipulated requirements of the designated department units, the overall CNMI central government and federal regulations.

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

The CNMI has adopted the following appeals process

8.80 APPEALS PROCESS

Those wishing to appeal DOL-WIA's rulings must submit the appeal to SWDB within 30 days of the issuance of the notice. The appeal must be in writing and include:

- a) name (of training provider/Client)*
- b) training program (s) impacted*
- c) training provider point of contact*
- d) point of contact phone and email e) a statement of the desire to appeal*
- f) reasons for the appeal, including documentation supporting the grounds for the appeal*
- g) signature of the appropriate training provider official.*

All appeals must be submitted to one of the following:

Electronic: cnmidolwia@gmail.com

Mail:

CNMI SWDB

Caller Box 10007

Saipan, MP 96950

The SWDB will conduct an initial, informal hearing with the provider and any additional parties with the purpose of identifying a solution to resolve the dispute. The SWDB will provide written notice to the concerned parties of the date, time, and place of the hearing at least ten (10) calendar days in advance of the scheduled hearing. Final decisions will be made within 60 days of receipt of the appeal and the provider will be notified in writing of the final decision.

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

The CNMI currently does not have a physical One Stop Operator System however it does have a virtual One Stop that is currently in use as well as a new Virtual Online System that will be implemented to help reduce costs and provide access to hard to serve and underserve populations. The CNMI has moved offices and is repurposing buildings pursuant to WIOA to develop a physical One Stop Operator System and locale as well as are in review of a draft Memorandum of Understanding between the core programs.

Provisions and processes for appeals in any dispute regarding the operations of the One Stop infrastructure and funding allocations will be developed by the SWDB in preparation for the completion of the physical one stop.

A dispute resolution process will be developed through the CNMIs State Workforce Development Board where a partner or partners in dispute will be accorded the opportunity for fairness that will achieve a successful dispute resolution.

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.

The SWDB has adopted the Operations Manual that helps the CNMI DOL WIA implement the Workforce Innovation and Opportunity Act and other federal laws. The established SWDB policies and procedures in providing the guidance for the CNMIs statewide workforce development system single area and for the expenditures of state funds for identified workforce investment activities that are considered allowable and approved provided for by WIOA and identified workforce investment allowable funding activities.

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

The CNMI will utilize the Governor's set aside funding only for allowable activities provided under the WIOA and as established by the SWDB policies and applicable CNMI and Federal regulations. The CNMI follows Title 80 and the applicable subsections of the CNMI Administrative Code to help companies and affected employees when they make their announcement of closures or reduction in force.

SWDB Operations Manual states that Rapid Response is provided through DOL-WIA Division and is coordinated at the state level by Rapid Response Coordinators (RRC). These teams of local workforce representatives and RRC offer options, resources, and information to aid the employer and the workers as they go through this transition. Rapid Response activities begin by contacting the company and arranging an initial meeting. These employer meetings help determine whether the layoff can be avoided and what services will be made available to the employees if it cannot. If the layoffs cannot be avoided, the RRC and DOL-WIA Division staff will share with the dislocated workers the services and resources available to them including training opportunities through WIOA, and other forms of hardship assistance.

DOL-WIA Division can provide access to WIOA services including core services such as labor market information, skill assessments, job search assistance, and resume advice. If DOL-WIA Division determines there is a need, they can also enroll the dislocated worker in intensive and training services to provide skill upgrading and certification in local demand occupations.

DOL-WIA and Employment Services Division will also provide much of the front line services that the dislocated workers will need. Although the RRC will coordinate all the necessary services, the job of DOL-WIA and Employment Services Division will be to assist in giving presentations, providing workshops, and assisting the dislocated workers in accessing other necessary services.

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 cases of natural disasters, the CNMIs Office of Homeland Security takes the lead on natural disasters response in coordination with federal responding agencies such as FEMA, other federal agencies and CNMI local departments and agencies on the list of first responders for natural disasters or state emergencies. The SWDB Operations Manual defers to Homeland Security's established protocols of the CNMI Emergency Management Center and Homeland Security for leadership. DOL-WIA Division RRCs will then be activated to offer Rapid Response services as needed.

SWDB Operations Manual states that Rapid Response is provided through DOL-WIA Division and is coordinated at the state level by Rapid Response Coordinators (RRC). These teams of local workforce representatives and RRC offer options, resources, and information to aid the employer and the workers as they go through this transition. Rapid Response activities begin by contacting the company and arranging an initial meeting. These employer meetings help determine whether the layoff can be avoided and what services will be made available to the employees if it cannot. If the layoffs cannot be avoided, the RRC and DOL-WIA Division staff will share with the dislocated workers the services and resources available to them including training opportunities through WIOA, and other forms of hardship assistance.

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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.

The CNMI is not a recipient of TAA benefits nor Wagner Peyser Program.

B. ADULT AND DISLOCATED WORKER PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

If the State is utilizing work-based training models (e.g. On-the-job training, Incumbent Worker training, Transitional Jobs, and Customized Training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

The CNMI SWDB Manual adopts the following:

6.20 WORK BASED TRAINING

A. On-the-Job Training Program (OJT)

OJT is defined at WIOA sec. 3(44). OJT is provided under a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. Through the OJT contract, occupational training is provided for the WIOA participant in exchange for the reimbursement, typically up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and supervision related to the training.

OJT contracts under WIOA title I, must not be entered into with an employer who has received payments under previous contracts under WIOA or WIA if the employer has exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees with wages and employment benefits (including health benefits) and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.

An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's IEP.

1. Employed Workers

OJT contracts may be written for eligible employed workers when:

(a) The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment, as determined by SWDB policy;

(b) The requirements are met; and

(c) The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the SWDB.

B. INTERNSHIPS AND WORK EXPERIENCES

For the purposes of WIOA sec. 134(c)(2)(A)(xii)(VII), an internship or work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists. These opportunities run from entrance up to 6 months to a year. They require scheduled evaluations of both the employer and the employee being trained in addition to meeting job description requirements and training plans. The ultimate outcomes are employment, industry certification or recognized certificate, a secondary diploma or its equivalent, and/or measureable skills gained towards a credential or employment.

C. CUSTOMIZED TRAINING

Customized training is training:

(a) That is designed to meet the special requirements of an employer (including a group of employers); (b) That is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and (c) For which the employer pays for a significant cost of the training

Coordination of Workforce Innovation and Opportunity Act training funds and other grant assistance

WIOA funding for training is limited to participants who:

(1) Are unable to obtain grant assistance from other sources to pay the costs of their training; or (2) Require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

Programs and training providers must coordinate funds available to pay for training. In making the determination one-stop centers may take into account the full cost of participating in training services, including the cost of support services and other appropriate costs. One-stop centers must coordinate training funds available and make funding arrangements with one-stop partners and other entities to apply the provisions of this section. One-stop centers must consider the availability of other sources of grants to pay for training costs such as State-funded training funds, and Federal Pell Grants, so that WIOA funds supplement other sources of training grants. A WIOA participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the one-stop center has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the one-stop center the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses.

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

The CNMI is working with the Guam Department of Labor to model an approved Registered Apprenticeship Program and System in the CNMI. The CNMI is committed to the inclusion of a Registered Apprenticeship Program with increased interests being generated by potential employer sponsors. The CNMI DOL WIA is monitoring the progress of the Northern Marianas Trades Institute and two employer sponsors IT&E and Pacific Rim in their efforts to build their respective apprenticeship programs in the CNMI. The CNMIs focus on developing its human capital with recognized credentials and the inclusion of a US Registered Apprenticeship Program is one of its workforce development training initiatives.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

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

The CNMI SWDB has adopted the following:

Eligible Training Provider (ETP):

An ETP is the only type of entity that receives funding for training services. Funding is provided through the individual client, through an individual training account. ETP must apply for and be approved in order to be included on the State list of eligible training providers and programs. ETP's must provide a program of training services and must be one of the following types of entities:

- (1) An institution of higher education that provide a program which leads to a recognized postsecondary credential; or*
- (2) An entity that carry out programs registered under the National Apprenticeship Act (29 U.S.C. 50 et seq.); or*
- (3) Other public or private providers of training services, which may include:*
 - a. Community-based organizations;*
 - b. Joint labor-management organizations; and/or*
 - c. Eligible providers of adult education and literacy activities under title II of WIOA if such activities are provided in combination with training services described at § 680.350.*

Program of Training Services:

A program of training services is one or more courses or classes, or a structured regimen that provides services that leads to:

(a) An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State involved or the Federal government, an associate or baccalaureate degree;

(b) A secondary school diploma or its equivalent;

(c) Employment; or

(d) Measurable skill gains toward a credential described in paragraph (a) or (b) of this section or employment.

Documentation Needed:

- *An Assurance Letter requesting for services, position, duration, potential funding source and that the ETP assure to DOL WIA WIOA that the ETP will meet the requirements listed above in order to participate in the program and will be able to provide agreed upon outcomes.*
- *For Employment Assistance, a Job Description describing the job duties, roles and responsibilities as well as whom the individual will report to.*
- *A Training Plan describing the timeline, activities, training outcomes, and eventual certification, credentialing, employment, and/or measureable skills gained towards a credential.*

Visit www.onetonline.org to help with job titles, job descriptions, proposed skills to be learned, length of preparation for the proposed vocation, etc.

The SWDB's process for transfer of up to 100% of funds includes a formal review of the funds and circumstances of the transfer, formal action by the SWDB to request the Governor to exercise his transfer authority under WIOA PL 113-128 section 133 B 4 and as described in TEGl 29-14 and a formal letter to the Governor requesting the transfer and the intended purposes.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDED BY THE ADULT FORMULA PROGRAM.

The CNMI SWDB Operations Manual adopted an application process that entails completion of the DOL WIOA Division application form and requires the physical attainment of all necessary eligibility documentation regarding citizenship, age, income (for Youths and Adults), selective service registration (if applicable), and a standardized basic skills assessment for math and reading levels. Upon completion of eligibility determination, eligible applicants are placed in an applicant pool. Source documentation requirements for data validation to report accurate program information. These source documentation requirements are listed in Section 3.50 GENERAL ELIGIBILITY DETERMINATION, and are the only documentation sources staff may accept in establishing WIOA program eligibility. Documentation means to maintain on-file physical evidence, which is obtained during the verification process.

Such evidence would be copies of documents (Documentary Evidence), completed Telephone Verification, and/or, as a last resort if other documentation is not available, signed Applicant Statements, following the case notes requirements. In order to be eligible to receive services or participate in activities funded by WIOA Title 1 funds; all participants must be able to prove their Age, Citizenship or Eligible Noncitizen status, and verification of selective service registration. Services funded by WIOA shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.

The SWDB also adopted the required income guidelines needed for eligibility.

Priority for adult services must be given to recipients of public assistance or other low income individuals, with added priority for individuals who are basic skills deficient. Priority applies regardless of funding levels. Individualized career services and training services must be given on a priority basis, regardless of funding levels, to:

- 1. Public assistance recipients and other low-income adults; and*
- 2. Individuals who are basic skills deficient.*

Low Income Individuals:

An individual who meets any one of the following criteria satisfies the low-income requirement for WIOA adult services:

- 1. Receives, or in the past six months has received, or is a member of a family that is receiving, or in the past six months has received, assistance through SNAP, TANF, or the Supplemental Security Income (SSI) program, or state or local income-based public assistance;*
- 2. Receives an income or is a member of a family receiving an income that, in relation to family size, is not in excess of the current combined U.S. Department of Labor (USDOL) 70 percent Lower Living Standard Income Level;*
- 3. Is a homeless individual, as defined in § 41403 (6) of the Violence Against Women Act of 1994, or a homeless child or youth as defined in § 725 (2) of the McKinney-Vento Homeless Assistance Act;*
- 4. Receives or is eligible to receive a free or reduced-price lunch under the NSLA*
- 5. Is a foster youth, on behalf of whom state or local government payments are made; or*
- 6. Is an individual with a disability whose own income meets WIOA's income requirements, even if the individual's family income does not meet the income requirements of the income eligibility criteria for payments under any federal, state, or local public assistance program.*

B. Basic Skills Deficient

An individual who is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society satisfies the basic skills deficient requirement for WIOA adult services. In assessing basic skills, Boards 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.

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

Policy : DOLWIA2018.001

Transfer of Funds

WIOA Adult/Dislocated Worker Programs

Effective Date: March 26, 2018

Purpose: This policy provides guidance and establishes the procedures for the transfer of Workforce Innovation and Opportunity Act (WIOA) adult and dislocated worker funds.

Background: On March 10, 2018, the CNMI State Workforce Development Board (SWDB) approved the policy to allow 100% transfer of WIOA Adult and Dislocated worker funds pursuant to U.S. P.L. 113-128, Sections 133 (B) (4) and 134 (C) (3) (E) subject to approval of the Governor. On March 22, 2018 Governor Ralph Torres approved the SWDB's request.

Procedure: (Transfer requests can be submitted anytime during the life of the funds.)

- **The maximum amount of Adult program and Dislocated Worker program funds that can be transferred per annual allocation (includes both the Program Year (PY) and Fiscal Year (FY) allocations) is 100 percent.**
- **Transfers from administrative funds to program funds within the same program's funding stream (i.e., Adult FY administrative funds to Adult FY program funds) do not require a plan modification.**
- **The SWDB should analyze the changing economic conditions in the CNMI as well as the financial position of the CNMI DOL WIA in order to identify a need for additional funding flexibility. If such a demand exists and there is a need to transfer up to 100 percent of the original allocated or re-allotted formula allocation, the SWDB must work with the WIOA Director to identify areas of need and submit a request to the Governor for approval. The following information must be provided:**

o The percent and dollar amount of the Adult or Dislocated Worker formula funds to be transferred;

o The justification for this transfer between the Adult and Dislocated Worker programs must be explained in the request and include the following information:

- **General purpose or reason for the transfer between Adult and Dislocated Worker programs;**
- **An explanation of the need for the transfer between Adult and Dislocated Worker programs (example: an increase in the number of welfare recipients in the SWDB and/or a decrease in the number of plant closings and mass layoffs);**

- *The SWDB must provide information on how the transfer will affect the program from which the funds are being transferred;*
- *Narrative explanation of how the transferred funds will be used (example: increased funding for Work Experience Program, tuition assistance for Adults, etc.).*
- *Provide any applicable and/or available SWDB minutes authorizing the request for the transfer*

Approved transfers will then be processed by the CNMI DOL WIA Office in coordination with the appropriate entities. Unapproved transfers will be returned to the SWDB.

C. YOUTH PROGRAM REQUIREMENTS

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

*1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS OR CONTRACTS.**

** Sec. 102(b)(2)(D)(i)(V)*

The Department of Labor-Workforce Investment Agency Division (DOL-WIA) has the authority over the criteria, information requirements, and procedures governing the eligibility of providers and programs of training services to receive WIOA Title 1B funds for adults, dislocated workers, and youth participants in accordance to the approved WIOA 4 Year Unified State Plan.

The DOL-WIA is responsible for:

- (1) Ensuring the development and maintenance of the State list of eligible training providers and programs;*
- (2) Ensuring that programs meet eligibility criteria and performance levels established by the State, including verifying the accuracy of the information;*
- (3) Removing programs that do not meet State-established program criteria or performance levels;*
- (4) Taking appropriate enforcement actions against providers that intentionally provide inaccurate information, or that substantially violate the requirements of WIOA and*
- (5) Disseminating the State list of eligible training providers and programs, accompanied by performance and cost information relating to each program to the public.*

Providers of training services are required to be on the Eligible Training Provider List (ETPL) in order to receive WIOA Title I Adult, Dislocated Worker and Out-of-School

Youth funding. Training services are provided through Individual Training Agreements (ITA). Eligible training providers allowed to receive ITAs are included in the following categories:

- Category 1: An institution of higher education with a program resulting in a recognized post-secondary credential.***
- Category 2: An entity with programs registered under the National Apprenticeship Act.***
- Category 3: A public or private provider of a training service program, including joint labor-management organizations and eligible providers of adult education and literacy activities under Title II, if such activities are provided in combination with occupational skills training.***

A provider described in category 1 or category 3 must comply with these procedures to be included on the ETPL. Category 2 is exempt from eligibility and may be included and maintained on the list while the corresponding program of the provider remains a registered apprenticeship program.

Types of Training to Which These Procedures Apply (WIOA Section 134)

In order for a provider of training services to receive WIOA funds, its program(s) must be listed on the ETPL. These programs may provide training services, such as the following:

- a) Occupational skills training, including training for non-traditional employment and occupational skills training that integrates English-language and math instruction needed to succeed on the job.***
- b) Programs that combine workplace training with related instruction, which may include cooperative education programs.***
- c) Training programs operated by the public, private for profit, or private non-profit sector.***
- d) Skill upgrading and retraining.***
- e) Entrepreneurial training.***
- f) Apprenticeship and Pre-apprenticeship Skills Training.***
- g) employment***

Initial eligibility for DOL-WIA Division ETPL applies to all training providers, with the exception of those listed in the Exemptions. To meet initial eligibility, a training provider or institution must

- 1. Have current accreditation status through an accrediting body recognized by the Department of Education or other recognized entity.***
- 2. Train for jobs that are considered in-demand and listed in the approved WIOA 4 Year Unified State Plan.***

3. Institution must comply with DOL-WIA performance requirements. Performance is reviewed each program year (July 1- June 30th) on a per program basis; DOL-WIA will publish a quarterly report to all approved providers for use in tracking their performance. DOL-WIA reserves the right to remove training programs that do not meet minimum performance and/or training providers who demonstrate trends of underperformance. New programs will have a maximum of 18 months to demonstrate compliance with required metrics. New program is defined as a course that has not previously been offered to the public through the institution as part of the ETPL.

Minimum Performance Goals for Program Year 2017 - 2018 are as follows:

- **Completion Rate: 70%**
- **Entered Employment/Placement Rate*: 60%**
- **Placement Wage: State minimum wage**
- **Performance for ABE and HISET (high school equivalency) courses must meet these minimums:**
- **Completion Rate: 70%**

These courses are considered remedial and do not provide credentials leading to employment.

4. Training must result in the awarding of an industry-recognized credential, national or state certificate or degree, including all industry appropriate competencies, licensing and/or certification requirements. Providers must demonstrate as part of the initial eligibility process the mechanism for awarding such credentials, certificates and/or degrees. Regardless of whether the provider's program requires a third-party certification for credential attainment/national or state certificate award, the provider is responsible for appropriately reporting such attainment to DOL-WIA. Copies of credentials/certificates must be made available to DOL-WIA, if requested.

5. The course fees must be competitive with similar courses offered in the region. DOL-WIA reserves the right to request supporting documentation to demonstrate a cost comparison within the region. Note that to ensure the best use of funds, DOL-WIA gives preference to quality programs available for free or low cost to the community.

6. Tuition costs must be equal to or less than the published rate on the institution website or catalog. If textbooks, class fees, or other materials are not included in the published rate, institution must provide a breakdown of additional costs to DOL-WIA as part of the application package.

7. Institution must have been in operation for at least six months as of the date of application and must be able to provide proof of financial solvency without the need for subsidy from WIOA training funds. DOL-WIA reserves the right to request financial documentation which includes Profit & Loss, Balance Sheet, and Statement of Cash Flow. For previously approved providers, DOL-WIA may require a declaration of the percentage of total organizational income made up by WIOA ETPL funding.

8. Institution must comply with all the equal opportunity and nondiscrimination requirements under WIOA Section 188 and are required to attest in their applications

that they will ensure compliance. This includes compliance with grievance and criminal activity reporting requirements.

9. Institution must meet the following requirements:

a. Not debarred from doing business with the Federal Government as per the System for Award Management (SAM.org) database governing acquisitions.

b. Provide DOL-WIA written documentation of any changes to accreditation status or approval to operate.

c. Post current year fact sheet on the website.

d. Provide advance notice of price changes to DOL-WIA.

e. Adhere to routine compliance and review requirements from DOL-WIA.

10. Approved providers may enter into agreements with training organizations to deliver content on their behalf. In doing so, the approved provider accepts all liability and certifies that the program, meets the approved providers's requirements for content and instructors as well as all other DOL-WIA policies and procedures. The approved provider is the sole contact for DOL-WIA. Approved providers must notify DOL-WIA of any program that will be delivered by training organizations or other third parties. DOL-WIA reserves the right to audit or review any course or instructor qualifications at any time.

DOL-WIA will evaluate all programs on the ETPL annually to ensure that they continue to meet eligibility requirements beyond the period of initial eligibility. This determination is called "subsequent eligibility." DOL-WIA's review will include but not be limited to:

a) Performance Scorecard - To be made available to ETPL providers quarterly and reviewed by DOL-WIA. Scorecard will include enrollments, completion rate, credential attainment rate, entered employment rate, and median wage data. Training providers may be delisted if performance metrics are not met for the year.

b) Proof of Compliance - Organizations will be required annually to submit proof of accreditation, changes in course costs and financial solvency. DOL-WIA will also take into consideration timely notification of changes and general responsiveness. Organizations which have become debarred from doing business with the Federal Government will be removed from the ETPL.

c) Customer Satisfaction Surveys - Surveys will be sent to each participant upon completion of their program. Data will be reviewed for trends by program as well as across training providers.

d) DOL-WIA Feedback - WIOA Director or other designated staff will provide feedback on the training providers they have worked with during the year. This will focus on information such as accuracy of information, responsiveness, refunds process, etc.

e) Site Visits -DOL-WIA will perform an onsite review of the training facility, interview staff and participants. This review will focus on areas such as accessibility, cleanliness, and compliance with requirements. Site visit reports will be issued documenting all

findings; provider will have 30 days to address any deficiencies and may be de-listed if appropriate action is not taken. A copy of the site visit checklist will be provided in advance of each visit.

f) Market Review — DOL-WIA will review tuition and fees for each course and similar courses in the area to determine that fees are competitive and match ITA payments.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

The CNMI is focused on the development of its human capital, from youth to adulthood. The CNMI will engage the following strategies to achieve an improved outcome for out-of-school youth.

1. Engage all workforce partner programs in the delivery of workforce development services and programs that specifically targets the OSY population

2. Allocate the required percentage of its youth funding program under the WIOA funding stream

3. Develop and implement education and training programs that are career path oriented

4. Develop education and training programs that leads to recognized credentials

5. Collaborate, partner, and leverage with other core partner programs resources that improves the expected outcomes and achievement of the program on its targeted OSY population

6. Improve on the collection and analysis of OSY data on their education and skills development needs that will lead to the development of innovative education and training programs

7. Implement innovative approaches of outreach services that targets OSY who are lacking high school equivalency diploma that encourages their participation back into the classroom

8. Implement classroom and employment dual service approach that encourages the OSY population to be engaged in their educational attainment and employment

9. Improve communications with other non-core workforce partner programs of the importance of a universal CNMI workforce development system design and implementation for the overall success of the CNMIs youth to adulthood workforce population

10. Build strong collaborations with state leaders for greater support of youth programs that targets those considered at-risk or most-in-need youth population

11. Develop a system of care across all levels of the CNMIs workforce development system that specifically targets the OSY population

12. Incorporate the involvement of families as part of the system design for improved OSY outcomes

*3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED, INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT.**

*** Sec. 102(b)(2)(D)(i)(I)**

The CNMI SWDB adopts the required 14 program elements described in WIOA section 129 (c) (2). The involvement of all core programs including those considered non-core programs is the overall strategy of the CNMIs workforce development program system design and implementation. The CNMI believes in investing in its future workforce, its youth population.

DOL-WIA Division shall provide elements consisting of—

1. tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;

2. alternative secondary school services, or dropout recovery services, as appropriate;

3. paid and unpaid work experiences that have as a component academic and occupational education, which may include—

(a) summer employment opportunities and other employment opportunities available throughout the school year;

(b) pre-apprenticeship programs;

(c) internships and job shadowing; and

(d) on-the-job training opportunities;

4. occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with indemand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria described in section 123;

5. education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

6. leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;

7. supportive services;

- 8. adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;**
- 9. follow-up services for not less than 12 months after the completion of participation, as appropriate;**
- 10. comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;**
- 11. financial literacy education;**
- 12. entrepreneurial skills training;**
- 13. services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and**
- 14. activities that help youth prepare for and transition to postsecondary education and training.**

In addition to the 14 Program Elements, DOL-WIA Division shall ensure:

§ Youths are provided information and referral to applicable or appropriate services that are available through the CNMI's WIOA Core Programs or other eligible providers to include training and educational programs that have the capacity to serve the participant either on a sequential or concurrent basis.

§ Youth applicants not meeting enrollment is referred for further assessment, as necessary, and referred to appropriate programs to meet the basic skills and training needs of the applicant.

DISCLOSURE:

DOL-WIA Division has the discretion to determine what specific program services a youth participant receives, based on each participant's objective assessment and individual service strategy.

DOL-WIA Division is required to provide every program service to each participant.

DOL-WIA Division will partner with existing local, State, or national entities that can provide program element(s) at no cost to the local youth program.

From K-12, to Higher Education Institution, Disabilities Programs including those from K-12, non-core youth program services, non-school season programs, private sector partnerships, State leaders support elected and non-elected are all involved in the desire to develop a youth system of care at all levels that will ensure the delivery and successful outcome of all required 14 elements under WIOA but also the development of system of programs and services that addresses other barriers affecting the CNMIs overall youth population.

The CNMIs investments in its youth programs is considered paramount for the success of the CNMIs future human capital development. The CNMIs public school system governed by the CNMI State Board of Education oversees the elementary and secondary education of the CNMIs youth population. Private school institutions also fall under the

purview of the CNMIs State Board of Education. At risk youth population are also accorded the same education rights. The CNMIs Public School System has implemented for numerous years on its school campus the Alternative Education Program specifically designed to assist students who are considered high risk and needing a different form of teaching environment that will help them succeed academically.

The CNMIs Department of Community and Cultural Affairs also administers the Division of Youth Services funded under a block grant. WIOA Title I B leverages every year with DCCA's DYS block grant program for the summer youth employment and training program. Juvenile delinquency programs, juvenile diversion programs, teen intervention, aggressive replacement training, project pay back program for youths under court ordered community work service are all administered at the state level under DCCA's block program.

Youth after school programs at village youth centers are the norm for the CNMIs island community. Tutoring services and study environment conducive to the better learning of the CNMIs youth population are well invested in by both the local government and responsible state workforce partner programs administering youth programs CNMI wide.

Every year the CNMIs youth receive services under the summer youth employment and training program connecting the youths with private sector employers gaining early on work experiences. The CNMI Public School System administers the Cooperative Education Program where annually high school students are provided the opportunity to work with employers earning a stipend or subsidized wages.

Additionally, the CNMIs Public School System administers the Career Technical and Education Program where career cluster focus is provided to the high school students preparing them in focusing on a career pathway that responds to the CNMIs overall workforce needs and economic development and success.

In collaboration with the CNMIs Northern Marianas College, the CNMIs youth population receives the College Start Smart Program/Cash for College preparing graduating students on the benefits of pursuing higher education and access to financial assistance in pursuit of their educational goals.

The CNMIs business community such as the local Chamber of Commerce are also one of the key players in the delivery of youth services compliant with WIOAs 14 youth elements. Entrepreneurship training, financial literacy are all delivered at the high school environment and further enhanced by the involvement of the CNMIs business organizations.

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

HOW THE STATE WILL ENSURE THAT LOCAL AREAS WILL HAVE A POLICY FOR THESE CRITERIA.

An individual (including a youth with a disability) who has no educational/employment goal; or is at risk of dropping out of school; or has a poor work history (to include no work history); or has been fired from a job in the last 6 calendar months.

An individual (including youth with a disability) who has no vocational/employment goal; or who has a poor work history (including no work history); or has been fired from a job in the last 6 calendar months.

In addition, the CNMI SWDB is considering the following recommendations:

- Have poor school attendance rates; or***
- Have a disability that warrants a school IEP; or***
- Lack job readiness skills to secure and hold employment; or***
- Show basic skills deficiency in reading, math or language skills (below 8.9 grade levels); or***
- Have below average grades; or***
- Have been expelled from school within the past 12 calendar months; or***
- Have been suspended from school at least within the past 12 calendar months; or***
- Have been previously placed in out-of-home (foster care, group home, or kinship care) for more than 6 month between the ages of 14-21; or***
- Are children of incarcerated parents; or***
- Have dropped out of a post-secondary educational program during the past 6 calendar months;***
- Have a poor work history, to include no work history***
- Has a record of not being able to hold employment due to being fired, or quitting two or more jobs in the last six months***
- Has a history of substance abuse***
- Is a veteran***
- No employment within the last 6 months***

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE “NOT ATTENDING SCHOOL” OR “ATTENDING SCHOOL,” INDICATE THAT IS THE CASE AND PROVIDE THE STATE POLICY FOR DETERMINING WHETHER A YOUTH IS ATTENDING OR NOT ATTENDING SCHOOL.

§ 60-20-420 STUDENT ATTENDANCE

The Public School System recognizes two types of absences: excused or unexcused.

(a) Excused absence is absence necessitated because of illness or death in the family, or absence with the written approval of parent/guardian when such approval is not inconsistent with the academic needs of the student as determined by the principal.

(b) Unexcused absences are those which are not excused. They may generally be categorized as being of such a nature that prudence would have avoided or precluded the absence. Suspensions and expulsions are considered unexcused absences.

(c) All students who participate in sanctioned school activities that remove the student from regular classroom attendance shall be considered as present. Sanctioned activities must have an educational purpose and students must make up any lesson or assignment missed as a result of such activity. Educational purposes include the discovery and understanding of life skills, community awareness, cultural diversity, language development, natural resources, social structures, political systems, historical perspectives and character development.

(d) School principals/designees have the authority to make determination of whether or not an absence will be considered excused or unexcused.

(e) Student Absences

(1) Secondary school students (grades 7-12) who incur thirteen or more unexcused absences in a course during one semester shall be considered excessively absent and shall not receive a passing grade for that course for that semester. Students under block scheduling who incur seven or more unexcused absences during a term shall be considered excessively absent and shall not receive a passing grade for that course during that term.

(2) Secondary students who do not receive a passing grade for a semester as a result of excessive absences shall receive a "no credit" (NC or 0.00) on their academic record, irrespective of the grade the student would have received before the excessive absences. The course must be repeated and the no credit may be deleted only upon successful completion of the repeated course.

(3) Elementary school students with 25 or more absences in a school year will not receive credit and will not be promoted, unless an exemption is granted by the Commissioner.

(4) For the purpose of this section, three unexcused tardies within a term or semester from a course/class shall equal one unexcused absence from the course/class for that term or semester.

(f) Tardiness

The term tardy is defined as being late to school, class or an activity with or without permission of parent/guardian. A student is considered tardy if he/she arrives after the designated time of the class or activity, regardless of whether the student is late by five minutes or fifteen minutes. A student who misses more than half of the class or activity shall be considered absent for the entire class or activity.

(g) Counseling for Absenteeism and Tardiness Problems

The teacher should counsel those students who are developing a pattern of being absent and/or tardy. The teacher will refer to a school administrator specifically designated by the school principal to handle such problems, those students who, in the teacher's judgment, are not making progress toward correcting the problem.

(1) Upon the first referral by a teacher, the administrator should attempt to determine the nature of the problem, inform the student and the student's parent/guardian of the absence and tardy policy and regulation.

(2) The teacher must refer the student to a school administrator and a parent conference must be held to discuss the problem and to explain the Board regulations and any appropriate discipline alternatives under the following circumstances:

(i) Under block scheduling, after the third unexcused absence or sixth tardy in a quarter.

(ii) For secondary schools without block scheduling, after the sixth tardy or sixth unexcused absence in a semester.

(iii) For elementary schools, after the sixth tardy in a semester or the sixth unexcused absence in a semester.

(3) In addition to counseling after teacher referrals, principals shall require doctor's excuses for absences in the following circumstances, unless a waiver for the absence is obtained from the school principal:

(i) Under block scheduling, a doctor's excuse will be required for any absence after the third in a term.

(ii) For secondary schools without block scheduling, a doctor's excuse will be required for any absence after the sixth in a semester.

(iii) For elementary schools, a doctor's excuse will be required for any absence after the sixth in a semester.

(h) Absenteeism and/or tardiness problems for special education students must be referred to the student's IEP team to address the problem and discuss any appropriate learning and/or disciplinary alternatives.

§ 60-20-422 Part-time Attendance

The PSS recognizes the need of some students to attend school on a part-time basis. The Board of Education has established this section regarding part-time attendance. It is the intent of this section to meet the individual needs of each student and at the same time establish rules and regulations that will preserve the discipline, health, and academic standards of the school.

(a) Eligibility Requirements

(1) To be eligible for part-time attendance, the student must be a resident of the CNMI.

(2) The student must be more than sixteen years old and less than twenty years unless the IEP of a student under 16 provides for part-time attendance. Students twenty years and older may apply and it will be at the discretion of the principal, and, in the case of a student with a disability, the IEP team, whether to approve part-time attendance for such students.

(3) The student must have parent/guardian approval if under 18 years of age.

(4) The student must demonstrate a definite need to attend school on a part-time basis. Examples are:

- (i) Financial needs of student or family,**
- (ii) Health problems of self or family,**
- (iii) Vocational training in school or on the job,**
- (iv) Enrollment in a school of higher education, and**
- (v) Unique curriculum offerings.**

(b) Application Procedure

(1) The student must secure an appointment with the guidance counselor and school principal prior to classification as a part-time student. The student must complete a part-time attendance request form at the conference. Before any decision is given concerning the request, a conference must be held with the student's parent/guardian if the student is under 18 years of age. All applications and conferences must be completed during the time preceding the semester in which the student is to be enrolled on a part-time basis.

(2) After an application has been submitted, the principal shall rule on the request and report to the Commissioner the names of all students who are to be enrolled on a part-time basis. This same report shall be transmitted to the Board of Education. In the event the principal denies the request, the student may appeal to the Commissioner who must respond in a reasonable time.

(3) Part-time students are governed by the same rules and regulations that apply to regularly enrolled students.

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL'S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

The CNMI follows the definition in WIOA Section 3 (5) (B).

D. SINGLE-AREA STATE REQUIREMENTS

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

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

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

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

1. Public Comments - No public comments from the public comment period represented any disagreement with the amendments to the State Plan. Other public comments or themes were collected and can be made available as needed.

2. Entity responsible for the disbursement of grant funds - CNMI Department of Labor

3. WIOA Title 1 Youth Activities

The WIOA funding enables the delivery of a comprehensive array of youth services that prepare youth for post-secondary educational and employment opportunities, attainment of educational and/or skills training credentials, and obtainment of employment with career opportunities. This is accomplished by assessing the participant's skills, interests, needs, and personal goals, creating customized service plans in collaboration with the participant, and expanding the participant's connection to and understanding of the local economy, educational opportunities, and available community services.

The CNMI Public School System delivers K-12 youth education services. There are numerous in school and after school programs that are administered by the CNMI Public School System and/or partnered with the private sector such as 1) Cooperative Education Program or COOP; 2) after school tutoring and mentoring programs; 3) youth takeover days in partnership with the local Chamber of Commerce; 4) summer programs for younger youth administered by the Department of Community and Cultural Affairs funded by block grants under the Division of Youth Services; 5) summer youth employment and training programs funded under WIOA Title 1 Youth Funding Stream; 6) youth business enterprise programs in partnership with the Commonwealth Development Authority (CDA); 7) youth mentoring programs in partnership with local businesses that is aligned with the youths career/profession interest (a group dinner program engagement organized by the Public School System bringing business leaders to have a one-on-one conversation with the student about their similar career/profession interest).

The Northern Marianas College provides college level courses and also provides through its Community Development Institute other short term certificated programs and related programs such as providing work readiness workshops for the youth population during the summer youth employment and training season. Other out of school session programs are also administered through the Northern Marianas College in partnership with other non-core programs.

The Northern Marianas Trades Institute also provides vocational technical high school, career, trades, and technical programs that targets both youth and adults. Programs

offered are Hotel and Restaurant Operations, Culinary Arts, Automotive Technology, and National Center for Construction Education & Research Programs.

Latte Academy provides opportunities in Hotel and Restaurant Operations, Computer Networking and Certification, Health Programs, Entrepreneurship and more.

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

In consideration of the mutual aims and desires of the CNMI WIOA Core Programs to this MOU, and in recognition of the public benefit to be derived from effective implementation of this MOU, the parties agree that their respective responsibilities under this MOU shall be as follows:

Department of Labor - Workforce Investment Agency Division agrees to:

- *Process the WIOA application of interested individuals with disabilities who desire training and employment assistance services in a timely manner but no later than ten working days after date of application;*
- *Refer WIOA clients who are individuals with disabilities to OVR;*
- *Refer WIOA clients, who may need to acquire basic skills necessary to function more effectively and productively in order to gain upward mobility, to the Adult Education State Office at the Northern Marianas College;*
- *Assess the skill levels, aptitudes, and abilities of applicants with disabilities as well as determine need for support services and make referral to other community agencies as appropriate;*
- *Offer career planning and counseling, job search, and placement assistance;*
- *Make available employment statistics information, including labor market update, job vacancy listing, job skills necessary for listed jobs and occupations in demand, and other relevant information;*
- *Provide follow-up services including sustained employment counseling and guidance;*
- *Provide training services such as work experience and OJT;*
- *Participate in shared funding of mutual WIOA and OVR cases and ensure such participation occurs with regularity; and*
- *Identify any duplication of services and streamline program processes as necessary.*

Adult Education State Office agrees to:

- *Process the WIOA application of qualified individuals who desire completing educational goals and workplace success training during the advising period;*
- *Refer WIOA clients, who are individuals with disabilities, to OVR;*
- *Refer WIOA clients, who are interested in training and employment assistance services, to DOL-WIA Division;*
- *Assess the educational skill levels of qualified WIOA clients as well as determine need for support services and make referral to other community agencies as appropriate;*
- *Offer workplace success training;*

- *Provide follow-up services such as educational and career pathway goal settings;*
- *Participate in shared funding of mutual WIOA and OVR cases (if allowable) and ensure such participation occurs with regularity; and*
- *Identify any duplication of services and streamline program processes as necessary.*

Office of Vocational Rehabilitation agrees to:

- *Process the OVR application of interested individuals with disabilities in a timely manner but no later than 60 days after date of application;*
- *Refer clients who may benefit from additional training and employment services to DOL-WIA Division;*
- *Refer clients who may need to acquire basic skills, workplace success training, and follow-up services such as educational and career pathway goal settings to the Adult Education State Office;*
- *Request and obtain from WIOA Core Programs appropriate documents that will help OVR to facilitate the application and IPE development processes in a timely manner (signed releases required);*
- *Provide vocational rehabilitation counseling and guidance, career planning and development, training (work experience and/or OJT), job search, placement assistance, and other services required to achieve consumer's vocational objective consistent with an approved Individualized Plan for Employment (IPE);*
- *Facilitate supported employment services to include job coaching for mutual consumers considered most significantly disabled;*
- *Assess the need for assistive technology to enable consumers to participate in training and employment activities;*
- *Provide guidance and information on disability employment matters;*
- *Participate in shared funding of mutual OVR and WIOA cases and ensure such participation occurs with regularity;*
- *Encourage individuals with disabilities that they refer to the WIOA Core Programs to self-disclose that they have a disability so that the programs can get a better idea of how many clients they have in common; and*
- *Identify any duplication of services and streamline program processes as necessary.*

REFERRAL PROCEDURES

The parties agree to establish consistent and sustained referral methods through the use of telephone, fax, email, or in-person to ensure that appropriate referrals are made to each agency accordingly. The CNMI WIOA Core Programs agree that their respective offices will make available to interested individuals including those with disabilities the other party's informational brochures and applications for services. In addition, the Core Programs will promote open dialogue amongst the parties to follow-up on referrals and the progress of mutual/co-enrolled consumers. Furthermore, the parties to this MOU will ensure that prior to any discussion or exchange of information about a mutual/co-enrolled consumer occurs, a signed release is first secured.

CROSS-TRAINING

An important benefit of partner collaboration, coordination, and cooperation is the awareness of partner activities and the resultant referral of mutual/co-enrolled consumers. The benefits of the reciprocity of that cross-training are obvious. Disability awareness training (including how to recognize, accommodate and effectively work with individuals with hidden disabilities) will guard against failures in the system due to lack of knowledge or sensitivity to the needs of individuals with disabilities, employers, service providers, and other workforce development participants as well. Consequently, each organization agrees to develop training geared towards educating staff about the mission, goals, objectives, processes, and policies and procedures of each partner agency in order to facilitate increased understanding by staff at all levels about their partner programs. In those instances when one of the partner agencies is participating in training that might be beneficial or educational for the partners, they agree to, at a minimum, invite the partner programs to participate in the training. Nothing about this invitation should be construed to indicate that there is a promise to cover the cost of such training for partner programs.

CONFIDENTIALITY

The CNMI WIOA Core Programs covered by this MOU will adhere to strict confidentiality when obtaining applicant and consumers' personal information such as names, Social Security Number, medical and psychological history as well as other identifiable information. Any release of information must be recorded on official program forms. Aggregate or summary data which protects the identity of individual applicants or consumers may be shared.

FUNDING

The CNMI WIOA Core Programs agree that they will expend funds for administrative and client services within the allowable parameters of their governing legislation. The WIOA encourages shared funding and resources to maximize the impact on mutual/co-enrolled clients. The partners agree to actively find ways to share resources for case service expenditures and to engage in joint planning to increase the capacity of each partner to share funding for the benefit of their mutual/co-enrolled consumers.

ALLOCATION OF COSTS

The parties to this MOU agree to serve mutual consumers, as appropriate, with emphasis on leveraging of resources in consideration of limited financial resources of many if not all Federally-funded programs, including the CNMI WIOA Core Programs. The implementation of a cost-sharing arrangement will help the agencies to serve more individuals determined eligible under their respective programs.

AMERICAN JOB CENTER (aka ONE-STOP CENTER)

The CNMI WIOA Core Programs through the State Workforce Development Board have agreed to a separate MOU for the American Job Center or One-Stop Center.

TERMS OF AGREEMENT

This MOU becomes effective upon the signatures of the duly authorized representatives of the CNMI WIOA Core Programs including the Chairperson of the State Workforce Development Board. This agreement may be amended or modified at any time by mutual consent. The Core Programs reserve the right to terminate this MOU at any time, upon thirty (30) days written notice to the other parties at the addresses provided herein. Unless there is written notice to terminate this MOU, it will automatically renew annually.

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

The following outlines the process for training providers and programs to be listed on the ETPL:

- 1. Training providers interested in applying to become part of the ETPL must complete and sign an application.***
- 2. DOL-WIA will review all submitted materials, request clarification or follow up as necessary and confirm that the organization is not debarred from doing business with the federal government.***
- 3. Confirmation of approval or denial will be issued within 30 days from the receipt of the application.***
- 4. Once DOL-WIA approves a program(s), the program becomes visible to the WIOA Core Programs (DOL-WIA, NMC-ABE, and OVR) and is accessible to the general public.***

Note that DOL-WIA makes no guarantees of minimum enrollments for approved programs or providers. Enrollments of participants in DOL-WIA ETPL programs are dependent on funding and participant training needs.

- 5. Training programs must meet subsequent eligibility requirements (as describe below in the Subsequent Eligibility section) after one year of being on the ETPL to remain on the list. Programs are also subject to annual compliance reviews.***
- 6. Programs that do not meet subsequent eligibility requirements are subject to delisting from the DOL-WIA ETPL (as described below in the Denial, Delisting and Appeals section).***

Important Note: DOL-WIA gives priority to high quality training which is available free of charge or at low coast to individuals. Additionally, Individual Training Account (ITA) expenditures through the ETPL are limited and these limits may change as needed.

CONTINUED ELIGIBILITY PROCESS

DOL-WIA will evaluate all programs on the ETPL annually to ensure that they continue to meet eligibility requirements beyond the period of initial eligibility. This determination is called "subsequent eligibility." DOL-WIA's review will include but not be limited to:

- a) Performance Scorecard - To be made available to ETPL providers quarterly and reviewed by DOL-WIA. Scorecard will include enrollments, completion rate, credential***

attainment rate, entered employment rate, and median wage data. Training providers may be delisted if performance metrics are not met for the year.

b) Proof of Compliance - Organizations will be required annually to submit proof of accreditation, changes in course costs and financial solvency. DOL-WIA will also take into consideration timely notification of changes and general responsiveness. Organizations which have become debarred from doing business with the Federal Government will be removed from the ETPL.

c) Customer Satisfaction Surveys - Surveys will be sent to each participant upon completion of their program. Data will be reviewed for trends by program as well as across training providers.

d) DOL-WIA Feedback - WIOA Director or other designated staff will provide feedback on the training providers they have worked with during the year. This will focus on information such as accuracy of information, responsiveness, refunds process, etc.

e) Site Visits -DOL-WIA will perform an onsite review of the training facility, interview staff and participants. This review will focus on areas such as accessibility, cleanliness, and compliance with requirements. Site visit reports will be issued documenting all findings; provider will have 30 days to address any deficiencies and may be de-listed if appropriate action is not taken. A copy of the site visit checklist will be provided in advance of each visit.

f) Market Review — DOL-WIA will review tuition and fees for each course and similar courses in the area to determine that fees are competitive and match ITA payments.

6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.

INDIVIDUAL TRAINING ACCOUNTS (ITA)

ITA is a payment agreement established on behalf of a participant with a training provider. WIOA title I adult and dislocated workers purchase training services from State eligible training providers they select in consultation with the career planner, which includes discussion of program quality and performance information on the available eligible training providers. Payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments also may be made incrementally, for example, through payment of a portion of the costs at different points in the training course.

WORK BASED TRAINING

A. On-the-Job Training Program (OJT)

OJT is defined at WIOA sec. 3(44). OJT is provided under a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. Through the OJT contract, occupational training is provided for the WIOA participant in exchange for the reimbursement, typically up to 50 percent of the wage

rate of the participant, for the extraordinary costs of providing the training and supervision related to the training.

OJT contracts under WIOA title I, must not be entered into with an employer who has received payments under previous contracts under WIOA or WIA if the employer has exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees with wages and employment benefits (including health benefits) and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.

An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's IEP.

1. Employed Workers

OJT contracts may be written for eligible employed workers when:

- (a) The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment, as determined by SWDB policy;*
- (b) The requirements are met; and*
- (c) The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the SWDB policy.*

B. INTERNSHIPS AND WORK EXPERIENCES

For the purposes of WIOA sec. 134(c)(2)(A)(xii)(VII), an internship or work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.

CUSTOMIZED TRAINING

Customized training is training:

- (a) That is designed to meet the special requirements of an employer (including a group of employers);*
- (b) That is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and*
- (c) For which the employer pays for a significant cost of the training*

Coordination of Workforce Innovation and Opportunity Act training funds and other grant assistance

WIOA funding for training is limited to participants who:

(1) Are unable to obtain grant assistance from other sources to pay the costs of their training; or

(2) Require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

Programs and training providers must coordinate funds available to pay for training. In making the determination one-stop centers may take into account the full cost of participating in training services, including the cost of support services and other appropriate costs. One-stop centers must coordinate training funds available and make funding arrangements with one-stop partners and other entities to apply the provisions of this section. One-stop centers must consider the availability of other sources of grants to pay for training costs such as State-funded training funds, and Federal Pell Grants, so that WIOA funds supplement other sources of training grants. A WIOA participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the one-stop center has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the one-stop center the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses.

7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.

Memorandum of Understanding

Between the

CNMI Workforce Innovation and Opportunity Act (WIOA) Core Programs:

The Department of Labor - Workforce Investment Agency Division;

The Adult Education State Office; and

The Office of Vocational Rehabilitation

PURPOSE

The purpose of this MOU is to formalize a cooperative and mutually beneficial relationship among the CNMI WIOA Core Programs comprised of the Department of Labor - Workforce Investment Agency Division, the Adult Education State Office, and the Office of Vocational Rehabilitation. Through this MOU, we look to improve our coordination of training and employment opportunities for mutual consumers/clients served.

Whereas WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy;

Whereas WIOA supersedes the Workforce Investment Act of 1998 and retains and amends the WIOA-funded Programs (Adult, Dislocated, and Youth), Adult Education and Family Literacy Act, and the Rehabilitation Act of 1973;

Whereas WIOA requires States to strategically align workforce development; Promotes Accountability and transparency; Fosters regional collaboration; Improves the American Job Center System; Improves services to employers and promotes work-based training; Provides access to high quality training; Enhances workforce services for the unemployed and other job seekers; Improves services to individuals with disabilities; Makes key investments in serving disconnected youth and other vulnerable populations; Enhances the Job Corps Program; and Streamlines and strengthens the strategic roles of workforce development boards;

Whereas, the authorizing and funding legislation of Vocational Rehabilitation, the Rehabilitation Act of 1973 as amended, which is Title IV of the Workforce Innovation and Opportunity Act calls for improved planning, coordination and collaboration between the Department of Labor-Workforce Investment Agency Division, Adult Education, and Vocational Rehabilitation, unified planning and increased services to youth in need, including students with disabilities, this MOU will help to foster a regular and sustained partnership among the aforementioned parties that involve: (1) unified planning; (2) data sharing; (3) leveraging of resources; (4) identifying duplication of services and streamlining processes; and (5) providing for an array of services necessary for consumers to achieve their employment goals in accordance with the provisions of law and regulations that govern each respective program's activities.

With this MOU, the CNMI WIOA Core Programs jointly agree to:

- 1) Engage in a unified planning process;***
- 2) Coordinate resources and programs for a more streamlined and efficient workforce development system;***
- 3) Promote the coordination of workforce activities to improve the performance measures of the Core Programs;***
- 4) Leverage resources by sharing cost of training of mutual/co-enrolled consumers, as appropriate;***
- 5) Identify and eliminate educational, architectural and employment barriers that may hinder individuals with disabilities who may wish to acquire access to service provisions under this MOU;***
- 6) Share data/information on the progress of mutual/co-enrolled consumers and how the programs could effectively connect to and collaborate with employers/businesses;***
- 7) Share and exchange information about vocational rehabilitation, adult education, and workforce development as well as invite the participation of the parties to this MOU in training activities that will prove mutually-beneficial;***

8) DOL/WIA and OVR will work closely together to set aside a number of work-based learning opportunities for students with disabilities annually;

9) DOL/WIA and OVR should target a set number of mutual/co-enrolled individuals with disabilities to share funding for training and employment services;

10) Pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs; and

11) Implement a tracking and reporting system for consumers that have been referred to, or are co-enrolled in the CNMI WIOA Core Programs.

PROGRAM DESCRIPTION AND PROVISION OF SERVICES

The following programs of WIOA supersede the Workforce Investment Act of 1998 and amend the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973.

Title I - Adult, Dislocated, and Youth

The CNMI Department of Labor (DOL) - Workforce Investment Agency (WIA) Division implements the Title I programs of WIOA. WIOA Title I authorizes the establishment of workforce development activities for eligible Youth, Adult, and Dislocated Workers. WIOA provides job seekers access to employment, education, training, and support services to succeed in the labor market and matching employers with the skilled workers they need to compete in the global economy. The CNMI DOL WIA Division also houses the CNMI State Workforce Development Board (SWDB) who is responsible for the overall implementation and monitoring of all applicable WIOA programs in the CNMI.

The mission of the SWDB is "Empowering, integrating, implementing, and innovating the workforce needs of the CNMI." The vision is "To promote a workforce development system that meets the needs of businesses, job seekers and workers to support a strong and vibrant economy in the CNMI."

Goals:

- Support pathways that lead to livable wage employment and upward mobility of participants.**
- Promote and support participants' efforts to obtain workforce credentials, skill development and training, and/or career or college readiness. Increase the number of participants who pursue and complete technical/trades programs and/or post-secondary education and specific skills necessary to compete in the CNMI's critical economic sectors.**
- Align, coordinate, and integrate the workforce development system to provide a quality and consistent experience for all participants.**
- Create a data-driven workforce environment supported by market forecasts, surveys, evaluations, analysis, and assessment results, etc.**
- Inventory and align the workforce skills needs of private sector employers and businesses with the education, service, and training provider offerings, so that**

participants are able to access the marketable skills to be matched to the private sector employers and businesses.

Eligibility varies for each respective program. Registration, In-take procedures and Assessments need to be conducted to determine eligibility.

Registration Requirements to be verified for qualification include the following:

- *Valid Identification;*
- *Verification of Citizenship;*
- *Household Income for the past 6 month period;*
- *Social Security Card or Official Tax Documents;*
- *Selective Service Registration (Males 18 to 26 years old);*
- *Education and Training documentation; and*
- *Current Resume.*

Additional Requirements may include:

- *Public Assistance Recipient Documentation;*
- *Veteran Status Verification;*
- *Letter of Program/Service Participation;*
- *Certification of Disability;*
- *Letter of Notice of Layoff or Termination;*
- *Unofficial School Transcript;*
- *STAR Reading & Math, SAT 10, or CASAS Results*

Title II - Adult Education & Literacy

The Northern Marianas College's Adult Education State Office receives an annual grant from the U.S. Department of Education. The statutory authority for this program is the Workforce Innovation and Opportunity Act (WIOA) of 2014.

The mission of the office is to ensure that educationally disadvantaged adults of the community have the opportunities to acquire basic skills necessary to function more effectively and productively in order to gain upward mobility by providing opportunities that will enable them to pursue further education in support of the Northern Marianas College mission.

Goals and Objectives:

- *To improve competency levels in language arts and mathematics to empower adult learners to participate more fully in community life;*
- *To prepare adults, who are parents, to become effective teachers of their children;*
- *Prepare adult learners who did not complete their high school education to pass the high school equivalency tests; and*
- *To prepare adults for successful job placement or career performance.*

Who is Eligible?

- **16 years or older; and**
- **Is NOT enrolled or required to be enrolled in secondary school under State law; and**
- **Has NOT achieved an equivalent level of education; and**
- **Is an English Language Learner**

(Taken from the Adult Education and Family Literacy Act of 2014)

Application and Intake Process:

Step 1: Make an appointment to go through application and advising

Step 2: Take the assessment test (by appointment only)

Step 3: Take O*Net Interest Profiler

Step 4: Register for classes/independent Study

Title IV - Vocational Rehabilitation

The mission of OVR is to increase employment and promote independence among eligible individuals with disabilities throughout the Commonwealth of the Northern Mariana Islands (CNMI). In doing so, OVR provides vocational rehabilitation services to eligible individuals with disabilities who meet certain eligibility criteria to achieve competitive integrated employment - as defined by the Workforce Innovation and Opportunity Act (WIOA) - within their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

An applicant is eligible for vocational rehabilitation services if the individual:

A) Is an individual with a disability; and

B) Has a physical or mental impairment which for such individual constitutes or results in a substantial impediment to employment; and can benefit in terms of an employment outcome from vocational rehabilitation services; and

C) Requires vocational rehabilitation services to prepare for, secure, retain, or advance in employment; and

D) Has legal status to allow employment in the CNMI or U.S.

Vocational rehabilitation services are designed to lessen the impact or eliminate entirely the barriers to employment. Services include, but are not limited to: assessment for determining eligibility and vocational rehabilitation needs, vocational rehabilitation counseling and guidance, information and referral, vocational and other training services, job search/placement assistance/job retention services, supported employment services, post-employment services, rehabilitation/assistive technology, pre-employment transition services, etc. Services are individualized and provided in the context of an approved Individualized Plan for Employment (IPE). OVR consumers may be required to financially participate in their rehabilitation program.

OVR's responsibility for administrative activities that cannot be delegated to any other agency or individual includes:

- *Decisions affecting eligibility for vocational rehabilitation services, the nature and scope of available services, and the provision of these services;*
- *Determination that an individual has achieved an employment outcome;*
- *Policy formulation and implementation; and*
- *Allocation and expenditure of vocational rehabilitation services.*

SPECIFIC PARTNER RESPONSIBILITIES

In consideration of the mutual aims and desires of the CNMI WIOA Core Programs to this MOU, and in recognition of the public benefit to be derived from effective implementation of this MOU, the parties agree that their respective responsibilities under this MOU shall be as follows:

Department of Labor - Workforce Investment Agency Division agrees to:

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- *Process the WIOA application of qualified individuals who desire completing educational goals and workplace success training during the advising period;*
- *Refer WIOA clients, who are individuals with disabilities, to OVR;*
- *Refer WIOA clients, who are interested in training and employment assistance services, to DOL-WIA Division;*
- *Assess the educational skill levels of qualified WIOA clients as well as determine need for support services and make referral to other community agencies as appropriate;*
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- *Provide follow-up services such as educational and career pathway goal settings;*
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- *Identify any duplication of services and streamline program processes as necessary.*

Office of Vocational Rehabilitation agrees to:

- *Process the OVR application of interested individuals with disabilities in a timely manner but no later than 60 days after date of application;*
- *Refer clients who may benefit from additional training and employment services to DOL-WIA Division;*
- *Refer clients who may need to acquire basic skills, workplace success training, and follow-up services such as educational and career pathway goal settings to the Adult Education State Office;*
- *Request and obtain from WIOA Core Programs appropriate documents that will help OVR to facilitate the application and IPE development processes in a timely manner (signed releases required);*
- *Provide vocational rehabilitation counseling and guidance, career planning and development, training (work experience and/or OJT), job search, placement assistance, and other services required to achieve consumer's vocational objective consistent with an approved Individualized Plan for Employment (IPE);*
- *Facilitate supported employment services to include job coaching for mutual consumers considered most significantly disabled;*
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- *Provide guidance and information on disability employment matters;*
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CROSS-TRAINING

An important benefit of partner collaboration, coordination, and cooperation is the awareness of partner activities and the resultant referral of mutual/co-enrolled consumers. The benefits of the reciprocity of that cross-training are obvious. Disability awareness training (including how to recognize, accommodate and effectively work with individuals with hidden disabilities) will guard against failures in the system due to lack of knowledge or sensitivity to the needs of individuals with disabilities, employers, service providers, and other workforce development participants as well. Consequently, each organization agrees to develop training geared towards educating staff about the mission, goals, objectives, processes, and policies and procedures of each partner agency in order to facilitate increased understanding by staff at all levels about their partner programs. In those instances when one of the partner agencies is participating in training that might be beneficial or educational for the partners, they agree to, at a minimum, invite the partner programs to participate in the training. Nothing about this invitation should be construed to indicate that there is a promise to cover the cost of such training for partner programs.

CONFIDENTIALITY

The CNMI WIOA Core Programs covered by this MOU will adhere to strict confidentiality when obtaining applicant and consumers' personal information such as names, Social Security Number, medical and psychological history as well as other identifiable information. Any release of information must be recorded on official program forms. Aggregate or summary data which protects the identity of individual applicants or consumers may be shared.

FUNDING

The CNMI WIOA Core Programs agree that they will expend funds for administrative and client services within the allowable parameters of their governing legislation. The WIOA encourages shared funding and resources to maximize the impact on mutual/co-enrolled clients. The partners agree to actively find ways to share resources for case service expenditures and to engage in joint planning to increase the capacity of each partner to share funding for the benefit of their mutual/co-enrolled consumers.

ALLOCATION OF COSTS

The parties to this MOU agree to serve mutual consumers, as appropriate, with emphasis on leveraging of resources in consideration of limited financial resources of many if not all Federally-funded programs, including the CNMI WIOA Core Programs. The implementation of a cost-sharing arrangement will help the agencies to serve more individuals determined eligible under their respective programs.

AMERICAN JOB CENTER (aka ONE-STOP CENTER)

The CNMI WIOA Core Programs through the State Workforce Development Board have agreed to a separate MOU for the American Job Center or One-Stop Center.

TERMS OF AGREEMENT

This MOU becomes effective upon the signatures of the duly authorized representatives of the CNMI WIOA Core Programs including the Chairperson of the State Workforce Development Board. This agreement may be amended or modified at any time by mutual consent. The Core Programs reserve the right to terminate this MOU at any time, upon thirty (30) days written notice to the other parties at the addresses provided herein. Unless there is written notice to terminate this MOU, it will automatically renew annually.

REVIEW OF LOCAL APPLICATION

The CNMI SWDB has delegated to the Director of WIOA the review local and state applications submitted under title II consistent with WIOA secs. 107 (d)(11)(A) and (B)(i) and WIOA sec. 232.

Eligible Training Provider (ETP):

An ETP is the only type of entity that receives funding for training services. Funding is provided through the individual client, through an individual training account. ETP must apply for and be approved in order to be included on the State list of eligible training providers and programs. ETP's must provide a program of training services and must be one of the following types of entities:

- (1) An institution of higher education that provide a program which leads to a recognized postsecondary credential; or*
- (2) An entity that carry out programs registered under the National Apprenticeship Act (29 U.S.C. 50 et seq.); or*
- (3) Other public or private providers of training services, which may include:*
 - a. Community-based organizations;*
 - b. Joint labor-management organizations; and/or*
 - c. Eligible providers of adult education and literacy activities under title II of WIOA if such activities are provided in combination with training services described at § 680.350.*

Program of Training Services:

A program of training services is one or more courses or classes, or a structured regimen that provides services that leads to:

- (a) An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State involved or the Federal government, an associate or baccalaureate degree;*
- (b) A secondary school diploma or its equivalent;*
- (c) Employment; or*
- (d) Measurable skill gains toward a credential described in paragraph (a) or (b) of this section or employment.*

Documentation Needed:

- *An Assurance Letter requesting for services, position, duration, potential funding source and that the ETP assure to DOL WIA WIOA that the ETP will meet the requirements listed above in order to participate in the program and will be able to provide agreed upon outcomes.*
- *For Employment Assistance, a Job Description describing the job duties, roles and responsibilities as well as whom the individual will report to.*
- *A Training Plan describing the timeline, activities, training outcomes, and eventual certification, credentialing, employment, and/or measureable skills gained towards a credential.*

Visit www.onetonline.org to help with job titles, job descriptions, proposed skills to be learned, length of preparation for the proposed vocation, etc.

8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

Memorandum of Understanding

Between the

CNMI Workforce Innovation and Opportunity Act (WIOA) Core Programs:

The Department of Labor - Workforce Investment Agency Division;

The Adult Education State Office; and

The Office of Vocational Rehabilitation

PURPOSE

The purpose of this MOU is to formalize a cooperative and mutually beneficial relationship among the CNMI WIOA Core Programs comprised of the Department of Labor - Workforce Investment Agency Division, the Adult Education State Office, and the Office of Vocational Rehabilitation. Through this MOU, we look to improve our coordination of training and employment opportunities for mutual consumers/clients served.

Whereas WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy;

Whereas WIOA supersedes the Workforce Investment Act of 1998 and retains and amends the WIOA-funded Programs (Adult, Dislocated, and Youth), Adult Education and Family Literacy Act, and the Rehabilitation Act of 1973;

Whereas WIOA requires States to strategically align workforce development; Promotes Accountability and transparency; Fosters regional collaboration; Improves the American Job Center System; Improves services to employers and promotes work-based training; Provides access to high quality training; Enhances workforce services for the

unemployed and other job seekers; Improves services to individuals with disabilities; Makes key investments in serving disconnected youth and other vulnerable populations; Enhances the Job Corps Program; and Streamlines and strengthens the strategic roles of workforce development boards;

Whereas, the authorizing and funding legislation of Vocational Rehabilitation, the Rehabilitation Act of 1973 as amended, which is Title IV of the Workforce Innovation and Opportunity Act calls for improved planning, coordination and collaboration between the Department of Labor-Workforce Investment Agency Division, Adult Education, and Vocational Rehabilitation, unified planning and increased services to youth in need, including students with disabilities, this MOU will help to foster a regular and sustained partnership among the aforementioned parties that involve: (1) unified planning; (2) data sharing; (3) leveraging of resources; (4) identifying duplication of services and streamlining processes; and (5) providing for an array of services necessary for consumers to achieve their employment goals in accordance with the provisions of law and regulations that govern each respective program's activities.

With this MOU, the CNMI WIOA Core Programs jointly agree to:

- 1) Engage in a unified planning process;*
- 2) Coordinate resources and programs for a more streamlined and efficient workforce development system;*
- 3) Promote the coordination of workforce activities to improve the performance measures of the Core Programs;*
- 4) Leverage resources by sharing cost of training of mutual/co-enrolled consumers, as appropriate;*
- 5) Identify and eliminate educational, architectural and employment barriers that may hinder individuals with disabilities who may wish to acquire access to service provisions under this MOU;*
- 6) Share data/information on the progress of mutual/co-enrolled consumers and how the programs could effectively connect to and collaborate with employers/businesses;*
- 7) Share and exchange information about vocational rehabilitation, adult education, and workforce development as well as invite the participation of the parties to this MOU in training activities that will prove mutually-beneficial;*
- 8) DOL/WIA and OVR will work closely together to set aside a number of work-based learning opportunities for students with disabilities annually;*
- 9) DOL/WIA and OVR should target a set number of mutual/co-enrolled individuals with disabilities to share funding for training and employment services;*
- 10) Pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs; and*
- 11) Implement a tracking and reporting system for consumers that have been referred to, or are co-enrolled in the CNMI WIOA Core Programs.*

PROGRAM DESCRIPTION AND PROVISION OF SERVICES

The following programs of WIOA supersede the Workforce Investment Act of 1998 and amend the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973.

Title I - Adult, Dislocated, and Youth

The CNMI Department of Labor (DOL) - Workforce Investment Agency (WIA) Division implements the Title I programs of WIOA. WIOA Title I authorizes the establishment of workforce development activities for eligible Youth, Adult, and Dislocated Workers. WIOA provides job seekers access to employment, education, training, and support services to succeed in the labor market and matching employers with the skilled workers they need to compete in the global economy. The CNMI DOL WIA Division also houses the CNMI State Workforce Development Board (SWDB) who is responsible for the overall implementation and monitoring of all applicable WIOA programs in the CNMI.

The mission of the SWDB is "Empowering, integrating, implementing, and innovating the workforce needs of the CNMI." The vision is "To promote a workforce development system that meets the needs of businesses, job seekers and workers to support a strong and vibrant economy in the CNMI."

Goals:

- ***Support pathways that lead to livable wage employment and upward mobility of participants.***
- ***Promote and support participants' efforts to obtain workforce credentials, skill development and training, and/or career or college readiness. Increase the number of participants who pursue and complete technical/trades programs and/or post-secondary education and specific skills necessary to compete in the CNMI's critical economic sectors.***
- ***Align, coordinate, and integrate the workforce development system to provide a quality and consistent experience for all participants.***
- ***Create a data-driven workforce environment supported by market forecasts, surveys, evaluations, analysis, and assessment results, etc.***
- ***Inventory and align the workforce skills needs of private sector employers and businesses with the education, service, and training provider offerings, so that participants are able to access the marketable skills to be matched to the private sector employers and businesses.***

Eligibility varies for each respective program. Registration, In-take procedures and Assessments need to be conducted to determine eligibility.

Registration Requirements to be verified for qualification include the following:

- ***Valid Identification;***
- ***Verification of Citizenship;***
- ***Household Income for the past 6 month period;***
- ***Social Security Card or Official Tax Documents;***

- *Selective Service Registration (Males 18 to 26 years old);*
- *Education and Training documentation; and*
- *Current Resume.*

Additional Requirements may include:

- *Public Assistance Recipient Documentation;*
- *Veteran Status Verification;*
- *Letter of Program/Service Participation;*
- *Certification of Disability;*
- *Letter of Notice of Layoff or Termination;*
- *Unofficial School Transcript;*
- *STAR Reading & Math, SAT 10, or CASAS Results*

Title II - Adult Education & Literacy

The Northern Marianas College's Adult Education State Office receives an annual grant from the U.S. Department of Education. The statutory authority for this program is the Workforce Innovation and Opportunity Act (WIOA) of 2014.

The mission of the office is to ensure that educationally disadvantaged adults of the community have the opportunities to acquire basic skills necessary to function more effectively and productively in order to gain upward mobility by providing opportunities that will enable them to pursue further education in support of the Northern Marianas College mission.

Goals and Objectives:

- *To improve competency levels in language arts and mathematics to empower adult learners to participate more fully in community life;*
- *To prepare adults, who are parents, to become effective teachers of their children;*
- *Prepare adult learners who did not complete their high school education to pass the high school equivalency tests; and*
- *To prepare adults for successful job placement or career performance.*

Who is Eligible?

- *16 years or older; and*
- *Is NOT enrolled or required to be enrolled in secondary school under State law; and*
- *Has NOT achieved an equivalent level of education; and*
- *Is an English Language Learner*

(Taken from the Adult Education and Family Literacy Act of 2014)

Application and Intake Process:

Step 1: Make an appointment to go through application and advising

Step 2: Take the assessment test (by appointment only)

Step 3: Take O*Net Interest Profiler

Step 4: Register for classes/independent Study

Title IV - Vocational Rehabilitation

The mission of OVR is to increase employment and promote independence among eligible individuals with disabilities throughout the Commonwealth of the Northern Mariana Islands (CNMI). In doing so, OVR provides vocational rehabilitation services to eligible individuals with disabilities who meet certain eligibility criteria to achieve competitive integrated employment - as defined by the Workforce Innovation and Opportunity Act (WIOA) - within their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

An applicant is eligible for vocational rehabilitation services if the individual:

A) Is an individual with a disability; and

B) Has a physical or mental impairment which for such individual constitutes or results in a substantial impediment to employment; and can benefit in terms of an employment outcome from vocational rehabilitation services; and

C) Requires vocational rehabilitation services to prepare for, secure, retain, or advance in employment; and

D) Has legal status to allow employment in the CNMI or U.S.

Vocational rehabilitation services are designed to lessen the impact or eliminate entirely the barriers to employment. Services include, but are not limited to: assessment for determining eligibility and vocational rehabilitation needs, vocational rehabilitation counseling and guidance, information and referral, vocational and other training services, job search/placement assistance/job retention services, supported employment services, post-employment services, rehabilitation/assistive technology, pre-employment transition services, etc. Services are individualized and provided in the context of an approved Individualized Plan for Employment (IPE). OVR consumers may be required to financially participate in their rehabilitation program.

OVR's responsibility for administrative activities that cannot be delegated to any other agency or individual includes:

- Decisions affecting eligibility for vocational rehabilitation services, the nature and scope of available services, and the provision of these services;***
- Determination that an individual has achieved an employment outcome;***
- Policy formulation and implementation; and***
- Allocation and expenditure of vocational rehabilitation services.***

SPECIFIC PARTNER RESPONSIBILITIES

In consideration of the mutual aims and desires of the CNMI WIOA Core Programs to this MOU, and in recognition of the public benefit to be derived from effective

implementation of this MOU, the parties agree that their respective responsibilities under this MOU shall be as follows:

Department of Labor - Workforce Investment Agency Division agrees to:

- *Process the WIOA application of interested individuals with disabilities who desire training and employment assistance services in a timely manner but no later than ten working days after date of application;*
- *Refer WIOA clients who are individuals with disabilities to OVR;*
- *Refer WIOA clients, who may need to acquire basic skills necessary to function more effectively and productively in order to gain upward mobility, to the Adult Education State Office at the Northern Marianas College;*
- *Assess the skill levels, aptitudes, and abilities of applicants with disabilities as well as determine need for support services and make referral to other community agencies as appropriate;*
- *Offer career planning and counseling, job search, and placement assistance;*
- *Make available employment statistics information, including labor market update, job vacancy listing, job skills necessary for listed jobs and occupations in demand, and other relevant information;*
- *Provide follow-up services including sustained employment counseling and guidance;*
- *Provide training services such as work experience and OJT;*
- *Participate in shared funding of mutual WIOA and OVR cases and ensure such participation occurs with regularity; and*
- *Identify any duplication of services and streamline program processes as necessary.*

Adult Education State Office agrees to:

- *Process the WIOA application of qualified individuals who desire completing educational goals and workplace success training during the advising period;*
- *Refer WIOA clients, who are individuals with disabilities, to OVR;*
- *Refer WIOA clients, who are interested in training and employment assistance services, to DOL-WIA Division;*
- *Assess the educational skill levels of qualified WIOA clients as well as determine need for support services and make referral to other community agencies as appropriate;*
- *Offer workplace success training;*
- *Provide follow-up services such as educational and career pathway goal settings;*
- *Participate in shared funding of mutual WIOA and OVR cases (if allowable) and ensure such participation occurs with regularity; and*
- *Identify any duplication of services and streamline program processes as necessary.*

Office of Vocational Rehabilitation agrees to:

- *Process the OVR application of interested individuals with disabilities in a timely manner but no later than 60 days after date of application;*
- *Refer clients who may benefit from additional training and employment services to DOL-WIA Division;*
- *Refer clients who may need to acquire basic skills, workplace success training, and follow-up services such as educational and career pathway goal settings to the Adult Education State Office;*
- *Request and obtain from WIOA Core Programs appropriate documents that will help OVR to facilitate the application and IPE development processes in a timely manner (signed releases required);*
- *Provide vocational rehabilitation counseling and guidance, career planning and development, training (work experience and/or OJT), job search, placement assistance, and other services required to achieve consumer's vocational objective consistent with an approved Individualized Plan for Employment (IPE);*
- *Facilitate supported employment services to include job coaching for mutual consumers considered most significantly disabled;*
- *Assess the need for assistive technology to enable consumers to participate in training and employment activities;*
- *Provide guidance and information on disability employment matters;*
- *Participate in shared funding of mutual OVR and WIOA cases and ensure such participation occurs with regularity;*
- *Encourage individuals with disabilities that they refer to the WIOA Core Programs to self-disclose that they have a disability so that the programs can get a better idea of how many clients they have in common; and*
- *Identify any duplication of services and streamline program processes as necessary.*

REFERRAL PROCEDURES

The parties agree to establish consistent and sustained referral methods through the use of telephone, fax, email, or in-person to ensure that appropriate referrals are made to each agency accordingly. The CNMI WIOA Core Programs agree that their respective offices will make available to interested individuals including those with disabilities the other party's informational brochures and applications for services. In addition, the Core Programs will promote open dialogue amongst the parties to follow-up on referrals and the progress of mutual/co-enrolled consumers. Furthermore, the parties to this MOU will ensure that prior to any discussion or exchange of information about a mutual/co-enrolled consumer occurs, a signed release is first secured.

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E. WAIVER REQUESTS (OPTIONAL)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;

2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;

3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;

4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:

EEEEEEEEEEEEEEEEEE. SUPPORTING EMPLOYER ENGAGEMENT;
FFFFFFFFFFFFFFFFFFFF. CONNECTING EDUCATION AND TRAINING STRATEGIES;
GGGGGGGGGGGGGGGGGG. SUPPORTING WORK-BASED LEARNING;
HHHHHHHHHHHHHHHHHH. IMPROVING JOB AND CAREER RESULTS, AND
IIIIIIIIIIIIIIII. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.

5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND

6. DESCRIBES THE PROCESSES USED TO:

JJJJJJJJJJJJJJJ. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
KKKKKKKKKKKKKKKK. PROVIDE NOTICE TO ANY LOCAL BOARD
AFFECTED BY THE WAIVER;
LLLLLLLLLLLLLLLLLLLL. PROVIDE ANY LOCAL BOARD AFFECTED BY THE
WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
MMMMMMMMMMMMMMMMMM. ENSURE MEANINGFUL PUBLIC COMMENT,
INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE
WAIVER.
NNNNNNNNNNNNNNNNNN. COLLECT AND REPORT INFORMATION ABOUT
WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT

7. THE SECRETARY MAY REQUIRE THAT STATES PROVIDE THE MOST RECENT DATA AVAILABLE ABOUT THE OUTCOMES OF THE EXISTING WAIVER IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER;

- 1. The CNMI SWDB requests a waiver for to lower the Out-of-School Youth Expenditure requirement to 50% and increase the In-School-Youth requirement to 50% of total funds received.**
- 2. The CNMI continues to promote youth employment in hopes of reducing the CNMI's dependency on CW workers (non U.S. eligible workers).**
- 3. The CNMI historically has used youth funding to server In-School-Youth through summer programs that helped students with work based learning experiences that provided them with their first ever exposure to jobs in their young lives. This opportunity not only benefitted the students but employers too as the employers were able to maximize the opportunity and train the individuals so that they would be prepared to enter their respective industries. This request would help the CNMI serve and prepare more In-School-Youth to help reduce the CNMI's dependency on CW workers (non U.S. eligible workers).**
- 4. Through the waiver, more In-School-Youth will have the opportunity to experience work based learning opportunities as well as be exposed to work place environments and employer engagement. This will provide the students with first hand experiences into the fields of their choice and to see whether or not they should pursue such career, enter into a career pathway program, enter into higher education or technical trades preparation or switch choices and pursue other fields.**
- 5. A majority of the youth in the CNMI are recipients of the FREE Lunch program and have parents who are of low income or meet NAP/SNAP requirements or have never been to college or worked in a livable wage paying job. These students work hard in-school in hopes of advancing not only their lives but the lives of their families. This opportunity will be more of a reward system for students to stay in school and complete or seek higher education.**
- 6. Progress of the students will be monitored according to establish performance standards and requirements.**

TITLE I-B ASSURANCES

The State Plan must include assurances that:

- 1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes**
- 2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes**
- 3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes**
- 4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes**

5. *Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes*
6. *The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions. Yes*
7. *The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes*
8. *The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes*
9. *If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes*
10. *The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes*
11. *The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes*

*PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM
(EMPLOYMENT SERVICES)*

All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE 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.

2. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM, AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION.

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.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UNEMPLOYMENT INSURANCE CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS.

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;

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE--

1. ASSESSMENT OF NEED

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

A. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE.

B. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO

BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION.

2. OUTREACH ACTIVITIES

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH WORKERS. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE COMPLAINT SYSTEM, INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWs IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS.

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS.

3. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM.

Describe the State agency's proposed strategies for:

A. PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

- CDLVII. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWs THROUGH THE ONE-STOP CENTERS;
- CDLVIII. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

4. OTHER REQUIREMENTS

A. COLLABORATION

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

B. REVIEW AND PUBLIC COMMENT.

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

C. DATA ASSESSMENT.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

D. ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

E. STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

- 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)); No**
- 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; No**
- 3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and No**
- 4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. No**

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The Unified or Combined State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under title II, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

Adult education programs have already adopted the Common Core State Standards into its curriculum and have aligned them with the College and Career Readiness Standards (CCRS) for Adult Education. In addition, adult education faculties have had the opportunity to attend the CCRS Implementation Training offered for Language Arts and Math as part of their professional development.

Programs measure student level and progress by using standardized assessment tools and by following assessment policy recommendations shared with them on an annual basis. Level gains and workforce skills are recorded using the Comprehensive Adult Student Assessment System (CASAS) TOPs Enterprise (TE) reporting system. The state uses the data provided by TE to analyze and improve performance.

Funds will be used to continue supporting professional development opportunities to aid in the implementation of standard based instruction for adult education in the Northern Mariana Islands.

The Adult Education program has mapped the adopted Common Core State Standards (CCSS) as well as the Adult Education College and Career Readiness Standards (CCRS) into the Student Learning Outcomes (SLOs) that are required in every course syllabus.

B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- ***Adult education;***
- ***Literacy;***
- ***Workplace adult education and literacy activities;***
- ***Family literacy activities;***
- ***English language acquisition activities;***
- ***Integrated English literacy and civics education;***
- ***Workforce preparation activities; or***
- ***Integrated education and training that—***
 1. ***Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and***
 2. ***Is for the purpose of educational and career advancement.***

The Northern Mariana Islands' Adult Education and Literacy Programs assist adults to become literate and obtain the knowledge and skills necessary to obtain a job or improve in their present jobs, to assist parents to be more involved with the educational development of their children, and to provide the opportunity for educational disadvantaged adults to complete a secondary education or credential.

Under Title II of the Workforce Innovation Opportunity Act (WIOA), eligible individuals are those who:

- ***has attained 16 years of age;***
- ***is not enrolled or required to be enrolled in secondary school under State law; and 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.***

Adult Basic Education (ABE) provides instruction in basic skills for adults with low literacy and numeracy skills. Adult Secondary Education (ASE) provides instruction for adults whose literacy and numeracy skills equate to a high school level and their goals are to obtain a high school equivalency diploma.

English as a Second Language (ESL) provides adults who lack proficiency in English and who seek to improve their literacy and competence in English.

In serving its students, the CNMI ABE program believes that adult learners learn best when:

- 1. They are in a comfortable with the learning environment and they attempt tasks that allow them to succeed within the contexts of their limited time and demanding lives;***
- 2. They provide input into the planning of their learning goals and processes;***
- 3. They have opportunities to engage in social learning, enabling them to learn from their peers and their instructors;***
- 4. They have a variety of options appropriate to their learning styles and have opportunities to analyze and expand their modes of learning;***
- 5. They are able to associate new learning with previous experiences and to use those experiences while learning;***
- 6. They have an opportunity to apply theory/information to practical situations in their own life; and***
- 7. When the instructors deal with learning difficulties and disabilities tactfully and patiently.***

The NMI Adult Basic Education Program has been designed for:

- Non-native speakers of English to improve their conversational, reading, writing and numeracy skills in English;***
- Adult students (16 years old and older) who did not complete their high school education, but plan to complete the high school equivalency examinations;***
- Returning adult speakers who did not complete their high school education to prepare to take the high school equivalency examination;***
- Adult literacy students to improve their basic reading, writing, and/or mathematics skill(s);***
- Adults to be prepared for successful job placement, career training or career performance; and***
- Adults who are parents preparing to become effective first teachers of their children. The performance measures for ABE programs are outlined in the Workforce Innovative Opportunity Act, Title II, Adult Basic Education and Family Literacy.***

The ABE curriculum will integrate skills, which includes digital literacy, critical thinking, and college and career readiness skills. These skills will assists students in improving educational levels and successfully continuing education or training and entering employment.

The CNMI Adult Education State Office will run competitions for its funds under WIOA Title II using the revised 12 considerations and the 5 new application requirements. These applications will include alignments with local workforce plans and participation in the one-stop system. The funds will be awarded to eligible providers that will provide some or all of the approved activities within the NMI region.

Eligible program providers may include some or all of the following:

- ***Adult education;***
 - ***Literacy;***
 - ***Workplace adult education and literacy activities;***
 - ***Family literacy activities;***
 - ***English language acquisition activities;***
 - ***Workforce preparation activities; or***
 - ***Integrated education and training that-***
- 15. 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***
- 16. Is for the purpose of educational and career advancement.***

The Adult Education Office under Subtitle C- Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e).

The Adult Education Office shall award two-year grants or contracts, on a competitive basis, to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

Note: The Adult Office has never done a competition before. With the available funds, the office works with the community and its sister islands of Tinian and Rota to identify a space for the office to come in and provide instruction. Our islands are very small and sites usually have less than 15 students. We also do not have much in terms of agencies capable in running programs, with the exception of possibly one (the Northern Marianas Trades Institute). Education for community members usually falls under the K-12 system, Adult Education, Northern Marianas College, and the Northern Marianas Trades Institute. This will be a developing process for the Adult State Office.

SPECIAL RULE

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school

under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- o Adult education and literacy activities;*
- o Special education, as determined by the eligible agency;*
- o Secondary school credit;*
- o Integrated education and training;*
- o Career pathways;*
- o Concurrent enrollment;*
- o Peer tutoring; and*
- o Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.*

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The CNMI State Department of Corrections (DOC) houses individuals remanded into their custody from the main island of Saipan and its two sister islands, Rota and Tinian and at times from its smaller minimally populated northern island chain. The Department of Correction has been a partner with adult education and family literacy programs for many years. Within the last several months, DOC has made some changes to prioritize providing educational and career training to their incarcerated individuals. Priority has been set to those who are likely to leave the institution within five years of participation in the adult education program.

For those who meet the eligibility requirements, the program will offer adult education and literacy activities. The instruction offered may integrate life skills, employability skills, and digital literacy skills to help the inmates obtain the needed skills to become self-reliant and contributing members of the island community after leaving DOC.

Currently there are no funding opportunities to provide adult education programs outside of AEFLA. The local program has included instruction and employability skills to DOC inmates. These inmate students must lack mastery in basic skills, or have not obtained a high school diploma or its equivalent.

The Adult Education State Office will run competitions, that adhere to Sec. 231, for eligible providers and from funds made available under section 222(a)(1) for a fiscal year, each eligible agency shall carry out corrections education and education for other institutionalized individuals. The funds described in subsection (a) shall be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including academic programs for— (1) adult education and literacy activities; (2) special education, as determined by the eligible agency; (3) secondary school credit; (4) integrated education and training; (5) career pathways; (6) concurrent enrollment; (7) peer tutoring; and (8) transition to re-entry initiatives and other post-release services with the goal of reducing recidivism. Each eligible agency that is using assistance provided under this section to carry out a program for criminal offenders within a correctional institution shall give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program. In addition to any report required under section 116, each eligible agency that receives assistance provided under this section shall annually prepare and submit to the Secretary a report on the progress, as described in section 116, of the eligible agency with respect to the programs and activities carried out under this section, including the relative rate of recidivism for the criminal offenders served.

Note: The office was able to offer instruction for one session, but progress was stalled due to serveral changes in leadership. There is also a question of enrollment as there are less than 10 who are eligible for services and this number varies from time to time due to probation opportunities. Communication is ongoing to continue services.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

1. DESCRIBE HOW THE STATE WILL ESTABLISH AND OPERATE INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAMS UNDER SECTION 243 OF WIOA, FOR ENGLISH LANGUAGE LEARNERS WHO ARE ADULTS, INCLUDING PROFESSIONALS WITH DEGREES AND CREDENTIALS IN THEIR NATIVE COUNTRIES.

Funding for Integrated English Literacy and Civics Education is not available for the CNMI.

2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, AN INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM AND HOW THE FUNDS WILL BE USED FOR THE PROGRAM.

Funding for English Literacy and Civics Education is not available for the CNMI.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA.

CNMI's Adult Education Office provides activities such as professional development opportunities; alignment of curriculum with standards and competencies that incorporate 21st century skills, workplace readiness activities with academic and life

skill courses; providing technology assistance, which includes staff training, program management improvement and support; working with other partner agencies to increase enrollment and completion rates in adult education programs; and partnering with postsecondary institutions.

The Adult Education Office will use the funds for required State Leadership activities as follows:

- *align with core partners and one-stop partners to support the strategies of its Unified State Plan, including the development of career pathways,*
- *improve instruction by developing high quality professional development programs that will include elements of reading instruction, dissemination of model programs and promising practices,*
- *provide technical assistance to providers based on researched evidence-based instructional practices, responsibilities of one-stop programs, effective use of technology, and*
- *monitor and evaluate the quality of adult education activities in the CNMI.*

Adult Education will use State Leadership funds for technical assistance to support local programs with programs, activities, and curriculum. The technical assistance will focus on data systems, assessment, integrated education and training, and career readiness and pathways.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE.

The CNMI's Adult Education Office will be responsible in carrying out permissible State Leadership activities, if funding permits, by:

- *maintaining membership and partnership in the Literacy Information and Communication System (LINCS) in order collaborate with other fellow agencies and minimize duplication of effort,*
- *furthering works on standards implementation, including the use of aligned and approved assessments to improve student preparedness for college and the workforce as a result of their participation in Adult Education and Literacy programs,*
- *improving assistance to adult learners to effectively meet personal and program goals,*
- *providing assistance to eligible providers in meeting adjusted levels of performance, via technical assistance, site visits, ongoing communications, and targeted professional development and program improvement activities,*
- *offering proven program models and content for integrated education and training and career pathways, and*
- *requiring evaluations of AEFLA programs every four years*

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

CNMI's Adult Education Office will visit programs to discuss program management, professional development needs, performance data and program compliance. If needed, specific trainings will ensure that proven and evidence based educational and student support models are being applied in the classroom. Monitoring site visits will be conducted with programs that are identified needing strategies for improvement of programs. With guidance from the Adult Education office, technical assistance will be given and will assist programs in developing an improvement plan. The Office will monitor the program closely and will conduct follow-up site visits to certify improvement plans are executed. Site visits may include classroom observations, and student surveys or evaluations. Monitoring examples may include financial, program management, data integrity, and teacher quality. All monitoring activities will result in a detailed compliance letter itemizing findings, recommendations, and commendations based on implementation of improvement plan and policy.

For on-going assessment purposes, the Adult Education Office will require all programs to submit on-going data that denote student participation levels and weekly attendance. Data submitted must also track student outcomes in the areas of obtaining or retaining employment, as well as transitioning into postsecondary education or training. Under WIOA, the Office will partner with the State Department of Labor (DOL) to track and report employment follow-up required in the new legislation.

The Adult Education Office assess the quality of its professional development programs by conducting an assessment and surveys on needs, services, and data. Programs will then create an action plan for planning professional development to address deficiencies or necessary improvements by outlining their strategies and activities. The Adult Education Office participates in program review under Northern Marianas College's Academic Programs and Services Division.

CERTIFICATIONS

States must provide written and signed certifications that

- 1. The plan is submitted by the State agency that is eligible to submit the plan. Yes*
- 2. The State agency has authority under State law to perform the functions of the State under the program. Yes*
- 3. The State legally may carry out each provision of the plan. Yes*
- 4. All provisions of the plan are consistent with State law. Yes*
- 5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan. Yes*
- 6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan. Yes*
- 7. The agency that is submitting the plan has adopted or otherwise formally approved the plan. Yes*

8. The plan is the basis for State operation and administration of the program. Yes

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization Northern Marianas College

Full Name of Authorized Representative: Dr. Carmen Fernandez

Title of Authorized Representative: President

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable,
please print, sign, and email to OCTAE_MAT@ed.gov

ASSURANCES

The State Plan must include assurances 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). Yes**
- 2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes**
- 3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes**
- 4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes**
- 5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes**
- 6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Yes**
- 7. The eligible agency agrees that in expending funds made available under title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303). Yes**

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

The Adult State Office will include GEPA language in the Information, Narrative, and Application Checklist Section of the RFP. A GEPA Attestation Statement Form

will be included in the RFP package for eligible providers to describe in detail how they will comply with the GEPA requirements.

Adherence to each agency's GEPA statement is monitored on a regular basis through quarterly desk audits and on-site review and technical assistance visits. Programs are reviewed to ensure equitable access to, and participation in all of its AFELA programs by eligible students, teachers and program beneficiaries with special needs. Monitoring includes, but is not limited to, dis-aggregated review of enrollment data, intake processes, hiring practices, etc.

Northern Marianas College is committed to the principle of equal opportunity in education. The College prohibits discrimination, including harassment, on the basis of race, gender, age, religion, color, national origin, ancestry, sexual orientation, marital status, disability, veteran status, or any other unlawful basis. This policy covers academic considerations such as admission and access to, and participation and treatment in, the College's programs, activities, and services.

Applicants of the WIOA Title II funding will engage in provisions such as extended seat time, use of large-print materials and tests, and admission into the Adult Basic Education program. Furthermore, the applicants will:

- 1. Assess the special needs of individuals requiring accommodations and ensure that the campus' facilities for individuals with physical impairments allow access to the building, classrooms, and restrooms.*
- 2. The Counselor or designee will serve as the counselor for students with special needs and will assist with the planning for the individual's with special learning needs and for coordinating the delivery of appropriate educational services at each campus.*
- 3. Assess the academic level of each student to ensure proper placement and provide reasonable accommodations as a part of the enrollment process at each campus. Administer the CASAS as appropriate for each participant utilizing the state assessment policy as a reference if needed.*
- 4. The State Office will establish a data collection and data entry process to ensure that any student who meets the NRS definition of Disabled is accurately reflected in the data.*
- 5. Advisors or designee will direct students to the HiSET Administrator for special accommodations for HiSET test. Once approved, the testing center examiners will ensure that these accommodations are made available to the examinee. (Refer to HiSET policy regarding accommodations for exams and the process for requesting accommodations.)*
- 6. Make available a brochure regarding program offerings on campus and sites.*
- 7. When appropriate, refer students to the Office of Vocational Rehabilitation if they are interested and meet the requirements of the program.*

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

**** Sec. 102(b)(D)(iii) of WIOA***

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

- 1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;***

The CNMI State Rehabilitation Council was provided with a draft copy of the VR portion of the Unified State Plan for their review, input and recommendations. The following comments or recommendations were submitted:

SRC Comment/Recommendation on Outreach:

The SRC recommends that OVR maximize public service announcements on the radio and in the newspapers in the three (3) official languages of the CNMI (e.g. English, Chamorro, and Carolinian) to increase awareness of OVR outreach activities including the Counselors' monthly trips to Tinian and Rota.

OVR Response:

OVR agrees and will make every effort to announce OVR outreach activities to increase public awareness and most especially access to and participation in the VR program.

SRC Comment/Recommendation on Improving Services to Unserved/Underserved Population:

The SRC recommends that OVR in the future consider working together with the WIOA Program, in collaboration and coordination with the Tinian and Rota Mayors' Office, to cost-share for an employee's salary and allocate that percentage of work time for the programs accordingly in an effort to ensure a more frequent VR presence on the neighbor islands.

OVR Response:

OVR agrees that Tinian and Rota are both unserved and/or underserved and that better strategies to increase access to and participation in the VR program are very much needed. OVR will consider the recommendation of a shared employee to help meet this need. In the meantime, OVR Counselors will continue to maximize the use of

distance technology (e.g. Skype) or more frequent emails and phone activity to further engage client participation throughout the VR process.

SRC Comment/Recommendation on Disability Awareness Training to Improve Capacity of Core Programs:

The SRC recommends that OVR work with their training and technical assistance provider(s) to provide training to stakeholders including the WIOA Core Programs in the area of disability awareness to increase confidence and competence in recognizing, accommodating and effectively serving individuals with disabilities including those with hidden disabilities.

OVR Response:

OVR agrees that increased competencies through effective training may result in better services to individuals with disabilities and in turn improves their chances for successful employment outcomes given the right provision of services and supports. OVR plans to pursue this recommendation in the near future.

SRC Comment/Recommendation on Office Space in Tinian and Rota:

The SRC recommends that OVR work out with CNMI DOL on the use of their office space in Tinian and Rota so as to better demonstrate collaboration and coordination with the WIOA Program resulting in enhanced outcomes for mutual clients served by both programs.

OVR Response:

OVR agrees and will pursue this recommendation in the very near future.

SRC Comment/Recommendation on American Job Center:

The SRC recommends that OVR reflect in Goal 4/Objective 4.7 that a “virtual” one-stop is a possibility for the American Job Center.

OVR Response:

OVR makes note of the recommendation; however, OVR will continue to advocate for a “physical” American Job Center due to inherent reasons (e.g. lack of computer literacy, need for accommodations, etc.).

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

Please refer to A-1 above.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

Not applicable

B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

The CNMI OVR has not requested a waiver.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not applicable

3. ALL STATE PLAN REQUIREMENTS WILL APPLY

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The CNMI OVR will continue its efforts to maintain or develop cooperative arrangements or agreements with various local, State, and Federal agencies and entities for referrals, training, services, facilities utilization, potential cost-sharing, and advocacy activities. These agencies include:

- State Rehabilitation Council for information/referral; outreach to increase education/awareness; collaboration/coordination and support for activities sponsored by the Disability Network Partners including the Transition Coalition; program review and evaluation including guidance on effective strategies to improve services and overall VR agency performance; employer engagement through Council-sponsored Employer Forum during all general membership meetings; etc.*
- Statewide Independent Living Council for information/referral, peer counseling, IL skills training, advocacy, transition services (transition from nursing homes and other institutions to community-based residences; assisting individuals to avoid institutional placement; and transition of youth with significant disabilities after completion of secondary education to postsecondary life), and transportation services).*

- ***CNMI Council on Developmental Disabilities for systemic change, public policy development, advocacy, empowerment training including self-advocacy, identification of barriers to employment and community inclusion for individuals with developmental and other disabilities, referral services, and collaboration and coordination with public education, Medicaid, and self-advocates, and awareness activities during Developmental Disabilities and Employment Awareness Month and/or other disability-related awareness activities throughout the year.***
- ***Commonwealth Healthcare Corporation:***

o Transitional Living Center for Work Experience Training for OVR and CGC's mutual consumers and Day Treatment Program to help increase function and independence.

o Non-Communicable Disease Bureau (NCDB) for information/referral, public education and awareness, advocacy, and training assistance.

o Students and Youth with Special Health Care Needs Program for care coordination of services to target group between birth and 21 years old.

o Community Guidance Center (CGC) for referral of rehabilitation services and increased collaboration/coordination of mutual clients to ensure meeting their employment and rehabilitation needs.

o Maternal and Child Health's Prevention Program for the promotion of health and wellness of women, infants, children (including children with special healthcare needs), adolescents and their families; cost-sharing of DNP-sponsored activities; information/referral; and outreach to increase education and awareness.

- ***Office of the Governor:***

o CNMI Medicaid Office for cost-sharing arrangements for services provided and referrals. Though a Memorandum of Understanding (MOU) with Medicaid exists, a current review may be required.

o Medical Referral Services (Rota and Tinian Centers, Guam, Hawaii, etc.) for service coordination; logical support; exploration of and utilization of comparable services/benefits; cost-sharing for provision of off-island medical services referral to mutual consumers.

- ***Scholarship Office for educational financial assistance at the Northern Marianas College and other institutions of higher education (IHE), referral of students to OVR for assistance and internships, and job/career exploration including information on rehabilitation careers.***
- ***Northern Marianas College:***

o The University Center for Excellence in Developmental Disabilities for faculty, student, and family training and advocacy, accommodations, increased awareness and empowerment in the postsecondary setting, and referral services.

o Counseling Office, Disability Support Services for referrals, sensitivity training, transition, accommodation assistance, financial aid counseling, and counseling on postsecondary educational opportunities.

o Adult Education and Literacy Program for educational and job skill training and referral services.

o Postsecondary Supports Pilot Project for information/referral; pre-employment transition services related to counseling on postsecondary options and instructions in self-advocacy; collaboration and coordination related to student accommodation; and individualized supports to students with disabilities.

- o Department of Community and Cultural Affairs:*

- o Office on Aging which provides information & referral; transportation services as well as the coordination of the Older Americans Awareness Month activities in May; and Senior Community Service Employment Program for subsidized part-time employment opportunities for low income individuals aged 55 years and older.*

- o Division of Youth Services for referrals and assistance on outreach.*

- o Nutrition Assistance Program for referrals and food assistance.*

- o Low Income Home Energy Assistance Program for assistance, utility subsidies and referral services.*

- o Child Care Program to assist individuals with disabilities and low income families to pay for child care while working, attending school or training.*

- o Commonwealth Respite Service Program for information/referral; outreach to increase education/awareness; volunteer training program to increase capacities leading to potential self-employment opportunities.*

- o Carolinian Affairs Office for referrals and outreach and collaboration/coordination for the translation of VR program materials in the Carolinian vernacular, if needed.*
 - o Saipan Chamber of Commerce for sponsorship of employers' training and education, mentoring & jobsite training, and referral services (employment engagement).*
 - o Society for Human Resource Management and Rotary Club for employer engagement:*

- o Information, referral and advocacy*

- o Employer awareness and education*

- o Collaboration with OVR for Work Experience (WE) and On-the-Job Training (OJT) placements*

- *Northern Marianas Protection and Advocacy Systems, Inc. for advocacy training, seminars, workshops, referrals, and cost-sharing of activities including National Developmental Disabilities and Employment Awareness Month (DDEAM).*
- *CNMI Center for Living Independently for advocacy and IL skills training, information/referral, peer counseling, transition, and transportation.*
- *Mayors' Offices of Saipan, Tinian, and Rota for referrals, outreach, program support services and coordination, and utility subsidies payment.*
- *Karidat for temporary housing, maintenance expenses, food assistance, and referral services.*
- *Ayuda Network for referrals and inter-agency updates, training and development.*
- *Commonwealth Office on Transit Authority (COTA) for transportation services, public education and awareness, and information & referral services.*
- *CNMI WIOA Core Programs through the State Workforce Development Board for leveraging of resource and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stop), and other authorized activities per WIOA.*
- *Disability Network Partners for ongoing discussions about issues affecting the disability community in the CNMI, information sharing, cost-sharing on disability awareness as well as employer engagement activities and training opportunities, referrals, technical assistance, etc.*
- *CNMI Transition Coalition for improved collaboration and coordination aimed at improving school to work transition services and preparing students with disabilities for the 21st century workforce through the provision of pre-employment transition services (Pre-ETS).*
- *Veteran's Affairs Office to assist in the coordination of services for common consumers and delivery of quality services for qualified disabled veterans.*
- *Department of Corrections / Division of Youth Services in developing a collaborative relationship with the Department of Corrections (DOC) and the Division of Youth Services (DYS) to coordinate service activities for individuals with disabilities who are interacting with the juvenile justice system, child welfare as well as adults scheduled for release. OVR will work with DOC in assisting inmates with disabilities with determining if they are eligible for OVR services. If found eligible, helping them to prepare for a successful employment transition as a component of their parole process.*
- *Special Education Program for referrals and the coordination and collaboration of the provision of pre-employment transition services to students with disabilities as defined by WIOA.*
- *Office of U.S. Congressman Gregorio Kilili Sablan for information/referral; outreach to increase education/awareness; participation in the annual Veterans Resource Fair sponsored by Cong. Sablan's Office.*
- *Northern Marianas Trades Institute for consumer training, job preparation, and placement; information/referral; outreach to increase education/awareness; support for and provision of student accommodation.*
- *The Lady Diann Torres Foundation Disability Center for information/referral; outreach to increase education/awareness; provision of training to individuals*

with disabilities to increase employability; provision of training to other community stakeholders including service providers, employers, the DNP, etc. to increase knowledge and capacities around disability employment.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

• Trankilu Alternative Financing Program (also known as the Assistive Technology (AT) Loan Program) for affordable loans made available to anyone who intends to purchase assistive technology, adapted vehicles, or modifications for a CNMI resident with a disability. Employers (provided that the assistive technology is to benefit exclusively the individual with a disability) and entrepreneurs with disabilities may qualify to participate in this program. They provide AT training as well as information and referral services.

TAFP works in collaboration with the CNMI Assistive Technology Program to provide AT training.

• The CNMI Assistive Technology Program is a federally-funded program under the CNMI Council on Developmental Disabilities and authorized under the Assistive Technology Act of 1998. In 1994, the CNMI Council on Developmental Disabilities was funded to develop, implement, and administer a Commonwealth-wide program to meet the assistive technology needs of persons with disabilities, which was known as STRAID. However, as a result of the new requirements of the Assistive Technology Act of 1998, as amended, the program is now called the CNMI Assistive Technology Program (CNMI ATP), which is under the CNMI Council on Developmental Disabilities. The CNMI ATP provides assistive technology-related services CNMI-wide to help children and adults with disabilities live productive, independent, and good quality lives. As an AT Act program, CNMI ATP carries out state level and leadership activities. State level activities consist of Alternative Financing Program (Trankilu Alternative Financing Program), Device Reutilization Program, Device Loan Program and Device Demonstration Program. Furthermore, CNMI ATP conducts state leadership activities CNMI-wide such as training, technical assistance, public awareness and outreach, information dissemination and referrals, and coordination and collaboration with various public, private and non-government entities.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

The CNMI OVR does not currently have cooperative agreements with any programs funded under the USDA.

But, as previously stated, the OVR will, when appropriate, continue to develop agreements with other state and local agencies that are not part of the statewide workforce investment system, including programs carried out by the Under Secretary for Rural Development of the Department of Agriculture and State programs, when such agreements will benefit the vocational rehabilitation of persons with significant disabilities.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

- **Workforce Investment Agency (WIOA Title I Program) for leveraging of resources and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stop), and other authorized activities per WIOA.**
- **Continue to maintain and strengthen relationships with the Northern Marianas Trades Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodation and effective communication with individuals with varying disabilities.**
- **Latte Training Academy for workforce development providing skilled and certified (Allied Health, Hotel & Hospitality, Business, and Information Technology) vocational training and career enhancement.**
- **Island Training Solutions for practicable ready to use training for public and private sector staff and management in Customer Service Team Building, Problem Solving, etc.**

5. STATE USE CONTRACTING PROGRAMS.

Not applicable

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU'S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

Section 20 of OVR's Policy and Procedures Manual states: "The Rehabilitation Act of 1973, as amended, requires the development of cooperative agreements, formal interagency agreements and memorandums of understanding, as appropriate, with other public agencies (CFR 361.22, CFR 361.23, 361.24). The cooperative agreement is designed for use whenever public agencies enter into agreements and does not involve an exchange of funds. This may be accomplished by executing a COOPERATIVE AGREEMENT BETWEEN PUBLIC AGENCIES, and obtaining required signatory approvals. The Rehabilitation Act of 1973, as amended, also allows for third-party cooperative arrangements (CFR 361.28). Interlocal contracts with public agencies may be entered into by executing an INTERLOCAL CONTRACT BETWEEN PUBLIC AGENCIES and obtaining required signatory approvals. The interlocal contract is designed for use whenever public agencies contract with one another for the performance of any government service" (p. 78).

Where specifically School-to-Work Transition is concerned, the CNMI Office of Vocational Rehabilitation (OVR) and the Public School System-Special Education Program (PSS-SPED), in FY 2015, re-evaluated their existing Interagency Cooperative Agreement (ICA) and made necessary revisions per the requirements of the Workforce Innovation and Opportunity Act (WIOA) of 2014. Section 8 of the ICA talks about Pre-Employment Transition Services: “The Rehabilitation Act of 2014, as amended (under Title IV of the Workforce Innovation and Opportunity Act signed into law by President Obama on July 22, 2014) requires OVR to provide eligible students with disabilities under IDEA or Section 504, ages 16-21 years, with pre-employment transition services (PETS), such as: Job exploration counseling, Work-based learning opportunities, Counseling on post-secondary educational opportunities, Workplace readiness training, and Instructions in self-advocacy. PSS-SPED will provide assistance to OVR in the coordination with employers on transition services including PETS for students with disabilities” (p. 3).

Procedures regarding the timely development and approval of individualized plans for employment for all CNMI OVR consumers, including students with disabilities, may be found in the Policy and Procedures Manual, under Section 16: INDIVIDUALIZED PLAN FOR EMPLOYMENT (IPE): “After determination of eligibility, Counselor shall develop an individualized plan for employment (IPE) within 60 work days, and the identification of rehabilitation needs, there will be an IPE initiated” (p. 35). In addition to the ICA, the School-to-Work Transition Guidelines provides more practical information including best practices for delivering transition services. According to the Guidelines, the CNMI OVR must ensure that the “Individualized Plan for Employment (IPE) should be completed as soon as eligibility has been determined but no later than 60 days, and the necessary information has been gathered. An IPE should be in place prior to graduation or exit from school. The IPE is to be coordinated with the student’s Individual Education Program (IEP) that is developed by the school system’s transition team” (p. 2).

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

Section 2 of the Interagency Cooperative Agreement states that the “OVR and PSS-SPED will engage in providing the other with consultation and technical assistance to plan for and ensure the smooth transition of students with disabilities” (p. 1).

VR staff are essentially a resource for schools and families to help educate students about supports needed for a smooth transition from school to work, further training, education and/or independent living. To achieve this objective the following general activities are completed:

- Consulting with and educating schools, parents, students, and other agencies about VR services.*
- Conducting outreach that includes VR orientation presentations, dissemination of VR brochures, and technical assistance with transition IEP planning.*
- Participation in transition fairs, job fairs, and other activities targeting parents and students to increase appropriate referrals.*
- Conducting early identification and assessment of student needs for transition services.*

- **Bringing the VR program to the school campuses through continued co-location efforts.**
- **Communicating relevant VR policy which may impact a student's application or eligibility for VR services.**

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

Section 3 of the Interagency Cooperative Agreement states that the "OVR's involvement during the transition planning phase of the IEP helps to ensure that the vocational or employment-related provisions of the IEP provide a bridge to the vocational rehabilitation services needed under an IPE for those students determined eligible for the vocational rehabilitation program" (p. 1).

As an extension of the 2015 Interagency Agreement between the Office of Vocational Rehabilitation and the Public School System-Special Education Program, the School to Work Transition Guide (SWTG) was developed to ensure a smooth transition process. This guide suggests best practices that can be used as a tool to assist in the improvement of communication, coordination, and services for students with disabilities transitioning from school to work. It was designed to be useful for all persons and agencies (stakeholders) involved in the transition process. This document varies depending upon the stakeholder's needs at the time of use. The Agencies and Programs involved in the development of this guide agreed to the following core values:

- **Transition is Essential: Transition is important for all students, regardless of disability. Transition provides the focus and early planning for all youth with disabilities to move towards achieving their goals.**
- **Individualization: Transition services are not the same for all students. Services are person-specific and developed with the young adult, their family, and those who know them well based on their interests, abilities, and needs.**
- **Outcome Focused: Transition services are specific outcomes driven activities designed to help students achieve their goals of training/education, employment, and independent living.**
- **Achieve More Together: Working together, as equal partners, creates a seamless transition from school to work. All can assist the student and their families identify their needs and develop plans to meet these needs. Everyone has something to contribute and leveraging of funds and staff leads to exceptional outcomes.**
- **Student and Family Involvement: Students and their families are actively involved in the entire transition process including service decisions. They are full and meaningful partners in the process.**
- **Identification of Roles and Process: Identifying the roles of every partner and the processes needed, sets clear expectations between partners about areas of focus and expertise, responsibilities, and where to go for assistance beyond the individual programs scope of practice. Knowing where to go for the right answers allows for smooth discussions about possibilities.**
- **Increase Understanding: Share information so all partners are aware of available resources to help in transitioning.**

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED) April 02, 2018.

Section 10 - Mutual Responsibilities

- **Training and Technical Assistance: OVR will provide consultation and technical assistance to PSS-SPED that will assist in the planning and transition of all students with disabilities who are eligible or potentially eligible from school to post-school activities, including employment. Develop and provide common training and professional development opportunities to improve transition and employment results to youth.**
- **Planning and Coordination: Joint collaboration in the development/continuation of a work group (Transition and Coordination Team-TACT) that targets the improvement of transition to employment outcomes in integrated, community settings for students with disabilities. The TACT will also explore and identify pre-employment transition services and transition-related services (work-based learning; internships; apprenticeships; dual enrollment programs; industry recognized credential programs and college programs). (Supporting document: School to Work Transition Guidelines) Ensure mutual support for and participation in the respective programs required State Plan and Needs Assessment process. Further, parties agree to work collaboratively to coordinate with and engage employers on pre-employment transition services and transition services for you and students with disabilities.**
- **Data Sharing: Sharing of data, within the bounds of confidentiality, of eligible students regarding transition services and outcomes.**
- **Transition Services/Accommodations: Identify and disseminate information about pre-employment transition services and transition services, accommodations, employment services, effective practices/strategies that create positive employment outcomes to program staff, partners, families, individuals, employers, and public and private stakeholders.**
- **Assistive Technology: Upon completion of the free appropriate public education (FAPE) of many eligible students, PSS-SPED is left with items of assistive technology which have been required by student's IEPs and which have been customized for particular students or are otherwise unlikely to be used by different students. Such items of assistive technology often are stored until they become obsolete.**
- **Co-Location Initiative: Parties agree to continue to lend their support for OVR staff, i.e, vocational rehabilitation counselor, to be based at the public high schools for a rehabilitation program, conduct Q&A with stakeholders, i.e. students, parents, and school personnel, entertain applications for vocational rehabilitation services, conduct initial interviews, and increase referrals to OVR.**

Section 11 of this document describes further the roles and responsibilities for each agency as applicable to their regulatory authority.

Section 12 - Financial Responsibility of the Interagency Cooperative Agreement States: When a student with a disability is both in school and has an IPE with OVR, the cost of

services necessary for both the student's education and for the student to become employed, will be delineated between PSS-SPED in terms of what will work with PSS-SPED representative in determining which is needed to complete high school coursework and which services pertain to fulfilling the IPE.

When another adult service provider agency has been identified by the IEP team (that can pay part or all of the cost of a specific service or device), a representative of that agency shall be invited and included in the IEP meeting where the responsibility for payment is negotiated. Arrangements to share the cost of a given service or device will be fully reflected and explained in the IEP or the IPE, or both. (Note: OVR is a secondary source of financial assistance.

Section 4 - Transition Planning Related to the Individualized Education Program (IEP)

Schools usually designate a staff person as a Transition IEP Coordinator. This person is responsible for communicating the student's transition services needs to agencies representatives who were unable to attend. For CNMI PSS-SPED, responsibility for the coordination of transition services is transferred to the school level and falls within the purview of SPED teachers.

The school must obtain agency commitments to provide or pay for needed transition services or reconvene the IEP to determine alternate methods for meeting the student's needs. It is important to the VR Counselor to respond to school staff on the progress of mutual students, with appropriate parental, legal guardian, or student (at age 18) consent,

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED)

Section 5: Procedures for Outreach

OVR and PSS—SPED will continue to support outreach activities that will increase referrals to OVR in an effort to provide eligible students with disabilities a smooth school to work transition. (Refer to the School to Work Transition Guidelines for detailed description on procedures for outreach.)

Outreach activities of the VR Counselor are primarily focused on providing information about VR to school staff, students, parents, community professionals, and others interested in pre-employment transition services and transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the following:

- ***Vocational Rehabilitation program purpose***
- ***Eligibility requirements***
- ***Procedures***
- ***Scope of services that may be provided to eligible students***

- *Pre-employment transition services that may be provided to potentially eligible students*

The VR Counselor can provide information regarding OVR services that can be passed on to students and their families by contacting the SPED Teacher, Transition Coordinator, SPED Coordinator, or School Counselor.

Ways the VR Counselor may conduct outreach include:

- *Providing VR brochures and business cards to the school*
- *Presenting at the first Open House or Orientation held at the school*
- *Conducting regularly scheduled school visits (co—location)*
- *Participating in Transition and job fairs at the school*
- *Attending school IEP meetings when invited*
- *Speaking about pre-employment transition services and VR services at school staff meetings, teacher in—service training, student/parent group meetings, or interagency meetings*

The VR Counselor should work with school staff to ensure referrals of students with disabilities to the OVR program at the beginning of the school year as follows:

- *Referral for pre-employment transition services beginning at age 16 for all students with disabilities who may need them*
- *Referral and application for OVR services is recommended at age 16 for students who are involved in or plan to be involved in Community-Based Work Experiences (CBWE)*
- *Although OVR does not impose an age limit on when a student can apply for VR Transition services, they encourage students to do so two years prior to school exit*
- *Students at high risk of dropping out should be referred if they are old enough to begin training or searching for employment*
- *The VR Counselor may act in an advisory capacity for at—risk youth who are too young to apply and/or do not have a disability*

This should allow sufficient time for determining eligibility, identifying OVR service needs, referring students to community services, and developing the approve IPE prior to the student's exit from school.

Section 8: Services Prior to Referral Transition services, including pre-employment transition services, may be provided by OVR to students with disabilities beginning at age 16 (or younger, if the IEP team determines it is appropriate), who have not yet applied for VR services. Consultation to students and families , technical assistance to schools, and participation in IEP meetings when invited.

OVR will collaborate with PSS-SPED to provide any or all of the five pre-employment transition services required activities described in the next section to students with disabilities (ages 16-21, or younger, if the IEP team determines it is appropriate).

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

There are no private non—profits providing VR services in the CNMI.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

A fee for services arrangement is in place with only one (1) private company to provide job coaching services: Marianas Health. The job coaches assist individuals with most significant disabilities during their participation in the work experience and/or on-the-job training programs. When necessary, the services of a job coach is procured to assist newly-hired consumers to ease their transition into employment. (Note: OVR did business with Pinnacle Staffing in the past for the provision of job coaching services; but after a devastating fire broke out, the company never recovered.)

Personal assistance services are provided to consumers with most significant disabilities to help them to further maintain their employment through the choosing of their own PAs who are compensated by OVR. In August of 2016, OVR expanded their CRP network to include Marianas Health as a provider of personal assistance services.

Still, the CNMI has a limited number of community rehabilitation programs (CRP), supported employment and extended service providers. This creates challenges in providing for a comprehensive support services, which are required for a successful program. Discussions with public agencies and organizations to provide and/or fund supported employment and extended services are ongoing. In addition, CNMI OVR will continue to identify individuals who have received training to provide supported employment services to VR consumers.

G. COORDINATION WITH EMPLOYERS

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate VR services for consumers with disabilities to prepare them for employment by:

- o Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs,***

- *Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management, Rotary Club, and other similar venues,*
- *Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge effectiveness,*
- *Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment,*
- *Participate in job/career fairs sponsored by various partners within our community, including but not limited to Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,*
- *Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,*
- *Work with our Disability Network Partners to consider inclusion of a few employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment,*
- *Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies,*
- *In PY 2017, OVR hired for the very first time an Employment Specialist whose duties and responsibilities revolve around business relations and employer engagement,*
- *In PY 2017, the Saipan Chamber of Commerce Executive Director had graciously offered for OVR to utilize the Chamber's website as a repository of disability employment resources for employers, and*
- *The SRC general membership meetings will provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This practice started in PY 2017 during the Council's 12/21/17 general membership meeting and will continue for all subsequent regular meetings.*

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate Transition services, including Pre-Employment Transition Services (Pre-ETS) for students with disabilities to prepare them for employment by:

- *Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs, and what opportunities could be available to PreETS, especially with regards to Work-Based Learning Experiences (WBLE) and transitioning students,*

- *Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management Rotary Club, and/or other similar venues,*
- *Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge effectiveness,*
- *Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment as well as WBLE opportunities,*
- *Participate in job/career fairs (for consumer or student support) sponsored by various partners within our community, including but not limited to: Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,*
- *Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,*
- *Work with our Disability Network Partners to consider inclusion of employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment as well as for Pre-Employment Transition Services (i.e. WBLE/OJT/Apprenticeship Programs)*
- *Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies,*
- *In PY 2017, OVR hired for the very first time an Employment Specialist whose duties and responsibilities revolve around business relations and employer engagement,*
- *In PY 2017, the Saipan Chamber of Commerce Executive Director had graciously offered for OVR to utilize the Chamber's website as a repository of disability employment resources for employers, and for the promotion of PreETS, and*
- *The SRC general membership meetings will provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This forum also affords OVR the opportunity to promote and market the PreETS and transitioning students. This practice started in PY 2017 during the Council's 12/21/17 general membership meeting and will continue for all subsequent regular meetings.*

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

During the general membership meeting of the CNMI Council on Developmental Disabilities (CDD) on 11/12/15, of which the OVR and the Medicaid are members, formal discussions on how we can collaborate with Medicaid to provide longer term supported employment and extended services to people with the most significant

disabilities through applicable waiver(s) was initiated. The Medicaid Administrator informed council members that because of a Medicaid cap for the CNMI and other territories, certain waivers are not applicable, and until such time that the cap is lifted, Medicaid will be unable to provide home and community—based services in support of competitive integrated employment. The Medicaid continues to provide services under their State Plan of 1989. Mandatory services include: inpatient services; outpatient services; other lab and x—ray; nursing facility services (only when referred off— island); physician’s services; early and periodic screening, diagnosis, and treatment for children under 18; home health care (only when referred off— island); family planning services; and rural health clinic (only when referred off— island). In addition, optional services are also covered, such as: clinic services; optometry services; other practitioner services; dental services; physical and occupational therapy (rehabilitation); speech, hearing, and language disorders; prescribed drugs, dentures, prosthetic devices, and eyeglasses; wheelchair; medical supplies; and transportation (to off— island facility only). Continued discussions with Medicaid by the CNMI Disability Network Partners (OVR included) will be planned including obtaining federal— level guidance and technical assistance on how CNMI’s current Medicaid restriction on the cap may be overcome to provide additional longer term services needed by people with more significant disabilities in order to achieve competitive integrated employment.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

CNMI OVR partners with the Council on Developmental Disabilities by engaging in activities that promote and improve our public VR program; identify and address the employment and other needs of people with disabilities; strengthen partnerships among the local Disability Network Partners (OVR, CDD, Northern Marianas Protection & Advocacy Systems, Inc., University Center for Excellence in Developmental Disabilities, Transition Coalition, employers, community rehabilitation programs, etc.); advocate that people with disabilities receive timely and quality services from community providers; educate the public on the mandates of federal and local statutes as they pertain to people with disabilities; leveraging of resources and expertise on similar State Plan goals/objectives for the benefit of VR consumers and potential applicants; among other things.

Collaboration with the CDD takes on the following form:

- Regular communications throughout the year.*
- Involvement in mutual councils and boards, such as the Council on Developmental Disabilities, the State Rehabilitation Council, the Special Education State Advisory Panel, the Ayuda Network, the Consumer Advisory Committee of the University Center for Excellence in Developmental Disabilities, the Statewide Independent Living Council, etc.*
- Involvement in mutual coalitions, for instance, the Transition Coalition and the Disability Network Partners.*
- Attendance and participation at each respective programs’ public hearing or forum to help inform the State Plan development.*

- **Leveraging of resources and expertise in areas of employment, advocacy, and systems change resulting in competitive, integrated, and timely services.**
- **Information and referral related to employment.**

CNMI CDD is committed to promoting systems change, providing advocacy, and supporting the independence, productivity, integration, and inclusion of individuals with developmental and other disabilities in our island community.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

The Community Guidance Center (CGC) is the primary provider of mental health and substance abuse services for all individuals residing in the CNMI. It incorporates all outpatient mental health services and administers all Federal health programs in the CNMI related to mental health and substance abuse, as well as all other publicly funded mental health services. Through collaboration and establishing interdependent relationships with other system providers, CGC is committed to providing high quality mental health and substance abuse treatment and other therapeutic services to the multi-diverse population of the CNMI, as well support services to families and friends, community outreach, prevention and education services, and referral assistance to other community resources.

In PY 2016, OVR initiated discussions with CGC about possibly entering into a memorandum of understanding (MOU) on how to better serve mutual consumers in achieving competitive integrated employment. This project continues in PY 2017 and more likely beyond with follow-ups, reviews, and/or further discussions possibly leading to the development of an MOU that meets the needs of both OVR and CGC.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

- i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;**

The qualifications of CNMI OVR staff are under consistent annual review to identify educational and training needs that are required to enhance professional development. These needs are incorporated in individual staff development plans that conform to both CNMI Personnel Service System Rules & Regulations (PSSR&R) and VR standards

as established in the Rehabilitation Act Amendments of 1998. All counseling professionals who do not meet these standards will be required to demonstrate significant progress per Section 101(a)(7) of the Rehabilitation Act. Activities that will continue to be conducted on an annual basis include:

- *Projections on the number of VR consumers to assess staffing needs, and to maintain or plan appropriate and adequate staffing levels;*
- *Findings of monitoring reports, SRC recommendations, Consumer Satisfaction Survey results, and performance evaluations will be reviewed for staffing suggestions. Other documents, such as reviewers' comments on the State plan development, deficiencies noted in submitted quarterly/annual RSA reports, and monitoring reports will also be reviewed;*
- *Consulting with VR counseling staff to identify training topics to support personnel development;*
- *Ongoing reviews of progress on the individual professional staff development plan.*

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

The Office of Vocational Rehabilitation currently employs thirteen (13) personnel that provide VR services to an estimated three hundred (300) individuals/consumers per year.

VR administrative support and services are provided by:

- *One (1) Director who is a product of federal CSPD Master's degree in Rehabilitation Counseling Program with CRC credential,*
- *One (1) Fiscal Officer with over thirty (30) years dedicated to CNMI OVR,*
- *One (1) Administrative and Operations Manager,*
- *One (1) Administrative Assistant,*
- *One (1) Data Analyst,*
- *One (1) Administrative Clerk,*
- *One (1) ILOB Case Worker Assistant, and*
- *One (1) Employment Specialist.*

Direct VR services are provided by:

- *Two (2) VR Counselors (General),*
- *One (1) VR Transition Counselor, and*
- *Two (2) VR Counselor Aides.*

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

CNMI OVR anticipates about a 5% increase in the number of individuals/consumers that will be served in PY 2018 and beyond due to the hiring of a VR Transition Counselor who actively seeks out potential applicants at the public high schools as well as the college and trades school campuses. In addition, VR Counselors make regular visits to the islands of Tinian and Rota thereby receiving a steady number of applications through the year, not to mention those received from Saipan. Current counselor caseload average is fifty-three (53). In addition, WIOA puts special emphasis on employer engagement activities as employers comprise VR's second customer base. This said, CNMI OVR successfully pursued the recruitment and hiring of its Employment Specialist who officially assumed his position on October 16, 2017. In addition, CNMI OVR will pursue the re-certification of the Case Service Manager position in the near future. The chart below represents current and projected vacancies by job title:

Job Title Total Positions Current Vacancies Projected Vacancies

Director 1 0 0

Fiscal Officer 1 0 0

Administrative & Operations Manager 1 0 0

VR Counselor 2 0 0

VR Transition Counselor 1 0 0

VR Counselor Aide 2 0 0

Administrative Assistant 1 0 0

Administrative Clerk 1 0 0

Data Analyst 1 0 0

ILOB Case Worker Assistant 1 0 0

Employment Specialist 1 0 0

Case Service Manager 0 0 1

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

CNMI OVR has one (1) VR Counselor with a general caseload who is enrolled in San Diego State University's (SDSU) Master's degree program in Rehabilitation Counseling via distance learning beginning in the Spring 2016 semester. This VRC successfully passed an interview with Dr. Charles Degeneffe of SDSU and were subsequently awarded federal financial assistance through the university.

CNMI OVR continues to encourage its counseling support staff to enroll at the Northern Marianas College at the level of their professional development needs and

requirements. CNMI OVR will continue to explore educational and training opportunities offered by other educational institutions that can further assist with enhancing the professional development of its staff.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

Currently the CNMI OVR has one VR counselor aide pursuing an Associate degree in rehabilitation and human services at the Northern Marianas College. In addition, there is one VR counselor pursuing a Master's degree in rehabilitation counseling from San Diego State University through distance learning.

iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

None

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

The CNMI OVR continues to maintain its affiliation with the San Diego State University (SDSU) as there are no institutions of higher education within the CNMI, Micronesia, or Hawaii that offers a Master's in Rehabilitation Counseling. CNMI OVR's recruitment efforts include contacts at SDSU and with the National Rehabilitation Leadership Institute (NRLI) as well as the Council of State Administrators of Vocational Rehabilitation (CSAVR), to name a few, for referrals or information about recent graduates in the field.

CNMI OVR will continue its efforts in obtaining a list of CNMI students who are pursuing a 4-year degree in Rehabilitation and Human Services at the Northern Marianas College as well as those who are receiving local scholarship assistance and majoring in related fields at off-island universities and/or colleges. These students will be sent information about careers in rehabilitation counseling in hopes of igniting interest via brochures and information packets provided to the CNMI Scholarship Office.

Job skills development for current personnel will be accomplished through enrollment in appropriate classes at the Northern Marianas College. Staff's educational, skills, and professional development will also be reinforced by regularly scheduling staff to attend job skills training sessions conducted by other government or partner agencies, as well as in-service trainings provided by staff.

Other recruitment and retention activities include:

- *Participating in job fairs and career day activities to generate interest and awareness among college and high school students including students with disabilities of potential career opportunities in the field of vocational rehabilitation;*
- *Encouraging students who are ready to graduate from high school and post-secondary institutions to file resumes that may be considered if and when a VR vacancy is created through retirement, resignation, promotion, or transfer of existing staff and when additional counseling positions are established in the future;*
- *CNMI OVR leadership will continue to identify trainings for managers to ensure they are able to assist employees in effectively dealing with stress;*
- *Providing supports to staff in the form of problem-solving sessions along with coaching, leadership, and mentoring services. A structured mentoring program aimed at pairing a more experienced staff with a less experienced employee will help to promote and encourage the development of specific job skills, provide ongoing feedback, and create an individual growth or career plan for staff;*
- *CNMI OVR will remain committed to providing its staff, especially those providing direct services, with opportunities to meet agency standards as well as career advancement.*

CNMI OVR utilizes and practices the same recruitment strategy and procedure administered under the local Office of Personnel Management (OPM). Currently, CNMI OVR does not use nor does it have a different recruitment procedure or system to reach minorities and individuals with disabilities.

The CNMI government is in itself a minority as one of the five (5) insular areas; therefore, CNMI residents, for the most part, are considered minorities. It is important to point out that since the inception of the CNMI government in 1978, the OVR was also instituted as an agency and all its employees were and continue to be representative of minority groups. Currently, at least eight (8) of CNMI OVR's thirteen (13) staff members are individuals with disabilities. CNMI OVR promotes the employment of qualified individuals with disabilities without regard to race, disability, etc.

3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

To ensure that CNMI OVR counselors are comparable to U.S. mainland rehabilitation counselors, CNMI OVR maintains adherence to the WIOA requirements for qualified rehabilitation counselors, which is a Bachelor's degree in Special Education,

Humanities, Vocational Rehabilitation Counseling or related field from an accredited U.S. College or University.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

All delegable functions (determination of eligibility, IPE development, IPE amendment, annual review of the IPE, and closures) are performed by staff who are qualified VR professionals who meet WIOA standards.

Currently, all work is signed off by the CNMI OVR Director who has a Master's degree in Rehabilitation Counseling and is a Certified Rehabilitation Counselor (CRC) until such time CNMI OVR hires a full-time Case Service Manager with similar credentials.

To ensure progress of CNMI OVR's professional and/or paraprofessional staff development, VR counselors' transcripts, student records, and grades are submitted to the OVR director or designee for periodic review to determine progress.

4. STAFF DEVELOPMENT.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

CNMI OVR's ongoing staff development activities which incorporate both on- and off-island opportunities include:

- o Enrolling in relevant courses offered at the Northern Marianas College and any other organizations or institutions that offer coursework that will enhance job skills;***
- o Attending related trainings, workshops, and seminars offered by other government agencies and organizations as well as in-service trainings provided by CNMI OVR staff or its community partners;***
- o Attending conferences and workshops that cover specific VR-related issues to enhance program knowledge and practices and to earn VR counselor professional certifications and Continuing Education Units;***
- o Coordinating intensive training sessions with San Diego State University-Interwork Institute or other designed specifically for VR staff covering a variety of subjects that will enhance work skills, professional development, and program knowledge;***

- *Initiating inter-agency awareness through trainings and workshops covering VR issues with appropriate staff from partner agencies and other organizations; and*
- *Continued networking with San Diego State University-National Rehabilitation Leadership Institute (SDSU-NRLI) graduates and the Council of State Administrators of Vocational Rehabilitation (CSAVR) for assistance in VR counseling, management, and staff training needs.*

The educational needs for CNMI OVR personnel are determined based on:

- *Input from the State Rehabilitation Council,*
- *Findings of the RSA Monitoring Report,*
- *Comprehensive Training Needs Assessment,*
- *Individual Staff Performance Evaluations, and*
- *Staff input into their individual training needs.*

B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

CNMI OVR continues to identify and engage in web-based trainings as appropriate at minimal to no cost to the program. Beginning in FY 2016, RSA will no longer make available to VR agencies funds from the In-Service Training grant as those have phased out. This means that all staff development activities will be supported by our Title I-Basic Support grant. CNMI OVR plans to maintain its relationship with SDSU-II to provide needed trainings in topic areas determined important to enhance job skills as well as to improve the general performance of our VR program. Two (2) members of the CNMI OVR's leadership team (director and administration/operations manager) have successfully completed a year-long leadership seminar through the SDSU-NRLI that began in FY 2015 and ended in the first week of FY 2016.

Continuous sharing of information, especially those obtained at trainings, conferences, seminars, webinars, etc. are highly encouraged among staff members. Monthly staff meetings offer a welcome venue to share, review, and discuss various VR materials or literature. Quarterly meetings of the councils (SRC & SILC) also offer a forum for information sharing. In addition, CNMI OVR's website offers a wealth of information to benefit a wide audience including VR staff themselves.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The majority of CNMI OVR staff members are multi-lingual, with personnel who can speak, read, and/or write in English, Chamorro, Carolinian, Chuukese, and Palauan. In PY 2018, three (3) OVR staff participated in a beginning ASL course for the Disability

Network Partners sponsored by the University Center for Excellence in Developmental Disabilities at no cost to the program.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

In PY 2018, CNMI OVR will reintroduce to the Public School System-Special Education Program (PSS-SPED) officials a proposed plan for the coordination of personnel development activities through joint training sessions that involve CNMI OVR employees and PSS-SPED faculty/staff. If needed, technical assistance will be obtained to provide the necessary training through a cost-sharing arrangement. On January 11-15, 2016, CNMI OVR coordinated with SDSU-II to provide training and technical assistance to OVR and its partners including the PSS-SPED on the WIOA requirements and implementation on topics that included pre-employment transition services (Pre-ETS) and coordination with education officials for improved services to students with disabilities as they transition from high school to postsecondary activities including competitive & integrated employment, continued education, and/or independent living.

J. STATEWIDE ASSESSMENT

(Formerly known as Attachment 4.11(a)).

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

In 2017, CNMI OVR contracted the professional services of San Diego State University-Interwork Institute to conduct a comprehensive statewide needs assessment (CSNA) of the VR needs of people with disabilities residing in the Commonwealth. In part, the purpose of the needs assessment was to help inform the development of OVR's State Plan.

Itemized below are the needs of individuals with most significant disabilities, including their need for supported employment services, and the recommendations offered to OVR based on the results of the recently-conducted CSNA:

- **"The need for work incentives counseling and benefits planning remains a major need in CNMI. OVR should ensure that all SSA beneficiaries, especially young people, have access to benefits planning so that they can help counter the fear of benefits loss through work. OVR consumers are referred to the SSA office for benefits planning currently, but it would be helpful for at least one individual at OVR to become an expert on SSA work incentives so that OVR can provide benefits counseling directly.**

- *The lack of an extended service providers continues to support the need for the development of natural supports for OVR consumers that need SE to be successful at work. OVR should continue to communicate with the Medicaid program in CNMI to see if they are willing to submit a Home and Community-Based Waiver to use for extended services.*
- *Several individuals indicated that individuals with disabilities in CNMI should do volunteer work more often as a strategy to show employers that they can perform the essential functions of the job.*
- *Although the program does not have specific job opening information for CNMI, the Labor Market Information System called The Career Index Plus can provide individuals with disabilities in CNMI some very valuable information on career exploration and qualifications for specific occupations. This program is free of charge for all individuals and can be accessed at www.thecareerindex.com.*
- *OVR should provide training on supported employment to their counselors on a regular basis, especially with the passage of WIOA and the changes to the SE program” (p. 36).*

B. WHO ARE MINORITIES;

The CSNA report also captured information regarding recommendations to assist minorities as well as individuals that are unserved or underserved to better have access to and participate in VR:

- *“OVR should investigate whether the use of software programs like Skype can increase communication with Tinian and Rota residents so that there is a mechanism in place for these residents to interact with OVR staff on more frequent basis that once a month. If there is a lack of Internet access on the islands, OVR should consider working with a consumer who is interested in self-employment to establish an Internet Café on island which could serve multiple purposes including a more frequent access point to OVR.*
- *Because of the stigma attached to disability in some of the distant villages, it would be helpful for OVR to develop an education campaign in partnership with the local schools that could reach families in the distant areas.*
- *The use of telemedicine was recommended as a way to meet the medical needs of residents in Tinian and Rota. It was suggested that OVR or some other government agency write a grant proposal for telemedicine for the neighbor islands.*
- *In order to increase the level of direct service to Tinian and Rota, the core partners should consider cost-sharing for an employee that can be paid by the Mayor’s office and each agency could share a percentage of the individual’s salary and allocate that percentage of work time for the program accordingly” (pp. 41-42).*

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Please see response to (B) above.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

The following information was extracted from the CSNA report for FYs 2014-2017:

- ***“OVR needs to implement a tracking and reporting system for consumers that have been referred to, or are co-enrolled in the WIOA program.***
- ***OVR and the WIOA program should continue to use OJT as a strategy to provide employment opportunities for individuals with disabilities in CNMI. The use of OJTs was mentioned as potentially very beneficial for individuals living in Tinian and Rota due to the lack of any training providers.***
- ***OVR should work closely with the WIOA program to set aside a set number of work-based learning opportunities for students with disabilities annually.***
- ***OVR and the WIOA program should target a set number of co-enrolled individuals with disabilities to share funding for training and employment services. The concept of shared or braided funding is viewed positively by both organizations, but it was difficult to identify any concrete examples of this in CNMI.***
- ***OVR and WIOA should provide regular and frequent cross-training for their staff on program flow and processes.***
- ***OVR should encourage individuals with disabilities that they refer to the WIOA program to self-disclose that they have a disability so that both programs can get a better idea of how many clients they have in common. This will help with reporting for the common performance measures as well.***
- ***The WIOA program should make their written material about programs and services available in multiple formats.***
- ***OVR, the WIOA program and Adult Education should pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs.***
- ***OVR should provide training to the core partners in CNMI on how to recognize, accommodate and effectively work with individuals with hidden disabilities” (pp. 54-55).***

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

The following information describes the needs of transition-aged youth with disabilities in the CNMI and is taken from the new comprehensive statewide needs assessment report:

- ***“The pre-employment transition services program needs to be marketed to students and parents so that they are familiar with the possible activities and the purpose of the program.***
- ***OVR should develop a way to track graduating students and those that receive pre-employment transition services in order to help reduce the number that lose contact after graduation.***
- ***OVR needs to ensure that they are taking advantage of the summer youth program through the Title I youth program. Youth with disabilities should be engaging in these opportunities along with all other youth in CNMI.***

- *OVR has been working with the WINTAC in the area of implementing pre-employment transition services. It would be helpful for OVR to ensure that they work with WINTAC to develop internal control policies and procedures on pre-employment transition services expenditures and service delivery.*
- *The need to establish high expectations for youth continues to be a recommendation. Youth with disabilities need to be encouraged to reach high and not to settle for a life of dependence on public support. Family education and peer mentoring can help set high expectations.*
- *OVR should encourage the pursuit of postsecondary education by assisting individuals to obtain part-time employment while they go to school and utilizing OVR resources for this purpose. This will help address the financial need of individuals and will help OVR achieve their common performance measures associated with credential attainment and skills gains.*
- *The Department of Education should ensure that IEPs are developed using person-centered planning. It would be helpful to ensure that all Special Education teachers have regular training on person-centered planning.*
- *The OVR counselor needs to be invited to every IEP as long as the student is agreeable to this.*
- *OVR should utilize social media to communicate with young consumers and help keep them engaged in the VR process” (pp.50-51).*

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Information below was also taken from the CSNA report covering fiscal years 2014-2017:

- *“Because the number of CRPs is very low in CNMI, OVR should continue to try and develop individual service providers to provide common service needs like job placement and job coaching. In addition, OVR should consider investigation whether the secondary school system staff or Northern Marianas College staff can be funded to provide services for OVR consumers” (p. 57).*

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT .

There is general consensus among community partners/stakeholders that students with disabilities will better prepare for the 21st century workforce through the provision of transition career services and pre-employment transition services. Curriculum on work readiness provided either in a classroom setting or community-based by private community rehabilitation programs/vendors should focus on helping the students to enhance their skills including soft skills and communication skills thereby boosting self confidence for increased positive outcomes throughout the employment process. Our VR Transition Counselor is in regular contact with the school personnel through co-location presence as well as attendance at IEP meetings. To also

better improve experiences and outcomes, employers must be supported with information and instructions as well as educated on innovative strategies with regards to how best to communicate or interact with students with varying disabilities and meet their unique needs.

In the new CSNA report, it was noted that each of the pre-employment transition services (e.g. Job exploration 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 (often referred to as soft skills); and Instructions in self-advocacy, which may include peer mentoring) “is a need on a recurring basis when discussing the needs of transition-age youth in CNMI” (p. 45). In addition, the “following themes emerged across all data gathering methods regarding the needs of youth with disabilities in transition in CNMI:

- ***A lack of work skills, soft skills, work experience and knowledge regarding the expectations of the workforce are all barriers to employment for youth with disabilities in CNMI.***
- ***OVR should engage youth in the schools at an early age and maintain contact with them upon graduation.***
- ***Disability still has a stigma attached to it for many families in CNMI, so the need for education about disability remains high” (p. 43).***

OVR will continue to maximize all efforts to increase successful transition outcomes in collaboration and coordination with community stakeholders including our education partners through transition including pre-employment transition services.

K. ANNUAL ESTIMATES

Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

The number of individuals in the State who are currently eligible for services by program category are as follows:

- ***Title I, Basic Support = 146 individuals (ST 10)***
- ***Title VI, Part B, Supported Employment = 37 individuals (ST 10)***

While the number of persons potentially eligible for OVR services is variable, our best estimate is 260 individuals between the ages of 16 and 64 will compose the BS and SE caseloads for FY 2019.

(Estimated calculations based on a three(3) year average as reported in the OVR Consumer Tracking System (CTS) and the RSA 911 data).

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

Estimate calculated based on a three (3) year average as reported in the OVR CTS and RSA 911 DATA:

Title I, Basic Support: 146 individuals with approved IPEs.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

Estimate calculated based on a three (3) year average as reported in the OVR CTS and RSA 911 data:

Title VI, Part B, Supported Employment: 37 individuals

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

Currently and historically, the CNMI Office of Vocational Rehabilitation has been able to avoid implementing an order of selection, although policies and procedures are in place to ensure that should the need arise, the Program will be prepared. The OVR will continue to manage its fiscal resources to ensure that all active Individualized Plans for Employment (IPE) are achieved.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Not applicable

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

Title I, Basic Support: 260 individuals

Cost per individual = \$1,235

Total cost = \$321,126

Title VI, Part B:

Supported Employment: 37 individuals

Cost per individual = \$608

Total cost = \$22,508

The data from the OVR CTS was used in conjunction with 911 data from the Rehabilitation Services Administration (RSA), as well as the CNMI Comprehensive Statewide Needs Assessment for Fiscal Years 2014-2017 (OVR/SRC/SDSU). The data was separated and is reported according to the content areas requested.

General Performance Data for OVR 2014-2016 as per most recent CSNA Item ALL CONSUMERS 2014 2015 2016 Applications 137 144 133

Total number of cases served 310 309 341

Ave. cost of all cases \$715.86 \$852.98 \$784.19

Ave. cost of cases closed rehabilitated \$1,098.08 \$1,663.11 \$1,872.70

Ave. cost per case closed unsuccessful \$256.36 \$3.53 \$23.21

Ave. cost per case closed prior to plan \$76.56 \$69.56 \$46.01

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The CNMI Office of Vocational Rehabilitation (OVR) and the State Rehabilitation Council (SRC) reviewed and jointly developed and approved their State Plan goals and priorities for Program Years 2018-2019 including any modifications and incorporated the findings and recommendations of the recently-conducted Comprehensive Statewide Needs Assessment (CSNA) for FYs 2014-2017.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

Basic Support Services:

Goal 1: Improve overall Agency performance.

Objective 1.1: In PYs 2018-2019, eighty-five percent (90%) of cases will be determined eligible/ineligible within sixty (60) days of receipt of VR application.

Objective 1.2: In PYs 2018-2019, the Individualized Plans for Employment (IPEs) will be developed in partnership with consumers within sixty (60) days after eligibility determination with a 90% targeted success rate.

Objective 1.3: In PYs 2018-2019, OVR will continue to support the training and/or education of VR staff.

Objective 1.4: In PYs 2018-2019, VR staff will continue their monthly outreach activities in Tinian and Rota. (Note: OVR will aim to utilize to the maximum extent possible public service announcements in the radio and/or newspaper regarding outreach activities in the 3 official languages of the CNMI.)

Objective 1.5: In PYs 2018-2019, consumers exiting the VR program in ST 26 will report the following:

- o 90% will report satisfaction with the quality of services received, and*
- o 90% will report that services were received in a timely manner.*

Objective 1.6: In PYs 2018-2019, OVR will target at least 3 self-employment plans/outcomes.

Objective 1.7: In PYs 2018-2019, OVR will continue to support the efforts of the Disability Network Partners' ad hoc committee on accessibility.

Objective 1.8: In PY 2018, in an effort to increase the level of direct services to Tinian and Rota, the core partners will begin discussions on the feasibility of cost-sharing for an employee that can be paid by the Mayor's Office and each agency could share a percentage of the individual's salary and allocate that percentage of work time for the program accordingly.

Objective 1.9: In PY 2018, OVR will pursue discussions and/or agreement with the DOL/WIOA Program regarding use of their office space in Tinian and Rota for VR counselors' monthly outreach activities in an effort to demonstrate increased collaboration between the 2 programs.

Objective 1.9.A: In PYs 2018-2019, OVR will support the activities of The Lady Diann Torres Foundation Disability Center to increase program awareness, to network with various stakeholders including people with disabilities and employers, to provide training opportunities to increase knowledge, skills, and abilities, to increase referrals to OVR, to share program data with partner agencies, and/or to support other related activities that promote independence, productivity, inclusion, integration and self-sufficiency of individuals with disabilities in our communities.

Goal 2. Facilitate the seamless transition of students/youth with disabilities to employment or continued education through coordination and collaboration with WIOA core and other programs.

Objective 2.1: In PYs 2018-2019, OVR will conduct at least one (1) outreach activity per high school per school year in an effort to educate students and parents about the pre-employment transition services program.

Objective 2.2: In PYs 2018-2019, OVR will continue to receive intensive technical assistance from the Workforce Innovation Technical Assistance Center (WINTAC) for the effective implementation of pre-employment transition services.

Objective 2.3: In PYs 2018-2019, OVR will attend at least ninety percent (90%) of IEP meetings invited to.

Objective 2.4: In PYs 2018-2019, OVR - in collaboration with the Disability Network Partners and other community partners - will provide the following pre-employment transition services:

- Job exploration counseling to at least 30 and 35 transition students with disabilities, respectively;
- Work readiness training to at least 30 and 35 transition students with disabilities, respectively;
- Counseling on postsecondary educational opportunities to at least 30 and 35 transition students with disabilities, respectively;
- Work-based learning experiences to at least 15 and 20 transition students with disabilities, respectively; and
- Instructions in self-advocacy to at least 30 and 35 transition students with disabilities, respectively.

(Note: Members of the Disability Network Partners include: Council on Developmental Disabilities, Transition Coalition, Public School System, Title I Youth Program, VOICES of the CNMI-Saipan, Tinian & Rota Chapters (a non-profit organization run by and for self-advocates with I/DD), Northern Marianas College (UCEDD, DSS, etc.), Center for Living Independently, Statewide Independent Living Council, State Rehabilitation Council, Protection & Advocacy, etc.)

Objective 2.5: In PYs 2018-2019, OVR will determine eligibility and develop IPEs in partnership with consumers and prior to high school graduation with a 90% targeted success rate. (Note: The IPE will be developed in consideration of the student's IEP.)

Objective 2.6: In PYs 2018-2019, OVR will conduct at least one (1) co-location activity per high school per school year as well as at the Northern Marianas College and Northern Marianas Trades Institute to increase student participation and engagement with VR. (Note: Co-locations make it possible for students to participate in the OVR intake and application process. These are also opportunities for OVR to improve networking and strengthen partnerships with school personnel to ensure successful transition outcomes. As well, co-locations provide a forum for Q&A by school staff, parents/guardians, and students with OVR staff.)

Objective 2.7: In PYs 2018-2019, OVR will collaborate with the Council on Developmental Disabilities and Transition Coalition to implement a best practice model in the CNMI high schools (CIRCLES or other model).

Goal 3. Strengthen partnerships with employers to identify and provide opportunities for competitive integrated employment to VR clients including students with disabilities.

Objective 3.1: In PYs 2018-2019, OVR - in collaboration and coordination with the Disability Network Partners and/or other community partners - will educate 15 and 20 employers, respectively, on the ability of OVR consumers and the potential for all individuals with disabilities in the CNMI.

Objective 3.2: In PYs 2018-2019, OVR - in collaboration with the Disability Network Partners - will develop or adopt at least one (1) public awareness campaign to engage CNMI employers.

Objective 3.3: In PYs 2018-2019, OVR will participate in at least two (2) job/career fairs sponsored by public and/or private entities per year.

Objective 3.4: In PYs 2018-2019, OVR - in collaboration with the WIOA Title I Program - will target 5 and 10 OJTs, respectively, to implement as a way to help meet the employment needs of local businesses. (Note: This will provide both programs with positive outcomes and contribute to the common performance measures of effectiveness in serving employers.)

Objective 3.5: In PYs 2018-2019, OVR - in collaboration with the Disability Network Partners - will survey employers who will report an average of at least 75% satisfaction with services provided to help them meet their business needs.

Objective 3.6: In PYs 2018-2019, OVR - through the State Rehabilitation Council - will continue to engage employers by hosting an Employer Forum at all Council general

membership meetings. (Note: This strategy officially kicked off at the Council's 12/21/17 general membership meeting.)

Objective 3.7: In PYs 2018-2019, OVR - in collaboration with the SRC and business partners - will disseminate at least four (4) disability employment-related information to help increase employer awareness per year.

Goal 4. Improve services that address the needs of people with disabilities served through other components of the statewide workforce development system.

Objective 4.1: In PYs 2018-2019, OVR will continue to engage in meaningful discussions with WIOA Core Program Partners and other team members regarding the development and/or implementation of a common case management system to track and report the participation and progress of consumers co-enrolled in the WIOA Core Programs.

Objective 4.2: In PYs 2018-2019, OVR - in collaboration with the WIOA Title I Program - will target 5 and 10 OJTs, respectively, as a strategy to provide employment opportunities for individuals with disabilities in the CNMI, as well as share funding for training and employment services.

Objective 4.3: In PYs 2018-2019, OVR - in collaboration with the WIOA Title I Program - will conduct at least one (1) cross training for staff on process flow and processes per year.

Objective 4.4: In PYs 2018-2019, the CNMI WIOA Core Programs will pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs.

Objective 4.5: In PYs 2018-2019, OVR - in collaboration with the San Diego State University-Interwork Institute or other provider - will provide at least one (1) training to core partners in the CNMI on how to recognize, accommodate, and effectively work with individuals with hidden disabilities.

Objective 4.6: In PYs 2018-2019, the CNMI WIOA Core Programs will pursue meaningful discussions leading to the development of a memorandum of understanding (MOU) outlining each programs' roles and responsibilities in serving mutual clients in their attainment of competitive integrated employment.

Objective 4.7: In PYs 2018-2019, OVR will collaborate with the CNMI Workforce Development Board towards the creation and implementation of a physical or virtual American Job Center (aka One-Stop) with an MOU in place that will outline the appropriate roles and contributions of resources for all required AJC program partners.

Supported Employment Services:

Goal 5. Improve VR service delivery to effectively meet the needs of clients with most significant disabilities.

Objective 5.1: In PYs 2018-2019, OVR will support the training of at least one (1) staff on work incentives counseling and benefits planning.

Objective 5.2: In PYs 2018-2019, OVR will provide work incentives counseling and benefits planning to at least ten (10) clients.

Objective 5.3: In PYs 2018-2019, OVR will continue to communicate with the CNMI Medicaid Program regarding a Home and Community-Based Waiver to use for extended services.

Objective 5.4: In PYs 2018-2019, because the number of CRPs is very low in the CNMI, OVR will continue to try and develop individual service providers to provide service needs like job placement and job coaching.

Objective 5.5: In PYs 2018-2019, OVR will train its staff on supported employment, customized employment, and/or other best practice employment model to increase knowledge, skills, and abilities to better serve clients with most significant disabilities.

Objective 5.6: In PYs 2018-2019, OVR will continue to support clients' needs for supported employment job coaching to assist them to acquire the necessary skills on the job and increase the likelihood that the job will continue when the training (e.g. OJT) is completed.

Objective 5.7: In PYs 2018-2019, OVR will continue to refer clients to the Center for Living Independently for Independent Living (IL) services in conjunction with VR services, as appropriate.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

As previously mentioned, the goals and priorities of the modified VR Portion of the Unified State Plan for Program Years 2018-2019 incorporated the findings and recommendations of the FY 2014-2017 Comprehensive Statewide Needs Assessment (CSNA).

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

OVR and SRC ensure that the VR Portion of the Unified State Plan goals and priorities were developed collaboratively and in consideration of the new CSNA findings and recommendations as well as the requirements of the WIOA common performance measures.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

No other available information.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

CNMI OVR has not entered into nor is it requesting for an Order of Selection at this time.

B. THE JUSTIFICATION FOR THE ORDER.

Not applicable

C. THE SERVICE AND OUTCOME GOALS.

Not Applicable

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

Not applicable

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

Not applicable

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT.

Not applicable

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

The CNMI OVR will distribute Title VI Funds for Supported Employment (SE) Services at the WIOA-mandated requirement of 2.5% for administrative costs (e.g. indirect cost) and the balance for the provision and delivery of services to individuals with the most significant disabilities. Fifty percent (50%) of Title VI funds for SE services will be reserved for youth with the most significant disabilities who are between 14 and 24 years old. Services leading towards competitive integrated employment will include, but are not limited to, the following: job training (work experience and OJT); job search and placement assistance; modifications that may be required by VR clients at employment sites; transportation; and other employment-related services.

The CNMI OVR Supported Employment Goals and Priorities are:

Goal 5. Improve VR service delivery to effectively meet the needs of clients with most significant disabilities.

Objective 5.1: In PYs 2018-2019, OVR will support the training of at least one (1) staff on work incentives counseling and benefits planning.

Objective 5.2: In PYs 2018-2019, OVR will provide work incentives counseling and benefits planning to at least ten (10) clients.

Objective 5.3: In PYs 2018-2019, OVR will continue to communicate with the CNMI Medicaid Program regarding a Home and Community-Based Waiver to use for extended services.

Objective 5.4: In PYs 2018-2019, because the number of CRPs is very low in the CNMI, OVR will continue to try and develop individual service providers to provide service needs like job placement and job coaching.

Objective 5.5: In PYs 2018-2019, OVR will train its staff on supported employment, customized employment, and/or other best practice employment model to increase knowledge, skills, and abilities to better serve clients with most significant disabilities.

Objective 5.6: In PYs 2018-2019, OVR will continue to support clients' needs for supported employment job coaching to assist them to acquire the necessary skills on the job and increase the likelihood that the job will continue when the training (e.g. OJT) is completed.

Objective 5.7: In PYs 2018-2019, OVR will continue to refer clients to the Center for Living Independently for Independent Living (IL) services in conjunction with VR services, as appropriate.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

CNMI OVR will maximize the use of 50% of Title VI funds to support youth consumers with the most significant disabilities in their achievement of competitive integrated employment through the provision of extended services not to exceed four (4) years, such as: job coaches, personal assistance services, transportation, and other employment-related services determined necessary for consumers to further maintain their competitive integrated employment.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

CNMI OVR, in collaboration and coordination with the Council on Developmental Disabilities (CDD) and other Disability Network Partners (DNP), will continue discussions with the Medicaid program to see if they are willing to submit a Home and Community-Based Waiver to use for extended services to support consumers with most significant disabilities including our youth.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES.

- a. Maximize training and/or postsecondary educational opportunities for VR clients to better prepare them for the 21st century workforce and develop support systems for consumers to attend this training.***
- b. Utilize the OVR Tracking System to monitor case status movements on a weekly or bi-monthly basis and identify modifications for enhancement, if any, as well as explore a new system with the CNMI WIOA Core Program Partners.***
- c. Conduct regular case staffing with VR counselors either individually or in a group setting.***
- d. Engage employers in identifying OJT and/or job placements for VR consumers.***
- e. Participate in job/career fairs sponsored by both public agencies and private sector businesses.***
- f. Expand self-employment opportunities for VR clients, especially in Tinian and Rota where the economy can remain stagnant for an indefinite period of time.***
- g. Work with Disability Network Partners including the State Rehabilitation Council to identify potential vendors capable of providing supported employment and/or extended services to VR clients, especially those with the most significant disabilities.***
- h. Continue monthly outreach activities in Tinian and Rota, and continue with positive working relationships with the Mayors' Offices to ensure effective services to people with disabilities.***
- i. Develop and/or strengthen relationships with the local business community through participation in employer-sponsored activities or events such as Chamber, SHRM, and Rotary meetings.***
- j. Meet regularly with various partners including public and/or non-profit groups or organizations to discuss implementation and cost-sharing of pre-employment transition services to students with disabilities to better equip them for the workforce.***
- k. Review existing MOUs with partners annually to ensure collaboration and coordination, addressing gaps in services, etc. to ensure maximum vocational outcomes.***
- l. Attend IEP meetings of students with disabilities beginning at age 14 to introduce early on the VR program and to establish better coordination with the public schools in the provision of transition services.***

- m. Support the personnel development of VR professionals and paraprofessionals especially in the areas of marketing the VR program, engaging employers, supported employment, customized employment, pre-employment transition services, work incentives counseling and benefits planning, etc.***
- n. Disseminate information to public and private sector employers to increase their awareness of how VR services could benefit people with disabilities as well as employers. Utilize the Saipan Chamber of Commerce's website as a repository of disability employment information.***
- o. Utilize as a forum the State workforce development board meetings to bring to the forefront disability employment issues facing the Commonwealth and the integration of quality services to people with disabilities in the workforce system.***
- p. Engage in discussions/negotiations with the State workforce development board regarding the development and maintenance of an American Job Center (aka One-Stop Center) where services to people with disabilities are streamlined and accessible.***
- q. VR professionals to conduct co-locations at the public high schools, Northern Marianas College, and other venues to increase referrals to VR, dialogue with stakeholders such as school personnel, students, parents/guardians, and coordinate for the provision of services including pre-employment transition services.***
- r. Build awareness and understanding that Independent Living (IL) services could be provided in conjunction with VR services, as appropriate.***
- s. Work with technical assistance providers to develop and/or strengthen Agency's policies and procedures including internal controls.***
- t. Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).***
- u. Identify and utilize comparable benefits to the maximum extent possible.***
- v. Enhance the OVR website so as to create a one-stop for disability employment information beneficial to all stakeholders including consumers/family members (as well as students with disabilities), service providers, and employers.***
- w. Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other.***
- x. In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc.***
- y. Support activities that will increase self-advocacy skills of people with disabilities.***
- z. Consider training current or former VR clients to provide much needed supported employment and/or extended services to individuals with disabilities especially those with the most significant disabilities in Saipan as well as the unserved or underserved municipalities of Tinian and Rota. Because the number of CRPs is very low in the CNMI,***

OVR will continue to try and develop individual service providers to provide service needs like job placement and job coaching.

aa. Ensure that clients are progressing through the VR process in a timely manner.

bb. Ensure consumers' full participation in the IPE process (informed choice).

cc. OVR will ensure timely communication with clients throughout the VR process.

dd. Utilize the SRC general membership meetings as a forum to engage employers.

ee. Continue the provision of supported employment services to consumers with most significant disabilities.

ff. And all other potential strategies that are identified by OVR and its community partners throughout PYs 2018-2019.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each state of the rehabilitation process and on a statewide basis. a. All VR services, including AT assessment/evaluation, devices and services will be provided in the context of an approved IPE. b. At intake and application for VR services as well as in the IPE development stage, VR counselors will ensure to capture information pertaining to the applicant or consumer's need for assistive technology to facilitate the achievement of their competitive integrated employment. c. VR professionals and paraprofessionals will engage the participation of applicants and consumers to identify and maximize comparable benefits such as the Assistive Technology Center for AT loan, demonstration, and training and the Trankilu Alternative Financing Program for assistance in securing a loan with a local bank toward the purchase of the needed AT device or equipment at a low interest rate. The Public School System-Special Education Program (PSS-SPED) AT expert, if any, will be utilized to provide assessment to students with disabilities. In the event an AT professional cannot be identified locally, CNMI OVR will reach out to the Guam Systems of Assistive Technology for their assistance and any needed service agreement. d. During IEP meetings of students with disabilities, VR professionals will work with our school and/or other community partners to address any significant AT needs of the students especially mutual clients. e. OVR consumers who are residing in Tinian and Rota and who are in need of assistive technology devices or equipment will be provided with the AT after exploring comparable benefits (e.g., Medicaid/Medicare, private insurance, etc.) through an approved IPE that takes into consideration shipping and handling costs for the ATs transport to the outer island of their residence.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

- ***OVR will strengthen its collaboration with community partners including the CNMI Center for Living Independently, Community Guidance Center, the Behavioral Health Planning Council, the local Autism Society, the Council on Developmental Disabilities, and the Public School System-Special Education Program (PSS-SPED) to identify outreach activities and serve individuals with the most significant disabilities. As expressed in the previous VR State plan, there is no need to specifically target minority individuals in the CNMI because the population are members of minority groups. Nevertheless, OVR will improve on efforts to facilitate information dissemination via the native languages of Chamorro and Carolinian as well as those of other Pacific islands and Asian countries.***
- ***Conduct triennial comprehensive statewide needs assessment.***
- ***Ongoing communication and interaction with community stakeholders comprised of individuals with disabilities and their family members, service providers, and the Disability Network Partners.***
- ***Involvement/engagement at disability public hearings or forums to obtain feedback from minorities and those unserved or underserved to better understand their needs to achieve competitive integrated employment and to live meaningful independent lives.***

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES).

a. OVR will continue to participate in discussions with the Public School System-Special Education Program (PSS-SPED) via the SESAP (Special Education State Advisory Panel) forums.

b. OVR will work with partners to strengthen and solidify the newly-formed CNMI Transition Coalition comprised of partners from the OVR, PSS-SPED, Council on Developmental Disabilities, Northern Marianas Protection & Advocacy Systems, Inc., University Centers for Excellence in Developmental Disabilities, etc. whose overarching mission is to collaborate to the maximum extent possible to meet the transition needs (e.g., pre-employment transition services) of students with disabilities resulting in the achievement of competitive integrated employment, continued education, and/or independent living.

c. VR staff will make regular contact with PSS-SPED staff so as to strengthen camaraderie and ensure that each stakeholder is on the same page as to what the transition issues and/or needs are and the effective methods for delivering on quality and timely transition/pre-employment transition services.

d. VR staff will attend as many IEP meetings as practicable, upon invitation, and will make a concerted effort to start introducing the VR program to families and students as early as age 14. (Transition Planning could be provided to students as early as age 14

whereas Transition Services including Pre-Employment Transition Services are provided to students 16 to 21.)

e. VR staff will continue to participate in job/career fairs where students with disabilities will be actively participating.

f. OVR will support the activities of the PSS-SPED, Co-Op Education & Training Program, etc. that prepare students with disabilities for employment, such as: job shadowing, mentoring, career exploration activities, work-based learning experiences, work readiness training, etc.

g. OVR will continue to conduct co-locations at the public high schools including the Northern Marianas College to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co-locations also allow VR staff to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition/pre-employment transition services.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

CNMI OVR will continue discussions with community partners/stakeholders for the ongoing exploration and identification of vendors for inclusion in our local CRP network of providers.

In addition, efforts will be taken to develop a mechanism to pay individual service providers to work with consumers in the CNMI, especially in Tinian and Rota where services are very limited due to the lack of CRPs there. The CSNA Report covering FYs 2014-2017 recommended that "Because the number of CRPs is very low in CNMI, OVR should continue to try and develop individual service providers to provide service needs like job placement and job coaching. In addition, OVR should consider investigation whether the secondary school system staff or Northern Marianas College staff can be funded to provide services for OVR consumers" (p. 57).

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

a. Evaluate current OVR Tracking System and modify as necessary to be able to efficiently record performance measures data.

b. Communicate with WIOA core program partners in obtaining and tracking data provided consumer consent is obtained.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

a. In collaboration and coordination with community partners, OVR will support the training activities through a cost-sharing arrangement/agreement with the statewide workforce development system that aims to increase knowledge of best practices in assisting individuals with disabilities to achieve competitive integrated employment and strategies for effective employer involvement/engagement in the process.

b. Participate in training and employment activities or initiatives organized by the CNMI Department of Labor.

c. Maintain and strengthen relationships with the Northern Marianas Trades Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodations and effective communications with individuals with varying disabilities.

d. Increase opportunities for shared-funding on WIA cases thereby demonstrating improved coordination and an overall greater partnership.

e. Continue the representation of WIA and/or DOL on the State Rehabilitation Council (SRC) as well as VR's representation on the State Workforce Development Board.

f. OVR to engage in meaningful discussions with the newly-reorganized State workforce development board regarding an all-inclusive workforce that integrates quality services for people with disabilities in pursuit of competitive integrated employment.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

- o Directly through VR staff***
- o In collaboration with the CNMI Disability Network Partners including the WIOA Core Programs with regards to the implementation of the VR State Plan***
- o Through the identification and utilization of comparable services/benefits to the maximum extent possible or allowable***
- o Through the Agency's existing infrastructure such as the enhanced OVR Tracking System (aka case management system)***
- o Through a quarterly evaluation and review of progress toward meeting State Plan goals and objectives by OVR's Leadership Team***
- o Through continuous program improvement efforts to improve overall agency performance***
- o Through guidance and direction provided by our technical assistance providers including WINTAC and RSA***
- o In consultation with the CNMI State Rehabilitation Council***

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Support Council-related activities in the form of: Staff support; travel by Council members to attend conferences, meetings, and trainings; Personal attendant; Board member compensation; Facilities rental for meeting and training sessions; Consultant fees for training and policy development; Meeting materials, supplies, and advertising costs; Printed materials for public awareness/information; etc. Total spent on SRC I&E activities in PY 2016 is \$28,402.07.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

CNMI OVR is committed to serving its clients in an equitable and timely manner through the provision of quality services so that they may achieve competitive integrated employment and live full and productive lives in their community. In the most recently conducted Comprehensive Statewide Needs Assessment for FYs 2014-2016, OVR recognizes the various potential barriers and strategies to accessing and participating in the VR program statewide, and some of these include:

- The need to establish and enforce a minimum time frame for response to consumers by VR staff.***
- The need to encourage self-employment as an outcome for more consumers, especially those in Tinian and Rota.***
- The need to ensure that VR counselors are developing IPEs in partnership with their consumers.***
- The need for work incentives counseling and benefits planning remains a major need in the CNMI.***
- The need to provide training on supported employment to VR counselors on a regular basis.***
- The need to investigate whether the use of software programs like Skype can increase communication with Tinian and Rota residents so that there is a mechanism in place for these residents to interact with OVR staff on a more frequent basis than once a month.***
- The Pre-Employment Transition Services (Pre-ETS) Program needs to be marketed to students and parents so that they are familiar with the possible activities and the purpose of the program.***
- The need to ensure that OVR work with WINTAC to develop internal control policies and procedures on Pre-ETS expenditures and service delivery.***
- The need to implement a tracking and reporting system for consumers that have been referred to, or are co-enrolled in the WIOA program.***
- The need to work closely with the WIOA program to set-aside a set number of work-based learning opportunities for students with disabilities annually.***
- The need to work with the WIOA program to target a set number of co-enrolled individuals with disabilities to share funding for training and employment services.***
- OVR and the WIOA program should provide regular and frequent cross-training for their staff on program flow and processes.***
- The CNMI WIOA Core Programs should pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs.***
- Because the number of CRPs is very low in the CNMI, OVR should try and develop individual service providers to provide service needs like job placement and job coaching.***
- The need to ensure that there is no paperwork or reporting burden on employers that provide job training or work experience opportunities for consumers.***

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

Goal 1. Improve the delivery of competitive integrated employment services to VR clients.

Objective 1.1: In PY 2016, 80% of cases will be determined eligible within sixty (60) days of receipt of VR application. For each program year thereafter and ending in 2019, incremental increases of 5% will be the baseline standard. (Target rate for PY 2018 - 2019 is 90%)

Extent achieved: Objective met

Strategies:

- *In PY 2016, 80% of cases were determined eligible/ineligible within sixty (60) days of receipt of VR application.*
- *Frequent monitoring of case status movements via the OVR Tracking System.*
- *Regular case staffing to ensure timeliness of eligibility determination.*

Objective 1.2: In PY 2016, the Individualized Plans for Employment (IPEs) will be developed within sixty (60) days after eligibility determination with an 85% targeted success rate. For each program year thereafter and ending in 2019, incremental increases of about 4% will be the baseline standard. (Target rate for PY 2018 - 2019 is 90%)

Extent achieved: Objective met.

Strategies:

- *In PY 2016, IPEs were developed within sixty (60) days after eligibility determination with an 85% targeted success rate.*
- *Frequent monitoring of case status movements via the OVR Tracking System.*
- *Regular case staffing to ensure timeliness of IPE development.*

Objective 1.3: In PYs 2016-2019, continue to maximize OJTs as a way to provide work experience and job placement for consumers.

Extent achieved: Ongoing.

Strategies:

- *Six (6) active OJTs were recorded in PY 2016. These were paid for by OVR through 100% reimbursement of wages to the employer.*
- *In PY 2017, so far from July 2017 to January 2018, there were 3 OJTs provided to consumers, paid for by OVR through 100% reimbursement of wages to the employer.*
- *Effective negotiation with VR's pool of committed employers.*
- *In PY 2016, and before the hiring of the VR Employment Specialist, counselors have historically provided the full array of VR services.*
- *With the addition of the Employment Specialist in PY 2017, counselors will be provided additional supports in identifying quality OJT or other training placements.*

Objective 1.5: In PYs 2016-2019 continue to support the training and/or education of VR professionals and paraprofessionals.

Extent achieved: Ongoing.

Strategies:

- *One (1) VR Counselor continues her Master's in Rehabilitation Counseling degree program through San Diego State University via distance learning. She is expected to complete her program in the fall of 2018.*
- *OVR continues to provide support to one (1) VR Counselor Aide as he pursues his Associates degree in Rehabilitation and Human Services at the Northern Marianas College.*
- *Continue to provide the necessary support, encouragement, and resources to staff who are pursuing their educational goals.*

Objective 1.6: In PYs 2016-2019, VR professionals will continue to visit the islands of Tinian and Rota once a month to do intakes and meet with interested applicants and current consumers as well as to reach out to community partners including employers.

Extent achieved: Ongoing.

Strategies:

- *In PY 2016, VR Counselors made ten (10) monthly trips to Tinian and eleven (11) monthly trips to Rota.*
- *In PY 2017, so far from July 2017 to January 2018, VR Counselors made six (6) monthly trips to Tinian and five (5) monthly trips to Rota.*
- *Ensure continued effective collaboration with internal and external staff with respect to travel preparations.*

Objective 1.8: In PYs 2016-2019, OVR will identify potential funding streams to support the hiring of one (1) Case Services Manager and one (1) Employment Specialist to help increase competitive integrated employment outcomes as well as develop/strengthen relationships with the business community.

Extent achieved: Partially met.

Strategies:

- *In PY 2017, OVR hired for the very first time an Employment Specialist to work with VR customers (clients as well as employers) to help meet their unique needs. Official employment start date is October 16, 2017.*

Objective 1.9: *In PYs 2016-2019, seventy percent (70%) of consumers exiting the VR program will report satisfaction (agree to strongly agree) with the quality and timeliness of services.*

Extent achieved: *Objective met.*

Strategies:

- *In PY 2016, 96% of consumers who exited VR after successful closure (ST 26) indicated their satisfaction with the quality and timeliness of services provided.*
- *In PY 2017, 100% of consumers who exited VR after successful closure (ST 26) indicated their satisfaction with the quality of services provided, while 82% reported satisfaction with the timeliness of services provided.*
- *VR consumers are treated with upmost respect and dignity.*
- *VR professionals and paraprofessionals maintain regular contact with consumers.*
- *VR services provided were comprehensive and met consumers' individual needs.*
- *Consumers were provided the opportunity to exercise informed choice throughout the VR process.*

Goal 2. *Facilitate the seamless transition of students/youth with disabilities to employment or continued education through coordination and collaboration with WIOA core and other programs.*

Objective 2.1: *In PY 2016, OVR, in collaboration and coordination with the PSS-SPED and/or private schools, will provide work readiness training to at least twenty-five (25) transition students with disabilities. For each program year thereafter and ending in 2019, an incremental increase of 20% per year will be the baseline standard.*

Extent achieved: *Objective met.*

Strategies:

- *In PY 2016, OVR - in collaboration with the Transition Coalition including the Public School System Special Education Program (PSS-SPED) - provided work readiness training to 95 transition students with disabilities during the first annual Pathways to Student Success Conference held in Saipan on September 2016. Of this number, 53 students had IEPs and were between 16-21 years old. Participating students were from Marianas High School, Kagman High School, and Saipan Southern High School.*
- *"Resume writing" was facilitated by the Northern Marianas College Community Development Institute and the University Center for Excellence in Developmental Disabilities.*

- *“Effective ways to prepare for an interview” was facilitated by the Public School System.*
- *“Job fair preparation tips” was facilitated by the PSS Co-Op Education and Training Program.*
- *“Soft skills basic” was facilitated by the Community Development Institute.*
- *Relied on the strong partnership OVR has with the Transition Coalition with several members having contributed financially to the conference through a cost-sharing arrangement or in-kind contribution.*

Objective 2.2: In PY 2016, OVR, in collaboration with community partners including non-profits, will provide self-advocacy skills training to at least twenty-five (25) transition students with disabilities. For each program year thereafter and ending in 2019, an incremental increase of 20% per year will be the baseline standard.

Extent achieved: Objective met.

Strategies:

- *In PY 2016, together with the Council on Developmental Disabilities, OVR supported the “Self-Advocacy and Leadership Training” conducted by VOICES of the CNMI-Tinian and Rota Chapters (a non-profit organization run for and by self-advocates with I/DD) to 13 transition students with disabilities at Kagman High School on March 8-9, 2017.*
- *In PY 2016, a VOICES of the CNMI-Tinian Chapter Self-Advocate facilitated the “Self-Advocacy and Leadership Training” session to 95 transition students with disabilities during the Pathways to Student Success Conference held in Saipan on September 2016.*
- *Relied on the strong partnership OVR has with the Transition Coalition with several members having contributed financially to the conference through a cost-sharing arrangement or in-kind contribution.*

Objective 2.4: In PY 2016, OVR, in collaboration with the PSS-SPED, the University Center for Excellence in Developmental Disabilities (UCEDD), Adult Basic Education and/or other community partners, will provide counseling on post-secondary educational opportunities to at least twenty-five (25) transition students with disabilities. For each program year thereafter and ending in 2019, an incremental increase of 20% per year will be the baseline standard.

Extent achieved: Objective met.

Strategies:

- *In PY 2016, OVR - in collaboration with the Transition Coalition including the PSS-SPED and UCEDD - provided counseling on post-secondary educational opportunities to 95 transition students with disabilities during the Pathways to Student Success Conference held in Saipan on September 2016.*
- *“Impact of Self-Determination Skills and IEP/Transition-High School vs. College” was facilitated by Dr. Kelly Roberts of Hawaii UCEDD and Dr. Robert Stodden of the University of Hawaii.*

- *“College Bound: Financial Aid and Disability Support Services” was facilitated by the NMC Financial Aid Office and the Disability Support Services.*
- *“Post-Secondary Options: NMC, NMTI, & WIA” was facilitated by the Northern Marianas College, the Northern Marianas Trades Institute, and the Workforce Investment Agency.*
- *“The Vocational Rehabilitation Process” was facilitated by OVR’s Transition Counselor, who also covered information pertaining to the availability of support services for students with disabilities at the local community college.*
- *Relied on the strong partnership OVR has with the Transition Coalition with several members having contributed financially to the conference through a cost-sharing arrangement or in-kind contribution.*

Objective 2.5: In PY 2016, OVR, in collaboration with the PSS-SPED and/or WIOA core and other community partners, will provide job exploration counseling to at least twenty-five (25) transition students with disabilities. For each program year thereafter and ending in 2019, an incremental increase of 20% per year will be the baseline standard.

Extent achieved: Objective met.

Strategies:

- *In PY 2016, OVR and WIA staff co-facilitated a job exploration session during the TJSHS IDEA Parent/Student Transitional Summit held in Tinian on May 18-19, 2017. Part of the session included exploring job vacancy announcements posted on the OVR and WIA websites. A total of seven (7) transition students attended the session.*
- *In PY 2016, OVR and the Transition Coalition provided job exploration counseling to 95 transition students with disabilities during the Pathways to Student Success Conference held in Saipan on September 2016.*
- *“Effective Ways to Prepare for an Interview” was facilitated by the Public School System HR staff. The PowerPoint presentation included information on studying the job vacancy announcement or job description and understanding what the position requires or calls for. As an example, discussed the JVA for Teacher Aide.*
- *Relied on the strong partnership OVR has with the Transition Coalition with several members having contributed financially to the conference through a cost-sharing arrangement or in-kind contribution.*

Objective 2.6: In FYs 2016-2019, upon request, OVR will increase attendance at IEP meetings of transition students beginning at age 14 as often as scheduling permits.

Extent achieved: Ongoing.

Strategies:

- *In PY 2016, OVR attended only two (2) IEP meetings.*
- *IEP notices/invitations were being sent via email directly to the VR Transition Counselor. The main office did not keep track of these notices/invitations to*

ensure VR's attendance by any one of their staff. Better tracking of these notices/invitations may have resulted in greater outcomes in this area.

- *The agency continues to encourage that technology be utilized to the maximum extent possible if it is not possible to attend IEP meetings in person (e.g. video conferencing).*
- *In PY 2017, from July 1, 2017 to February 16, 2018, OVR has so far increased their attendance at IEP meetings to six (6). Two of these meetings were conducted via Face Time and teleconferencing. (Note: For this time frame, there were a total of thirteen (13) IEP notices/invitations to OVR, but OVR attended only six (6) with a 46.2% achievement rate. Nevertheless, the total number of IEPs attended in this current program year is up by 4 from previous program year.)*

Objective 2.7: *In PYs 2016-2019, to ensure seamless transition, VR professionals must ensure the development of the IPE prior to graduation and in consideration of the student's IEP.*

Extent achieved: *Objective met, ongoing.*

Strategies:

- *In PY 2016, eight out of eight (100%) student IPEs were developed prior to graduation from high school.*
- *In PY 2017, from July 1, 2017 to January 31, 2018, one out of two (50%) student IPEs was developed prior to graduation from high school.*
- *VR Counselors to ensure regular case reviews and effective monitoring and feedback are completed.*

Objective 2.8: *In PYs 2016-2019, VR professionals will continue with the practice of co-location at the public high schools, the Northern Marianas College, and other CRPs as appropriate. Co-locations make possible intakes at the school sites rather than requiring students and their families to come to the OVR office to complete the intake and application process. These are also opportunities for VR professionals to improve networking and strengthen partnerships with school personnel to ensure successful transition outcomes. As well, the co-locations provide a forum for Q&A by school staff, parents/guardians, and students with the VR professionals.*

Extent achieved: *Objective met, ongoing.*

Strategies:

- *In PY 2016, OVR conducted a total of twenty-three (23) co-locations at the following locations: Marianas High School-2; Kagman High School-2; Saipan Southern High School-1; Tinian High School-6; Rota High School-9; and Northern Marianas College-3.*
- *In PY 2017, from July 2017-January 2018, OVR has so far conducted a total of fifteen (15) co-locations at the following locations: Marianas High School-4; Kagman High School-5; Saipan Southern High School-1; and Northern Marianas College-5.*

- *Positive networking and collaboration with school personnel including SPED teachers, counselors, and administrative staff.*

Goal 3. Strengthen partnerships with employers to identify and provide opportunities for competitive integrated employment to VR clients including transition students with disabilities.

Objective 3.1: In PY 2016, OVR, in collaboration and coordination with community partners, will educate five (5) employers about reasonable accommodation in the workplace and the benefits of hiring people with disabilities (e.g., tax incentives) and how to increase an inclusive business culture. For each program year thereafter and ending in 2019, incremental increases of five (5) employers will be the baseline standard.

Extent achieved: Objective met.

Strategies:

- *In PY 2016, VR Counselors educated 17 employers/businesses about the vocational rehabilitation program and entered into a partnership with them to provide 6 OJTs and 14 Work Experience Trainings to consumers.*
- *In PY 2017, OVR educated 63 employers who were mostly business owners and managers during a presentation by the OVR director and a State Rehabilitation Council member during the July 5, 2017 general membership meeting of the Saipan Chamber of Commerce. Speakers gave an overview of the vocational rehabilitation program including services to employers as well as shared Hyatt's success stories of working with OVR and other partner agencies to support the training and employment of qualified individuals with disabilities. This event was truly made possible by the SRC whose members include the Executive Director of the Saipan Chamber of Commerce and Hyatt's HR Director who also happens to be representing the State Workforce Development Board on the Council.*

Objective 3.2: In PYs 2016-2019, OVR will spearhead an ongoing awareness campaign targeting employers through the dissemination of disability employment materials via the various media outlets (e.g., print, radio, online, etc.).

Extent achieved: Objective met, ongoing.

Strategies:

- *In PY 2016, disability employment materials were disseminated via the OVR website and print publications such as the DNP's quarterly Disability Watch Newsletter, a newsletter supported by the OVR, Council on Developmental Disabilities, UCEDD, and Protection and Advocacy.*
- *In PY 2017, OVR and SRC presented to 63 members of the Saipan Chamber of Commerce who were mostly business owners and managers during their July 5, 2017 general membership meeting.*

- *In PY 2017, OVR's Employment Specialist met with over two (2) dozen representatives from the business community who attended the focus group meetings for employers as part of OVR's triennial comprehensive statewide needs assessment project on October 24-25, 2017.*
- *In PY 2017, OVR's Employment Specialist traveled to Tinian on October 26, 2017 to attend the Workforce Innovation and Opportunity Act (WIOA) Program Overview and Business Services event as well as deliver a prepared speech to business partners on behalf of the OVR Director. Networking took place afterwards with dissemination of resource materials including OVR's "Services to Employers" brochure and the "Building an Inclusive Workforce 2017: A Four Step Reference Guide to Recruiting, Hiring, and Retaining Employees with Disabilities," a free publication of U.S. DOL/ODEP.*
- *In PY 2017 and until January 2018, OVR's Employment Specialist had attended a few meetings of the Saipan Chamber of Commerce and the Society for Human Resource Management and networked with employers.*
- *In PY 2017 and until January 2018, OVR's Employment Specialist was active engaging employers from the hotels with regards to OJT partnership as well participated in the activities of the SRC Employment and Marketing Committee.*
- *VR Counselors continued their interactions with employers regarding training and job placement activities including extending assistance to employers to help them meet their business needs.*
- *SRC maintained the mandated membership of four (4) representatives from business/industry/labor.*

Objective 3.3: In PYs 2016-2019, OVR will increase its involvement in job/career fairs sponsored by the various business industries (e.g., hotel, casino, etc.) in the CNMI.

Extent achieved: Objective met, ongoing.

Strategies:

- *In PY 2016, OVR participated in two (2) job/career fairs: Public School System's Co-Op Job Fair on February 2, 2017 and Northern Marianas College's Career Fair on April 27, 2017 (with SRC Employment & Marketing Committee).*
- *In PY 2017, OVR and the SRC Employment & Marketing Committee participated in the Public School System's Co-Op Job Fair on September 7, 2017.*

Goal 4. Continue to collaborate with the Title I-WIOA Partner to prepare mutual clients for competitive integrated employment.

Objective 4.1: In PYs 2016-2019, VR professionals will enhance communication with WIOA case workers to identify opportunities to leverage resources and expertise for the provision of training services to mutual clients leading toward competitive integrated employment.

Extent achieved: Ongoing.

Strategies:

- *In PY 2016, there were four (4) instances in which OVR and WIOA collaborated to help meet the training and employment needs of mutual consumers.*

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Goal 1. Improve the delivery of competitive integrated employment services to VR clients.

Objective 1.4: In PYs 2016-2019, increase self-employment opportunities for VR clients especially in Tinian and Rota where competitive integrated employment opportunities are significantly limited. The target will be at least 3 self-employment outcomes for this State Plan period.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- *In PY 2016, there were no active self-employment plans pursued for Saipan, Tinian, and Rota clients.*
- *In PYs 2017-2018, OVR will conduct a review of their self-employment policies and procedures to ensure no barriers exist that would otherwise prevent consumers from pursuing self-employment as a viable employment outcome.*
- *In addition, OVR may seek guidance from WINTAC or other technical assistance provider for recommendations in policies/procedures and staff training.*

Objective 1.7: In PYs 2016-2019, OVR will conduct a minimum of one (1) outreach to distant villages in Saipan per quarter to accommodate those with transportation or other barriers.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- *In PY 2016, OVR conducted only one (1) Saturday outreach at the Tanapag Youth Center on 11/19/16. Only one (1) community member attended the outreach.*
- *Prior to PY 2016, the Saturday outreach project resulted in very few to no referral/applicants each time.*
- *The Saturday outreach project was advertised in the local newspaper(s).*

Goal 2. Facilitate the seamless transition of students/youth with disabilities to employment or continued education through coordination and collaboration with WIOA core and other programs.

Objective 2.3: In PY 2016, OVR, in collaboration with the PSS-SPED, the Workforce Investment Agency (WIA), and/or other community partners, will provide work-based learning experiences to at least twenty-five (25) transition students with disabilities. For each program year thereafter and ending in 2019, an incremental increase of 20% per year will be the baseline standard.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- ***In PY 2016, only (1) OVR-eligible transition student was provided work experience training opportunity under an approved IPE paid for by OVR.***
- ***In PY 2017 so far, there are no transition students who received work-based learning experiences that OVR is aware of.***

Goal 3. Strengthen partnerships with employers to identify and provide opportunities for competitive integrated employment to VR clients including transition students with disabilities.

Objective 3.4: In PYs 2016-2019, seventy percent (70%) of employers will report satisfaction (agree to strongly disagree) with VR services provided to them.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- ***CNMI employers were not surveyed in PY 2016.***
- ***Hiring of the VR Employment Specialist did not take place in PY 2016 but rather in PY 2017.***
- ***In PY 2017, the State Rehabilitation Council for the very first time put on their December 21, 2017 agenda the Employer Forum as a strategy to engage employers. Two (2) business representatives from Kanoa Resort and Best Sunshine engaged in meaningful discussions with the Council on the importance of employer commitment in advancing disability employment initiatives.***

Goal 4. Continue to collaborate with the Workforce Investment Agency (WIA) to prepare mutual clients for competitive integrated employment.

Objective 4.2: In PY 2016, OVR and WIA will engage in shared funding of three (3) identified cases. For each program year thereafter and ending in 2019, incremental increases of at least one (1) case per year will be the baseline standard.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- ***No record of any shared funding between OVR and WIA in PY 2016.***
- ***Not aggressively pursuing any collaboration as it relates to shared funding of cases.***
- ***Lack of MOU that would otherwise describe among other things the process on how to collaborate regarding shared funding of cases.***

Objective 4.3: In PYs 2016-2019, OVR and WIA will pursue the development of a memorandum of understanding (MOU) that will outline how individual program resources will be utilized to better serve mutual clients, jobseekers with disabilities and employers, through an integrated system of service delivery.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- ***Process was initiated but never finalized. A review of a sample MOU from WINTAC continues into PY 2017 and possibly beyond.***
- ***OVR anticipates entering into an MOU with WIOA Core Program Partners in PYS 2017-2018.***

Objective 4.4: In PYS 2016-2019, OVR will work closely with the State Workforce Development Board to fully engage the workforce system stakeholders in the development, implementation, and modification of a Unified State Plan that incorporates the integration of quality services for individuals with disabilities.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- ***The CNMI Workforce Development Board, though organized, did not meet in PY 2016.***
- ***In PY 2017, the WDB was reorganized and conducted their first general membership meeting on January 18, 2018. Agenda included the following topics: (1) Overview of WIOA; (2) Board Functions; and (3) CNMI WIOA Unified State Plan. At this time, the Board's goal is the timely submission of the 2-year modifications for the CNMI WIOA Unified State Plans for Program Years 2018-2019.***

Objective 4.5: In PYS 2016-2019, OVR will work with the SWDB towards the creation of an American Job Center (aka One-Stop) with an MOU in place that outlines the appropriate roles and contribution of resources for all required AJC program partners.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- ***The CNMI Workforce Development Board, though organized, did not meet in PY 2016.***
- ***Please also see Objective 4.4.***

Objective 4.6: In PYS 2016-2019, OVR will work with the SWDB towards identifying and disseminating best practices related to meeting the needs of employers, workers and jobseekers including those with disabilities and other WIOA-required activities.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- ***The CNMI Workforce Development Board, though organized, did not meet in PY 2016.***
- ***Please also see Objective 4.4.***

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

Goal 5. Improve VR service delivery to effectively meet the needs of clients with most significant disabilities.

Objective 5.1: In PYs 2016-2019, continue to expand outreach to employers and try and develop more frequent and diverse opportunities for OJTs in the community.

Extent achieved: Objective achieved, ongoing.

Strategies:

- o In PY 2016, OVR paid for a total of six (6) OJTs and fourteen (14) Work Experience Trainings (WET). Out of the 6 OJTs, 5 are consumers with most significant disabilities (83.3%). Out of the 14 WETs, 11 are consumers with most significant disabilities (78.6%). (Note: No shared funding with WIA on any of these cases.)*
- o In PY 2017, so far from July 2017 to January 2018, OVR paid for a total of 3 OJTs, all benefiting consumers with most significant disabilities.*

Objective 5.2: In PYs 2016-2019, continue to support client's need for supported employment job coaching to assist him/her to acquire the necessary skills on the job and increase the likelihood that the job will continue when the OJT is completed.

Extent achieved: Ongoing.

Strategies:

- o OVR continues to provide job coaching services in the context of an approved IPE to consumers with most significant disabilities who need assistance to be successful in their training program or in maintaining their employment.*
- o In PY 2016, seven (7) consumers with most significant disabilities received job coaching services paid for by OVR.*
- o In PY 2017, so far from July 2017 to January 2018, only one (1) consumer received job coaching services paid for by OVR.*

Objective 5.3: In PYs 2016-2019, continue discussions with Medicaid regarding a waiver to potentially provide extended services to supported employment VR clients, address barriers, secure/obtain technical assistance on waiver request, submission, implementation, and work out other-related matters.

Extent achieved: Ongoing.

Strategies:

- *Previous communication with Medicaid regarding “waiver” did not continue or carry over in PY 2016.*
- *However, in PY 2017, OVR began the process of discussing Home and Community-Based waiver with their legal counsel to provide longer term supported employment and extended services (e.g. personal assistance) to clients with most significant disabilities. This conversation will continue in PY 2018 (and for the duration of this State Plan, if necessary) so that Medicaid recipients will receive expanded services and supports.*

Objective 5.6: In PYs 2016-2019, Independent Living (IL) services to VR clients will be provided in conjunction with VR services, as appropriate.

Extent achieved: Ongoing.

Strategies:

- *Communication/staffing with VR Counselors also include the possibilities and benefits of providing IL services in conjunction with VR services as necessary and in the context of an approved IPE.*
- *VR Counselors are encouraged to learn more about the services provided by the local Center for Living Independently.*

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Goal 5. Improve VR service delivery to effectively meet the needs of clients with most significant disabilities.

Objective 5.4: In FYs 2016-2019, continue identifying individuals and organizations in Tinian and Rota to provide job coaching and other supported employment services to VR clients with most significant disabilities. OVR will consider a “Grow your own” concept whereby OVR prepares and trains current or former clients to provide needed services in the sister islands.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- *OVR, through their counselor(s), had tried to reach out to private citizen(s) in the neighbor island(s) who may be potentially interested in providing job coaching services to VR clients; however, discussions fell through and never again pursued.*
- *In PY 2017 and beyond, OVR will reach out to a newly-established non-profit organization in Rota to see if there is potential to provide supported employment and/or extended services and/or if there is a possibility of training community members to provide needed services for OVR’s MSD population. In addition, OVR will try and reach out to other potential providers such as retired teachers and nurses or other health professionals.*

Objective 5.5: In PY 2016, OVR will identify a CRP (on- or off-island) that could train VR professionals in benefits counseling in order for clients to understand how working impacts cash payments from SSA. In PY 2017, OVR will support the benefits counseling training of its VR professionals. In PY 2018-2019, VR professionals will be trained and prepared to provide benefits counseling services to their clients.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- **In PY 2016, OVR administration did not identify a CRP who could train staff in providing work incentives counseling and benefits planning to clients who are receiving cash benefits from SSA.**
- **In PY 2017, OVR identified a staff willing to be trained in work incentives counseling and benefits planning. OVR will research and identify a CRP who could provide the necessary training so that training could commence at the soonest time possible.**

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

TO CALCULATE THE EMPLOYMENT RATE: THE NUMBER OF PARTICIPANTS WHO EXITED DURING THE REPORTING PERIOD WHO ARE FOUND TO BE EMPLOYED, EITHER THROUGH DIRECT UNEMPLOYMENT INSURANCE (UI) WAGE RECORD MATCH OR SUPPLEMENTAL WAGE INFORMATION, IN THE SECOND QUARTER AFTER THE EXIT QUARTER DIVIDED BY THE NUMBER OF PARTICIPANTS WHO EXITED DURING THE REPORTING PERIOD.

| Program | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|---------------------------|---|--|--|--|
| Adults | Baseline | 30.00 | Baseline | 33.00 |
| Dislocated Workers | Baseline | 30.00 | Baseline | 33.00 |
| Youth | Baseline | 35.00 | Baseline | 38.00 |
| Adult Education | Baseline | 9.00 | Baseline | 9.00 |
| Wagner-Peyser | Baseline | 0.00 | Baseline | 0.00 |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 2. Employment (Fourth Quarter after Exit)

To calculate the employment rate: The number of participants who exited during the reporting period who are found to be employed, either through direct Unemployment Insurance (UI) wage record match or supplemental wage information, in the fourth quarter after the exit quarter DIVIDED by the number of participants who exited during the reporting period.

| Program | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|---------------------------|-------------------------------------|--|-------------------------------------|--|
| Adults | Baseline | 30.00 | Baseline | 33.00 |
| Dislocated Workers | Baseline | 30.00 | Baseline | 33.00 |
| Youth | Baseline | 35.00 | Baseline | 38.00 |
| Adult Education | Baseline | 9.00 | Baseline | 9.00 |
| Wagner-Peyser | Baseline | 0.00 | Baseline | 0.00 |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

| Program | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|---------------------------|-------------------------------------|--|-------------------------------------|--|
| Adults | Baseline | 2,700.00 | Baseline | 2,900.00 |
| Dislocated Workers | Baseline | 2,700.00 | Baseline | 2,900.00 |
| Youth | Baseline | 0.00 | Baseline | 0.00 |
| Adult Education | Baseline | 0.00 | Baseline | 0.00 |
| Wagner-Peyser | Baseline | 0.00 | Baseline | 0.00 |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

TABLE 4. CREDENTIAL ATTAINMENT RATE

A RECOGNIZED POSTSECONDARY CREDENTIAL IS DEFINED AS A CREDENTIAL CONSISTING OF AN INDUSTRY-RECOGNIZED CERTIFICATE OR CERTIFICATION, A CERTIFICATE OF COMPLETION OF AN APPRENTICESHIP, A LICENSE RECOGNIZED BY

THE STATE INVOLVED OR FEDERAL GOVERNMENT, OR AN ASSOCIATE, BACCALAUREATE DEGREE, OR POST-GRADUATE DEGREE. A RECOGNIZED POSTSECONDARY CREDENTIAL IS AWARDED IN RECOGNITION OF AN INDIVIDUAL'S ATTAINMENT OF MEASURABLE TECHNICAL OR INDUSTRY/OCCUPATIONAL SKILLS NECESSARY TO OBTAIN EMPLOYMENT OR ADVANCE WITHIN AN INDUSTRY/OCCUPATION. THESE TECHNICAL OR INDUSTRY/OCCUPATIONAL SKILLS ARE GENERALLY BASED ON STANDARDS DEVELOPED OR ENDORSED BY EMPLOYERS OR INDUSTRY ASSOCIATIONS.

| Program | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|---------------------------|-------------------------------------|--|-------------------------------------|--|
| Adults | Baseline | 63.00 | Baseline | 66.00 |
| Dislocated Workers | Baseline | 63.00 | Baseline | 66.00 |
| Youth | Baseline | 72.00 | Baseline | 75.00 |
| Adult Education | Baseline | 0.00 | Baseline | 0.00 |
| Wagner-Peyser | n/a | n/a | n/a | n/a |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 5. Measurable Skill Gains

The measurable skill gains (MSG) indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs.

Participants may receive annual MSG for advancement through a program. For example, an annual MSG can be gained as a participant advances through college, assuming necessary requirements are met.

| Program | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|---------------|-------------------------------------|--|-------------------------------------|--|
| Adults | Baseline | 0.00 | Baseline | 0.00 |

| Program | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|---------------------------|-------------------------------------|--|-------------------------------------|--|
| Dislocated Workers | Baseline | 0.00 | Baseline | 0.00 |
| Youth | Baseline | 0.00 | Baseline | 0.00 |
| Adult Education | Baseline | 32.00 | Baseline | 34.00 |
| Wagner-Peyser | n/a | n/a | n/a | n/a |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

The Effectiveness in Serving Employers indicator is a shared indicator across the six core programs within the state. The purpose of sharing the indicator is to ensure that the core programs within the state are using a holistic approach to serving employers. This measure is being piloted to test the feasibility of the three proposed approaches prior to developing a standardized indicator.

State VR agencies will be able to use RSA-911 data element 392 in order to determine the retention with the same employer in the 2nd and 4th quarters after exit. This information can be calculated based on information calculated from state wage records.

| Program | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|---------------------------|-------------------------------------|--|-------------------------------------|--|
| Adults | Baseline | 0.00 | Baseline | 0.00 |
| Dislocated Workers | Baseline | 0.00 | Baseline | 0.00 |
| Youth | Baseline | 0.00 | Baseline | 0.00 |
| Adult Education | Baseline | 0.00 | Baseline | 0.00 |
| Wagner-Peyser | Baseline | 0.00 | Baseline | 0.00 |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

TABLE 7. COMBINED FEDERAL PARTNER MEASURES

| Measure | PY 2016 Proposed/ Expected Level | PY 2016 Negotiated/ Adjusted Level | PY 2017 Proposed/ Expected Level | PY 2017 Negotiated/ Adjusted Level |
|-------------------------------|-------------------------------------|---------------------------------------|-------------------------------------|---------------------------------------|
| Employment | 8.00 | 8.00 | | |
| Median Earnings | 7,500.00 | 7,500.00 | | |
| Credential Attainment | 58.00 | 58.00 | | |
| Measurable Skills Gain | 42.00 | 42.00 | | |

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

Innovation and Expansion (I&E) funding was used, in accordance with federal regulation, to provide for allowable activities for the State Rehabilitation Council (SRC). Consistent with OVR goals and priorities, I&E efforts continue to promote competitive integrated employment outcomes for students and youth with disabilities, extend the community's capacity to serve persons who are blind or visually impaired, and integrate employment outcomes for persons with developmental disabilities. During PY 2016, the SRC spent \$28,402.07 from I&E funding to carry out their allowable activities.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

- 1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.*

The CNMI OVR will continue its efforts to provide supported employment (SE) services to individuals with the most significant disabilities to achieve meaningful employment per their IPE goal. The Office continues to negotiate with both private firms and public agencies to identify opportunities for competitive integrated employment outcomes for clients participating in this program. OVR currently utilizes one (1) private firm to provide both job coaching and personal assistance services for supported employment consumers. As well, consumers may select private citizens/individuals to provide PA services. The limited number of community rehabilitation programs (CRPs) and extended employment service providers in the CNMI pose a significant challenge to providing a full range of services to consumers who are most significantly disabled. Should Title VI, Part B funds not be made available to VR agencies in PYs 2017-2019, OVR will utilize Basic Support Title I funding for the provision of supported employment services.

Quality of Supported Employment: Supported Employment services are coordinated by VR professionals in collaboration with community rehabilitation program providers such as Marianas Health as well as through individual vendors chosen by VR clients themselves to provide the needed personal assistance services at the jobsite to further maintain competitive integrated employment for the duration allowed by law. Ongoing monitoring of Supported Employment cases will be conducted to evaluate the timeliness, appropriateness, and effectiveness of service delivery to VR clients including students and youth with the most significant disabilities.

Scope of Supported Employment Services: Services intended to support the competitive integrated employment of VR clients including students and youth with the most significant disabilities include job coaching services, personal assistance services on the job, assistive technology, and other post-employment services necessary for job preservation. Natural supports provided by the employer to assist an individual with most significant disabilities to maintain employment may be considered a type of supported employment service.

Extent of Supported Employment Services: The specifics and extent of services needed are determined on an individual basis and written into and provided in the context of an approved Individualized Plan for Employment (IPE). A maximum of twenty-four (24) months of supported employment services may be provided to a consumer with the most significant disabilities to help him/her achieve competitive employment and stability in an integrated work setting. Services may lead to natural supports on the job provided by supervisor and co-workers as well as supported by family and friends. When the IPE is developed, extended support services are planned in order to assure continued support for the consumers. Services will continue to be provided until such time the consumer's job skills meet the employer's expectations and the job is stable and permanently secured. Family-provided supports may include transportation as well as personal assistance services.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Timing of transition from supported employment to extended services: The timing of the transition to extended services for VR clients with the most significant disabilities receiving supported employment services from CNMI OVR as part of their approved IPE occurs as soon as the IPE services are completed and the consumer has achieved competitive integrated employment as described in the IPE, or after a period of time not to exceed twenty-four (24) months, whichever comes first. The CNMI OVR may, under special circumstances, extend supported employment services beyond 24 months, if the consumer and the VR counselor agree to extend the time to achieve the desired employment goal as reflected in the approved IPE.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **CNMI Office of Vocational Rehabilitation**

Name of designated State agency **CNMI Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Arlene Kay A. Yamagata, M.S., CRC**

Title of Authorized Representative: Director

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act. Yes**

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the designated State agency listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan; Yes**

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The Authorized Representative listed above has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes

8. The Authorized Representative listed above has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

FOOTNOTES

Certification 1 Footnotes

*** Public Law 113-128.**

**** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.**

Certification 2 Footnotes

*** All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.**

**** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.**

***** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.**

Certification 3 Footnotes

*** No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.**

**** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes**

**ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE
CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION**

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any

agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **CNMI Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Arlene Kay A. Yamagata, M.S., CRC**

Title of Authorized Representative: **Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **CNMI Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **Arlene Kay A. Yamagata, M.S., CRC**

Title of Authorized Representative: **Director**

***SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).***

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: The State Plan must provide assurances that:

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. 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 (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 WITH 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.

The designated State agency allows for the local administration of VR funds No

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: 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 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? See Section 2 of this VR services portion of the Unified or Combined State Plan. No

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

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 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?

Agency will provide the full range of services described above Yes

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 REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14) OF THE REHABILITATION ACT.

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,

CCCVIII. HAS DEVELOPED AND WILL IMPLEMENT,

A. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND

B. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES IDENTIFIED BY THE STATE, TO IMPROVE AND EXPAND VOCATIONAL REHABILITATION SERVICES FOR STUDENTS WITH DISABILITIES ON A STATEWIDE BASIS; AND

CCCIX. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:

A. THE DESIGNATED STATE UNIT ASSURES THAT IT WILL INCLUDE IN THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN ALL INFORMATION REQUIRED BY SECTION 606 OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL SUBMIT REPORTS IN SUCH FORM AND IN ACCORDANCE WITH SUCH PROCEDURES AS THE COMMISSIONER MAY REQUIRE AND COLLECTS THE INFORMATION REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT SEPARATELY FOR INDIVIDUALS RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE I AND INDIVIDUALS

RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE VI OF THE REHABILITATION ACT.

C. THE DESIGNATED STATE UNIT WILL COORDINATE ACTIVITIES WITH ANY OTHER STATE AGENCY THAT IS FUNCTIONING AS AN EMPLOYMENT NETWORK UNDER THE TICKET TO WORK AND SELF-SUFFICIENCY PROGRAM UNDER SECTION 1148 OF THE SOCIAL SECURITY ACT.

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT PROGRAM:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL EXPEND NO MORE THAN 2.5 PERCENT OF THE STATE'S ALLOTMENT UNDER TITLE VI FOR ADMINISTRATIVE COSTS OF CARRYING OUT THIS PROGRAM; AND, THE DESIGNATED STATE AGENCY OR AGENCIES WILL PROVIDE, DIRECTLY OR INDIRECTLY THROUGH PUBLIC OR PRIVATE ENTITIES, NON-FEDERAL CONTRIBUTIONS IN AN AMOUNT THAT IS NOT LESS THAN 10 PERCENT OF THE COSTS OF CARRYING OUT SUPPORTED EMPLOYMENT SERVICES PROVIDED TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES WITH THE FUNDS RESERVED FOR SUCH PURPOSE UNDER SECTION 603(D) OF THE REHABILITATION ACT, IN ACCORDANCE WITH SECTION 606(B)(7)(G) AND (H) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL USE FUNDS MADE AVAILABLE UNDER TITLE VI OF THE REHABILITATION ACT ONLY TO PROVIDE SUPPORTED EMPLOYMENT SERVICES TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, WHO ARE ELIGIBLE TO RECEIVE SUCH SERVICES; AND, THAT SUCH FUNDS ARE USED ONLY TO SUPPLEMENT AND NOT SUPPLANT THE FUNDS PROVIDED UNDER TITLE I OF THE REHABILITATION ACT, WHEN PROVIDING SUPPORTED EMPLOYMENT SERVICES SPECIFIED IN THE INDIVIDUALIZED PLAN FOR EMPLOYMENT, IN ACCORDANCE WITH SECTION 606(B)(7)(A) AND (D), OF THE REHABILITATION ACT.

7. PROVISION OF SUPPORTED EMPLOYMENT SERVICES:

A. 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:

CCCX. 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

CCCXI. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT, WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH

*SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION
ACT.*

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program— and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at <http://www.regulations.gov> by selecting Docket ID number ETA-2015-0006.

**** States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.***

APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the two years of the plan. States will only have one year of data available under the performance accountability system in Section 116 of the WIOA; therefore, the Departments will continue to use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as “baseline” indicators in the first plan submission. A “baseline” indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on negotiated levels of performance. “Baseline” indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.

States are expected to collect and report on all indicators, including those that have been designated as “baseline”. The actual performance data reported by States for indicators designated as “baseline” in the first two years of the Unified or Combined Plan will serve as baseline data in future years.

Each core program must submit an expected level of performance for each indicator, except for those indicators that are listed as “baseline” indicators below.

For this Plan, the Departments will work with States during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs.

Baseline Indicators for the First Two Years of the Plan

Title I programs (Adult, Dislocated Workers, and Youth):

- ***Measurable Skill Gains***
- ***Effectiveness in Serving Employers***

Title II programs (Adult Education):

- ***Employment in the 2nd quarter***
- ***Employment in the 4th quarter***
- ***Median Earnings***
- ***Credential Attainment***
- ***Effectiveness in Serving Employers***

Title III programs (Wagner-Peyser):

- *Effectiveness in Serving Employers*

Title IV programs (Vocational Rehabilitation):

- *Employment in the 2nd quarter*
- *Employment in the 4th quarter*
- *Median Earnings*
- *Credential Attainment*
- *Measurable Skill Gains*
- *Effectiveness in Serving Employers*

States may identify additional indicators in the State plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the State indicators. Please identify any such State indicators under Additional Indicators of Performance.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|----------------------------------|-------------------------------|---------------------------------|-------------------------------|---------------------------------|
| Adults | Baseline | 30.00 | Baseline | 33.00 |
| Dislocated Workers | Baseline | 30.00 | Baseline | 33.00 |
| Youth | Baseline | 35.00 | Baseline | 38.00 |
| Adult Education | Baseline | 9.00 | Baseline | 9.00 |
| Wagner-Peyser | Baseline | 0.00 | Baseline | 0.00 |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

User remarks on Table 1

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|----------------------------------|------------------------|--------------------------|------------------------|--------------------------|
| Adults | Baseline | 30.00 | Baseline | 33.00 |
| Dislocated Workers | Baseline | 30.00 | Baseline | 33.00 |
| Youth | Baseline | 35.00 | Baseline | 38.00 |
| Adult Education | Baseline | 9.00 | Baseline | 9.00 |
| Wagner-Peyser | Baseline | 0.00 | Baseline | 0.00 |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

User remarks on Table 2

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|---------|------------------------|--------------------------|------------------------|--------------------------|
|---------|------------------------|--------------------------|------------------------|--------------------------|

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|----------------------------------|------------------------|--------------------------|------------------------|--------------------------|
| Adults | Baseline | 2,700.00 | Baseline | 2,900.00 |
| Dislocated Workers | Baseline | 2,700.00 | Baseline | 2,900.00 |
| Youth | Baseline | Baseline | Baseline | Baseline |
| Adult Education | Baseline | Baseline | Baseline | Baseline |
| Wagner-Peyser | Baseline | Baseline | Baseline | Baseline |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

User remarks on Table 3

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

TABLE 4. CREDENTIAL ATTAINMENT RATE

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|---------------------------|------------------------|--------------------------|------------------------|--------------------------|
| Adults | Baseline | 63.00 | Baseline | 66.00 |
| Dislocated Workers | Baseline | 63.00 | Baseline | 66.00 |

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|----------------------------------|------------------------|--------------------------|------------------------|--------------------------|
| Youth | Baseline | 72.00 | Baseline | 75.00 |
| Adult Education | Baseline | 0.00 | Baseline | 0.00 |
| Wagner-Peyser | n/a | n/a | n/a | n/a |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

User remarks on Table 4

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

TABLE 5. MEASUREABLE SKILL GAINS

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|---------------------------|------------------------|--------------------------|------------------------|--------------------------|
| Adults | Baseline | 0.00 | Baseline | 0.00 |
| Dislocated Workers | Baseline | 0.00 | Baseline | 0.00 |
| Youth | Baseline | 0.00 | Baseline | 0.00 |
| Adult Education | Baseline | 37.00 | Baseline | 38.00 |

| Program | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|----------------------------------|------------------------|--------------------------|------------------------|--------------------------|
| Wagner-Peyser | n/a | n/a | n/a | n/a |
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

User remarks on Table 5

Adults, DW and Youth are all baseline levels for PY 2016 and PY 2017.

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

Adult Education levels were negotiated with federal grantors.

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

| Measure | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|---|------------------------|--------------------------|------------------------|--------------------------|
| Line 1 (enter the measure information in the comments below) | Baseline | 0.00 | Baseline | 0.00 |
| Line 2 | Baseline | 0.00 | Baseline | 0.00 |
| Line 3 | Baseline | 0.00 | Baseline | 0.00 |
| Line 4 | Baseline | 0.00 | Baseline | 0.00 |

| Measure | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|---------------|---------------------------|-----------------------------|---------------------------|-----------------------------|
| Line 5 | Baseline | 0.00 | Baseline | 0.00 |
| Line 6 | Baseline | Baseline | Baseline | Baseline |

User remarks on Table 6

All baseline goals throughout PY 2016 and PY 2017.

The VR program will not have negotiated indicators of performance for the first two years of the initial state plan submitted spring 2016.

TABLE 7. ADDITIONAL INDICATORS OF PERFORMANCE

| Measure | PY 2018 Expected Level | PY 2018 Negotiated Level | PY 2019 Expected Level | PY 2019 Negotiated Level |
|-----------------------------------|---------------------------|-----------------------------|---------------------------|-----------------------------|
| Employment | 8.00 | | 8.00 | |
| Median Earnings | 7,500.00 | | 7,500.00 | |
| Credential Attainment | 58.00 | | 58.00 | |
| Measurable Skills Gain | 42.00 | | 42.00 | |

User remarks on Table 7

APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)
